



Dear Minister,

European Ecolabel voting decisions next week

I am writing to you to communicate our concern on four products to be voted on in the European Ecolabelling Board by your Government or a representative in regulatory committee.

We are seriously concerned about a number of criteria proposed which do not reflect the principle that the Ecolabel shall be awarded to the best environmental performing products and, as a voluntary market-based tool, goes beyond legislation. On the contrary, the final Commission proposals include major changes that do not reflect the general discussions already held in the EU Ecolabelling Board or the working group meetings on the criteria development, and fall behind legislation and public expectation.

This trend towards reducing the ambition of the Ecolabel, and sometimes restricting to existing legislation levels, has been increasingly evident in the past two years. This is likely because of the increasing potential of the Ecolabel as a tool for driving environmental improvement, especially through green public procurement. But at the same time, this trend is undermining the potential impact of such green public procurement, making it less "green".

The proposals to be voted on next week are of such concern for the credibility of the scheme that we have decided to write you directly, as Environment Minister to warn you of this situation. The most controversial issues of concern are the need to clearly exclude the following:

- Flame retardants and biocides in textiles and bed mattresses
At the very least, substances forbidden in electronic appliances should not be allowed in ecolabelled textiles and bed mattresses
- PVC in wooden furniture
Alternatives are available to this controversial material
- Genetically-modified trees in wooden furniture
Member States have already agreed to exclude them, but the Commission does not agree

The attached Annex provides the details of the proposal and our voting recommendations.

We urge you to take these considerations into account when discussing the final criteria for these Ecolabel product groups and when deciding on your position in the votes.

Yours sincerely,

John Hontelez
Secretary General

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ANNEX:

More detailed voting recommendations on the Ecolabel product groups to be voted on 24 April

TEXTILES

Flame retardants

Halogenated and brominated flame retardants are allowed despite general concerns about their harmful properties for human health and the environment and that less problematic substitutes are available. The proposed criterion does not exclude PBDEs (including deca-BDE) and lags behind the requirements established in the Restriction of Hazardous Substances Directive. This fundamental inconsistency is all the more worrying considering that the exposure to PBDEs in textiles is higher.

We call on you to ensure that no halogenated flame retardants are allowed. As a minimum, to ensure consistency with legislation, all PBDEs, including Deca-BDE, should be clearly excluded.

Biocides

Use of biocidal products is accepted, contrary to a general agreement to keep the exclusion of these chemicals.

We call on you to ask for re-inclusion of the original requirement that biocides not be used

WOODEN FURNITURE

PVC

The final proposal has not addressed the requested exclusion of PVC from this EU Ecolabel.

We call on you to ask for the use of materials that do not contain PVC

Genetically modified trees

The final proposal does not exclude wood originating from genetically modified trees, in spite of lack of public acceptance of genetically modified organisms.

We call on you to ask for the re-inclusion of this requirement.

Percentage of wood originating from sustainable managed forests

This requirement has not yet been finalised by the Commission. The originally suggested level of 70% is accepted by most forest certification schemes including the FSC and the PEFC and is in line with what is being demanded through current national procurement policies.

We urge to support the level of 70% both for solid wood and wood-based materials.

BED MATTRESSES

Flame retardants

As in the Ecolabel for textiles, halogenated and brominated flame retardants are allowed.

We urge you to require that no halogenated flame retardants are allowed. As a minimum, all PBDEs, including Deca-BDE, should be clearly excluded.

Biocides

As with the Ecolabel for textiles the final proposal does not take into consideration major agreement from Member States that these should be excluded.

We call upon you to ask for re-inclusion of the original text so biocides are not allowed.

Genetically modified trees

As with the Ecolabel for wooden furniture we urge you to ensure that the requirement excluding use of genetically modified trees is re-introduced.

Percentage of wood originating from sustainable managed forests

Similar to the Ecolabel for wooden furniture we call upon you to support the level of 70% of virgin wood originating from sustainable managed forests.

INDOOR AND OUTDOOR PAINTS AND VARNISHES

Halogenated organic solvents and phthalates

While the criterion largely supported by the EUEB requested that halogenated organic solvents and phthalates be not used in the product before or during the tinting, the final proposal has weakened this requirement.

We call on you to ask for the exclusion of all halogenated solvents and phthalates

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