



Ministry of Environment
of Denmark

Environmental
Protection Agency

**Danish Government views
regarding Sustainable Product
Initiative (SPI) and the Green Claims
Initiative (GCI)**

The Danish government support the Sustainable Product Initiative and the Green Claims initiative

Especially:

- ✓ Widening the scope of the ecodesign directive beyond energy-related products
- ✓ The introduction of a Digital Product Passport as a provision for communication of environmental data in the market
- ✓ The intended request to document green claims by PEF as a provision for use of green arguments in marketing
- ✓ The horizontal use of PEF for Life cycle based documentation within all relevant regulations

The two initiatives may significantly contribute to reducing negative impact on environment, climate and health – and ultimately lead to a

A climate neutral, resource efficient circular market economy



But there are some essential preconditions for success!!

- **A mechanism for setting minimum requirements to products is needed**
- **A coherent legal framework for sustainable products should be established**
- **A level playing field**
- **Easy and credible communication in the market**
- **Effective EU and member state governance and surveillance are needed**

Minimum requirements

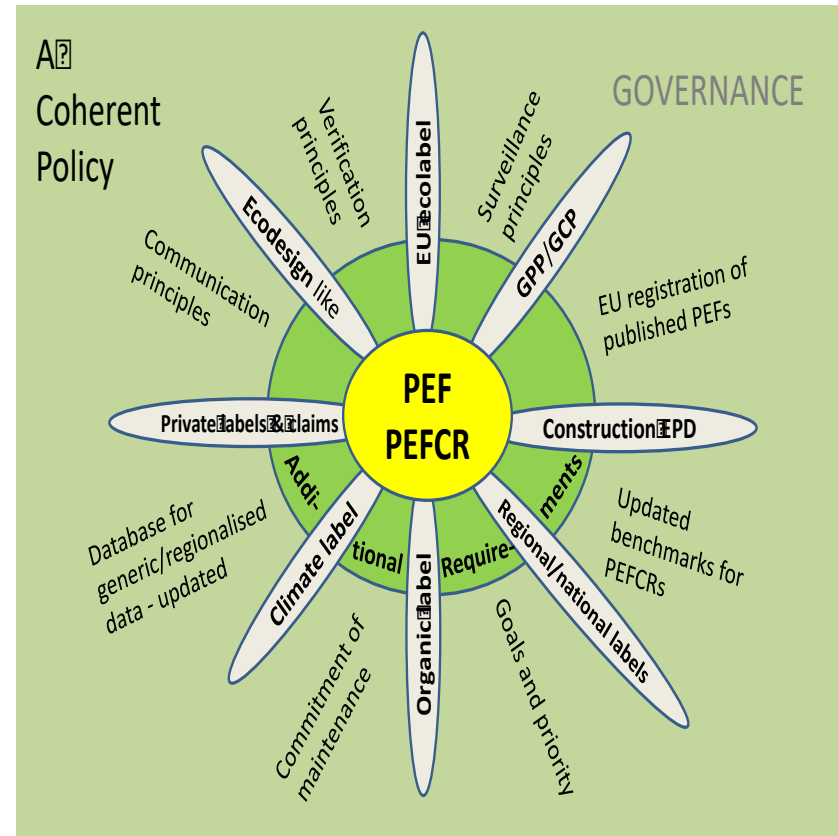
PEF is a “calculator” – does not include requirements regarding e.g. product category non-acceptable emission of CO2.

There is a need for:

- **Including in SPI a horizontal mechanism for setting minimum requirements and how such requirements are to be updated in time**
- **Initiate a political process for defining legal binding minimum requirements for specific high priority product categories**
- **SPI should include a generic ban of special hazardous substances – e.g. the CMR substances**
- **Setting-up principles of “trade-offs”, i.e. how to set priority to those impact categories which should have priority for each product category**

Establish a coherent product policy framework

- All relevant regulations and directives should be based on the PEF toolbox
- The EU Ecolabel should apply PEF/PEFCRs as the basis for LCA assessments
- Especially the building sector EPDs should be fully aligned with PEF
- The PEF toolbox should replace the ecodesign EcoReport tool and MEErP be adjusted accordingly



GCP: Green (voluntary) Corporate Procurement

The Green Claims Initiative: Provisions for a well-functioning market – a level playing field.

- **The Green Claims Initiative is essential for mitigating green wash in the market**
- **Commission should keep the objective of the intended regulation: “no marketing of green properties of products without verified PEF documentation”**
- **As a further provision, green claims should only be supported if the documentation confirms that the product environmentally is among the best third in the market.**

Easy communication in the market

- The digital product passport is crucial for a future share of relevant product information in the value chain
- The passport is a provision for a future tracing of environmental properties of secondary materials
- Commission should further extend the availability of high quality secondary data for PEF documentation, where primary data are unavailable
- A registry should be established governed by the Commission regarding product PEFs
 - A registration number should be allocated as a documentation for proper registration
 - Open database for all stakeholders
 - Use of registered PEFs for regular update of the environmental benchmark

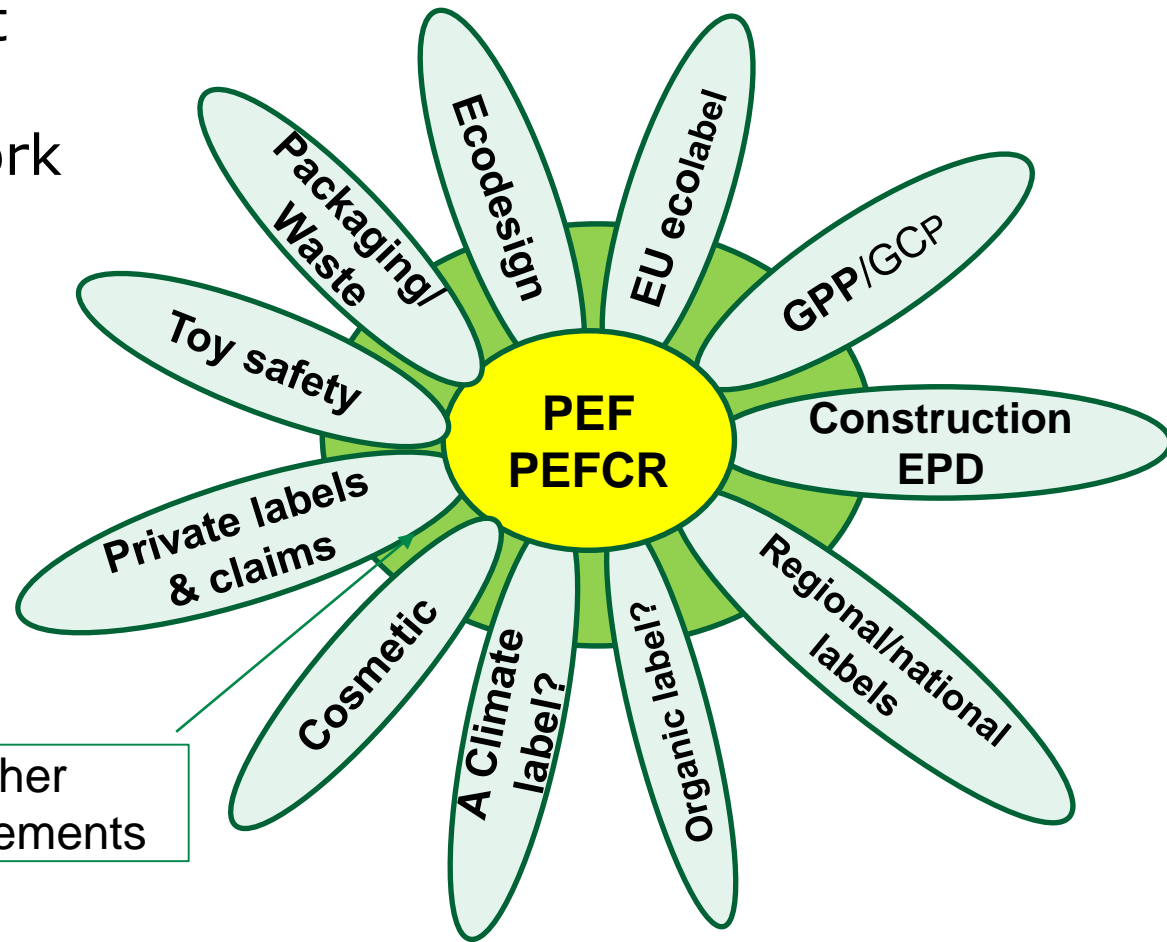
Effective EU and member state governance and surveillance needed

- **A mechanism for future update and development of PEF and PEFCRs should be established.**
- **There is an urgent need for improvement of the method regarding chemicals use, toxicity, biodiversity and direct and indirect land use.**
- **A PEF committee with COM, MS and stakeholders should be established.**
- **An effective surveillance should be established based on the new market surveillance regulation**
- **The proper uses of PEF in the market should be effectively monitored**

Thank you!



Toolbox for a coherent policy framework



Other requirements

