



31 January 2007

Benjamin Caspar  
DG Environment  
European Commission  
B-1049 Brussels

Dear Mr Caspar and Member State representatives on the Ecolabel,

I am writing on behalf of BEUC and EEB to express our concerns about the day-to-day delivery of the ecolabel process. Throughout a number of product group criteria development processes, it has become increasingly clear that the ecolabel scheme is lacking a clear vision. We are uneasy about the inefficient running of the Ad-Hoc Working Group meetings, and a general decision-making process that appears increasingly divorced from wider environmental policy. We believe this is having an overall negative impact on the running of the scheme and represents a serious threat to its credibility.

To help correct this situation, we would like to suggest that the Policy Management Group be re-established, to re-introduce a forum where policy issues can be discussed. The first meeting could be held on the morning of 23 April. This way, we can take advantage of having the maximum number of Member of Member State representatives present to participate in the meeting.

Re-establishing the Policy Management Group would assist the Commission team and would provide the crucial policy guidance needed to result in quality criteria. It is also a key time to reconvene this Management Group, at the start of the ecolabel regulation revision process. The Group could consider some suggestions for change to the current scheme structure and operating system, and could help make a more smooth transition to the new structure once it is finalised.

We propose the following points to be discussed in the first meeting, as a means of identifying the priority areas for action:

- Changes to the environmental policy framework the ecolabel sits in - what is the position of the ecolabel within e.g. the Sustainable Consumption and Production Action Plan, the Ecodesign for Energy-Using-Products Directive.
- New developments in horizontal policy areas - REACH, GHS, nanotechnologies, etc.
- Transition from old scheme to new scheme - what main elements of the ecolabel can be improved now and which would help ease the transition to the new scheme (eg. elaboration of ambition level, criteria development guidelines).

We hope that the Commission and Member States will give the necessary consideration to accept this debate needs to take place. This will significantly improve the process and results of the revised regulation and the functioning of the scheme.

Yours sincerely,

Blanca Morales  
BEUC/EEB EU Eco-label Coordinator