TIC Council Webinar
Implementing the Circular Economy Action Plan: how to avoid greenwashing?

24 November 2021
TIC Council
The Independent Voice of Trust

• Born from the merger of IFIA and CEOC
• ~90-member companies & organizations active in more than 160 countries (HQ mapped)
• TIC Council has its head office in Brussels. It is also present in Washington DC, China and India.
TIC Council Mission

As the voice of the global independent testing, inspection and certification industry, the TIC Council engages governments and key stakeholders to advocate for effective solutions that protect the public, support innovation and facilitate trade.

The TIC Council works with its members to promote best practices in safety, quality, health, ethics and sustainability.
Implementing the Circular Economy Action Plan: how to avoid greenwashing?

Moderator

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TIC Council
Executive Director for Europe
Implementing the Circular Economy Action Plan: how to avoid greenwashing?

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Implementing the Circular Economy Action Plan: how to avoid greenwashing?

TIC Council webinar, 24 November 2021 (web)

Andrea NAM,
Energy & Living - CEN-CENELEC Management Centre
About standards
European Standardization Organizations

CEN - European Committee for Standardization
CENELEC - European Committee for Electrotechnical Standardization
ETSI - European Telecommunications Standards Institute

→ Recognized by European law (EU Regulation 1025/2012)
Standardization happens at different levels

Aim: identical standards in Europe and worldwide
The network of CEN and CENELEC

More than **200 000 experts** are connected

- **34 national members**
- **European organizations** - associations and federations of businesses, consumers, environmental and societal organizations, etc.
- **Institutions and governmental bodies** (including the European Commission (EC) and the European Free Trade Association (EFTA))
- **Affiliates** - the national standards bodies in countries that are cooperating with the European Union
- **International cooperation** with ISO and IEC & regions and countries outside the European Union and EFTA
Harmonization effect

Why are European Standards so unique?

1 European Standard

↓

34 identical national standards
All conflicting standards removed

↓

Access to a market of 600 million consumers
International dimension

INTERNATIONAL LEVEL

Vienna (ISO-CEN) and Frankfurt (IEC-CENELEC) Agreements

Principal aim: Identical European and international standards

CEN: over 30% of portfolio identical to ISO
CENELEC: close to 80% of portfolio identical to (+ another 6% based on) IEC standards
Standards and CE
Turing into a Circular Economy

**EC CE Action Plan adopted in March 2020**

35 actions, with a focus on:
- Sustainable products and production design
- Empowering consumers
- Key product value chains
- Reducing waste
- Lead global efforts on circular economy

- Circular economy is broad, covers the whole economy
- CEN and CENELEC develop standards in support of all areas of the Circular Economy
SDOs developing CE & ME horizontal standards

- International and European Standardization organisations all have activities related to CE
The influence of Circular Economy on standardization

- Standardization took a more horizontal approach (more demand for horizontal standards)
  - Closer cooperation is needed among the sectors (e.g., the communication between the producers and recyclers on the design and use of materials improved)
  - Broad involvement and exchanges with stakeholders (industry, SMEs, societal stakeholders, policy makers) helps identify the needs

- Further improvement of the cross sectorial and more strategic coordination of circular economy-related standardization is necessary
coordinate (ongoing and new) standardization activities in the field of Circular Economy - within CEN and CLC, other international standards development organizations as well as the European Commission (EC)

focus on identifying and discussing strategic standardization issues in need of action from CEN and CLC and advises CEN and CLC governance (e.g., SABE and BT) on priorities

does not develop standards - It may develop guidance documents (incl. Guides) in the field of Circular Economy, intended to be used by the CEN and CLC standardization community
# SABE CE-TG horizontal activities

<table>
<thead>
<tr>
<th>Group</th>
<th>Scope</th>
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<tbody>
<tr>
<td>AHG1</td>
<td><strong>Tracking and Analysis</strong> - mapping of ongoing, planned, missing and blocking standardization activities on CE within CEN, CLC and beyond</td>
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<td>AHG2</td>
<td><strong>CE-TG Working Plan</strong> - defining short-, medium- and long-term activities for CE-TG based on CEN and CLC TCs and other stakeholders’ needs (survey on TCs awareness)</td>
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<td>AHG3</td>
<td><strong>Terminology</strong> - make terminology on CE/ME/RE readily available to CEN and CLC TCs. Focus on collect existing / under development terms and definitions</td>
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<td>AHG4</td>
<td><strong>Mainstreaming CE and education</strong> - include CE in processes of CEN &amp; CLC (guidance, templates). Promote knowledge sharing and provide basic CE training</td>
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<td>AHG5</td>
<td><strong>Taxonomy</strong> - review and analyze the European development on sustainable finance and assess the need for standardization and the best approach (new)</td>
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Summary of the mapping initiative – existing activities

Graph: February 2021
Update - September 2021 - 215 standards (non-complete)

# EXISTING ACTIVITIES: 152
- # of European origin
- # of national origin
- # of international origin

# EXISTING ACTIVITIES PER SECTOR
Summary of the mapping initiative - needs

Graph: February 2021
Update - September 2021 – 57 needs (non complete)

# NEEDS: 43
- # short term needs (I)
- # medium term needs (II)
- # long term needs (III)

# NEEDS PER SECTOR

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Circular Economy Workshops

- CE-TG has over 120 members, representing 30 CEN and 9 CLC Technical Committees (TCs), 19 National Standard Bodies and Committees and 10 Liaisons – not complete!

Workshops (2x/year) - TCs share highlights of CE-related standardization activities/best-practices with CEN and CLC community
New initiatives for key product value chains

• **Batteries** – draft Sreq on performance and sustainability requirements for rechargeable batteries

• **Packaging** – test schemes for home compositing of carrier bags, test methods demonstrating that plastic caps and lids of plastic beverage containers remain attached

• **Plastics** – Sreq Plastic recycling and recycled plastics requesting the development of standards for design for recycling, collection and storing, recycled content

• **Textiles** – determination of microplastics including fibre losses during washing

• **Construction** - integration of the circularity principles in all phases from design to deconstruction and developing a common approach across the value chain

• **Water/Chemicals** – horizontal method for the determination of the 20 target PFASs

• **Secondary raw materials** – Ancillary action on material efficient recycling and preparation for re-use of CRMs from different waste streams

Etc.
Avoiding green washing
Examples
Ecodesign and Energy Labelling

- Ecodesign removes from the market the least energy and resource efficient products
- Energy Labelling enables consumers to make a better and more rational use of energy by choosing more efficient products

≈ 180 published European standards (ENs) & ≈ 50 under development

Upcoming EU Ecodesign Working Plan 2020-2024 will focus more on circular economy matters!

Eco-design standards are harmonized standards:

- Compliance with harmonized standards provides a presumption of conformity (CE marking) with the corresponding requirements of harmonization legislation → product can be sold in Europe
- Standards set technical specifications to meet the essential requirements (health, safety, protection of environment) of relevant EU legislation (Annex ZA and Annex ZZ).
- References and titles are cited in the Official Journal

**Circumvention**: alteration of the performance of a product when measurements are undertaken in a test procedure → increased energy and resources consumption or release of pollutants leading to economic, societal and environmental damage.

**Measurement standards** are affected by ‘circumvention’ as they may be used to enable deviations or interpretations of the measurement method laid down in the standard.

Circumvention in standards is addressed within **legislative texts** - Ecodesign and Energy Labelling framework (Energy Labelling Framework Regulation (EU) 2017/1369) and product-specific delegated acts and implementing acts (regulations) - **prohibits** the inclusion of software or hardware that alters the performance of a product in test conditions.

Methods and standards should deter
- intentional (avoiding a difficulty to conform) and
- unintentional (accidental bypassing conformance) circumvention
Actions to prevent circumvention

- **Guidelines** of CEN/CENELEC Eco-CG to standardizers on Ecodesign and Energy Labelling for:
  - a **systematic consideration** of circumvention in the development of standards
  - **suspicious cases** to be addressed by standardizers in order to close loopholes and weaknesses
    - (e.g. manufacturers’ instruction manual or test instructions could be used to gain unfair benefits, such as requesting for special accessories to be installed (e.g. bowl support for dishwasher) or removed (e.g. shelf guides in oven) during testing, allowing testing under extremely unlikely consumer conditions (e.g. refrigerator without door opening))

- **Internal guide** of CENELEC TC/59X on Consumer relevant testing – household appliances
  - considering the typical usage of many consumers, so-called ‘real-life conditions’.
  - assessing standards to reflect ‘real-life conditions’ while also being suitable for producing measurement standards with the required repeatability and reproducibility necessary to support legislation.
Assessing sustainability in construction

CEN/TC 350 ‘Sustainability of construction works’
- develops horizontal methods for the assessment of the sustainability aspects of new and existing construction works in the context of the UN SDGs and circular economy.

Environmental Product Declarations (EPD) present quantified environmental information on the life cycle of a product to enable comparisons between products.

The reference EN standards for the EDP are

• EN 15804:2012+A2:2019 - Environmental product declarations - Core rules for the product category of construction products'
• EN 15978:2011 - Assessment of environmental performance of buildings - Calculation method’
• EN 15942:2021 - Environmental product declarations - Communication format business-to-business – It details the communication format of the information defined in EN 15804

EDPs are based on the Life Cycle Assessment (LCA) methodology - described in the EN ISO 14040 series

✓ LCA analyses the impact over the whole life cycle of a product in a “cradle to the grave” approach (all the steps of the process are looked at, from raw material, product manufacturing, use, transport etc.)
✓ LCA used in EDPs prevents greenwashing as it is based on a rigorous calculation
Reliable waste recycling

The Waste Electrical and Electronic Equipment (WEEE) Directive 2012/19/EU addresses producers and importers of EEE in Europe. It sets requirements and targets for the collection and treatment of WEEE. Producers and importers report on the amount of EEE which was put on the market, and treatment operators on the amount of WEEE treated. The reported amounts provide information on how targets were met.

European Standards developed in support of the WEEE Directive:
- Assist treatment operators in fulfilling the requirements of the WEEE Directive, give additional guidance
- Cover the treatment of waste from all products categories within the extended scope of the WEEE Directive.
- Cover the collection and transport of WEEE to allow proper treatment.
- Include preparation for reuse of the WEEE

Provide reliable information to legislators and authorities!
The WEEE standard series

EN 50574 series - **Collection, logistics & treatment requirements** for end-of-life household appliances containing volatile fluorocarbons or volatile hydrocarbons

EN 50625 series on **treatment requirements**

- Although the WEEE Directive contains some requirements to be fulfilled by treatment operators, most of these are not very specific and they do not contain as much detail as the general treatment standard EN 50625-1 coupled with its accompanying technical specification on de-pollution TS 50625-3-1.

- There are in addition more specific treatment standards EN 50625-2-1 (lamps), EN 50625-2-2 (CRTs and FPDs), EN 50625-2-3 (heat-exchange equipment) and EN 50625-2-4 (for photovoltaic panels) each of which has its own associated technical specification respectively TS 50625-3-2, TS 50625-3-3, TS 50625-3-4 and TS 50625-3-5.

- Another Technical Specification, TS 50625-4, defines requirements for the collection of WEEE and the logistics associated transporting that WEEE to a treatment facility.

- TS 50625-5 provides specification of the end-processing of WEEE fractions – copper and precious metals

EN 50614:2020 - Requirements for the **preparing for re-use** of waste electrical and electronic equipment

- *Brochure* - European Standards for Waste Electrical and Electronic Equipment (WEEE)
Thank you!

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Mathilde Crêpy
ECOS
Senior Programme Manager
Implementing the Circular Economy Action Plan: how to avoid greenwashing?

Mathilde Crepy | Senior Programme Manager | 24 November 2021
About ECOS

international environmental NGO

technical expertise

network of members & experts
ECOS MEMBER ORGANISATIONS

National member organisations

Austria
- Umweltdachverband
- Global 2000

Belgium
- Bond Beter Leefmilieu Vlaanderen (BBLV)
- Inter-Environnement Wallonie (IEW)
- RepairTogether
- Repair & Share

Bulgaria
- Institute for Ecological Modernisation (IEM)

Croatia
- DOOR – Society for Sustainable Development Design

Czech Republic
- Zelený Kruh (Green Circle)

Cyprus
- Terra Cypria – The Cyprus Conservation Foundation

Denmark
- The Danish Society for Nature Conservation (DN)
- Danish Ecological Council (Det Økologiske Råd)

France
- Zero Waste France
- Women in Europe for a Common Future (WECF-France)
- Halte à l’Obsolescence Programmée (HOP)
- CLEO – French Energy Transition Network
- Ethikos

Germany
- Bund Für Umwelt und Naturschutz Deutschland (BUND)
- Bundesverband Bürgerinitiativen Umweltschutz (BBU)
- Deutscher Naturschutzbund (DNR)
- Nature Friends Germany (NaturFreunde Deutschlands)
- Deutsche Umwelthilfe
- Runder Tisch Reparatur

Greece
- Ecocity Greece

Hungary
- Clean Air Action Group (CAAG)

Italy
- Legambiente

Ireland
- Community Reuse Network Ireland (CRNI)

Latvia
- Friends of the Earth Latvia (Zemes Draugu)

Lithuania
- Žiedadė ekonomika

Luxembourg
- The Luxembourg Ecological Center (Oekozenter Lëtzebuerg)

Netherlands
- Stichting Natuur en Milieu [SNM]
- Leefmilieu

Norway
- BELLONA Norway

Poland
- Polish Foundation for Energy Efficiency (FEWE)
- ClientEarth Poland

Portugal
- ZERO

Slovakia
- REPAIRABLY

Spain
- ECODES

Sweden
- The Swedish Society for Nature Conservation (SCNCSNF)

Switzerland
- WWF Switzerland

United Kingdom
- Energy Saving Trust (EST)
- UK Sustainability Network for Standardisation

USA
- Green Science Policy Institute

Pan-european member organisations

Bellona
- Bellona Europe

EEB
- European Environmental Bureau

FoEE
- Friends of the Earth Europe

HCWH
- Health Care Without Harm Europe

HEAL
- Health & Environmental Alliance

RREUSE
- European umbrella for social enterprises with activities in reuse, repair and recycling

T&EE
- European Federation for Transport & Environment

WWF-EPO
- WWF - European Policy Office

ZWE
- Zero Waste Europe
The CEAP

One of the 3 objectives: empower consumers and public buyers

- **Legislation on empowering consumers** (planned for 2020, now for 2022)
  - reliable & useful information on products, e.g. on their lifespan and repair options
  - prevent overstated environmental information and sale of products with a covertly shortened lifespan
  - set minimum requirements for sustainability logos & labels.
- **Legislation on substantiating green claims using harmonised LCA methodologies**
- **Recognition of a right to repair**
- **EU GPP**
ECOS plastics claims report

82 products selected for high waste volumes & high impact

Product types:
- Bottles & jugs
- Clothing
- Sachets & pouches
- Film & bags
- Plastics in food service
- Diapers & wipes

Claim types:
- Reusable or refillable
- Recyclable
- Recycled content
- Compostable
- Biodegradable
- Bio-based content
Fundamental Principles

Findings

82 plastic items analysed

- 46% do not meet relevance criterion
- 49% do not meet clarity criterion
- 26% do not meet reliability criterion
- 75% appear not to be third-party verified

Based on UNEP Guidelines for Providing Product Sustainability Information
Some examples

**Reusability**

- ‘Reusable’ dishware
  - Misleading

- Firm-operated bottle return system
  - Truly reusable

- Single-use refill pouch
  - Still single-use

- In-store refillables
  - Truly reusable
Our recommendations

Key recommendations

1. Eliminate loose and stretchable definitions
2. Legislate explicitly on what market actors may or may not claim
3. Strengthen legislative enforcement and sanctions against greenwashing
4. Make sustainable products the norm

Standards
Key elements to improve standards

- In line with *circularity hierarchy*: Reduce – Reuse – Recycle
- Better reflect real-life conditions
- Evenly allocate recycled-content across outputs
- Require *sustainable sourcing* of biological materials
- Exclude vague/misleading terms such as ‘circular plastic’, or ‘plastic-free’
- If advertised as good/better for the environment, substantiate

⇒ Specific recommendations on existing standards (EN 13429, CEN/TR 13688, CEN/TR 13688, EN 13432, EN 17033, EN 15343, EN 16785-2, ASTM D6866 and EN 16640).
Thank you

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ECOS is co-funded by the European Commission & EFTA and a range of sources including foundations and membership fees
Rakesh Vazirani
TÜV Rheinland Sustainability Services for Business Stream Products
Key points of previous speakers

- Credible Standards for measuring Circular Economy
- Need for validation to avoid Greenwashing
Launchpad for strong Circular Economy Implementation by Industry

Trust and Efficiency

CE Implementation

- Independent Verification
- Scientific Basis
- Competent Assessment
- Continuous Improvement
- Consistent Evaluation
We ensure quality & safety

INDUSTRIAL SERVICES & CYBERSECURITY
- Pressure Equipment
- Elevators & Lifting Equipment
- Electrical Engineering & Building Technology
- Industrial Inspection & Materials Testing
- Infrastructure & Project Supervision
- Energy & Environment
- Cybersecurity & Functional Safety

MOBILITY
- Periodical Technical Inspection
- Driver's License
- Car Services & Appraisal
- Engineering & Type Approval
- Rail

PRODUCTS
- Softlines
- Hardlines
- Electrical
- Solar & Commercial Products
- Medical

ACADEMY & LIFE CARE
- Occupational Health & Safety
- Training & HR Development
- Labour Market Services & Private Schools
- Digital Transformation

SYSTEMS
- Certification of Management Systems
- Customized Services
- Government Inspections & International Trade

5 BUSINESS STREAMS
24 BUSINESS FIELDS
Our Motivation

Ensuring Safety during interaction of any 2 vertices
Value of Conformity Assessment

Conformity assessment is a vital link between standards and the reality

37 standards for conformity assessment
Accreditation

third-party attestation related to a conformity assessment body, conveying formal demonstration of its competence, impartiality and consistent operation in performing specific conformity assessment activities (ISO-IEC:17000)
Sustainable Finance ECO-System

1. **STRATEGIZE**
   - Science Based Targets
   - Circular Economy Action Plan
   - Fitch Ratings
   - Standard & Poor's
   - Moody's

2. **DIGITIZE/Automatize**
   - HPC
   - Multidim. Databases
   - Datafication & Cloudification

3. **DECARBONIZE**
   - ISO/TC 146 Air Quality
   - ISO/TC 147 Water Quality
   - ISO/TC 287 Environmental Management
   - ISO/TC 301 Energy Management and Energy Savings

4. **LEGITIMATIZE**
   - Independent Verification
   - Based on technical standards
Integration & Interconnections

- Energy Efficiency
- Water Efficiency
- Material Efficiency
- Social/Labor aspects
- Biodiversity
- Air Quality

Satellite data
Benchmarking
Scenarios
Investor Demand
Regulatory Demand

Public Perception

Digital Universe
AI/NLP/BIG DATA
Our Work

- FSC, PEFC Schemes
- GHG emissions verification
- Waste Management System certification
- Renewable Energy schemes

- Recycled Content Verification
- Energy Efficiency schemes
- Performance Testing
- Chemical/Physical Testing
- Good Manufacturing Practices
- Personnel Certification
Questions?
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