

1 September 2020

FEAD feedback to the EC Roadmap on Empowering the Consumer for the Green Transition

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **welcomes** the European Commission's initiative to **empower the consumer for the green transition**. Private waste management companies are major operators in this service, operating in 60% of municipal waste markets in Europe, and in 75% of industrial and commercial waste.

FEAD considers that a **new stand-alone consumer protection instrument (option 2** of the Inception Impact Assessment of the Roadmap) is the appropriate mean of achieving a uniform regulatory framework with regards to products' sustainability and consumer protection, in line with the European Green Deal and the new Circular Economy Action Plan. Consumers should be provided with valid information on how products are **designed, manufactured, and used**, how they ensure the **sustainable use of natural resources** and their **recycling and/or reuse** characteristics. In particular, a recycling label or product pass should inform consumers about both (i) whether and if so to which extent a product can be recycled (i.e., design for recycling), and (ii) when possible, the extent of recycled material in a product.

The waste management sector and the circular economy's contribution to the green transition are crucial as **GHG emissions** from raw material extraction and from products' manufacture **need to be reduced and resource consumption needs to be minimised**. Proper waste management and use of recycled materials in products bring in many cases significant CO₂ emissions reduction, and consumers need to be aware of the products' footprints, the materials' efficiency, and the potential for recirculation of high-quality materials in the market. FEAD believes that product (eco-)labels, in particular related to recycling, would foster change in consumer choices and behavior, resulting in achieving the untapped potential to reduce greenhouse gas emissions thanks to more recycling. Consumers should be provided with the tools to shift towards green products and business. An **inventory** of avoided CO₂ emissions of frequently used products should be made, considering the amount of the materials, and the recycling process for each material, to select the products/waste to be tackled first. Finally, a proper eco-label should reflect the avoided CO₂ emissions at the manufacturing stage, and more generally, the CO₂ performances when using the product.

Based on the above, the following key elements must be taken into consideration by the EC and the EU legislator in designing a new framework to push consumers towards the green transition:

- facilitation of consumers' choice: **enhanced eco-labelling** focusing on recycling to reflect the actual recyclability of products and the presence of (including the percentage of) recycled content (**Recycling Label**). We do not regard the current structure of EU Ecolabel and equivalent national/regional schemes (e.g. Nordic Swan, Blue Angel, etc.) as specific enough to inform about (i) whether and if so to which extent a product can be recycled, (i.e., design for recycling) and (ii) the extent of recycled material in a

product. An improved Recycling Label should be developed by the European Union but should be, as a first step, at manufacturers' and/or distributors' own discretion whether it is used on products. However, we believe due to consumer pressure for green information such a Recycling Label will be used widely once it is available to the market. It could be set up as a traffic light, e.g. as in Hamburg <https://www.stadtreinigung.hamburg/einkaufsguide/#12>;

- **mandatory recycled content in the products:** particularly in packaging, automotive, construction, paper, EEE and textile sectors. Eco-labelling should accompany such mandatory content. As we are aware that accounting for the detailed recycled content in each product can be a complex issue, eco-labelling should include at least as minimum information, “product complying with the EU requirement on mandatory recycled content”;
- **mandatory eco-design:** a true dismantlability and recyclability of products through targets and use of mandatory standards for products, reducing or phasing out harmful chemical substances and preventing waste. A robust eco-design policy will be a key tool for the prevention of the generation of waste;
- **mandatory green public procurement rules** to include eco-labelled recyclable products and/or products incorporating recycled content, which would also aid the shift in consumer behavior;
- **a hierarchy for raw materials, giving priority to recycled materials and promoting the fair and sustainable supply of raw materials from global markets**, also reflected in the labels;
- **financial or fiscal tools** (e.g. reduced VAT or “CO₂ bonus”): reduced price of products incorporating recycled content, reflecting savings of CO₂-emissions;
- Development of valid **Green Claims** which can be used in promotion towards consumers if specific scientific ecological criteria (e.g. specific amount of recycled content in a product) are met in order to avoid misleading green washing;
- incorporating **environmental costs** into the economy;
- strict rules for **products failures, products with short life-span and greenwashing**;
and
- better **enforcement** of the rules adopted.

FEAD totally supports the EU idea of developing a uniform and binding regulatory framework, in order to empower consumers. Consumers, with their power of choice, can be the engine of the environmental revolution.