

Position paper on the Circular Economy Action Plan

The testing, inspection and certification (TIC) sector welcomes the EU Green Deal and the measures announced in this Action Plan. The members of TIC Council provide services that help businesses identify carbon and environmental hotspots throughout their processes and supply chain. These include products' lifecycle impact, eco-design and carbon foot-printing assessment, auditing for energy and environmental management throughout the supply chain, as well as reduction at source, re-use, recycling and recovery of residual materials, within a global framework of waste management.

Moreover, the TIC sector enables the proper introduction of new technologies, by testing, verifying and certifying:

- renewable energy technologies;
- reverse cycle related technologies such as recycling, disassembling and remanufacturing;
- technologies for industrial symbiosis (e.g. energy generators from waste steam), and for smart manufacturing (e.g. additive manufacturing and its reparability fostering).
- technologies for e-mobility, fuel efficiency and autonomous driving.

As such, certification contributes to the continuous improvement of products' as well as manufacturing and service delivery processes' environmental footprint, and helps mitigate risk of impacting environment across any organization, and across whole value creation process.

Our experience illustrates that mandatory third-party conformity assessment and certification are necessary tools for preventing environmentally harmful products and overall technological solutions from being placed on the EU market. Firstly, it prevents manufacturers from accidentally placing on the market products not compliant with EU legislation, including circular economy provisions, by applying our members' broad experience to product testing and our thorough understanding of potential rules applying on the product.

Secondly, it enables market surveillance to focus their controls on products that bear no certification and identify those bearing counterfeited markings. To this end, our members often team up with authorities to help them identify fake certificates and take corrective action against manufacturers and suppliers who illegally use fake or false TIC markings, without having their products tested and certified and take the relevant preventive action in order to deter re-occurrence of fake and counterfeit certification.

Thirdly, certification can provide more timely action than post-market surveillance. For instance, the compostability of plastic bags takes several months to be tested.

As a result, even if a bag is taken from the market to be tested by authorities, such bags will continue to be sold while the tests are ongoing. On the contrary, certification acts before a product is placed on the market and prevents non-compliant products to reach consumers and professional users.

In this context, **certification relieves the work of publicly-financed market surveillance authorities, as it enables them to use their resources more selectively by focusing on products that are not third-party tested.**

Fourthly, certification can help manufacturers and authorities gain confidence about products' compliance with regulation in cases where there are no standards in place. This is often the case for new technologies and innovative solutions that enter the market before the standard has been developed.

Finally, certification supports **users' empowerment**, as it provides them with reliable information on the tests and audits that manufacturers undertake to substantiate sustainability claims. **Certification provides information about the impact of materials used in products, be it consumer, industrial or construction products.** In this context, it leads to informed purchasing choices and can more easily identify fake environmental claims. As a result, mandatory certification provides financial incentives for manufacturers who place on the market compliant products and who take extra steps for their products' sustainability.

Therefore, we strongly believe that mandatory third-party certification is a key element to the successful implementation of the upcoming circular economy action plan. Overall, we believe that it is rightly accompanied by ambitious investment programmes and a robust regulatory framework.

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TIC Council is a global association representing over 90 international independent third-party testing, inspection, certification and verification organizations. The industry represents an estimated one million employees across the world with annual sales of approximately USD 200 billion.