



**RREUSE position on the Commission's Communication**  
**Integrated Product Policy – Building on Environmental Life-Cycle Thinking**

RREUSE is the specialised European network of national and regional social economy federations and companies with activities in reuse and recycling. Its member organisations in 11 EU countries combine both social and environmental objectives at an equal level. For many years we have been actively reducing waste through the collection of used clothes, WEEE, furniture etc. Collected items are resold or, when this is not feasible, recycled. The sector represents about 40,000 people.

RREUSE aims to implement sustainable development at a local and regional level by promoting its three objectives.

**Introduction**

The EU made the commitment to take the lead on the establishment of programmes on sustainable consumption and production as included in the Plan of Implementation from the Johannesburg World Summit on Sustainable Development (see Council conclusions 20 and 21 March 2003).

The Commissioner opened the last Green Week in 2003 stating that changing our behaviour en choosing a more environmentally sustainable lifestyle are key to meet the commitments made on sustainable development at the Johannesburg summit.

The degradation of the environment through pollution and extraction of natural resources should be stopped. A strategy, like IPP, focussing on the whole life cycle of a product –design, manufacturing, use and disposal - could make a significant contribution because it can prevent the transfer of an environmental impact of one phase of the life cycle to another phase.

The Commission's communication is therefore very disappointing in the sense that it proclaims a voluntary approach (as opposed to a mandatory one) and therefore lacks concrete objectives. If the Communication will not be changed into a framework proposing binding measures to ensure the greening of products from cradle to grave and to make sure consumers are well informed about the environmental performance of the product they buy, the envisaged contribution of this policy initiative will not actually contribute to its claimed objectives. Binding measures, such as tax reductions for environmentally friendly products, promotion of eco-labels, life expectancy labels and

green public procurement, are necessary to ensure that a market will be created for greener products.

The intention of IPP is to encourage the penetration of environmentally friendly products into the market. Enough incentives and information is then needed for the consumers to make their purchasing choice for these products. If real life cycle thinking was to be achieved, RREUSE is of the opinion that this Communication should also focus on **sustainable consumption** to actually encourage people to choose a more sustainable lifestyle. RREUSE feels that this is the only way in which economic growth can be decoupled from resource use. If the selling of products is being replaced by the selling of services, economic growth might even get re-coupled with the labour market!

The recently released report 'State of the World 2004: Richer, Fatter and not much Happier' of the World watch Institute concludes that 'meeting basic human needs, improving human health and supporting a natural world that can sustain us will require that we control consumption, rather than allow that consumption will control us'.

RREUSE is convinced that **promoting and encouraging reuse of end-of-life products throughout the whole life cycle of that product will contribute in a significant way to the overall aim of sustainable production (design and manufacturing phase of a product) and consumption (use phase of a product)**<sup>1</sup>. Some absolutely necessary tools to achieve the EU's commitment in Johannesburg, and in its 6<sup>th</sup> EAP, are discussed in this paper:

#### **A. Tools to promote sustainable production**

1. Easy repair is part of good product design

#### **B. Tools to promote sustainable consumption**

1. Reduced VAT rate for reuse and repair
2. Consumer information
3. Greening of public procurement

#### **A. Tools to promote sustainable production**

##### **I. Easy repair is part of good product design**

The reuse of products and components generally means passing them on for second use with the same purpose, if necessary after repair and testing. Manufacturers should design and manufacture in such way that their products are durable, long lasting and are designed to encourage repair and reuse.

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<sup>1</sup> RREUSE made its comments on the disposal phase of a product in its opinion on the Commission's communication towards a thematic strategy on the prevention and the recycling of waste, dated November 2003.

### ***The benefits of reuse***

Natural resources should be used in the most efficient way and the negative impact on natural resources should be minimised.

Reuse supports this aim:

- ? Repair and reuse of end-of-life products extends the life of a product and the need to buy new products, and therefore the need to consume energy and raw materials in their manufacture and distribution, is deferred.
- ? Reuse also reduces disposal costs because it may avoid treatment costs.

In addition reuse provides social benefits:

- ? Social economy projects active in the reuse of products create and sustain jobs for people at risk, such as long-term unemployed, disabled and youngsters.
- ? Reuse also offers essential household items for people with low incomes.

### ***A Good Design facilitates Repair and Reuse***

In order to reuse products and components it is sometimes necessary to repair them. The design of the products should be such that, when the present owner wants to dispose them, refurbishment can be done easily and without reducing their environmental performance. This will depend on how it is designed and especially on how information for repair is provided and not restricted due to purely economic reasons.

### ***Accredited re-users***

RREUSE members have developed systems of accredited re-users to ensure that the environmental and security performance of the refurbished appliances are ensured to the consumer. To this end, a specific label has been developed that guarantees well functioning and safe appliances, repaired by certified employees according to specific procedures. These appliances have been submitted to thorough testing before they are put back for sale with a specific label. Such a system avoids that only appliances with a good functioning from an environmental and safety view are refurbished. The appliances not able to achieve these standards are being treated for recycling.

### ***RREUSE wants the IPP communication to:***

- ? Ensure that manufactures take the responsibility of designing a product in such way that is **durable** and **easy to repair and reuse**. To this end, manufacturers should provide all necessary information to do so while making sure that reuse is not hindered through the introduction of artificial threshold for refurbishers.
- ? Introduce a system of accredited re-users to avoid so-called reuse leading to eco-dumping.

## **B. Tools to promote sustainable consumption**

As the Communication says, IPP should look at the whole life cycle of a product, including the use phase. However, unfortunately this element has not been dealt with in the Communication. This is somewhat contradictory in itself.

Consumers will have to be convinced of the fact that not only new products are beautiful... just as well as producers have to admit that their products, no matter in what stage of the lifecycle discarded, are altered after the first user.

In our consumption focused society this concept is far from accepted. People should be made aware of the measures they can take in their daily lives to reduce, reuse and recycle. Environmental advantages (better use of materials and reduction of the need for landfills and incinerators) of reused products and products containing reused components and recycled material need to be emphasized so that a cleaner environment can be left for future generations. Consumer awareness about the environmental impact of products influences the purchasing behaviour. And a greener purchasing behaviour will make production greener.

### I. Reduced VAT rates for reuse and repair

An ecological tax reform should be introduced to stimulate the purchase choice of consumers.

RREUSE applies for a **lower VAT rate for reused products and components and repair services** because of the environmental results and benefits. Currently there is no lower VAT rate on the sales of reusable products and components, though this would be fully justified by environmental as well as social reasons.

RREUSE welcomes the statement of the Commission that its long-term goal is 'getting the prices right, through internalizing environmental externalities into the price of a product so that its environmental impacts are accurately reflected in the price'.

It is regretful that the Commission has taken the position in the same Communication that it will not develop any initiatives to apply for reduced VAT rates to products bearing the eco-label for the time being. The draft versions of the text had more courageous proposals! The text says also that the Commission would take into account the results of the experiment of applying reduced VAT rates to labour-intensive services, which have proven to be positive by the Council and the Parliament in the meantime!

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**RREUSE wants the IPP communication to:**

- ? Encourage green consumption by reduction of VAT for accredited reuse and repair centres.

### II. Consumer information

To change consumer behaviour and make people choose for a sustainable life-style, this consumer needs to be informed. People should be made aware of the different possible contributions to create a more sustainable world and the measures they can take as individuals. One should feel their effort has a positive influence for the environment and this should be communicated! Decisions of millions of individual consumers do make a

difference: if their thinking changes the manufacturers has no other choice than to follow.

Examples of possible measures to inform the consumer include:

- ✍ Eco-label on repairable goods, making the consumer aware of the fact that the product is a repaired and/or a repairable good.
- ✍ Life expectancy labels (possibly as part of eco-labels) indicating the average lifetime of a product at the point of sale would encourage users to select more durable items.
- ✍ Repair centre guides, provided via different media, for citizens so that they have easy access to repair centres.
- ✍ Obligation for all Members States to ensure that at regional and/or local level reuse centres are established where citizens would be directed to leave their used products suitable for reuse (currently practice in Netherlands and Belgium). These centres could also play an important role in informing the citizens about the way they can contribute to waste reduction.
- ✍ European Reuse and Recycle Day (like European car free day)
- ✍ Education programmes for the educators and the educated.

***RREUSE wants the IPP communication to:***

- ? Introduce measures and programmes to **maximise awareness raising** on reuse and recycling to make sure that
  - i. Consumers are well informed about the products they buy so that they can objectively make their purchase choices,
  - ii. Consumers should be made aware of the results of their efforts,
  - iii. Facilitate ways for citizens and businesses to participate in reuse programmes.

**III. Greening of public procurement**

Public procurement is an important tool to create a market for environmentally friendly products. The IPP communication is weak on the proposal it makes to promote the greening of public procurement because it does not set any binding measures but remains in the voluntary sphere.

***RREUSE wants to IPP communication to:***

- ? Programmes for 'green procurement' with the public sector leading by example.

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