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BEUC and EEB comments to the EU Ecolabel work plan 2016- 2018

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Summary

In this position paper we provide the European Commission, DG Environment and the members of the EU Ecolabelling Board (EUEB) with recommendations on what should be taken into account before finalising the next EU Ecolabel Work Plan for 2016-2018.

The European Commission has provided a first draft for comments to stakeholders which outlines the planning for the future development of the scheme and covers proposals on the revision of existing product groups and for the development of Ecolabel criteria for additional product groups. Moreover, it contains suggestions for which cross-cutting aspects horizontal guidance should be developed and how the scheme can be better promoted.

We are concerned that the current draft is missing out to give the EU Ecolabel a strong role in a future EU circular economy and resource efficiency strategy. We therefore make suggestions on which aspects in the EU Ecolabel should be developed in the coming years, such as setting criteria for durability, upgradeability, reparability and longer commercial guarantees which will help to create synergies of the EU Ecolabel with other policy instruments which are crucial in a circular economy.

We are moreover concerned that for the prioritisation of new product groups no sound study has been undertaken which allows for a solid prioritisation of additional product groups. The use of old data impedes an adequate prioritisation of the work which should be undertaken in the coming years to make the EU Ecolabel even more relevant and attractive for consumers.

We highlight in the context of the ongoing Regulatory Fitness and Performance Programme (REFIT) that the EU Ecolabel Regulation needs to be kept as a tool of environmental excellence which covers all environmentally relevant criteria based on a life-cycle approach which a strong focus on eliminating hazardous chemicals.

Furthermore, we make suggestions which product groups should be prioritised for revision from 2016 to 2018 and for which additional product groups EU Ecolabel criteria should be developed.

Finally, we outline our recommendations with regard to tackling cross-cutting issues which are relevant for many product groups through horizontal task forces and offer our support for an EU-driven communication campaign.

1. Strong role of the EU Ecolabel in a Circular Economy

Today it is widely recognized that our production and consumption patterns are based on a “produce-use-dispose” model which is not viable. Manufacturers act with the assumption that natural resources are abundant, cheap and endless available. There is therefore a crucial need for policy makers to set the right political framework which will allow for a more sustainable development that puts less pressure on the environment and on natural resources. We need to shift towards an economy in which goods are produced in a more energy-efficient way, last longer and are easily repaired and disposed.

To respond to these burning challenges, we expect the European Commission (EC) to propose an ambitious and coherent EU framework to foster resource efficiency and to enable a circular economy.

In this regard BEUC and the EEB strongly emphasise the role of the EU Ecolabel scheme in a circular economy. There is no doubt that the EU Ecolabel is an excellent tool to help shifting towards a more sustainable economy by:

- increasing resource efficiency through designing products that last longer, are easier to repair, to upgrade, to remanufacture and to recycle;
- preventing waste;
- reducing the use of hazardous chemicals harmful which is important to facilitate re-use and re-cycling.

The work plan 2016-2018 should therefore develop more systematically the crucial role which an EU Ecolabel can and should play in the future policy framework on circular economy and resource efficiency.

In this regard, we strongly encourage the EC, to consider life-time expansion and reparability as a key goal for all EU Ecolabel product groups as products which fail much earlier than one could reasonably expect put pressure to the environment and are not in line with consumers’ expectations.

Both, EEB and BEUC contributed in summer 2015 to the EU public consultation on the circular economy. We have noticed with regret that the questionnaire did not give a strong consideration to the EU Ecolabel in this strategy and we urge the Commission to rectify this shortcoming through a more systematic development of the role that the EU Ecolabel could play in the work plan and the upcoming communication on circular economy.

2. EU Ecolabel implementation strategy and policy development

2.1 Keeping the Ecolabel Regulation a powerful instrument which covers all environmentally relevant aspects

In the framework of the Regulatory Fitness and Performance Programme (REFIT) which aims to improve the efficiency of the current European legislation, the European Commission (EC) is doing a fitness check and an evaluation of the existing Ecolabel regulation¹. Among the potential options, the EC proposes to reduce the number of EU Ecolabel criteria per product/service group and focus on the main environmental impacts.

BEUC and the EEB doubt that a criteria reduction is possible without undermining the credibility of the scheme. The Ecolabel has to remain a label of environmental excellence based on a multi-criteria approach covering all aspects of the life-cycle of a product. We fear that reducing the number of criteria might lead to leave some important aspects related to safety or sustainability out of the requirements and degrade the environmental profile of ecolabelled products.

Our preferred approach is to continue with the implementation of the Ecolabel Regulation in its current form. The major reason for this is that we consider the provisions on chemicals which have been added in the 2010 Regulation as very important achievements, in particular the articles 6.6 and 6.7. The implementation of these crucial legal requirements has in the meantime been facilitated through the development of a horizontal guideline on chemicals to which the EEB and BEUC contributed.

In the two years to come, the EC is likely to revise this horizontal guidance on hazardous chemicals to ensure a more practical approach for applicants. We do not support reworking on the document after such a short period of time as we are concerned that this would lead to less ambitious requirements from an environmental and safety point of view. In addition, banning undesirable chemicals substances is a strong argument for consumers' organisations and environmental NGOs to promote the added-value of the EU ecolabelled products compared to conventional ones.

The Product Environmental Footprint (PEF) methodology should not be applied to the Ecolabel yet. As the results of the ongoing pilots are still uncertain, we do not know if the use of the PEF methodology would bring significant benefits to the Ecolabel criteria development. While the PEF is currently testing the USEtox methodology measuring ecotoxicity, BEUC and the EEB are convinced that the Ecolabel scheme cannot base on it. The main reason is that the EU Ecolabel has to remain based on precautionary principles instead of a risk-based approach which would undermine the credibility of the scheme. In addition, we are concerned that applying the USEtox methodology in the PEF pilot phase would not deliver reliable and meaningful results.

2.2 Providing for increased synergies between the EU Ecolabel and the overall policy framework on sustainable consumption and production

The EU 2020 Strategy has set the target of a more sustainable, resource-efficient and competitive economy. Policy tools such as Ecolabel, but also Ecodesign are very important elements contributing to the shift toward a greener economy by setting sustainable product design requirements.

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:027:0001:0019:en:PDF>.

In order to optimize resources, save time and make the work more efficient, BEUC and the EEB support a better integration between the existing EU policy instruments, i.e. Ecolabel, Ecodesign, Energy Label and Green Public Procurement. We are convinced that the Ecodesign scheme could significantly benefit from the methodology and multi-criteria approach used in Ecolabel. In addition, Ecolabel preparatory studies could be used in the Ecodesign criteria development and measurement methods should be aligned with the Ecolabel scheme. Criteria developed for the Ecolabel demonstrate that products can be significantly improved from an environmental and safety point of view and this work can promote frontrunner products on the market which can inspire the development of mandatory criteria at a subsequent stage.

Moreover, both schemes should better address material resource efficiency, lifetime expansion, upgradeability, reparability, re-use and recycling and a consistent approach will provide for synergy effects of Ecodesign and Ecolabelling.

2.3 Developing meaningful horizontal guidance to facilitate a coherent approach across product groups

BEUC and the EEB agree that developing horizontal guidance applicable for all product groups and for each horizontal issue increases the efficiency of the scheme and avoids repetitive discussions. This is why we support addressing cross-cutting issues through horizontal task forces.

In its first draft work plan for 2016-2018, the EC has identified the following cross cutting issues that may be subject to a specific Task Force / Working Group:

- Hazardous chemicals
- Energy criterion
- Packaging
- Strategic product planning
- Promotion of EU Ecolabel Tourism Accommodation Services

Whereas we reiterate our wish to participate to the development of horizontal task forces, cross-cutting issues should be prioritized as the development of a horizontal guidance is time-consuming and emphasis should be put on the most relevant issues. As the guidance on chemicals is a recent document, we do not consider a revision to be a priority. Instead, we suggest starting working on horizontal criteria for energy and packaging.

Besides, due to limited resources and time constraints, horizontal documents should be developed one by one in order to optimise the efficiency of the work carried out.

3. Product group criteria development and maintenance of established ones

3.1 The EU Ecolabel scheme should be extended to new relevant product groups

BEUC and EEB's global vision is to foster the expansion and the growth of the EU Ecolabel scheme. Introducing new product and services groups in order to increase visibility for consumers will be important to develop the scheme further. The more product categories can be labelled with the Ecolabel, the greater the chance consumers will become aware of the added value of the label and make responsible choices. New

product groups should be carefully evaluated and selected based on latest data and according to their potential of uptake on the market and their likeliness to benefit from a multi criteria approach.

In the draft Work Plan, the EC proposes a non-exhaustive list of products that could be introduced in the EU Ecolabel scheme in the next years and that are ranked according to a prioritisation exercise done by the Product Bureau (PB). This list is mostly based on the Environmental Impact of products (EIPRO) study which has been carried out by the Institute for Prospective Technological Studies (IPTS) in 2006 and which analyses the life cycle environmental impact of products related to their final consumption. While this study has in the past decade been crucial to prioritise the EU's work on sustainable consumption and production and has had a visible impact on a lot of related policy instruments, the findings are by now partly outdated and are not suitable without of an additional in-depth prioritisation study to select future Ecolabel product groups.

We are therefore concerned that the European Commission has not based their analysis for potential new product groups on the findings of a dedicated preparatory study. Such a study has for instance been undertaken in the context of developing a new work plan for Ecodesign and a similar exercise should have been undertaken to prioritise the work in the EU Ecolabel scheme for the coming years. The Ecodesign study describes the scope of the product groups, sales data, user behaviour, environmental improvement potential and investigates which other initiatives already exist including other labelling schemes. In the absence of such a dedicated study for the Ecolabel, we suggest to the European Commission to take the findings from the Ecodesign study into account.

We think that a lot of product groups listed in the prioritisation table which has been drafted based on the EIPRO study are not suitable for the application of the EU Ecolabel. Therefore, this list has to be further discussed in order to focus on those products and services which have a high environmental improvement potential at the one hand and match consumer demand on the other.

The EC has decided to set up a strategic Task Force to better assess the potential of some product groups. Therefore, BEUC and the EEB express our wish to be involved in this horizontal Task Force. We insist that in order to avoid a random selection of new product groups, the EUEB should be consulted and take a decision based on the results of the Task Force what new product groups and services should be included in the work plan.

From a consumer and environmental perspective we would see an added value to introduce the EU Ecolabel to the following product groups and services, which have not yet been mentioned in the work plan: repair services, toys, mobile phones, hair dryers and flowers.

- **Repair services:** It would be very beneficial to develop an EU Ecolabel that can be awarded to companies who promote repairing, lending, borrowing or reusing of products. Such a service group would have an added value by motivating and inspiring people to adopt more sustainable consumption patterns and to reduce waste. In this context we refer to a Swedish initiative called Miljönär which has been established by Swedish municipalities. The Miljönär label rewards companies, or individuals which promote repaired, reusable second-hand products, giving products a second life. As we consider products' durability and extended lifetime as a key major topic in the EU Ecolabel, we strongly encourage the EC to look deeper into this initiative and come up with a similar suggestion for the EU Ecolabel.

- **Toys:** BEUC and EEB considers developing strict health and environmental requirements to the materials used in the toys as beneficial because toys are used by vulnerable consumers. As the current toy safety directive (2009/48/EC) is not very strict and does not solve all problems related to hazardous chemicals, such a label would bring an added-value, keeping in mind that children are very likely to chew on toys and are therefore exposed to potentially leaking chemicals. In the criteria set, it would be very beneficial to tackle the production of raw materials, the presence of hazardous chemicals, reusability of products and packaging. Criteria should also look into durability and reparability. However, if the product group is taken on board in the EU Ecolabel scheme, different categories of toys should be included as there are different problems to be tackled to preserve consumers' health and the environment.

BEUC German member Stiftung Warentest has carried out tests on different types of toys including wooden toys, stuffed toys and plastic toys. The findings demonstrate that each category suffers from specific shortcomings with regards to the chemicals content and need to be addressed such as formaldehyde in wood, softeners in plastic and flame retardants in stuffed toys².

The French consumers' organisation UFC Que choisir has recently tested products intended for children under three years including toys and revealed the presence of endocrine disruptors in more than one in six products. UFC Que choisir therefore calls for a stricter European regulation to limit these harmful substances and in the absence of meaningful legal criteria it would be a good starting point to develop EU Ecolabel criteria.³

In addition, toys are offered to consumers in most cases without any trustworthy third party labelling. Developing an Ecolabel for toys would allow consumers and in particular parents to differentiate easily products and to be given the possibility to buy safe products for their children.

Finally, as we know the scope of this product group is wide, we suggest to start developing criteria on Wooden Toys first and to set criteria on other types of toys subsequently, in order to protect adequately consumers' health.

- **Mobile phones:** As mobile phones are nowadays changed frequently and consumers are often not aware of their negative impact on the environment, we strongly encourage the EC to introduce mobile phones as a new product group in the EU Ecolabel scope. Developing this new product groups under the EU Ecolabel framework is a way to focus on the durability and reparability of products, in order to extend the phone's usable life and let consumers have more control over their electronic devices. In our views, there is room for improvement at every stage of the life-cycle of mobile phones. Indeed, the potential EU Ecolabel criteria can tackle the following aspects:
 - *The origin of raw materials and minerals:* minerals, such as copper, iron, nickel, aluminium, tin, silver, chromium, gold, palladium etc., should not be used in the manufacturing process of the device if they have been extracted in conflictual areas or war-torn countries, or in disastrous working conditions in developing countries. Controversial sources from raw materials should be strictly avoided in the EU Ecolabel scheme.
 - *The working conditions in the manufacturing sites:* we recommend the EC to make sure that the workers are employed and treated in accordance to the

² Stiftung Warentest. Holzspielzeug: Die Hälfte birgt Gefahren, 21.11.2013, <https://www.test.de/Holzspielzeug-Die-Haelfte-birgt-Gefahren-4633745-0/>.

³ UFC Que choisir, Produits pour bébés. Gare aux perturbateurs endocriniens !, 12.02.2015, <http://www.quechoisir.org/sante-bien-etre/hygiene-beaute/communiqu-e-produits-pour-bebes-tetines-bodys-tapis-d-eveil-gare-aux-perturbateurs-endocriniens>.

international social conventions such as the International Labour Organisation (ILO) Convention. Good, safe and fair working conditions in industrial sites is crucial to contribute to the social and economic development of the host country.

- *The expansion of the phone's lifespan:* Mobiles phones should be designed and manufactured so that it is easy and affordable for their buyers to extract and replace certain broken components. Owners should be given the possibility to disassemble themselves the components of their phones, buy a replacement for the deficient part and repair their mobile instead of throwing it away and purchasing a complete new phone. To this end, it is highly recommended that legal provisions oblige manufacturers to produce spare parts and make them available on the market at a reasonable price. For certain repairs which can easily being performed safely by the consumer such as switching the battery, consumers should be enabled to perform the repair/maintenance themselves without a need to consult a professional repair service which is often expensive, time consuming and inconvenient. In this respect it is of particular importance to set design requirement concerning the placing and fixing of the battery as it should be easily accessible and replaceable at affordable costs. The EU Ecolabel criteria would go beyond the current Directive on Waste Electrical and Electronic Equipment (WEEE) which does not provide enough legal provisions which require an easy replacement of batteries during the use-phase. Furthermore, one last major issue related to the planned obsolescence of electronic devices concerns the short availability of software upgrades. It happens that the software upgrades are not being made available for older versions of smart phones or that newer software cannot be installed into older models as it is not compatible. As a consequence not all functions might be useable, the use of the phone might become unattractive as it is getting slow or it may become incompatible with other electronic devices. This is a strategy from manufacturers to incentivise the consumers to buy a more recent model. The EU Ecolabel could require manufacturers to make compatible mobile software upgrades available for a longer time.
- *The recyclability of the product:* The possibility to disassemble components of mobile phones facilitates the recycling process: it is therefore important that components and parts are not glued together. This design contributes to reducing the waste generation. This is of high importance as every year tons of mobile phones are thrown away and will not be used anymore. In the United States, in 2010 "89% of mobile devices went to landfill".⁴
- *The reduction of packaging waste:* It is often the case that the mobile phone is sold wrapped in a much bigger paper or plastic box than needed which generates avoidable waste. The EU Ecolabel criteria could tackle this aspect in order to optimise the packaging size related to its content and choose more environmentally friendly packaging options.

- **Hair Dryers:** Finally, we propose to set up a new product group "Hair dryers" as they are likely to be present in most households and being used daily. Hair Dryers would benefit from a multi-criteria approach under the Ecolabel.

In general, the criteria development should focus on energy consumption and material efficiency, noise as well as ensuring the durability and reparability of the products which are the main potential savings for this product group.

For all of the three above mentioned product groups – toys, mobile phones and hair dryers – Ecolabel criteria have already been developed at national or regional level such

⁴ A circular economy for smart devices. Opportunities in the US, UK and India, Green Alliance, January 2015.

as for the Blue Angel or Nordic Swan which can facilitate the Ecolabel criteria development.

We are aware that Hair Dryers and Mobile phones might also be included in the future working plan for the investigation of potential Ecodesign measures and/or the Energy Labelling. However, this approach would not be incompatible with the development of Ecolabel criteria for the same product categories. On the contrary and as already mentioned in this paper, the EEB and BEUC would support adopting a complementary approach as Ecolabel criteria aim to reward the environmental frontrunners based on a multi-criteria approach.

The respective preparatory studies which will analyse the need for minimum Ecodesign requirements and/ or Energy labels could eventually benefit from the life-cycle assessment undertaken for setting Ecolabel criteria. This would create some synergies between the different policy instruments and result in an effective push-pull approach to reduce the most important environmental impacts related to these products.

In addition, the existence of clearly defined environmental standards and labelling schemes would help mitigating the proliferation of misleading green allegations by manufacturers of these products and provide consumers with a reliable basis to make responsible purchasing choices.

- **Flowers:** BEUC and the EEB consider this product group as a good candidate to be included in the Ecolabel scope and see a great potential to success on the market at a later stage. The first reason is that this product group already exists under the national Dutch green label Milieukeur⁵ and has a very high uptake on the Dutch market. The second reason is that this product group is perfectly suitable to the application of Ecolabel criteria since it can benefit from the multi-criteria approach which tackles all stages of the product lifecycle. Indeed, with regards to flowers, we would expect the Ecolabel requirements to address the following major sustainability themes:
 - *Fair and safe working conditions of employees* of the flower industry should be considered as of high importance in this product group and guaranteed by Ecolabel criteria.
 - The *use of toxic pesticides and fertilizers* should be banned in Ecolabel criteria for Flowers as these substances are very harmful to human health and the environment. In fact, pesticides are carcinogenic substances, may cause infertility and birth defects and are also very toxic for animals. In addition, pesticides remain within soils and water for years and are very likely to enter the food chain by poisoning animals that we eat. With regards to fertilizers, their use should be restricted as they pose high risks for health and the environment, such as water pollution and eutrophication through high concentration of phosphates spread in soils. This is the reason why only an efficient use of organic fertilisation should be allowed in the production of Ecolabel Flowers.
 - The *energy and water used* for the production should be measured and reduced through the implementation of resources management instruments. Farms or flower industries should be incentivised to reduce their carbon footprint by saving energy and opt for greener energy supplies.
 - The *protection of biodiversity* should be ensured. The flowers' production should be made through respect for the local nature, landscape and animal species.

⁵ Please see <http://www.milieukeur.com/275/home.html> for more information on the Dutch label.

- *Packaging* of flowers should be addressed in order to reduce and optimize the use of packing materials.
- *Waste management*: the flower producers should commit to good waste management practices which include the sorting of organic and inorganic waste, recycling of plastic, glass, and responsible water waste discharge.

At the last EU Ecolabelling Board (EUEB) meeting, the EC has proposed the development of a new product groups: solar photovoltaic panels (solar PV panels). This product group is also mentioned in the list of potential new product groups of the draft work plan.

We express doubts regarding the suitability of this product group to the EU Ecolabel for the following reasons:

- We agree with the findings of the preparatory work that a differentiation can be made among solar PV panels during the production phase, especially when comparing the dominant technologies in the market (i.e. mono/polycrystalline silicon wafer, ribbon/micro-crystalline silicon, thin film). However, not all manufacturing technologies are supposed to be covered in the scope of the EU Ecolabel which could in consequence privilege one technology based on environmental reasons. This is not feasible as it could leave the impression with consumers that other technologies are unsustainable which is not the case. Such an approach could also as an unwanted consequence brake the Research & Development initiatives on other technologies– which is essential to ensure the continuous improvement of the sustainability of solar panels. In addition, the potential environmental benefits of a sustainable production shall be assessed together with the performance and the duration of the solar panels, which are of high importance from a consumer perspective.
- BEUC and EEB doubt that an EU Ecolabel, mainly focused on the environmental impact of the production phase could give meaningful information to consumers before taking a purchase decision for two reasons. First, the performance of the panels will differ depending on in which climate they will be installed: some are more efficient in humid climates while others will be more performant in a dry and hot climate. This will not only be confusing for consumers but can also have important economic consequences, in case they plan to pay off a loan based on expected revenues from the electricity production. Moreover, it will also be difficult to assess the global environmental footprint of solar panels with clear-cut criteria. As the performance may depend on the geographic region, the EU Ecolabel instrument is not suitable to make a valid differentiation between products. Second, the consumer needs primarily information about the life-time and the performance of solar panels as the installation is a considerable investment which has to pay-off. A solar panel shall last today at least 25 years and in case an Ecolabel would be developed, the durability would necessarily form part of the criteria. However, we are concerned that it is extremely difficult to make solid assessments on the longevity of panels based on their technology alone.
- Based on the experience from consumer organisations work in the area of renewable energies⁶, we argue that only specialized factory audits during the manufacturing which are dedicated to verifying the quality assurance are suitable to ensure the quality of solar PV panels. As manufacturers keep opening, closing and dislocating

⁶ European consumer organisations form a project consortium called “CLEAR” whose objective it is to lower market barriers to the purchase of RES, hence raising consumers capacity to take informed decisions. The project will be a significant uptake in the purchase of renewable energy solutions (RES) by European consumers and therefore an important contribution to the 2020 European targets; <http://www.clear-project.eu/the-project/partners-engaged>

factories and production lines, these audits need to be repeated permanently in order to be reliable and should not be limited to a single check. Such a procedure would not be easily implementable for competent bodies in the context of the Ecolabel.

As a conclusion, BEUC and the EEB doubt that this product group would benefit from a multi-criteria approach taking into account all phases of the product's life cycle. Therefore, we think that this product group should not be prioritized in the EU Ecolabel resources allocation.

3.2 Review of existing product groups

BEUC and the EEB consider the EU Ecolabel criteria revision process as of high importance to ensure that the scheme keeps updated with the latest market innovations and confirms the label as reference standard in environmental product labelling.

We are concerned that several product groups whose criteria expire in 2018 are not marked with a specific date for revision in the draft work plan which raises question marks with regard to the intention of the Commission to keep some of them in the scope of the scheme.

BEUC and the EEB recommend keeping working on the following product groups expiring in 2016-2018:

- Absorbent hygiene products;
- Textile products;
- Indoor paints and outdoor paints and varnishes;
- Hard coverings;
- Flushing toilets and urinals;
- Heat pumps;
- Bed mattresses.

We consider that there is room for improvement of the criteria for these products and therefore suggest mentioning them with concrete dates in the work plan when the revision process should start.

For instance, we are concerned that there is for the moment a low uptake of absorbent hygiene products on the market. However, the Commission should therefore not conclude that this product group is completely meaningless and therefore should be phased out of the EU Ecolabel scheme. On the contrary, the criteria provide for an added value for consumers and the environment but we see a need to do more in terms of marketing to make sure that the product group will be better promoted to economic operators and to consumers.

4. Increased and effective communication

BEUC and the EEB support the development of an increased and effective communication of the scheme which is a key factor for success. More marketing activities, awareness-raising actions and public education campaigns are needed to ensure an increased visibility of the scheme for consumers, producers, retailers, public purchasers and other stakeholders.



BEUC and the EEB would like to express their interest in participating in the preparation activities of such an EU Ecolabel communication campaign which is likely to be launched mid-2016.

We also support the idea of establishing separate taskforces for product groups and "service" groups, such as the one to promote Tourism Accommodation and Campsites Services (TACS).

BEUC will promote the EU Ecolabel by communicating the latest developments of the scheme to our members through existing tools such as press releases published on our website, internal newsletters, and social media such as Twitter. Through an effective external communication flow, BEUC encourages its members to promote Ecolabel and include relevant information about the EU Flower in their national consumer magazines. In addition, BEUC gives updates to and discuss the developments of the EU Ecolabel scheme with experts from members during the yearly sustainability experts meetings. BEUC also develops factsheets on EU Ecolabel which we disseminate as communication material to meetings, conferences or events in order to reach a larger audience.

The EEB uses the same communication tools mentioned above. The EEB communicates mostly with its members on an ad-hoc basis through an electronic working group and provides them with updates on Ecolabel activities, including news on the Green Public Procurement (GPP) programme. The EEB is also making use of social media such as Facebook, Twitter and LinkedIn to increase the visibility of the activities of the EEB including the developments of the Ecolabel scheme.

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