

Bld. Brand Whitlock 114 / B-1200 Brussels  
T: +32 2 738 78 10

**Korrina Hegarty**

korrina.hegarty@applia-europe.eu



## **Key Messages**

# **Inception Impact Assessment: Legislative proposal on substantiating green claims**

APPLiA Home Appliance Europe represents the home appliance industry in Europe. Home Appliance manufacturers offer better lifestyles to Europeans, investing over EUR 1.4 billion in R&D and creating nearly 1 million jobs in Europe. The growth of our industry is directly linked to our freedom to innovate for our consumers. We improve lifestyles by providing the choice of a wide range of products designed for well-being, convenience, performance, sustainability, energy efficiency, design, robustness, after-sales service, and affordability.

APPLiA maintains its support for the European Commission's work to examine options and actions for a more coherent product policy framework of the different strands of work related to circular economy, while preserving the single market, competition, and innovation. APPLiA believes that sharing best practices and using market-based incentives should be prioritised to drive a circular culture.

In this paper, we outline our initial response to the European Commission's consultation on the INCEPTION IMPACT ASSESSMENT (IIA) on the potential legislative proposal on substantiating green claims. We look forward to cooperating further with the European Commission as it develops its ideas and activities in this field.

### **Key Messages**

- APPLiA's vision for 2030 - all home appliances should be optimised for sustainability & circularity.
- A future EU sustainable product framework should continue to drive innovation and competition that further improves consumer choices. It should appreciate how individual sectors are already driving a circular economy so that targets and proposals can be better adapted to reality.
- Manufacturers should remain in a position to choose which route towards greater sustainability/ reduced environmental impact would suit them best, while ensuring innovation, competition, and customer satisfaction.



- It is very important for home appliance manufacturers that consumer trust in home appliances is maintained. Transparency of any information given to the consumer is a must to establish trust and to ensure the legitimacy of environmental product legislation. Environmental information of a product must be simple and comprehensible. Whatever the claim will be, it must be controllable and enforceable as otherwise the consumer is misled.
- APPLiA believes it is critical that future EU regulation on the environmental performance of products should require green claims to be verified by robust standards to avoid false claims and confusion.
- Robust standards need to ensure measurability, repeatability, reproducibility, and enforceability. While a measurable methodology is crucial, it should be not just enforceable, but also enforced. Only feasible, efficient, and functional market surveillance promotes level playing and consumer protection.
- Manufacturers should have the freedom to adopt the path that best plays to their strengths, enabled by a healthy business environment that respects competition law and encourages innovation.
- Market surveillance authorities need to be able to check that the green claims made on products are correct, thus ensuring proper enforcement. The authorities should have sufficient resources to be able to effectively check the accuracy of the green claims and, if necessary, sanction infringements. A distortion of competition would otherwise be the result.
- As outlined in Option 2 in the IIA on legislative proposal on substantiating green claims, the Environmental Footprinting methodology could be worth exploring to see how it could be applicable to home appliances and work with the existing regulatory tools such as the energy label and ecodesign minimum requirements, as well as waste and chemical legislation. The Environmental Footprinting methodology could add some value to the current LCA methodologies by assessing a common ground for rules concerning different product categories (i.e. the definition of category rules for a product).

*APPLiA is ready to work with the European Commission on these new initiatives stemming from the Circular Economy Action Plan to ensure the best sustainable product policy framework for environmentally friendly products fit for the Green Deal.*

APPLiA - Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of EUR 53 billion, investing over EUR 1.6 billion in R&D activities and creating nearly 1 million jobs.

