

# Public consultation on a potential legislative proposal on substantiating green claims

Fields marked with \* are mandatory.

## Introduction

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The initiative responds to the priorities announced in the European Green Deal[1], and its associated Circular Economy Action Plan (CEAP)[2] and Farm to Fork Strategy[3].

The initiative will cover claims made on any of the environmental impacts covered by the Environmental Footprint methods and on claims on overall environmental performance. We consider as environmental claims any explicit environmental information on products (including services) or companies, including labels/ logos and text, in whichever form it is provided (e.g. website, brochure, on shelf, television, radio etc.)

This initiative will be developed in close coordination with other initiatives:

- the revision of EU consumer law to empower consumers for active participation in the green transition [5] (also announced in the CEAP);
- a sustainable product policy initiative, which will focus on making products fit for a climate-neutral, resource-efficient and circular economy (also announced in the CEAP);
- the action to create a sustainable labelling framework, announced in the Farm to Fork Strategy[6].

These initiatives will seek to establish between them a coherent policy framework to help the Union to make sustainable goods, services and business models the norm and to integrate environmental considerations in decision-making. This would push consumption, business transactions and investments in a more sustainable direction. They aim to reduce significantly the environmental footprint of products consumed in the Union and contribute to the overall policy objective of EU climate neutrality by 2050.

The aim of this consultation is to gather stakeholder opinions on policy options on substantiating environmental claims using the Environmental Footprint methods. Previous consultation activities will also be taken into account[7].

**For more information on the Environmental Footprint methods, please refer to the background document.**

If you have any questions, please contact the European Commission via [env-environmental-footprint@ec](mailto:env-environmental-footprint@ec).

Your voice matters and we are grateful to you for taking the time to complete this consultation.

[1] <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1588580774040&uri=CELEX:52019DC0640>

[2] <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2020:98:FIN>

[3] <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0381>

[4] The methods are available here: [https://eplca.jrc.ec.europa.eu/permalink/PEF\\_method.pdf](https://eplca.jrc.ec.europa.eu/permalink/PEF_method.pdf) and [https://eplca.jrc.ec.europa.eu/permalink/OEF\\_method.pdf](https://eplca.jrc.ec.europa.eu/permalink/OEF_method.pdf). More information can also be found here: <https://ec.europa.eu/environment/eusssd/smgp/index.htm>

[5] The inception impact assessment on empowering consumers for the green transition: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12467-Empowering-the-consumer-for-the-green-transition> (feedback period is open until the 1st of September 2020)

[6] <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0381>

[7] [https://ec.europa.eu/environment/eusssd/smgp/pdf/EF\\_stakeholdercons19.pdf](https://ec.europa.eu/environment/eusssd/smgp/pdf/EF_stakeholdercons19.pdf)

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese

- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

Emilie

\* Surname

Bartolini

\* Email (this won't be published)

eba@amchameu.eu

\* Organisation name

*255 character(s) maximum*

American Chamber of Commerce to the European Union (AmCham EU)

\* Organisation size

- Micro (1 to 9 employees)

- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

## Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

5265780509-97

## \* Country of origin

Please add your country of origin, or that of your organisation.

- |   |  |  |  |
|---|--|--|--|
| <input type="radio"/> Afghanistan         | <input type="radio"/> Djibouti           | <input type="radio"/> Libya            | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands       | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein    | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania             | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania        | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria             | <input type="radio"/> Ecuador            | <input type="radio"/> Luxembourg       | <input type="radio"/> Samoa                            |
| <input type="radio"/> American Samoa      | <input type="radio"/> Egypt              | <input type="radio"/> Macau            | <input type="radio"/> San Marino                       |
| <input type="radio"/> Andorra             | <input type="radio"/> El Salvador        | <input type="radio"/> Madagascar       | <input type="radio"/> São Tomé and Príncipe            |
| <input type="radio"/> Angola              | <input type="radio"/> Equatorial Guinea  | <input type="radio"/> Malawi           | <input type="radio"/> Saudi Arabia                     |
| <input type="radio"/> Anguilla            | <input type="radio"/> Eritrea            | <input type="radio"/> Malaysia         | <input type="radio"/> Senegal                          |
| <input type="radio"/> Antarctica          | <input type="radio"/> Estonia            | <input type="radio"/> Maldives         | <input type="radio"/> Serbia                           |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini           | <input type="radio"/> Mali             | <input type="radio"/> Seychelles                       |
| <input type="radio"/> Argentina           | <input type="radio"/> Ethiopia           | <input type="radio"/> Malta            | <input type="radio"/> Sierra Leone                     |
| <input type="radio"/> Armenia             | <input type="radio"/> Falkland Islands   | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore                        |
| <input type="radio"/> Aruba               | <input type="radio"/> Faroe Islands      | <input type="radio"/> Martinique       | <input type="radio"/> Sint Maarten                     |
| <input type="radio"/> Australia           | <input type="radio"/> Fiji               | <input type="radio"/> Mauritania       | <input type="radio"/> Slovakia                         |
| <input type="radio"/> Austria             | <input type="radio"/> Finland            | <input type="radio"/> Mauritius        | <input type="radio"/> Slovenia                         |
| <input type="radio"/> Azerbaijan          | <input type="radio"/> France             | <input type="radio"/> Mayotte          | <input type="radio"/> Solomon Islands                  |

- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga

- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen

- Czechia
- Lebanon
- Saint Helena  
Ascension and  
Tristan da  
Cunha
- Zambia
- Democratic  
Republic of the  
Congo
- Lesotho
- Saint Kitts and  
Nevis
- Zimbabwe
- Denmark
- Liberia
- Saint Lucia

\* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

**Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

\* Please indicate if you are

- a standardisation body
- an environmental label/ initiative/ methodology owner
- a life cycle assessment consultant
- a life cycle data provider
- a life cycle assessment software provider
- a researcher/ research organisation active in life cycle assessment
- none of the above

\* Please specify the type of product your organisation produces or represents:

- intermediate product (a product that requires further processing before it can be sold to the final consumer, e.g. ingredient or component for a final product);
- final product (used as it is);
- both intermediate and final products;

- other (e.g. services)

\* Please indicate if you are/were involved in:

- the Environmental Footprint pilot phase (2013-2018)
- the Environmental Footprint transition phase (starting in 2019)
- Both the pilot and transition phase
- I was not involved

\* Please indicate your level of knowledge of the Environmental Footprint methods (the Product and Organisation Environmental Footprint method, PEF and OEF):

- I am aware of these methods
- I am using/ used these methods
- I am aware of life cycle assessment (LCA)
- I am using/ used LCA
- I am not aware of any of the above

\* I wish to reply to...

- questions for the general public
- questions for experts

## Questions to experts

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1. What is your opinion on the following statements on environmental information on **products and services**?

	I don't agree at all	I somewhat disagree	I somewhat agree	I fully agree	I don't know
* There are too many methods for measuring the environmental performance of products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There are too many labels on the environmental performance of products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Not enough information is available on the environmental performance of products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The proliferation of methods to quantify the environmental performance of products hinders the cross-border trade of green products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>



* Different requirements imposed by national legislation or private initiatives on environmental information on products (including labelling) increases the costs for companies when trading cross-border (as they need to comply with different methods in each country)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The proliferation of methods on the environmental performance of products/ could hinder fair competition between companies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. What is your opinion on the following statements on environmental information on **organisations (companies)**?

	I don't agree at all	I somewhat disagree	I somewhat agree	I fully agree	I don't know
* There are too many methods to quantify organisations' (including companies') environmental performance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There are too many reporting initiatives on the environmental performance of organisations (including companies)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Not enough information is available on the environmental performance of organisations (including companies)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Having multiple methods and initiatives makes it more difficult to understand the environmental performance of organisations (including companies)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The proliferation of methods and initiatives on the environmental performance of organisations (including companies) doesn't allow market actors to decide for greener options (e.g. investments, choice of suppliers, etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Different requirements imposed by national legislation or private initiatives on environmental reporting increases the costs for companies when trading cross-border (as they need to comply with different methods in each country)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* The proliferation of methods on the environmental performance of organisations could hinder fair competition between companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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### Questions on policy options

There are more than 200 environmental labels active in the EU, and more than 450 active worldwide[1]; there are more than 80 widely used reporting initiatives and methods for carbon emissions only[2]. Some of these methods and initiatives are reliable, some not; they are variable in the issues they cover.

The questions below explore measures to enhance the reliability and bring more harmonisation of environmental information on products and organisations (including companies).

[1] Source: analysis based on ecolabelindex.com data

[2] Company GHG emissions reporting – a study on methods and initiatives, EC, 2010

3. The list below lists different options to tackle the proliferation of methods and labels and misleading claims. What is your opinion on the options below in view of the objective to provide reliable, comparable and verifiable information for **products** (goods and services) offered on the EU market?

	I don't agree at all	I somewhat disagree	I somewhat agree	I fully agree	I don't know
* The current situation is satisfactory: market actors can prove environmental claims through the method of their choice, and Member States' competent authorities can prohibit misleading claims towards consumers (e.g. claims that are not specific, clear, accurate and substantiated) under the general clauses of the Unfair Commercial Practices Directive 2005/29/EC on a case-by-case basis	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Market actors can prove environmental claims with the method of their choice, but they should comply with certain minimum requirements in order to avoid greenwashing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Market operators can prove environmental claims with the method of their choice, if methods, labels or initiatives integrate the Environmental Footprint methods (e.g. labelling scheme setting criteria by hotspots identified by running a Product Environmental Footprint (PEF) study; a product declaration scheme implementing a Product Environmental Footprint Category Rule	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* If market actors decide to make an environmental claim on a product related to the impacts covered by the PEF method, they have to prove their environmental claims through the PEF method (including any developed Product Environmental Footprint Category Rule), whenever claims are related to the impacts covered by the method	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* If market actors decide to make an environmental claim on a product related to the impacts covered by the PEF method, they have to use a EU logo or label based on the PEF method	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

*200 character(s) maximum*

4. In your opinion, using the PEF method to substantiate green claims on products...

	I don't agree at all	I somewhat disagree	I somewhat agree	I fully agree	I don't know
* will make environmental claims more reliable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will make environmental claims more comparable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will make environmental claims more verifiable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will help actors along the supply chain to share environmental performance information	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* will provide a level playing field for competing based on environmental performance for all products sold on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will help market actors (e.g. consumers, business partners, public authorities) to make informed, greener purchasing choices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will reduce costs for companies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* will decrease costs for public administrations as certain tasks would be performed at EU level (e.g. preparatory work, criteria setting)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will increase prices for green products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

*200 character(s) maximum*

5. In your opinion, using the PEF method to substantiate green claims on products...

	I don't agree at all	I somewhat disagree	I somewhat agree	I fully agree	I don't know
* should be complementary to existing "best-in-class" labels (ISO 14024 type I labels such as the EU Ecolabel, Blue Angel, Nordic Swan etc., awarded to products and services meeting high environmental standards throughout their life-cycle) by making visible the environmental impacts of products not covered by the schemes or providing additional environmental information on them	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* should be used as a basis for identifying criteria for existing "best-in-class" labels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* PEFCR benchmarks should be used as thresholds for accessing existing "best-in-class" labels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* should not be required if the product is already covered by an existing "best-in-class" label	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

We understand and support the need to reinforce the existing framework to substantiate green claims. The new framework should, however, be flexible enough to allow market actors to use sound methodologies other than PEF. From this point of view, sustainability claims made at product level should be in conformity with minimum requirements established at EU level, in order to ensure fair competition and avoid trade barriers within the internal market. In this context, the use/application of the PEF method should remain voluntary, complementary to existing methods that are both “best-in-class” labels but also privately certified labels that comply with certain minimum requirements. This way, the new EU framework on green claims should allow the choice of credible methods meeting certain minimum quality criteria. Companies wishing to make claims about the environmental profile or performance of their products and services should be free to substantiate their claims through valid science-based methodologies, such as PEF or other Life-Cycle Analysis (LCA) and related methods, as well as established international standards and credible governmental, NGO, official and industrial certification schemes. Any such claims would require the use of a well-characterised and documented methodology that is available for critical evaluation, with underlying data made available for scrutiny by relevant competent authorities.

While PEF functions adequately in some sectors, it is not equally effective when it comes to all product categories, that is why other robust methods to assess products’ life cycles cannot be excluded. In particular, we support the best voluntary industrial sector benchmark initiatives relying on ISO standards and/or other international standards for any measurements of LCA and/or ISO Type I ecolabels, whose compliance is based on ex post enforcement (check of claims through random regular checks or based on complaints).

By adopting a voluntary approach with minimum requirements for methodologies, we would better achieve the objectives of ensuring a level playing field and increase consumer confidence, whilst allowing market actors to choose the methodologies that best adapt to the different product categories.

6. The list below sets out options to tackle the proliferation of methods and initiatives, and misleading claims. Please express your opinion on the options below in view of the objective to provide reliable, comparable and verifiable information for **organisations** (including companies) active on the EU market?

	I don't agree at all	I somewhat disagree	I somewhat agree	I fully agree	I don't know
* The current situation is satisfactory: market actors can prove environmental claims or report on their environmental performance through the method of their choice; and Member States’ competent authorities can prohibit misleading claims towards consumers (e.g. claims that are not specific, clear, accurate and substantiated) under the general clauses of the Unfair Commercial Practices Directive 2005/29/EC on a case-by-case basis)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Market actors can prove their environmental claims or report on their environmental performance using approaches promoted under the Non-financial reporting directive (e. g. UN Global Compact, ISO 26000; please note that <a href="#">a review of the directive is ongoing</a> )	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Market actors have to prove their environmental claims or report on their environmental performance using the Organisation Environmental Footprint (OEF) method (including any developed Organisation Environmental Footprint Sector Rule), whenever they are related to the impacts covered by the method	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* If market actors decide to make an environmental claim on the company, related to the impacts covered by the OEF method they have to use a specific reporting format based on the OEF method	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* If market actors decide to make an environmental claim on the company, related to the impacts covered by the OEF method, they have to integrate results into their financial report	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

*200 character(s) maximum*

7. In your opinion, using the OEF method to substantiate green claims on organisations (including companies)...

	I don't agree at all	I somewhat disagree	I somewhat agree	I fully agree	I don't know
* will make environmental claims more reliable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will make environmental claims more comparable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will make environmental claims more verifiable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will help actors along the supply chain to share environmental performance information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* will provide a level playing field for competing based on environmental performance for all products sold on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will help market actors to make informed, greener purchasing choices (e.g. choice of suppliers, investment decisions)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will be appropriate to inform sustainable finance tools (e.g. input to sustainability ratings, indicators for non-financial reporting)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will reduce costs for companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* will decrease costs for public administrations as certain tasks would be performed at EU level (e.g. preparatory work, OEFSR development)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* is appropriate for reporting on environmental performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other, please specify:

*200 character(s) maximum*

8. Please express your opinion on the effectiveness of options for EU action on substantiating green claims on **products** via the Product Environmental Footprint method. We consider a measure effective in case it contributes to reducing the proliferation of methods and initiatives, and it contributes to reducing misleading claims.

Please note that below options are not necessarily mutually exclusive.

	Not effective at all	Somewhat ineffective	Somewhat effective	Very effective	I don't know
* Revise the <a href="#">2013 Commission Recommendation</a> , which recommends the use of the Environmental Footprint methods to measure and communicate life cycle environmental performance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Establish new EU legislation (for instance, EU regulation) putting in place a voluntary scheme for making product-related green claims based on the Product Environmental Footprint method	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Establish new EU legislation (for instance, EU regulation) requiring companies to substantiate green claims based on the PEF method. Claims will have to use Product Environmental Footprint Category Rules (PEFCRs), if they exist; if they don't, the PEF method applies. The requirement would apply to claims that are covered by the method	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Provide stronger protection against greenwashing (i.e. claims on environmental qualities of products or services that are exaggerated, too vague, false or impossible to prove) through EU consumer law (in this case, only claims towards consumers are covered)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify other:

*200 character(s) maximum*

Please see the attached paper for a detailed explanation.

9. Please express your opinion on the effectiveness of options for EU action on substantiating green claims on organisations (including companies) via the Organisation Environmental Footprint method.

Please note that below options are not necessarily mutually exclusive.

	Not effective at all	Somewhat ineffective	Somewhat effective	Very effective	I don't know
* Revise the <a href="#">2013 Commission Recommendation</a> , which recommends the use of the Environmental Footprint methods to measure and communicate life cycle environmental performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>



* Reinforce requirements on providing environmental information on companies via the revision of the Non-financial reporting directive (in such a case, only company-level claims are covered)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Establish new EU legislation (for instance, EU regulation) putting in place a voluntary scheme for making company-related green claims based on the OEF method	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Establish new EU legislation (for instance, EU regulation) requiring companies to substantiate green claims based on the OEF method. Claims would have to be based on Organisation Environmental Footprint Sector Rules (OEFSRs), if they exist – if they don't, the OEF method applies. The requirement would apply to claims that are covered by the method	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Provide stronger protection against greenwashing (i.e. claims on environmental qualities of companies that are exaggerated, too vague, false or impossible to prove) through EU consumer law (in this case, only claims towards consumers are covered)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify other:

*200 character(s) maximum*

- \* 10. How much is the company currently spending on using environmental labels/ logos, methods and initiatives related to their products? (if you are not a company, please write "not applicable")

*100 character(s) maximum*

- \* 11. Please indicate the number of labels/ logos, methods and initiatives used (if you are not a company, please write "not applicable"):

*100 character(s) maximum*

n/a

\* 12. If the PEF method were required to substantiate environmental claims, would you expect the cost related to using environmental labels/ logos, method and initiatives to

- Be significantly higher
- Be somewhat higher
- Stay the same
- Be somewhat lower
- Be significantly lower
- I don't know

\* 13. How much is the company currently spending on using environmental methods and initiatives related to the company (e.g. reporting initiatives, method for calculating the carbon/ environmental performance of the company, investor questionnaires) (if you are not a company, please write "not applicable")?

*100 character(s) maximum*

n/a

\* 14. Please indicate the number of methods and initiatives used (if you are not a company, please write "not applicable"):

*100 character(s) maximum*

n/a

\* 15. If the OEF method were required to substantiate environmental claims, would you expect the cost related to using environmental method and initiatives to

- Be significantly higher
- Be somewhat higher
- Be somewhat lower
- Be significantly lower
- I don't know

16. If the Commission proposes requirements on substantiating voluntary green claims via the Environmental Footprint methods, the initiative should:

	Not effective at all	Somewhat ineffective	Somewhat effective	Very effective	I don't know
* Not establish any requirement on how the information is communicated	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Establish general principles on the way the information is communicated (e.g. transparency, availability & accessibility, reliability, completeness, comparability and clarity)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Define minimum content of the information to be communicated (for instance overall environmental performance, listing the most relevant impacts, information on third party verification)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Define a common EU label/logo based on the PEF method	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Define a common reporting format based on the OEF method	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

A calculation based on the PEF/ OEF methods gives quantitative information on the performance of the product or organisation. This result is not comparable to results of other products/ companies (for instance, product X has a lower impact than product Y). This is due to the fact that the PEF/ OEF methods leave some methodological and data choices to the user. These choices are available to enable the application of the PEF/ OEF methods to any product or organisation.

Product Environmental Footprint Category Rules (PEFCRs) define a benchmark, which corresponds to the environmental performance of the average product on the EU market. The benchmark is defined per environmental impact and for environmental overall performance (single score). In this case, it is possible to compare the performance of a specific product to the benchmark of the same product category. PEFCRs also identify which are the most relevant environmental impacts, life cycle stages (e.g. manufacturing or use) and processes (e.g. production of ingredients – wheat grain) for the product category.

Similarly, OEFSRs identify the most relevant environmental impacts, life cycle stages and processes for the product portfolio of the organisation. OEFSRs currently do not contain benchmarks, but may define comparable indicators (e.g. results divided per total revenue).

Tests on how to communicate Environmental Footprint information were carried out [during the pilot phase](#) and through a [subsequent study](#).

17. If market actors communicate on their PEF profile based on a PEFCR, the following minimum content should be available:

	Not relevant at all	Low priority	Somewhat relevant	High priority	I don't know
* Single score on a 3-point scale (e.g. average corresponding to the benchmark, better and worse)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Single score on a 5 level scale (e.g. classes of performance on an A-E scale)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Single score on a 5 level scale, where top performance is reserved to products awarded with an EU Ecolabel	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* List the three most relevant impact categories (e.g. climate change, land use, water use)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Provide the performance on the three most relevant impact categories (e.g. better than average on climate change, average on water use, worse than average on eutrophication – freshwater)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Percentage by which performance is better or worse than average on the single score	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Absolute results (e.g. 15t CO2 equivalents on climate change)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

*200 character(s) maximum*

Please see the attached paper for a detailed explanation.

18. In case market actors communicate on their PEF profile for a product for which there is no PEFCR available (calculations are based on the PEF method), the initiative shall

	Not relevant at all	Low priority	Somewhat relevant	High priority	I don't know
* Prohibit the use of absolute values to avoid that consumers or other stakeholders are misled into comparing performances of similar products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allow the use of absolute values with specific conditions (e.g. a clear communication that results are not comparable)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Prohibit the communication of % of improvement on the same product to avoid that products with high improvement figures are unfairly judged as better respectively to where only incremental improvements are possible	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allow the communication of % of improvement on the same product with specific conditions (e.g. that absolute values are displayed alongside with the % of improvement)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allow statements on the environmental performance of the product ( e.g. "Did you know that the materials used for the upper part of a shoe are responsible for 41% of its impact on climate change? Our shoes are made of recycled materials, reducing greenhouse gas emissions.")	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Allow information on what contributes most to the environmental impacts of the product (e.g. 60% of impacts come from growing ingredients; 15% from manufacturing, 15% from transport, 5% from the use of the product and 5% from disposal)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

*200 character(s) maximum*

19. If market actors communicate their OEF profile, calculated based on an OEFSR, the following minimum content should be available:

	Not relevant at all	Low priority	Somewhat relevant	High priority	I don't know
* Scope of the analysis (e.g. which business units are included in the analysis)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Characterised results per impact category (results for the full life cycle, per impact category, e.g. climate change)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Characterised results per impact category, divided by turnover	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Normalised results per impact category (characterised results divided by normalisation factors defined based on yearly emissions of an average global citizen)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Weighted results and single score (weights applied to each impact category and the sum of impacts in points. Weights were defined based on expert judgement, consider planetary boundaries and the robustness of indicators);	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Single score divided by turnover	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Most relevant impacts, processes and life cycle stages (based on OEFSR)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Results on additional environmental information required/ recommended by OEFSR	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Information on verification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Link to full report	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other, please specify:

*200 character(s) maximum*

20. If market actors communicate their OEF profile, calculated based on OEF but in absence of an existing OEFSR, the following minimum content should be available:

	Not relevant at all	Low priority	Somewhat relevant	High priority	I don't know
* Scope of the analysis (e.g. which business units are included in the analysis)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Statement on the comparability of information, to avoid that users of the information are misled into comparing performances where this is not possible	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Characterised results per impact category (results for the full life cycle, per impact category, e.g. climate change)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Characterised results per impact category, divided by turnover	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Normalised results per impact category (characterised results divided by normalisation factors defined based on yearly emissions of an average global citizen)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Weighted results and single score (weights applied to each impact category and the sum of impacts in points. Weights were defined based on expert judgement, consider planetary boundaries and the robustness of indicators);	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Single score divided by turnover	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Most relevant impacts, processes and life cycle stages as calculated based on the OEF	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Results on additional environmental information deemed relevant by the user of the method	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Information on verification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Link to full report	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

\* Please specify other:

*200 character(s) maximum*

n/a
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Verification consists in a conformity assessment process carried out by verifier(s) to demonstrate whether the EF study, used to substantiate the environmental claim, has been carried out in compliance with the most updated version of the PEF or OEF method.

Validation is a confirmation by the verifier(s), that the information and data included in the EF study, EF report and the communication vehicles are reliable, credible and correct.

21. Verification should be done by:

	Not appropriate at all	Less appropriate	Appropriate	Best solution	I don't know
* Bodies appointed at national level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A verification body at EU level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Independent certification/verification organisations obtaining accreditation for this specific task	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify other:

200 character(s) maximum

22. What is your view on the following statements regarding enforcement?

	I don't agree at all	A somewhat disagree	I somewhat agree	I fully agree	I don't know
* For all environmental claims subject to the requirements of this initiative, including labels, economic operators shall submit an application to an EU or national competent authority before using the claim on the market (ex ante check)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Competent authorities shall ensure an ex-post enforcement (for instance, check that claims comply with requirements, whether they were appropriately verified, informing the public, treating complaints, monitoring misleading claims and complaints on misleading claims)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The use of an environmental claim, including of a label, shall be notified to the competent authorities who would ensure an ex-post enforcement (for instance, checking that the claims comply with the requirements, informing the public, treating complaints, monitoring complaints on misleading claims)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A mechanism of administrative cooperation shall be put in place between the different competent authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The economic operators making environmental claims, including using a label, shall communicate the results of the Environmental Footprint study to an EU or national competent authority	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

23. The authorities competent to ensure compliance of environmental claims with the Environmental Footprint methods should be:

	I don't agree at all	I somewhat disagree	I somewhat agree	I fully agree	I don't know



* Consumer law enforcement bodies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Environmental enforcement bodies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Technical bodies specialised in LCA / EF methods	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Specific competent authorities at national level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A pan-European entity	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other national/ regional public entities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify other:

*200 character(s) maximum*

\* 24. In order to ensure reliable, comparable and verifiable information on the environmental footprint of products and organisations, the following actions related to data should be envisaged:

- Create an EU life cycle inventory secondary database, including the necessary data to allow for the implementation of the Environmental Footprint methods
- A network/dataspace of different national databases with EF-compliant data should be set up
- A network/dataspace of different national databases and private databases with EF-compliant data should be set up
- Other

If other, please specify:

*200 character(s) maximum*

We would support both option 1 (EU inventory) and option 3 (different national databases with EF-complaint data) . For an addition explanation please see attached paper.

25. In order to support SMEs to substantiate their environmental claims based on the EF methods, the following measures would be needed

	I don't agree at all	A somewhat disagree	I somewhat agree	I fully agree	I don't know
* Training to SMEs on how to measure their environmental footprint	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* EU funds (e.g. LIFE, COSME) enabling projects that include the assessment of the environmental footprint based on PEF/ OEF	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Free access to secondary datasets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Free online calculators or other tools available online or offline for calculating environmental footprint	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Simple online calculators or other tools available online for calculating environmental footprint	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If other, please specify:

These should be created for PEF but also for other science-based methods which exist or will be developed over time. These should be made available to all companies, including larger ones.

Thank you for spending time completing this questionnaire. Your answers are valuable in helping to understand stakeholders' views on this issue. If you wish to expand on any of your answers or to add comments or information on other aspects relevant to green claims in Europe, please do so in the box below:

*1500 character(s) maximum*

If you would like to upload a document, please select below.

If you chose that your contribution is anonymous, please make sure that there are no data identifying you or the organisation you represent in the file.

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