



**Paper and board manufacturing and converting industry's
Joint Position Paper on
The Commission's Communication on IPP – Integrated
Product Policy
November 2003**

1. Guiding Principles for an IPP Framework

CEPI and CITPA, representing the European paper and board manufacturing and converting industries, welcome the adoption of a framework approach to product policy at EU level as an element of the Union's sustainable development perspective, to enhance consistency between existing measures at EU and national levels. They also welcome the Communication's focus on voluntary approaches, continuous improvement and stakeholders' involvement.

However, the signatory organisations are concerned about a number of elements of the proposed IPP approach, namely:

1. **IPP should be based on a stronger holistic approach to product policy and better integrate the Union's long-term and strategic objectives and principles.**
 - The Lisbon process and the EU's Communication on **Sustainable Development** indicate the clear link between the objective of sustainability and the IPP framework to be created. This means that IPP should not solely focus on the environmental pillar and should promote a balanced approach between the three pillars of sustainability. It should for example not hamper innovation and hence growth through restrictive rules.
 - The EU's product policy should set a framework allowing the European Union to set **product-oriented long-term goals and incentives**. In this respect, IPP should be the mechanism aimed at continuous resource efficiency and have a clear and strong link with the EU's **Thematic Strategy on the sustainable use of natural resources**.
 - **IPP should strive towards more consistency of EU legislation:** IPP should not aim at adding legislation to the already very extensive set of EU legislation. It should on the contrary aim at making existing legislation more consistent and at taking best advantage of it. The signatory organisations welcome the drive towards more focus on voluntary and standardisation approaches, but feel that the call for EU industry to adopt voluntary measures and the development of standards should go along with a reduction in regulatory legislative approaches. It should also aim at more consistency between national and EU approaches so as to avoid overburdening companies with different approaches.
2. **IPP should not promote market distorting measures neither directly, nor through non cost-efficient measures or subsidies.**
 - **Fiscal measures** – all the more at national level – would distort competition within Europe and between European companies and their non-EU competitors. The internalisation of costs is only possible if applied globally. Instead, IPP should aim at informing consumers, whilst leaving consumers freedom of

choice between products on the basis of various criteria, price, quality, fitness for use and environmental aspects.

3. **IPP should strongly be based on the principle of “continuous improvement”**: the signatory organisations strongly support the continuous development approach as they are truly committed to environmental management systems (today, some 60% of the pulp and paper produced in Europe comes from a mill certified with an environmental management system), which represent a realistic approach to sustainable development, and are useful tools to audit and improve all direct and indirect elements of the production process. Some EMS schemes, such as EMAS, are also designed to promote open and transparent communication, and are therefore useful tools to educate the general public and promote awareness of environmental issues.

4. **Chain approach**: the signatory organisations believe that a true chain approach should be promoted on the basis of shared responsibility along the chain for end products. It is also important to recognise the impact of products at the user's stage and not only at the design stage. Within this approach, it has to be noted that packaging is an auxiliary product to the product it contains and, consequently, should not be focused on within an IPP approach.

5. **Information to Customers and Consumers -**

- **Demand must be driven by consumers and users**; consumers should be educated, not made to buy given products through artificial subsidies. Information to consumers should be encouraged, not imposed.
- Similarly, **“greening the market”** artificially may result in expensive products for society - one way or another, which is not what consumers wish. Product policy should also take account of the global nature of trade.
- **Product policy should respect companies' competence and expertise** as the design, production and marketing of products are companies' core business. Eco-design is a useful tool, which should however not be over-prescriptive as it could hamper innovation.
- **Ecolabels** are voluntary instruments and should remain so. They are meant to provide end consumers with information on the end product and its proper application. The environmental impacts of paper making are however best controlled and continuously improved through EMS. Ecolabels should cover all products with the same use whatever they are made of (e.g. envelopes) so as to avoid market distortion.
- The signatory organisations **welcome the opening up to other types of communication for end products**, including environmental product declaration (Type III labelling), self declared claims (Type II labelling) and truly believe that different information tools are fit for different purposes: environmental declarations for example are best fitted for business-to-business communication, while single-issue labels may well be fitted for products which are characterised by a major environmental impact (e.g. energy). The organisations however believe that a full LCA approach can be too complex to be a basis for environmental product declarations.

6. **Life Cycle Approach**

- **Life cycle thinking** should be a guiding principle for policy making. Policy making should however not be overly prescriptive and should be built on a wide range of tools. However, the strict application of the LCA methodology is best suited for companies' internal applications where environmental performance characteristics are being analysed along a certain producer's service chain. LCA must not be used to make comparisons – especially between materials.

- Choices between final products can often be complex and contradictory and open to subjective judgements.

7. Public Procurement

- Whilst it is legitimate for authorities to incorporate environmental concerns in **public procurement**, the signatory organisations strongly believe that environmental considerations cannot be a substitute for the essential considerations of quality, price and fitness for use.
- The signatory organisations are concerned by the proposal to use **ecolabels in public procurement** and wish to point out the need for equal treatment for both EMS and ecolabels within the public procurement framework and consequently the improved clarity in the procurement guidelines communicating this equity. Proof of compliance and/or competence should be as transparent as possible, or in other words several tools, such as EMS and others alongside ecolabels, should be accepted to demonstrate compliance and/or competence.

8. Developing a Focus on Particular Products

- The signatory organisations question the approach outlined by the Commission with regard to its added value in terms of contribution to sustainable development or to eco-efficiency. It must be remembered that there are trade-offs (functional, social), which would not be considered in such a judgemental approach. The identification of products with the greatest potential for improvement is de facto similar to the identification of the products with high negative environmental impacts – in both cases the approach is discriminatory. It is not possible to define criteria that are truly objective and take account of trade-offs to distinguish between products.
- Instead the signatory organisations strongly recommend identifying the **barriers to the “greening of products”**, be they technological, legislative, marketing or economic so as to promote ways and tools to remove these barriers and ensure a sound functioning of the market.
- The signatory organisations are concerned about the **methodology** used to identify such products. The experience gained in Belgium is worrying since the study used in Belgium displays numerous shortcomings and erroneous data. It does for example ignore the environmental benefits of recycling operations...

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