TIC COUNCIL

THE INDEPENDENT VOICE OF TRUST

TIC Council Webinar

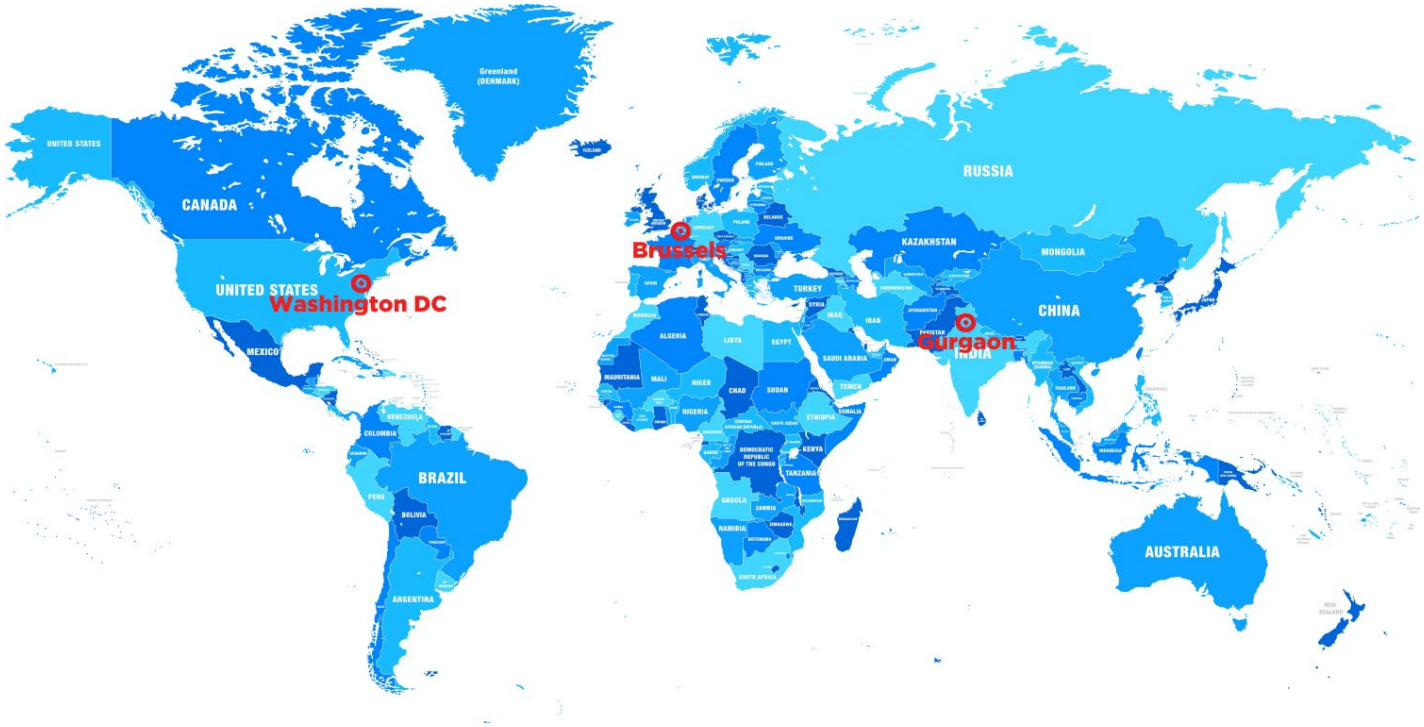
Implementing the Circular Economy Action Plan: how to avoid greenwashing?

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

Martin Michelot
TIC Council
Executive Director for Europe

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

Speakers

Andrea Nam
CEN/CENELEC
Technical Programme Manager

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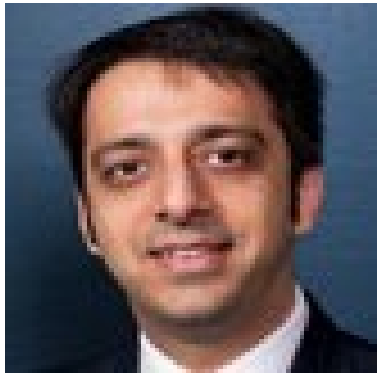
Senior Programme Manager



Rakesh Vazirani
TÜV Rheinland
Sustainability Services for Business Stream Products

Andrea Nam

CEN/CENELEC
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European Standardization Organizations

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

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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)

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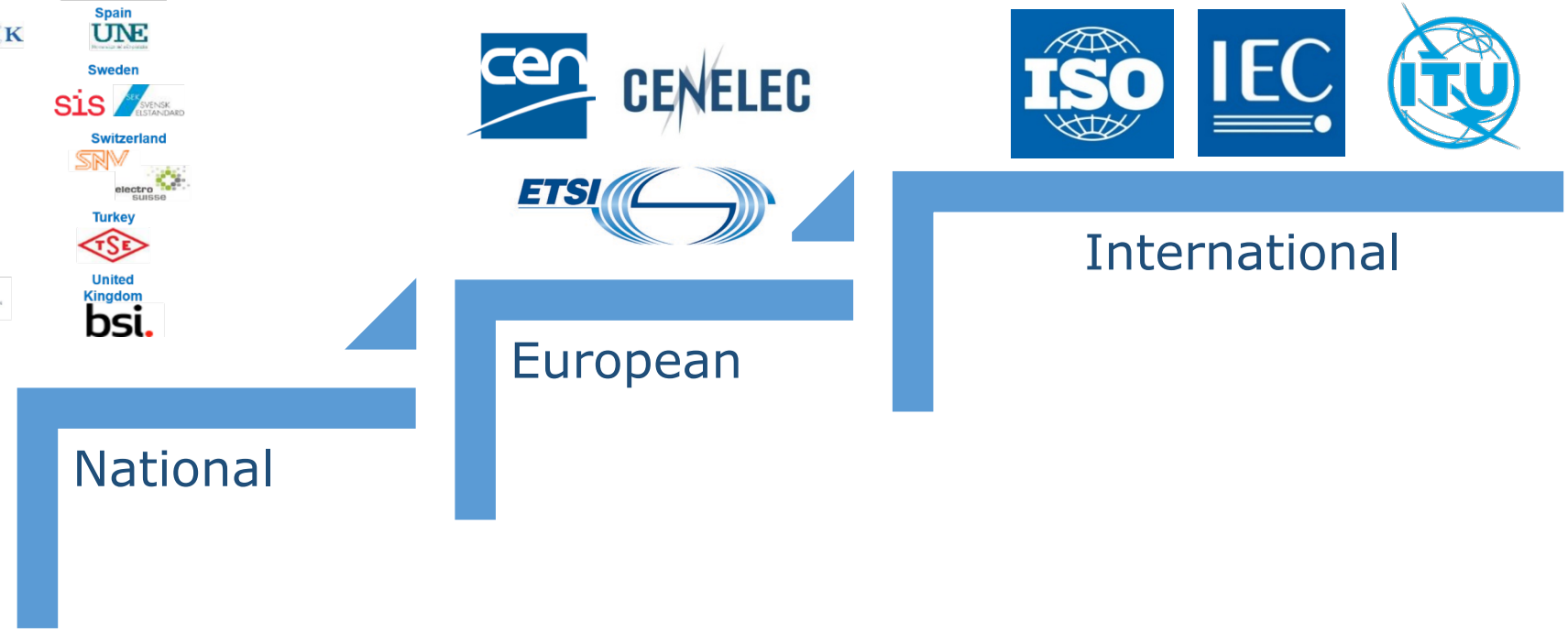
Standardization happens at different levels

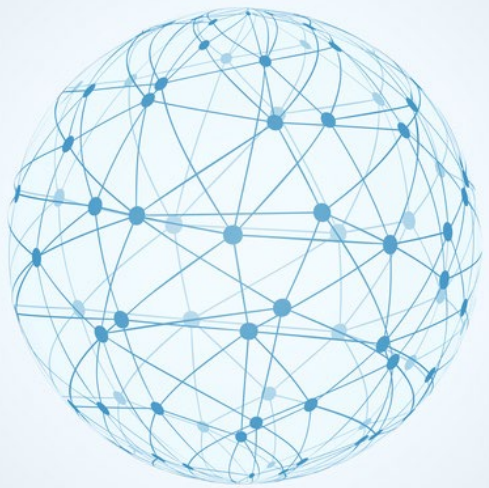
Aim: identical standards in Europe and worldwide



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*



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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

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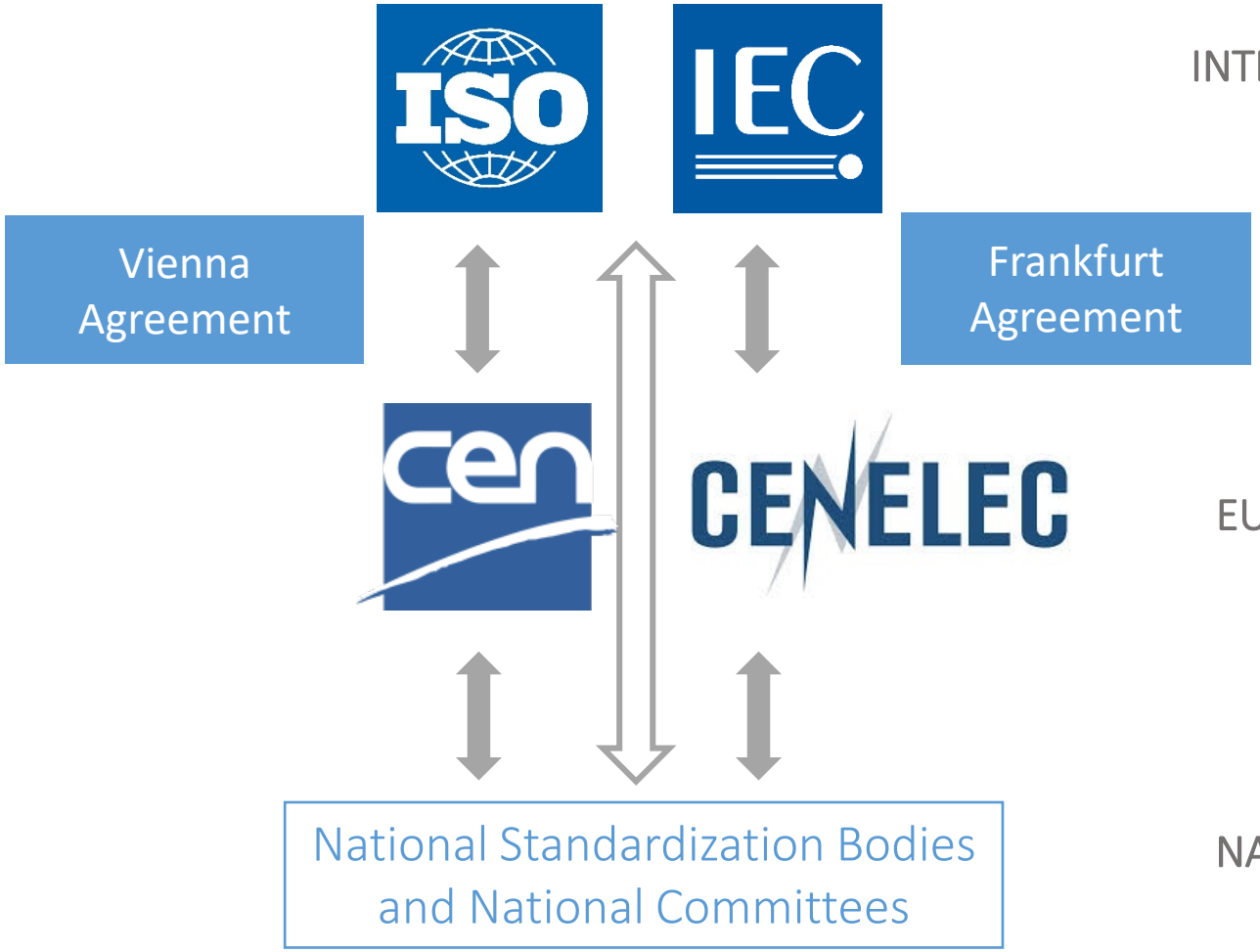
International dimension



INTERNATIONAL LEVEL

EUROPEAN LEVEL

NATIONAL 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

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Standards and CE

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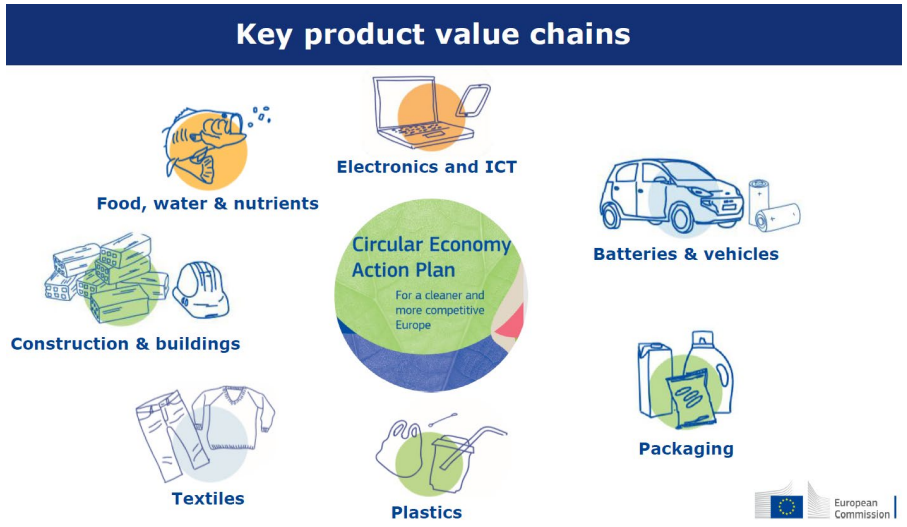
Turing into a Circular Economy

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

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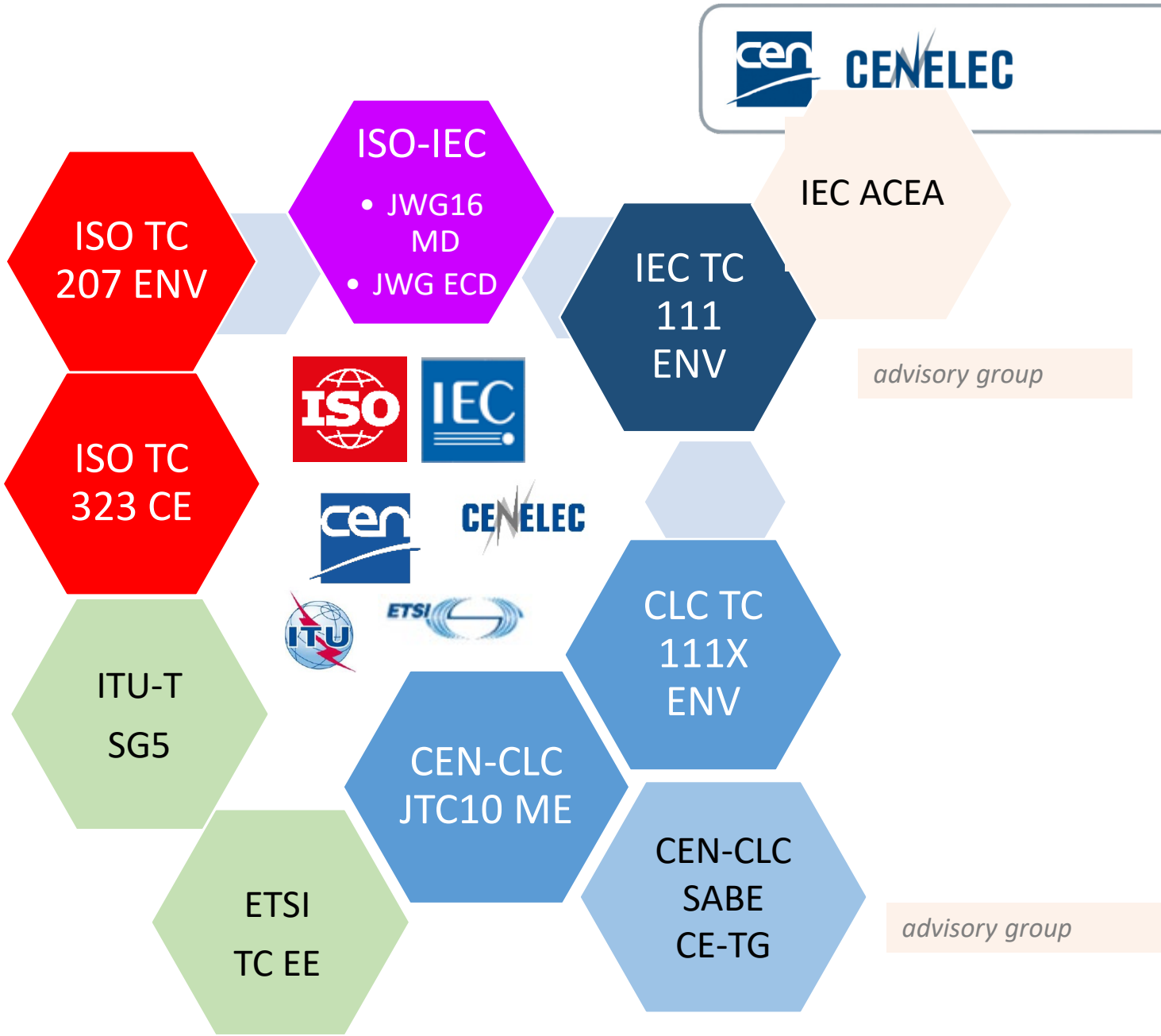
SDOs developing CE & ME horizontal standards

- International and European Standardization organisations all have activities related to CE



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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 (eg. 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

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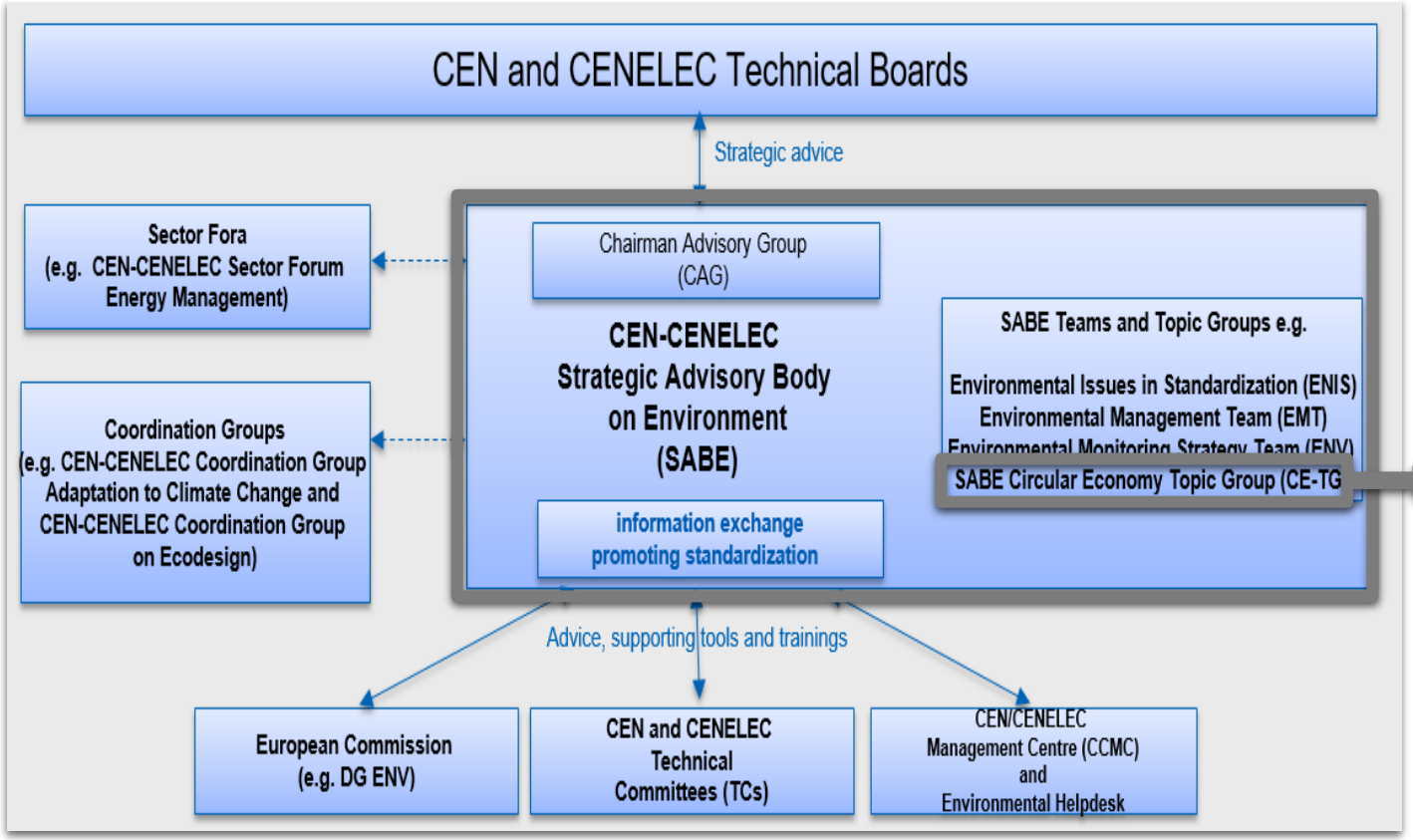
CEN-CENELEC Circular Economy Activities
(CEN-CENELEC SABE CE-TG)



- **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

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SABE CE-TG horizontal activities

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

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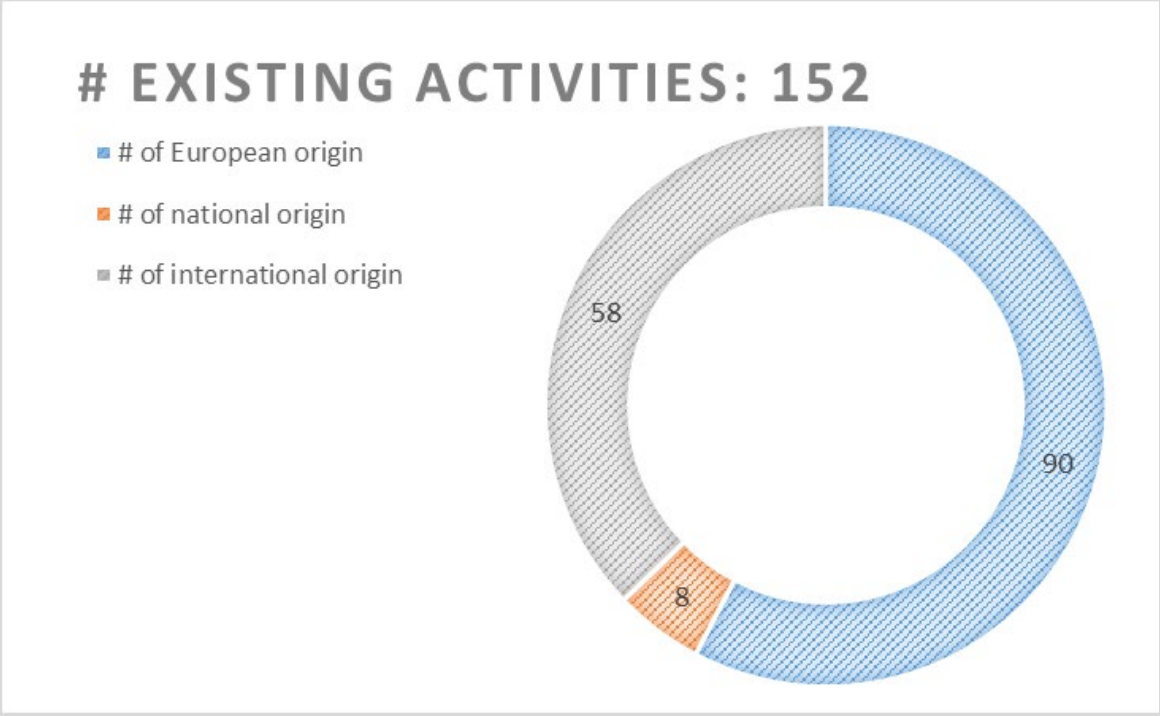
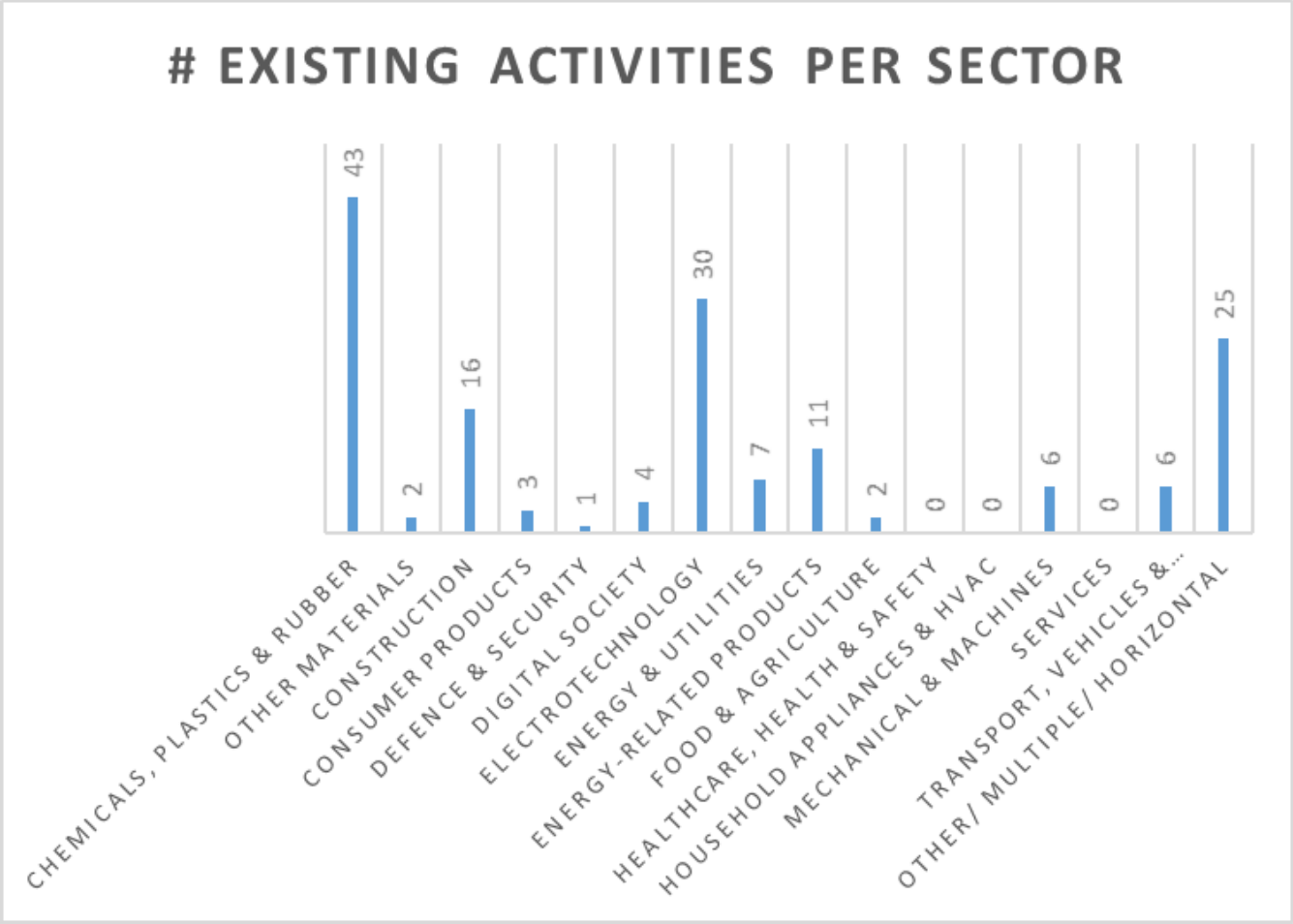
Summary of the mapping initiative – *existing activities*

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





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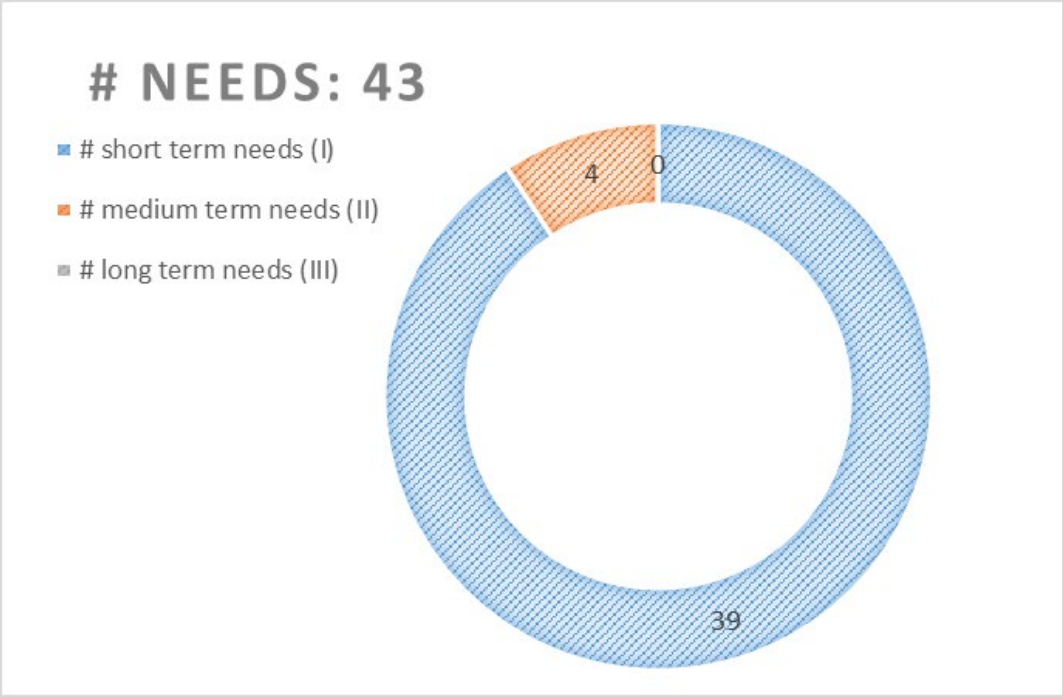
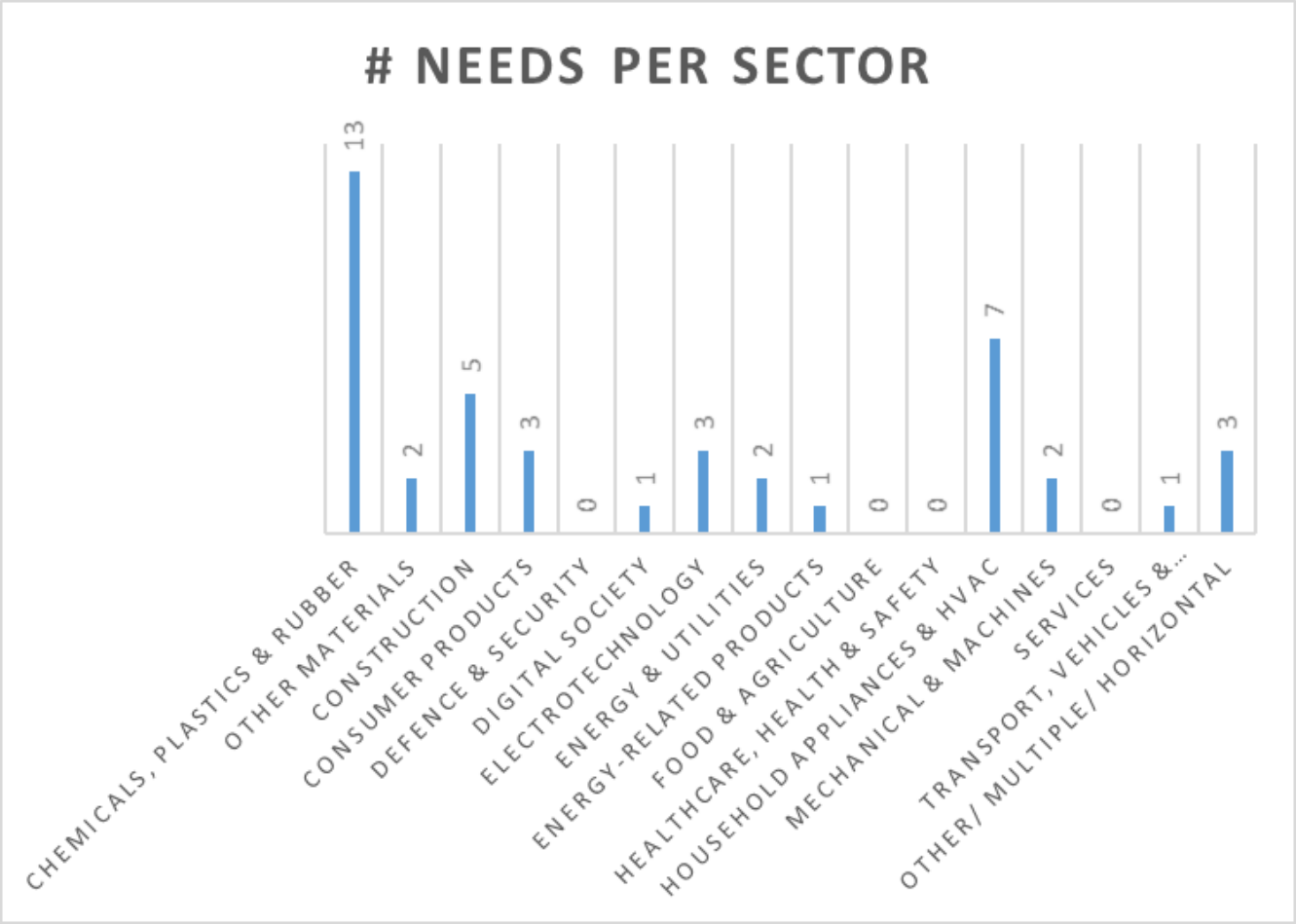
Summary of the mapping initiative - *needs*

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





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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

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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.

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Avoiding green washing

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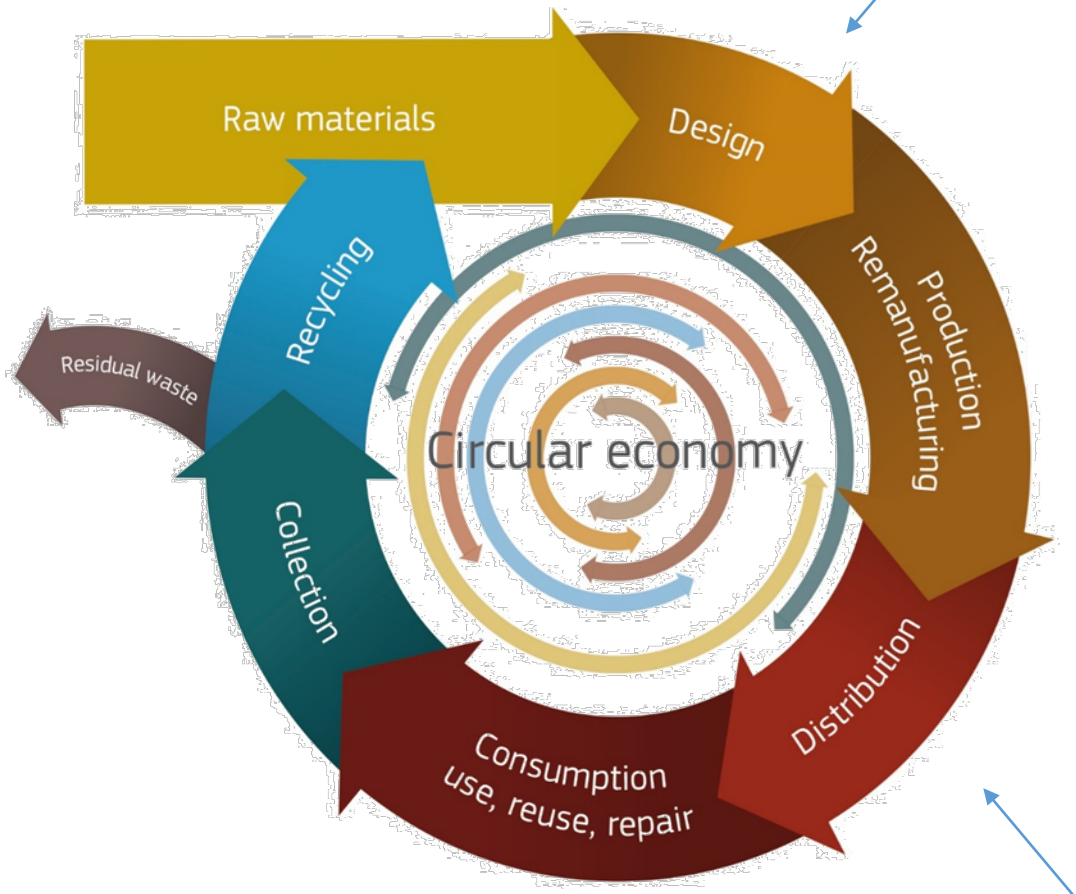
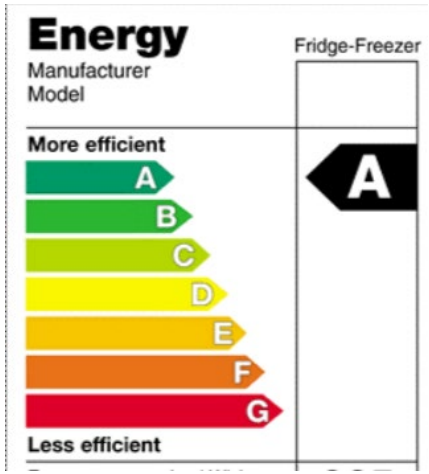
Examples


Raw materials
Design
Production
Remanufacturing
Distribution
Consumption
use, reuse, repair
Collection
Recycling
Residual waste
Circular economy

Product design and consumer information

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**

➢ List of harmonized standards – EC DG GROW website: http://ec.europa.eu/growth/single-market/european-standards/harmonised-standards_en

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Circumvention

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) - **prohibit**s 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

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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.

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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

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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!

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The WEEE standard series

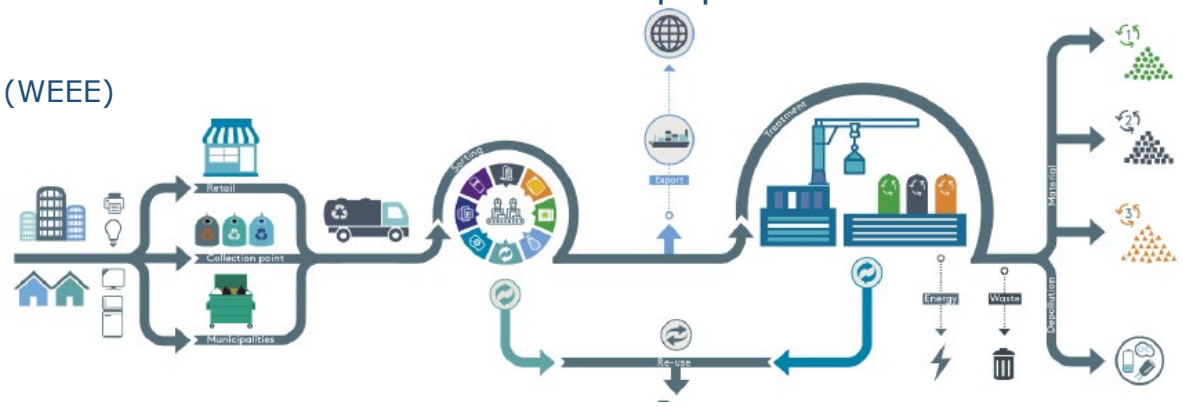
EN 50574 series - **Collection, logistics & treatment requirements** for end-of-life household appliances containing volatile fluorocarbons or volatile hydrocarbons

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)



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Thank you!

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

Mathilde Crepy | Senior Programme Manager | 24 November 2021

About ECOS

ENVIRONMENTAL
COALITION
ON STANDARDS

ecos

international environmental NGO

technical expertise

network of members & experts

52

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)
- CLER – French Energy Transition Network
- Ethikis

Germany
- Bund Für Umwelt und Naturschutz Deutschland (BUND)
- Bundesverband Bürgerinitiativen Umweltschutz (BBU)
- Deutscher Naturschutzring (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 Draugi)

Lithuania
- Žiedinė 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 (SCNC/SNF)

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&E
- European Federation for Transport & Environment

WWF-EPO
- WWF – European Policy Office

ZWE
- Zero Waste Europe

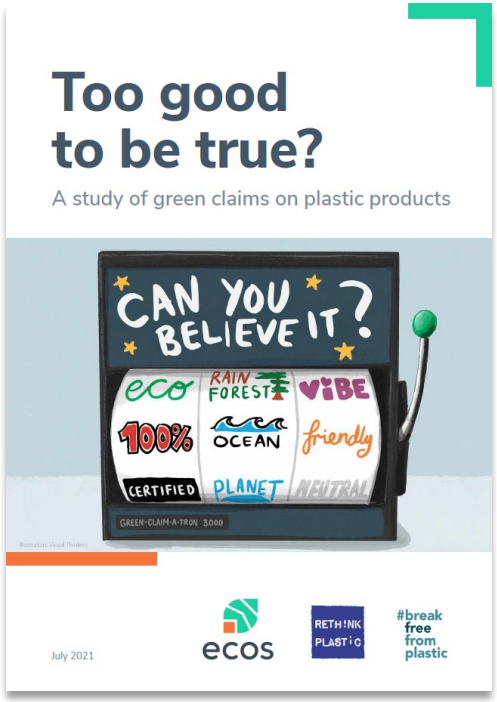
ecos

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

RELEVANCE

- of claims
- of product characteristics

RELIABILITY

- substantiated
- verified

CLARITY

- informative
- transparent
- accessible

Based on UNEP Guidelines for Providing Product Sustainability Information

Findings

82
plastic items analysed

do not meet relevance criterion

do not meet clarity criterion

do not meet reliability criterion

appear not to be third-party verified

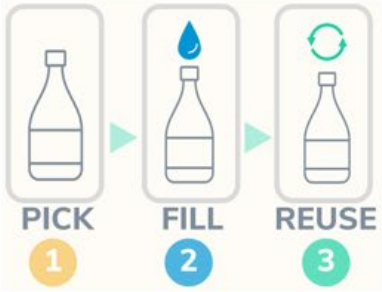
Some examples

Reusability

'Reusable' dishware
Misleading

Single-use refill pouch
Still single-use

Firm-operated bottle return system
Truly reusable



In-store refillables
Truly reusable

Our recommendations

Key recommendations

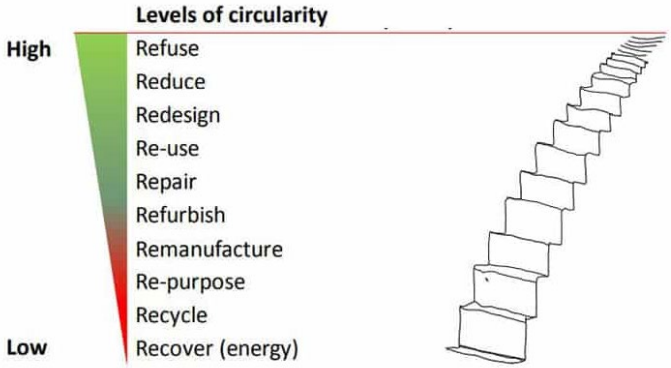
1. Eliminate loose and stretchable definitions
2. Legislate explicitly on what market actors may or may not claim
3. Strengthen legislative enforcement and sanctions against greenwashing
4. Make sustainable products the norm

Standards

ecos

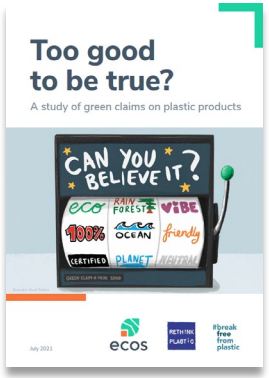
Key elements to improve standards

- In line with **circularity hierarchy**: Reduce – Reuse – Recy
- 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**



The 10 R's hierarchy

→ 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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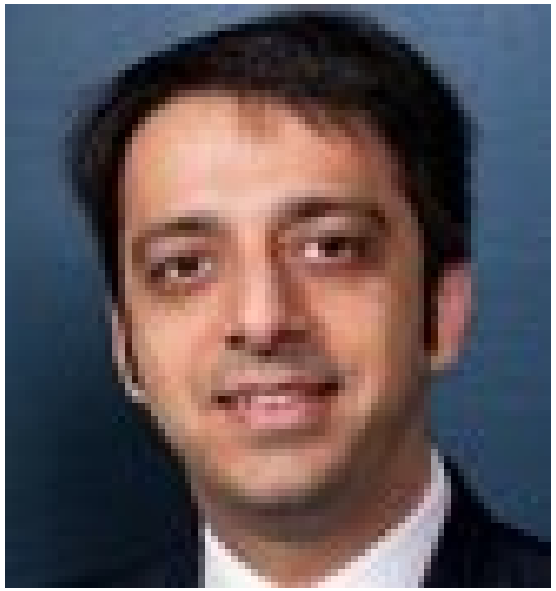


Rakesh Vazirani

TÜV Rheinland
Sustainability Services
for Business Stream
Products

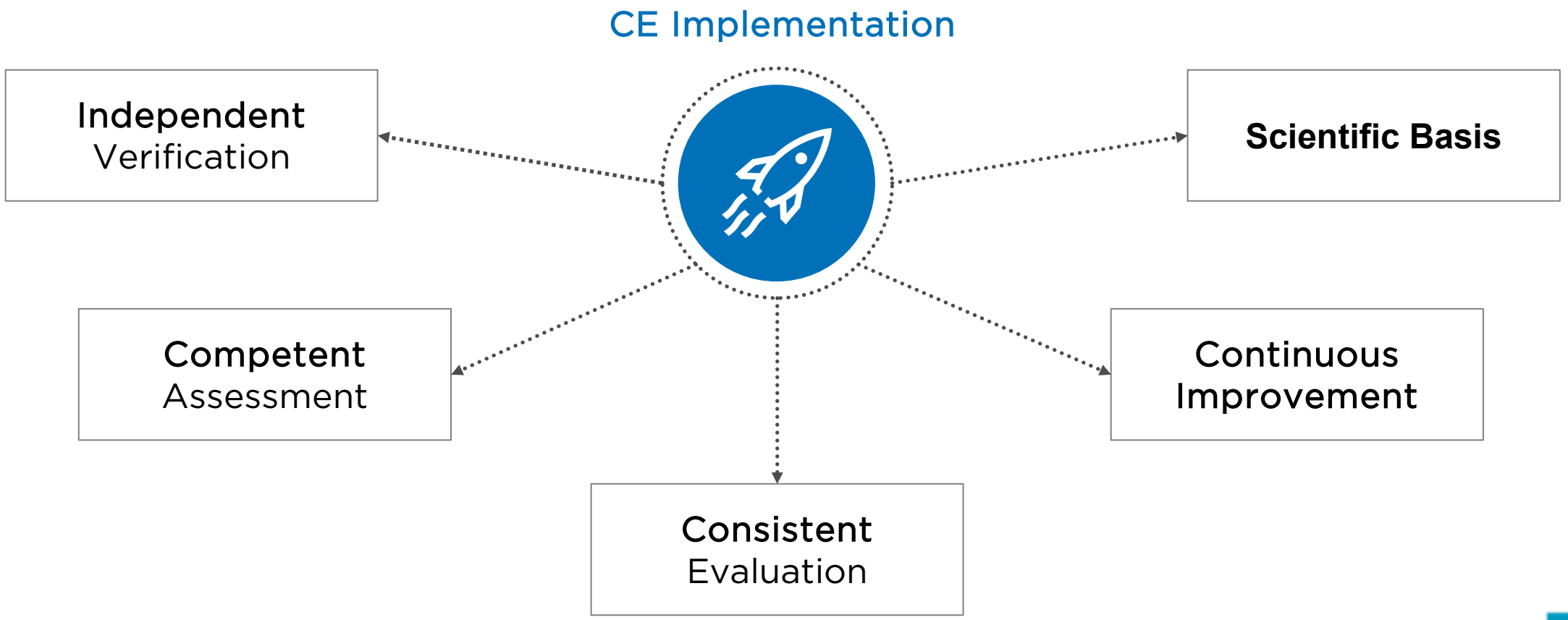
Key points of previous speakers

- Credible Standards for measuring Circular Economy

- Need for validation to avoid Greenwashing

Launchpad for strong Circular Economy Implementation by Industry

Trust and Efficiency



We ensure quality & safety

5 BUSINESS STREAMS

24 BUSINESS FIELDS

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

Our Motivation

WE SUPPORT UN GLOBAL COMPACT

TIC COUNCIL

People

TIC COUNCIL

Technology Environment

Ensuring Safety during interaction of any 2 vertices

Factory Worker
OR
Consumer

TIC COUNCIL

Factory machine
OR
Chemicals
OR
Garment

Water body
outside factory
OR
Landfill

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 <u>conformity assessment body</u>, conveying formal demonstration of its **competence**, **impartiality** and **consistent operation** in performing specific conformity assessment activities

(ISO-IEC:17000)

SCIENCE BASED TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

UNITED NATIONS PARIS CLIMATE AGREEMENT SIGNING CEREMONY 22 APRIL 2016

HONG KONG MONETARY AUTHORITY
香港金融管理局

Circular Economy Action Plan
The European Green Deal

FitchRatings

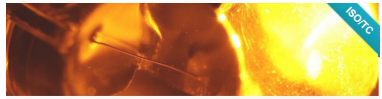
STANDARD & POOR'S

MOODY'S

Company

GRI Empowering Sustainable Decisions · CDP · SASB · TCFD Task Force on Climate-Related Financial Disclosures · GRESB The ESG Benchmark for Real Assets

Supply-network

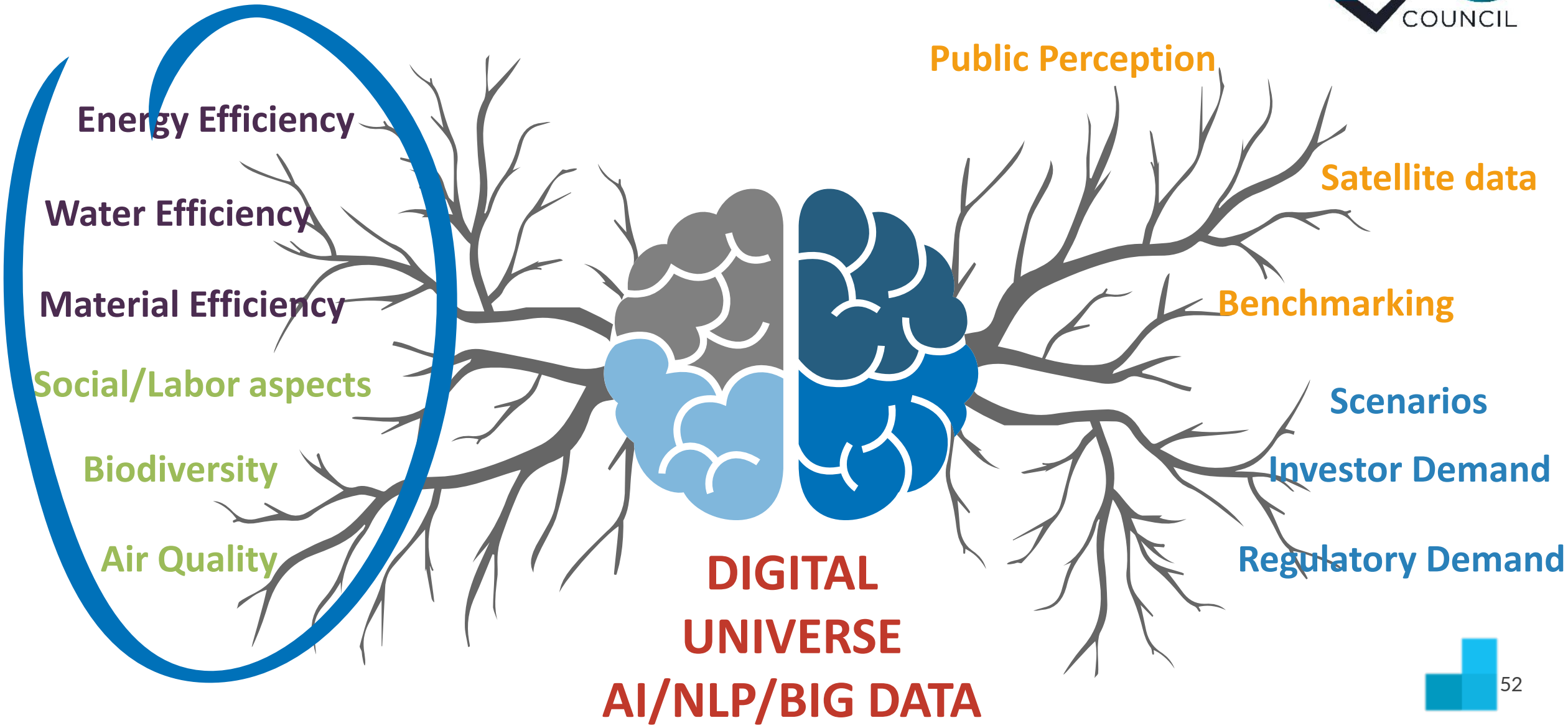


STRATEGIZE → **DIGITIZE/ Automatize** → **DECARBONIZE** → ***LEGITIMATIZE***

Independent **Verification** Based on technical standards

Sustainable Finance ECO-System

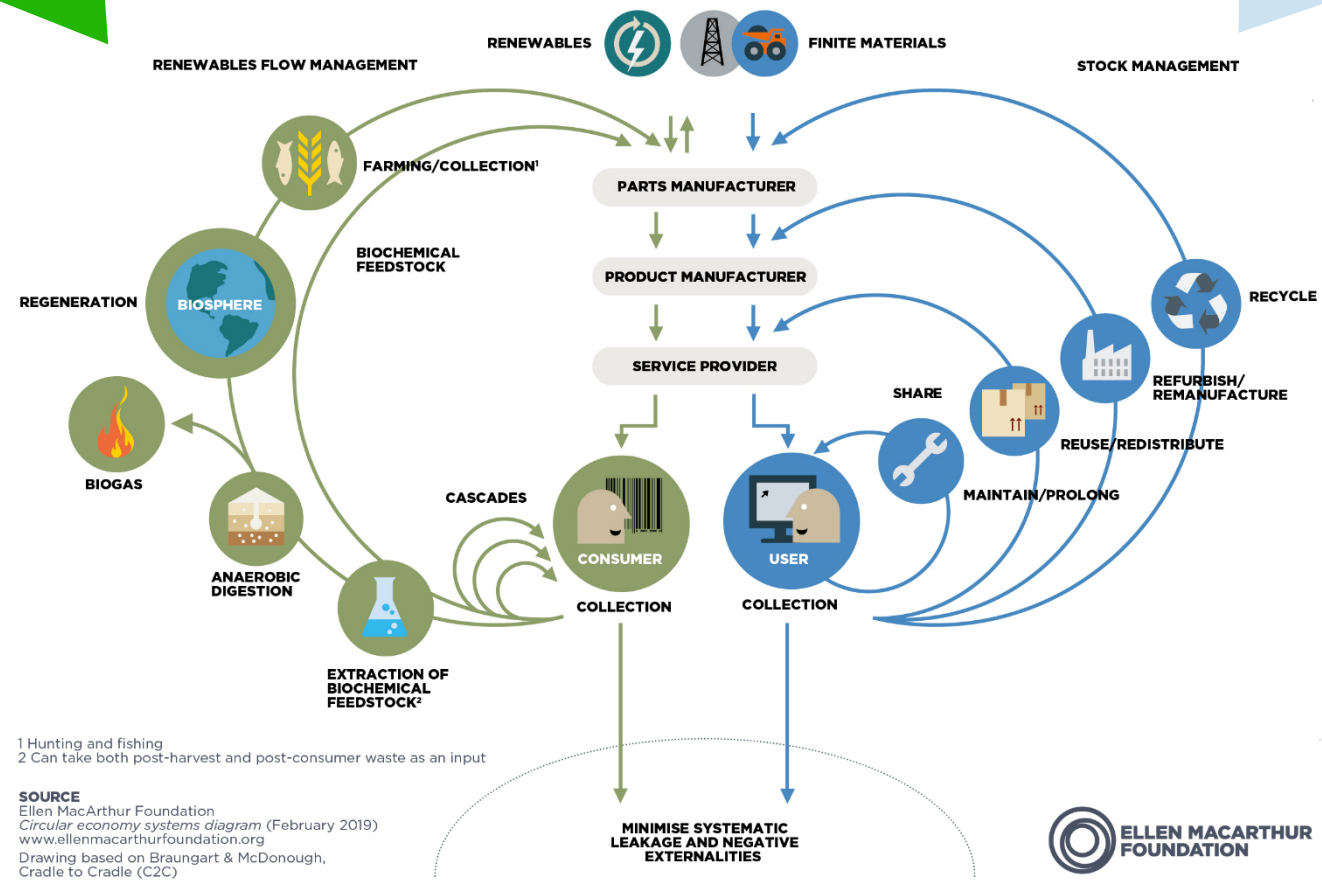
Integration & Interconnections



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



1 Hunting and fishing
2 Can take both post-harvest and post-consumer waste as an input

SOURCE
Ellen MacArthur Foundation
Circular economy systems diagram (February 2019)
www.ellenmacarthurfoundation.org
Drawing based on Braungart & McDonough, Cradle to Cradle (C2C)

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Questions?

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