



# Sostenibilità ambientale e responsabilità sociale

Supporto alle aziende per attuare strategie volte a migliorare la performance ambientale e sociale della propria organizzazione e a ridurre l'impatto ambientale dei prodotti lungo l'intero ciclo di vita.

27 FEBRUARY 2024 – CONFERENCE



IDEAS AND SOLUTIONS  
FOR TEXTILE FIBERS  
RECOVERING AND RECYCLING

**Certifications against greenwashing**

[ Dr. Paolo Foglia ]



# Some elements of the European regulatory framework

# Making sustainable products the norm

With communication COM (2022), 140 of 03.30.2022, the European Commission introduces a package of initiatives regarding sustainable products with the general objective of:

- Ensure sustainable growth through using better the resources and the materials that make up the products, as well as improving the products themselves.
- Making products consume less energy, by using them more efficiently and for longer, by relying on recycled materials instead of primary raw materials, and by spreading frontrunner circular economic models we can decouple our economic growth from natural resource use and environmental degradation.



# Making sustainable products the norm

The package of proposals includes a set of coordinated initiatives that aim to :

## a. Promote Ecodesign to create more sustainable, more circular products with better energy performance

- Proposal for an **Ecodesign for Sustainable Products Regulation (ESPR)** which aims to make products suitable for a **climate-neutral, resource-efficient and circular economy**.
- Targeted sector initiatives such as the '**EU Strategy for Sustainable and Circular Textiles**' which, among other things, aims to establish the conditions for making environmental self-declarations regarding future environmental performance, for example 'climate neutral by 2030', and to make comparisons with other products.

## b. Empower and protect consumers

The role that consumers can have in supporting the ecological transition is recognized and, at the same time, the need to improve consumer protection is affirmed.

## c. Promote responsible business models

Proposal for a **Directive on Corporate Sustainability Due Diligence** to contribute to the promotion of sustainable business models globally and to encourage the transition towards sustainability of businesses in all industrial sectors by requiring them to consider and address negative impacts on the environment in their respective global value chains.

# Ecodesign Regulation for sustainable products

## Piano di lavoro 2022-2024 sulla progettazione ecocompatibile

- Maggiore efficienza energetica e circolarità dei prodotti connessi all'energia
- Nuove norme per gli apparecchi elettronici destinati ai consumatori (smartphone, tablet, pannelli solari)



The proposed **Ecodesign Regulation for sustainable products** which will introduce binding ecodesign specifications which will cover the following:

- durability and reliability of products;
- reusability;
- Possibility of reparability, maintenance, refurbishment;
- Presence of substances of concern;
- Efficiency in the use of energy and resources;
- Recycled content;
- remanufacturing and recycling;
- Reduce the carbon and, more in general, the environmental footprint;
- Expected generation of waste materials.

Nel 2023 la Commissione ha lanciato una consultazione per raccogliere osservazioni e valutare le priorità di intervento rispetto ai gruppi di prodotti selezionati ai quali è stato attribuito un punteggio per ciascuna categoria di impatto, in base alla rilevanza degli impatti ambientali e del potenziale di miglioramento.

Questi punteggi vanno da 1 (molto basso) a 5 (molto alto).

	WATER	AIR	SOIL	BIODIVERSITY	WASTE	CLIMATE CHANGE	ENERGY USE	HUMAN TOXICITY	MATERIAL EFFICIENCY	LIFETIME EXTENSION
<b>Score 43</b> TEXTILES and FOOTWEAR	5	2	4	4	5	5	5	3	5	5
<b>Score 30</b> FURNITURE	1	3	3	3	4	3	3	2	3	5
<b>Score 30</b> CERAMICS PRODUCTS	3	3	3	3	3	4	4	1	3	3
<b>Score 30</b> TYRES	3	4	3	3	3	3	3	2	3	3
<b>Score 28</b> DETERGENTS	4	2	1	4	3	3	3	2	3	3
<b>Score 26</b> BED MATTRESSES	1	3	1	2	5	3	3	2	3	3
<b>Score 24</b> LUBRICANTS	2	2	2	2	2	3	3	2	3	3
<b>Score 24</b> PAINTS	3	3	2	3	3	2	2	2	3	1
<b>Score 23</b> COSMETICS	4	2	1	4	3	2	1	2	3	1
<b>Score 22</b> TOYS	1	1	1	1	3	2	2	3	3	5
<b>Score 21</b> FISHING GEARS	4	1	1	4	3	2	1	1	3	1
<b>Score 18</b> ABSORBENT HYGIENE PRODUCTS	2	1	2	2	4	2	2	1	1	1

	WATER	AIR	SOIL	WASTE	BIODIVERSITY	HUMAN TOXICITY	CLIMATE CHANGE	ENERGY USE	
IMPACT RELEVANCE									
IMPROVEMENT POT. RELEVANCE									
SCORE									
Low EI + Low IP									1
Low EI + Medium IP									2
Low EI + High IP									3
Medium EI + Low IP									2
Medium EI + Medium IP									3
Medium EI + High IP									4
High EI + Low IP									3
High EI + Medium IP									4
High EI + High IP									5

## Horizontal considered measures

As possible horizontal measures, 5 aspects were evaluated

«Durability»

«Riciclability»

«Light design»

«Content of post-consumer materials»

«Sourcing sustainably»

At the conclusion of the evaluation, three of these aspects are taken into consideration as **priorities**

**Durability**

**Riciclability**

**Content of post-consumer materials**

The other two will be further elaborated before finalizing the ESPR work plan.



## RECYCLABILITY

### Potential horizontal provisions

#### Ability to easily separate the product into different materials

(e.g. metals, plastic, textiles)

#### Choice of materials and restrictions on substances

(e.g. choice and combination of polymers, absence of flame retardants)

#### Condition for the access to product data relevant for the recycling, including dismantling information

(e.g. marking of parts and materials, use of component and material coding standards for the identification of components and materials, indicative weight range of different materials, including CRMs and environmentally relevant materials, hardware and software needed for the recycling process changes)

#### Introduction of a recyclability scoring index/label

### Potential product coverage

- Textiles 
- Printed paper 
- Stationary paper 
- Paper carrier bag products 
- Bed mattresses 
- Furniture 
- Absorbent hygiene product 
- Detergents 
- Cosmetics 
- Animal care products 
- Toys 

### Potential expansion



## POST-CONSUMER RECYCLED CONTENT

### Potential horizontal provisions

Provisions on minimum content of post-consumer recycled material expressed either as a fraction of the total material input (in %) or in absolute numbers (kg per unit, million tonnes Mt in aggregates)

### Potential product coverage

- Textiles**  
in terms of recycled cotton, wool, viscose, polyester or rubber (depending on the product-specific composition) 
- Plastic products**  
for which the use of recycled content is already possible  
*Bed mattresses, agricultural products (e.g. Hoses, Irrigation pipes, Raised beds, Cultivation trays, Foils and films for coverings and silage), other plastic products such as Cable casings, Safety triangles, Warning lights, Exterior rear-view mirrors, Garbage bags, Buckets and barrels, Folding boxes, Rain barrels, Composters, Flowerpots, bowls and baskets* 
- Products containing CRMs:**  
in terms of secondary CRMs 

### Potential expansion



# Strategy for sustainable and circular textile product

The key actions for sustainable and circular textiles are:

- a. **Binding eco-design specifications in accordance with the Ecodesign Regulation**
- b. **Introduction of the ban on destruction of unsold products**, including, where applicable, unsold or returned textiles
- c. Design specifications aimed at **reducing the accidental release of microplastics into the environment**
- d. Information obligations and introduction of a **digital product passport**
- e. Minimum criteria for all types of environmental self-declarations **in the context of the environmental self-declaration initiative.**
- f. **Extended producer responsibility** and promotion of reuse and recycling of textile waste

Furthermore, **verification on compliance with ecodesign specifications are covered.**



# Consumer empowerment for the green transition

The proposed revision of the Consumer Rights Directive, announced in the "New Consumer Agenda" launched by the Commission in 2020, aims to strengthen consumers' ability to choose by providing them with better information and, at the same time, protecting them from commercial practices disloyal.

At the same time, it aims to:

- information is provided on the existence of a commercial guarantee of product durability;
- information is provided on the reparability of the products;
- consumers are not deceived regarding the environmental and social impacts, durability and reparability of products;
- environmental declarations can only be submitted in the presence of clear commitments;
- what is considered common practice in the market cannot be advertised as benefits for consumers
- the display of sustainability labels not based on a certification system or not established by public authorities is prohibited



## Nuove norme per responsabilizzare i consumatori per la transizione verde

- Tutele contro l'ecologismo di facciata e la pianificazione o progettazione deliberata di prodotti con durata di vita limitata
- Informazioni sulla durabilità e la riparabilità dei prodotti

# Proposal of Directive about *Green Claims*

On 22 March 2023, the Commission adopted the proposal for a Directive on the "**Communication of explicit environmental declarations**" (COM 2023, 166 final, dated 03.22.2023), also called the Green Claims Directive, which has the objective of:

- Make environmental declarations credible, comparable and verifiable;
- Protect consumers from the phenomenon of misleading or untrue statements (greenwashing);
- Contribute to creating a sustainable and circular economic model that enables consumers to make informed choices;
- Create a business environment that is based on the environmental performance of products.



53% of green claims give vague, misleading or unfounded information



40% of claims have no supporting evidence



Half of all green labels offer weak or non-existent verification



There are 230 sustainability labels and 100 green energy labels in the EU, with vastly different levels of transparency

# Proposal of Directive about Green Claims

After the approval last January 24 by the European Parliament of the proposal for a Directive on improving consumer protection from unfair practices and information (COM 2022, 143 final), the Internal Market and Environment Commissions of Parliament have expressed their opinion on the Green Claims Directive which is now expected to be voted on in plenary in March.

**Ensure the verification of the validity of environmental assertions by Certification Bodies (ODC) accredited in accordance with Reg (EC) 765/2008**

**Ensure non-misleading environmental information** that is based on objective, accurate evidence and demonstrates improved environmental performance from a life cycle perspective

**Protect consumers** from unfair information and commercial **practices**(greenwashing)

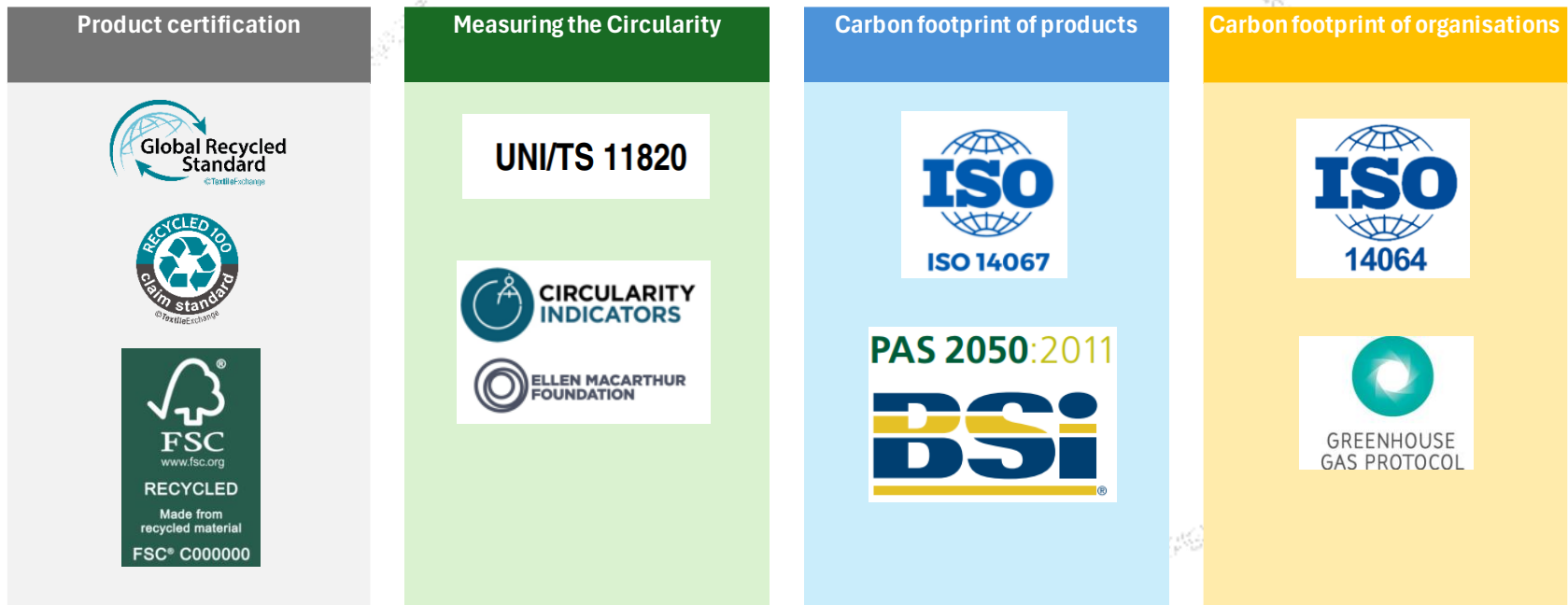
# Verification process of environmental claims

- a. **Verification of preliminary conditions to be met:**
  - It is definitely a claim and it is an environmental one;
- a. **A materiality analysis has to be carried out** in order to ensure that the environmental issues considered in the claims:
  - are the relevant ones, and
  - they do not hide other negative impacts due to other parts of the products, other products or other processes..
- c. Verification of whether the claims are:
  - **accurate, verifiable, not generic, not misleading;**
  - **truthful;**
  - **validated and verified;**
  - **supported by an explanatory statement** that avoids any misunderstandings.

# The role of certifications in relation to the normative framework



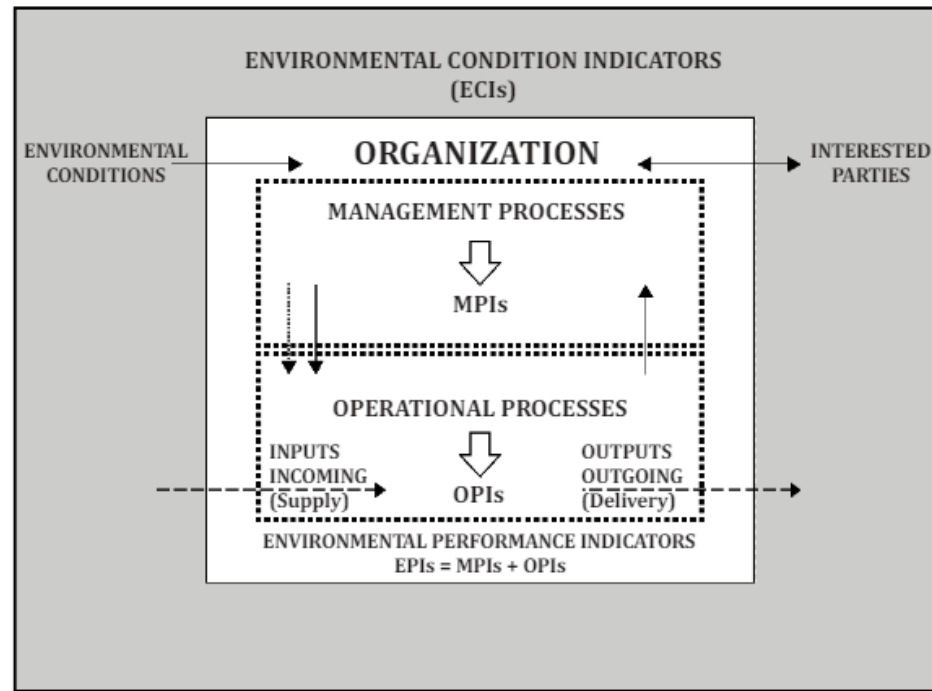
Certifications will be increasingly "informed" by the regulatory framework and will be increasingly useful to ensure independent verification of the truthfulness of declarations





## - 2 -

Evaluations are increasingly performance-oriented and will be based on sets of **Key Performance Indicators (KPIs)** which will also reflect the main environmental and social aspects referred to in the legislation



Key

- information flows
- - -→ input and output flows related to the organization's operations
- · ·→ decision flows

Source: UNI EN ISO 14031

Certifications and performance measurements strengthen Corporate Sustainability Reporting in accordance with the CSRD Directive

