

Evaluatie-onderzoek EU Ecolabelverordening: voorbereiding Survey

Introduction		Competent Body or Government Ministry
	Name and Contact Information Name, email, telephone number, organisation please	Ineke Vlot manager non-food SMK Alexanderveld 7 - 2585 DB Den Haag – The Netherlands ivlot@smk.nl Tel.: +31 70-3586300 Mob.: +31 6-10761573 www.smk.nl
	In which EU Country are you based?	The Netherlands [Select from list of 28 Countries]
	What is your role?	Competent Body EU Ecolabel [Select from list of 7 stakeholder types]
Awareness of Policy	Are you aware of the EU Ecolabel?	Yes/No
	If yes, which of the following aspects of the EU Ecolabel are you aware of? ✓ The EU Ecolabel logo ✓ Its aims and objectives ✓ How to make an application ✓ Product groups covered by the EU Ecolabel ✓ Verification processes ✓ Detailed criteria for particular product groups (please specify) all Other - please specify.....	Select for positive answers (NB: we have selected all: being the Dutch Competent Body for EU Ecolabel, we are aware of all aspects of the EU Ecolabel certification programme)
	Are you aware of the following product policies/ tools at the EU level: 1. Ecodesign Directive	Are you aware of the following product policies/ tools at the EU level:

	<p>2. Energy labelling 3. Green Public Procurement 4. Product Environmental Footprint 5. EU Organic Label 6. Other – please specify</p>	<p>Yes/No Yes/No Yes/No Yes/No Yes/No Please share more detail if you wish to. Product Environmental Footprint Organisation Environmental Footprint Energy Efficiency Directive Procurement Regulation European Food Sustainable Consumption and Production Round Table Energy Star Clean vehicles Directive SCP Action Plan Horizon 2020 Roadmap to a Resource Efficient Europe 7th Environmental Action Plan EMAS/ISO 14000</p>
	<p>Are there any synergies between the EU Ecolabel and any of the following product policies/ tools: 1. Ecodesign Directive 2. Energy Labelling 3. Green Public Procurement 4. Product Environmental Footprint 5. EU Organic Label 6. Other – please specify</p>	<p>Yes/No Please specify which policy or tool, and give detail 1.,2. Yes: as a voluntary label of environmental excellence EU Ecolabel builds forth upon Ecodesign and Energy Labelling 3. Yes: for certain product groups and services EU Ecolabelcriteria can provide a solid basis for GPP criteria, although in many cases the specific needs of public purchasers will not be met by the more consumer or B2B related EU Ecolabelcriteria, e.g. not purchasing building componentens/materials, but buildings as such 4. Currently pilots are carried out to investigate the relation of Product Environmental Footprint and possible EU Ecolabelcriteria: in potence there is a large synergy 5. In for instance the EU Ecolabel criteria for textile</p>

		products, bed mattresses and Absorbent hygiene products, criteria for cotton are a.o. based on certified organic cotton
	Are there any conflicts between the EU Ecolabel and any of the following product policies/ tools: 1. Ecodesign Directive 2. Energy Labelling 3. Green Public Procurement 4. Product Environmental Footprint 5. EU Organic Label Other, please specify	Yes/ No , possibly Please specify which policy or tool, and give detail 2. EU Ecolabel criteria may sometimes require a more energy efficient performance than the best Energy Labelling class, and/or the 'product scopes' of both instruments may not match 3. Sometimes the specific needs of public purchasers will not be met by the more consumer or B2B related EU Ecolabelcriteria, e.g. not purchasing building components/materials, but buildings as such (see above). 4. To be explored: in theory current EU Ecolabel may not match with PEF results. This exploration will be part of the current pilots. 5. Some stakeholders/countries feel that future including Food/feed in EU Ecolabel, would conflict with the EU Organic Label. In The Netherlands it is felt by many stakeholders that both Labels would complement each other, if it is clearly defined under which conditions each label would be awarded.
Use of the EU Ecolabel	Does your Organisation prioritise purchasing EU Ecolabelled products or services?	Yes/ No [Please detail which product group and give your reasons] Dish washing detergents, toilet paper, copying paper, hand soaps. Other certified products are currently not applicable within our office.
	If no, do you purchase products or services with any other label or product certification? If yes, which ones and why?	Because no EU Ecolabelled food products are available, (certified) organic products or 'Milieukeur' (the Dutch national environmental label) certified food products are bought, if applicable. Also, our kitchen is Milieukeur (the national Dutch environmental label) certified and our

	<p>In your opinion, are the following topics drivers, direct benefits, both or neither for manufacturers and service providers adopting the EU Ecolabel?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Improve the competitiveness or market positioning of the product. <input type="checkbox"/> Respond to a specific request made by an important customer or retailer. <input type="checkbox"/> Aim for/achieve increased sales. <input type="checkbox"/> Pursue/achieve cost-saving opportunities. <input type="checkbox"/> Obtain access to public procurement. <input type="checkbox"/> To meet export market opportunities. <input type="checkbox"/> Increase consumers/customers interest and satisfaction. <input type="checkbox"/> Improve relations/reputation with stakeholders. <input type="checkbox"/> Improve employee commitment to overall company environmental performance. <input type="checkbox"/> Improve management commitment to overall company environmental performance. <input type="checkbox"/> Better management of a specific environmental issue for the company. <input type="checkbox"/> Improve overall company environmental performance. <input type="checkbox"/> The EU Ecolabel improves the company organisational and managerial capabilities in the environmental area. <input type="checkbox"/> Better supply chain management and capabilities <input type="checkbox"/> Promote product innovation <input type="checkbox"/> Improve product design and development. <input type="checkbox"/> Access to finance/insurance. <p>Other, please specify</p>	<p>textile floor covering is C2C certified.</p> <p>[Driver/Direct benefit/A driver and a direct Benefit/Neither/Don't know. Please share more detail if you wish to.]</p> <p>A driver and a direct Benefit</p> <p>A driver and a direct Benefit</p> <p>A driver and a direct Benefit Direct benefit</p> <p>A driver and a direct Benefit Driver Driver</p> <p>Driver</p> <p>Driver</p> <p>Driver</p> <p>Driver</p> <p>Neither</p> <p>Neither Driver Driver Neither</p>
	<p>In your view, what are the indirect benefits associated with obtaining the EU Ecolabel? Please indicate how strongly you agree or disagree with the following indirect benefits for the EU Ecolabel:</p> <ul style="list-style-type: none"> <input type="checkbox"/> EU Ecolabel requirements/criteria set a benchmark 	<p>In your view, what are the indirect benefits associated with the EU Ecolabel? [Use following scale to assess each statement: 1 - strongly disagree/2 - disagree/3 - neutral/ 4 - agree/5 - strongly agree/Don't know/Please share more detail if you wish to.]</p>

	<p>for environmentally better performing products within the EU market.</p> <p><input type="checkbox"/> EU Ecolabel requirements/criteria are useful to manufacturers to provide indicators for what a "green product" is and what its performance should be for various environmental impacts, even if a company does not adopt the EU Ecolabel.</p> <p><input type="checkbox"/> EU Ecolabel requirements/criteria can be used by manufacturers as a guideline and a support for the product design process towards eco-innovation, even if a company does not adopt the EU Ecolabel.</p> <p><input type="checkbox"/> The EU Ecolabel is a useful guide for consumers to drive their choices towards the greenest products on the market.</p> <p><input type="checkbox"/> The EU Ecolabel criteria are a useful guide for companies who intend to develop green procurement strategies e.g. selecting suppliers on the basis of environmental criteria.</p> <p><input type="checkbox"/> The EU Ecolabel drives improvements in environmental performance of non-EU Ecolabelled products and services.</p> <p><input type="checkbox"/> When a company adopts the EU Ecolabel the level of awareness of environmental issues increases amongst the employees.</p> <p><input type="checkbox"/> Job opportunities are created because companies using the EU Ecolabel hire new personnel with expertise and specific know how.</p> <p><input type="checkbox"/> The EU Ecolabel criteria support companies in making correct and effective environmental claims, helping to avoid "green-wash".</p> <p><input type="checkbox"/> EU Ecolabel raises awareness of citizens that the EU sees environmental issues as a priority.</p> <p>Other, please specify.</p>	<p>4 – agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>5 - strongly agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>2 – disagree</p> <p>5 - strongly agree</p> <p>4 – agree, but to improve and support this effect, communications aimed at the public and public awareness campaigns etc. need to be increased</p>
	<p>In order to pursue the benefits associated with the EU Ecolabel, what actions do companies undertake or carry out? Please indicate how strongly you agree/disagree</p>	<p>In order to pursue the benefits associated with the EU Ecolabel, what actions do companies undertake or carry out. [Use following scale to assess each statement:1 -</p>

	<p>that companies carry out the following actions for promoting their EU Ecolabelled products:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Advertising on TV, radio, press or other media (including street advertising). <input type="checkbox"/> Advertising on new media (such as the web). <input type="checkbox"/> Communication on the company website. <input type="checkbox"/> Marketing "in-field" when participating in fairs, expositions, etc. <input type="checkbox"/> Direct communication to key-clients (e.g.: engagement in a workshop or other direct contacts). <input type="checkbox"/> Communication within the supply chain (e.g. to suppliers). <input type="checkbox"/> External communication towards the stakeholders (e.g. press release, company newsletter, involvement of local authorities, communication with NGOs, etc.). <input type="checkbox"/> Training and involving the sales personnel of the company to promote the EU Ecolabel with the (potential) clients. <input type="checkbox"/> Partnership with NGOs to promote the EU Ecolabel and/or the EU Ecolabelled products. <input type="checkbox"/> Commercial agreement or partnership with retailers to promote the EU Ecolabelled products on the shelf or in the point of sale. <input type="checkbox"/> Discounts or other special price-policies applied to the EU Ecolabelled products. <input type="checkbox"/> Increased budget for marketing the EU Ecolabelled products. <p>Other, please specify</p>	<p>strongly disagree/2 – disagree/3 – neutral/ 4 – agree/5 - strongly agree/Don't know/Please share more detail if you wish to.]</p> <p>4 – agree, but TV and radio advertising is very rare, being very costly</p> <p>4 – agree</p> <p>5 - strongly agree</p> <p>5 - strongly agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>1 - strongly disagree</p> <p>2 – disagree</p> <p>2 – disagree</p> <p>2 – disagree</p>
	<p>What are the main barriers and difficulties that firms experience with the EU Ecolabel? Please indicate how strongly you agree/disagree with the following barriers for the EU Ecolabel:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Costs of adopting the EU Ecolabel (including costs of 	<p>What are the main barriers and difficulties that firms experience with the EU Ecolabel? [Use following scale to assess each statement: 1 - strongly disagree/2 – disagree/3 – neutral/ 4 – agree/5 - strongly agree/Don't know/Please share more detail if you wish to.]</p>

	<p>complying with the relevant criteria). <input type="checkbox"/> In particular, the costs of the EU Ecolabel licence.</p> <p><input type="checkbox"/> Too much documentation required/ too much "red tape". <input type="checkbox"/> Complexity of documentation. <input type="checkbox"/> Requirements are too stringent. <input type="checkbox"/> Lack of human resources and competence within the company. <input type="checkbox"/> Lack of technical and information support from outside the company. <input type="checkbox"/> Lack of external incentives (including fiscal incentives or access to public procurement). <input type="checkbox"/> Lack of competitive rewards and advantages. <input type="checkbox"/> Lack of recognition by the stakeholders. <input type="checkbox"/> Lack of recognition by the public institutions (including regulatory relief). <input type="checkbox"/> Lack of recognition at the international level. <input type="checkbox"/> Too difficult to communicate the EU Ecolabel to stakeholders and consumers (incl. use of the logo). <input type="checkbox"/> Too many individual requirements (criteria) <input type="checkbox"/> Requirements (criteria) are not addressing the most relevant environmental impacts Other, please specify</p>	<p>4 – agree (especially the costs of (lab) testing required).</p> <p>2 – disagree - However: the fees between countries differ and there are rules according to the Regulation where to apply. One Dutch industry organisation has complained about a 'non-level playing field', pleading to adopt (again) a uniform fee level in all EU Member States in the future (e.g. after revision of the Regulation).</p> <p>4 – agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>5 - strongly agree</p> <p>5 - strongly agree</p> <p>4 – agree</p> <p>4 – agree</p> <p>2 – disagree</p> <p>2 – disagree</p> <p>4 – agree</p> <p>2 – disagree</p> <p>One Dutch industry organisation has complained about a lack in harmonization between CBs in the assessment of dossiers and the issuing of licenses, thus creating a 'non-level playing field'</p>
<p>EU Ecolabel and other national labels</p>	<p>8a) Does your country have an ecolabel that covers any of the same product groups as the EU Ecolabel?</p> <p>8b) If yes to 8a, please name the label (multiple labels</p>	<p>Yes/No</p> <p>Milieukeur</p>

	<p>are welcomed)</p>	
	<p>If yes to 8a, Do you agree/disagree with the following statements? Please tick applicable boxes:</p> <p>When compared to the label highlighted in 8b, the EU Ecolabel...</p> <p><input type="checkbox"/> The EU Ecolabel is better known by stakeholders/customers.</p> <p><input type="checkbox"/> The EU Ecolabel has stricter environmental performance requirements.</p> <p><input type="checkbox"/> The EU Ecolabel has easier application procedures.</p> <p><input type="checkbox"/> The EU Ecolabel requires the same type of application information (from suppliers, test certifications, etc)</p> <p><input type="checkbox"/> The EU Ecolabel has lower costs than the other label(s).</p> <p><input type="checkbox"/> The EU Ecolabel has better application support (e.g. advice from the Competent Body, guidance documents and templates) than the other label.</p> <p><input type="checkbox"/> The EU Ecolabel is more distinctive than the other label(s) (because it is more credible or has a better reputation).</p> <p><input type="checkbox"/> The EU Ecolabel is more widespread among our main competitors or among the other members of our trade association.</p> <p><input type="checkbox"/> The EU Ecolabel is more valuable than the other label(s) (it implies better economic and / or competitive performances)</p> <p><input type="checkbox"/> The EU Ecolabel has a more robust methodological approach (e.g. LCA, hazardous substances restrictions) for the same product groups.</p>	<p>[Use following scale to assess each statement: 1 - strongly disagree/2 - disagree/3 - neutral/ 4 - agree/5 - strongly agree/Don't know/Please share more detail if you wish to.]</p> <p>4 - agree</p> <p>n.a.: Milieukeur concerns other product groups, for which EU Ecolabel is not available</p> <p>n.a.: Milieukeur concerns other product groups, for which EU Ecolabel is not available</p> <p>2 - disagree: Milieukeur is an accredited label, meaning that the inspection/audits and test reports required etc. are subject to more stringent verification requirements, although there are some similarities</p> <p>4 - agree, but this will change in the coming years, as the EU Ecolabel fee structure has been adapted in The Netherlands</p> <p>2 - disagree. Because of the independency of Milieukeur as accredited label, licensed independent Certification Bodies carry out the inspections and they are responsible for the award of certificates</p> <p>1 - strongly disagree, because of the independency of Milieukeur as accredited label (see above)</p> <p>The question is unclear: what do you mean by 'our' and 'our trade association'? Also, Milieukeur concerns other product groups, for which EU Ecolabel is not available. If looked at the topic in more general way: 4 - agree 2 - disagree. The community of Amsterdam grants 'regulatory relief' in case of Milieukeur certified products or services in particular cases.</p> <p>4 - agree regarding some respects, e.g. with regard to hazardous substances restrictions</p>

	<input type="checkbox"/> The EU Ecolabel has different objectives, goals and target groups to the other label(s)	1 - strongly disagree: Milieukeur and EU Ecolabel both aim at promoting sustainable consumption and production and do not compete, but complete each other
	If yes to 8a , Are there are other synergies between the EU Ecolabel and the label(s) you highlighted?	Yes, certainly: in some Milieukeur certification schemes, criteria are included that refer to EU Ecolabel criteria/EU Ecolabel certification (verification), for instance in Hospitals and care institutions, and Events
	If yes to 8a , How would you strengthen the synergies you identified between the EU Ecolabel and the label(s)?	As Milieukeur concerns other product groups and services, like for instance 'green' electricity and data centre climate control, Milieukeur could serve as a pilot and 'pave the way' for new, interesting EU Ecolabel product groups. Also, Milieukeur agro/food serves since many years a clear and growing market in addition to certified organic food products: this may help to broaden the EU Ecolabel to food/feed in the future.
	If yes to 8a , Are there other conflicts between the EU Ecolabel and the other label(s)?	In principle, normally no Milieukeur criteria are developed, if EU Ecolabel criteria are available. However, the current EU Ecolabel criteria approach concerning sustainable wood (FSC, PEFC or equivalent) conflicts with the findings of SMK's Timber Procurement assessment committee, see: http://www.tpac.smk.nl/32/home.html . This is a more general conflicting policy matter, not specifically related to Milieukeur.
	If yes to 8b , How would you solve the problem of the existing conflicts you identified between the EU Ecolabel and the other label(s)?	EU Ecolabel would have to follow a different approach towards sustainable certified wood, in order to align with the Dutch Timber Procurement Policy.
Impact of the EU Ecolabel	How has the EU Ecolabel performed over time? For example	EU Ecolabel products and services certified amount of companies producing/supplying

	<p>- Increased overall number of EU Ecolabelled products on the market. - The EU Ecolabel produced an increase of sales of greener products in general. Do you have data that demonstrates these points? May we have access to this data? - Inclusion of the EU Ecolabel criteria in Public Procurement.</p>	<table border="1"> <thead> <tr> <th colspan="2">by SMK</th> <th>EU Ecolabel awarded products and services certified by SMK</th> </tr> </thead> <tbody> <tr> <td>2010</td> <td>789</td> <td>58</td> </tr> <tr> <td>2011</td> <td>870</td> <td>76</td> </tr> <tr> <td>2012</td> <td>845</td> <td>72</td> </tr> <tr> <td>2013</td> <td>975</td> <td>85</td> </tr> </tbody> </table>	by SMK		EU Ecolabel awarded products and services certified by SMK	2010	789	58	2011	870	76	2012	845	72	2013	975	85
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<p>Model / Costs of the EU Ecolabel</p>	<p>Does the current business model of the EU Ecolabel work well? Please indicate how strongly you agree/disagree with the following sentences</p> <ul style="list-style-type: none"> <input type="checkbox"/> The time-span to obtain the EU Ecolabel should be shortened <input type="checkbox"/> The number of criteria should be limited, covering the main environmental impacts <input type="checkbox"/> The time-span for the criteria development/revision process should be shortened <input type="checkbox"/> The criteria development/revision process should be simplified whenever reliable science-based information on the environmental impact categories is already available <input type="checkbox"/> The transition period for existing licence holders to comply with the new criteria is adequate <input type="checkbox"/> The scheme should cover a higher percentage of the market's products <input type="checkbox"/> The procedures of the Competent Bodies of different Member States need to be harmonized <input type="checkbox"/> The fee structure is adequate 	<p>[Use following scale to assess each statement: 1 - strongly disagree/2 - disagree/3 - neutral/4 - agree/5 - strongly agree/Don't know/Please share more detail if you wish to.]</p> <p>2 - disagree</p> <p>2 - disagree</p> <p>4 - agree (within the Commission, sometimes the revision procedure takes a long time, e.g. for rinse-off cosmetics)</p> <p>4 - agree (but our experience is that stakeholders may disagree about reliable science-based information, thus discussion is still to be expected)</p> <p>4 - agree</p> <p>4 - agree (this would increase the impact of the EU Ecolabel en make it more well-known, however the EU Ecolabel needs to be 'top of the market' and therefore needs to be selective)</p> <p>4 - agree</p> <p>2 - disagree: the current flexibility may cause confusion and may cause companies to look for the 'cheapest way out'</p>															

	<ul style="list-style-type: none"> <input type="checkbox"/> The prevision of reduced fees should be extended to other categories of beneficiaries <input type="checkbox"/> The scope of the scheme should be extended to include more intermediate product groups <input type="checkbox"/> The scope of the scheme should be extended to include food, feed and beverages product groups <input type="checkbox"/> The marketing and promotional activities for the EU Ecolabel at the European level are adequate to stimulate the market for products with the Ecolabel <input type="checkbox"/> The marketing and promotional activities for the EU Ecolabel at the national level are adequate to stimulate the market for products with the Ecolabel <input type="checkbox"/> The promotion of the EU Ecolabel should be strengthened within GPP promotional initiatives <input type="checkbox"/> Member States should provide more fiscal incentives to licence holders <input type="checkbox"/> The European Commission should increase the level of integration of the EU Ecolabel in the existing EU legislation <p>Other, please specify</p>	<p>2 – disagree (will make the situation more confusing)</p> <p>2 – disagree: this will make EU Ecolabel still more complex</p> <p>4 – agree, see above: Milieukeur agro/food serves since many years a clear and growing market in addition to certified organic food products: this may help to broaden the EU Ecolabel to food/feed in the future.</p> <p>2 – disagree: more (and other kind of) of such activities will increase the impact of the EU Ecolabel (but we realize that EC financial resources are scarce)</p> <p>2 – disagree: more (and other kind of) of such activities will increase the impact of the EU Ecolabel, but national budget is scarce due to other priorities</p> <p>4 – agree, as far as the public purchasers buy EU Ecolabel related products and services within the boundaries of the Procurement Regulation</p> <p>4 – agree in principle, but this seems 'utopic' due to legal limitations etc.</p> <p>2 – disagree: the EU Ecolabel is a voluntary instrument and should stay so</p>
	<p>Would you recommend stopping the application of the EU Ecolabel in any of the product groups that are currently covered by the Scheme? Please indicate which and give reasons.</p>	<p>No, but we would advise not to (further) develop EU Ecolabel criteria for any kind of buildings and building materials in the future, as other building related instruments will be more effective to increase the sustainability of buildings</p>
	<p>Would you recommend including new product categories in the EU Ecolabel scheme? Please indicate which products and give reasons.</p>	<p>Energy efficient data centres, 'green' electricity and fire extinguishers are interesting product groups, but currently no stakeholder initiatives are available to take up the EU Ecolabel criteria development process, as this will be very time and cost demanding</p>

	Have you ever tried to quantify the whole cost of applying for the EU Ecolabel? If yes, can you provide figures for the first licence application and for the annual "maintenance" of the licence?	no
	How could these costs be reduced?	No suggestions: both the first application and the license 'maintenance' are time consuming with the current procedures etc. Under accreditation, these procedures would even be more demanding (and more costly).
	What is the total annual cost associated with the activities carried out by the CB? Please report the last available official figure or provide an estimate	€ 305.000 (2014)
	What is the relative weight of the following cost items: <input type="checkbox"/> attendances fees of the members; <input type="checkbox"/> travel & subsistence costs of the members; <input type="checkbox"/> marketing activities; <input type="checkbox"/> assessment and verification costs (e.g.: hiring experts for specific product groups, etc.); <input type="checkbox"/> market surveillance and control of the use of the EU Ecolabel; <input type="checkbox"/> fixed costs (e.g.: structural costs, telephone, etc...)	5% 4% 80% 1% 10%
	Are the designated members of the CB full time employees or external experts?	2 internal employees, in total 1.5 FTE
	(Apart from the members of the Competent Body) How many FTEs work on the scheme?	0.22 FTE external experts
	Has the CB a dedicated budget for promotion/training/external assistance activities? Which is the annual amount? How has this budget evolved over time? Has it been affected by the current economic downturn?	n.a.

	Is the Competent Body Forum effective in promoting the exchange of experiences and ensuring a consistent implementation of the scheme in different Countries?	Yes, certainly
	Does the criteria development/revision process ensure a balanced participation of all relevant interested parties concerned with a particular product group?	Yes, certainly
	<p>Are the means invested appropriate in quantity and quality to achieve the defined objectives of the EU Ecolabel?</p> <ul style="list-style-type: none"> - Means invested by the national government via the Competent Body? - Means invested by the European Commission? 	<p>The Dutch CB is limited in its capacity. Participating in EU Ecolabel criteria development/revision is possible only to a very limited extent, and only for a few priority product groups. Our main activities concern assessment and verification. Due to limited capacity and related expertise, external experts are consulted regarding some application dossiers.</p> <p>Increase in invested means would help to improve the EU Ecolabel and bring forward the discussion on certain important issues, for instance by creating a Horizontal Task Force on Fibres (sustainable wood).</p>
	<p>Are the means invested in the EU Ecolabel - considering its relevance and (potential) effectiveness - appropriate compared to the means invested in other policy tools (considering their impact, effectiveness, future potential)?</p> <ul style="list-style-type: none"> - from the national government via the Competent Body? - from the European Commission? <p>What could be done to improve the implementation of the EU Ecolabel?</p>	<p>The invested means are relatively low compared to other policy tools, both on the European and the national level.</p> <p>For the future, a possible increase in impact could be realized by linking EU Ecolabel (criteria) to other innovative instruments to promote sustainable production and consumption, like the CO2 Performance Ladder in The Netherlands (see: http://www.skao.nl/index.php?ID=45) Also, the link of EU Ecolabel criteria to the Dutch Public Procurement criteria for cleaning, has increased the amount of EU Ecolabel certificates and applications significantly. This example can be followed in other</p>

		relevant product groups.
Future of the EU Ecolabel	Is the EU Ecolabel, and its set of common requirements, a valuable tool to facilitate a higher uptake and free circulation of green products (in the pursuit of a single market for green products) across Europe?	Yes/ No [Please share more detail], especially when linked to other product policy instruments like green public procurement criteria and innovative instruments like the CO2 Performance Ladder (see above). Extensive stakeholder consultation and dialogue provides a solid basis for public support of the EU Ecolabel instrument: this is a unique strong key characteristic of the EU Ecolabel.
	Is it beneficial to have a set of common requirements in the pursuit for a single market for green products across Europe in the form of the EU Ecolabel?	Yes/ No [Please share more detail]. No other comparable transparent, reliable environmental certification instrument for both consumers and B2B information purposes is available on the European market.
	Overall, would you recommend retaining the EU Ecolabel as it is, changing it or abolishing the scheme?	[Retain as is / Change / Abolish]
	If selected Changing If you recommend changing the scheme, what would you suggest to improve the EU Ecolabel? Please indicate how strongly you agree/disagree with the following suggestions: <input type="checkbox"/> The EU Ecolabel requirements should be fewer in number and focus on the most significant impact areas. <input type="checkbox"/> The process of developing the EU Ecolabel requirements should be streamlined and made faster. <input type="checkbox"/> The awarding process should move from "pass/fail" system to a "point" system, where products need to gain a certain minimum number of points to be awarded the label, but the decision about priority areas for improvement is left to applicants.	[Use following scale to assess each statement: 1 - strongly disagree/2 - disagree/3 - neutral/4 - agree/5 - strongly agree/Don't know/Please share more detail if you wish to.] 2 - disagree 4 - agree (Internal Service Consultation within the European Commission often take a lot of time) 2 - disagree: but this needs to be investigated thoroughly before introduction and a "point" system only is undesirable, maybe a 'case by case' approach is feasible (NB: negative properties can be compensated: do we accept this?). In for instance the Dutch Milieukeur system such flexibility is included for certain product groups/services, defining both obligatory and optional criteria 4 - agree
	<input type="checkbox"/> The requirements should be based on life-cycle	

	<p>indicators.</p> <p><input type="checkbox"/> EU Ecolabelled products should be subsidised or incentivised to improve their competitiveness.</p> <p><input type="checkbox"/> The EU Ecolabel should be more integrated and consistent with national labels.</p> <p><input type="checkbox"/> The EU Ecolabel can be strengthened by introducing the requirement of providing indicators on the key environmental impacts of the product, to be included in (or accompanied to) the label.</p> <p><input type="checkbox"/> The scope of the EU Ecolabel should be widened from environmental to sustainability issues (e.g.: to include social, ethical and safety aspects).</p> <p><input type="checkbox"/> The EU Ecolabel should be transformed into a "graded label" covering all products and showing their relative environmental performance, instead of the current label rewarding top-class products.</p> <p><input type="checkbox"/> The EU Ecolabel should be more intensively promoted by the institutions (at the EU, national and local level).</p> <p>Other. Please specify</p>	<p>Subsidized: 2 – disagree; Incentivized: 4 – agree. The market must provide for itself.</p> <p>4 – agree: however, we feel that attention is already paid to such integration. See also below about the general opinion of our Ministry of Environment concerning environmental labels, expressed in: <i>From resource efficiency to a circular economy - Contribution from the NL Ministry of Environment to the forthcoming Communication on the Circular Economy, 14-02-2014</i></p> <p>2 – disagree</p> <p>Sustainability (social/ethical): 4 – agree; safety: 2 – disagree – this must be covered by regulation (law)!</p> <p>2 – disagree (too ambitious, not realistic, will not be supported by industries)</p> <p>4 – agree, wherever possible, for instance when a relevant for Green Public Procurement</p>
	<p>If selected abolish If you recommend abolishing the EU Ecolabel is there an alternative scheme (existing or to be developed) that could be applied in the EU to replace the current EU Ecolabel scheme?</p>	<p>n.a.</p>
	<p>If selected abolish Why would this be more attractive and efficient?</p>	<p>n.a.</p>
	<p>Please share with us any further comments you would like to make.</p>	<p>Our Ministry of Environment has expressed recently the following opinion:</p>

		<p><i>Environmental labels</i></p> <p>The Commission could look into ways for harmonizing the world of labels in Europe and – by taking into account behavioral science - making them more effective as a tool to influence consumer behavior. For example by making comparison between products possible and identifying options for making the level of sustainability of products visible or readable in a simple manner on a label with figures, or for example by a barcode readable by smart phones and connected to social media. The Commission should develop ways to prevent the use of misleading and unreliable green claims on labels.</p> <p><i>Source: From resource efficiency to a circular economy - Contribution from the NL Ministry of Environment to the forthcoming Communication on the Circular Economy, 14-02-2014</i></p>