



Mr. Timo Mäkelä
Director
European Commission
DG Environment
B-1049 Bruxelles

Ref.: JMU/092006166/cm

27 September 2006

Consumer and environmental organisations' concerns on Integrated Product Policy (IPP) process to date

Dear Mr. Mäkelä,

Following over two years of active participation in the Commission's IPP process, we are writing to provide a detailed explanation of the concerns we notably expressed at the IPP Regular meeting in June.

Both BEUC and EEB have long-standing interests in product policy, particularly as it relates to environmental and consumer protection within sustainable consumption and production. For this reason, we have taken part in elements of the IPP process, notably BEUC in the two pilot projects, and EEB in the product information needs working group.

Through our involvement, we aimed to help the Commission to develop tools that would effectively develop and deliver fundamental product policy mechanisms. However, based on the experiences from our participation, we are unconvinced that the IPP activities to date can reach this aim.

We are disappointed by the outcome of the two pilot projects – in particular, that industry and the Commission preferred a voluntary agreement approach by default. In addition, in the mobile phone group, the environmental improvements we suggested (eg, developing phone chargers that stop charging when the battery is full) were dismissed as not having enough environmental benefit for the added environmental impact. This, despite industry not presenting documented research arguing the point. There was also a clear impression that the manufacturers put most of the responsibility on other parties, namely consumers and recyclers. In their view, consumer demand should drive environmental improvements, as though such improvements were not justified in themselves. To us, this misses the central point of sustainable production.

.../...

BEUC – The European Consumers' Organisation
Avenue de Tervueren 36, bte 4, B-1040 Bruxelles, Tel: (+32-2) 743 15 90, Fax: (+32-2) 740 28 02

EEB – European Environmental Bureau
Boulevard de Waterloo 34, B-1000 Brussels, Tel : + (32-2) 289 10 90, Fax : (+32-2) 289 10 99

In contrast, the experience from the product information needs working group is more positive and constructive. The discussion process was more balanced, and the output reflects this. The working group recommendations represent a fair attempt at balancing the arguments of each stakeholder group. These recommendations identify several concrete policy actions and actors in delivering and improving product environmental performance information. The recommendations include a legislative framework for the standardised provision of information. This proposal reflects the reality that product policy tools, such as design obligations, green public procurement or ecolabels, require good quality data on product impacts and performance profiles to function effectively.

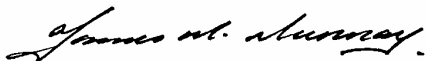
We are now concerned that the pilot project model will be used to further develop the IPP framework, giving priority to sectoral voluntary agreements. We believe that regulatory mechanisms must play a central role in IPP if objectives are to be achieved effectively.

In conclusion, BEUC and the EEB urge the Commission to:

- 1) discontinue the pilot project - voluntary - approach taken so far as an IPP policy development and communication tool;
- 2) act on the recommendations of the information needs working group as soon as possible and come forward with a legislative proposal;
- 3) deliver the discussion document on product design obligations foreseen for 2005 as detailed in the Commission's communication on IPP (COM(2003) 302 final).

Failing the above, we will assess the effectiveness of our continuing involvement in the process. We welcome the opportunity to further discuss these matters with you.

Yours sincerely,



Jim Murray
Director



John Hontelez
Secretary General

cc.: Mr. Klaus Koegler – Deputy Head of Unit
DG Environment