



Union of Industrial and Employers' Confederations of Europe  
Union des Confédérations de l'Industrie et des Employeurs d'Europe

**Mr Kenneth Collins**

**President**

Committee on the Environment, Public Health and Consumer  
Protection

European Parliament

rue Belliard, 97-113

1047 Bruxelles

ZT/SR/vb/18/1

16 February 1998

Dear President,

**re : UNICE Comments on the Draft Report on the proposal for  
a Council Regulation on a revised Community Eco-labelling  
Scheme (COM (96) 0603) - dated 21 November 1997**

As the European Parliament will be voting the draft Report on the proposal for a Council regulation on a revised Community Eco-label Award Scheme on 19 March at the Environment Committee meeting, UNICE is taking this opportunity to send you its comments on the above mentioned draft.

UNICE continues to accept and support the objectives of eco-labelling as defined in Regulation 880/92 and reiterated in the Council proposal. However, UNICE considers that this proposal is not the best instrument for achieving the scheme's fundamental goals of an improved environmental communication process and the establishment of a single label in the Community.

Indeed, UNICE believes that viable alternatives could be developed for environmental communication and thus suggests introducing another recital in the preamble such as:  
*"Whereas voluntary agreements on consumer information schemes need to be taken into account as a viable alternative to the eco-label regulation"*

The Commission has proposed the creation of a European Eco-label Organisation (EEO). This organisation would establish and up-date the eco-label criteria and the corresponding assessment and verification requirements as well as

coordinate the activities of the Competent Bodies. UNICE is not in favour of the creation of such an organisation as its composition poses problems because of the heterogeneous structure of the different Competent Bodies. Moreover, the EEO would have the status of a private international association which would become self-financing after a few years' time. UNICE doubts that this idea of a self-financing association is a viable solution. (*Amendment 22*)

UNICE believes that the European Parliament's proposal regarding creation of a Technical Committee for the Eco-label (TCEL) is more appropriate as it would involve participation of technically competent members (*Amendment 8*). Nonetheless, there is a need on the part of industry to participate more actively in the decision-making process and UNICE suggest that industry is consulted on matters discussed by the Committee.

Indeed, UNICE is much in favour of maintaining the Advisory Forum, as set up in Art.6 of Regulation 880/92, as it is the only body where every single stakeholder is represented and where industry can be consulted.

Finally, UNICE firmly supports development of a credible and consistent methodology for cost-benefit analysis, applied to eco-labelling, that would provide decision-makers with a transparent and useful means to weigh real benefits against real costs.

In conclusion, UNICE would very much appreciate it if European Parliament members would take into account the above comments in their final report and is willing to explain, develop and defend these comments with a view to realistic and balanced development of European eco-labelling.

*(original signed by)*  
Zygmunt Tyszkiewicz,  
Secretary General

cc. : Mr Poggiolini, Rapporteur