

Brussels, 1 February 2010

EPBA Position Paper on Environmental Product Labels (EPLs)

Background

The EU battery Directive, 2006/66/EU, imposes requirements upon the battery industry to label all portable and automotive batteries with their electrical capacity. The European Parliament's intent in introducing this requirement was to provide consumers with information which would allow them to choose batteries with a higher performance and lifetime.

More recently there has been a proliferation of other such EPLs which aim to provide consumers with information on the carbon footprint across the life cycle of products. Among these are:

UK Carbon label – attempts to represent a product's carbon footprint with a single number for the amount of CO₂ and other greenhouse gases emitted as part of the product's life cycle.

Swiss Climatop label – attempts to compare the CO₂ emissions during the life cycle of products in the same category.

Casino Carbon Index – attempts to indicate quantity of greenhouse gases generated over the course of each product's lifecycle, including for packaging, waste and transport expressed in grams of CO₂ equivalent per 100 grams of end product,

All these measures aim to influence consumer behaviour by providing them with information in a simplified form.

Battery Industry Position

Unregulated environmental product labels cause consumer confusion and could damage free movement of goods

- The battery industry already spends a great deal of time, money and other resources on providing consumers information on fitness for purpose, safety, disposal and further regulatory requirements. The addition of EPLs risks overloading consumers with information and exposing manufacturers to legal liabilities for example in the event of differences between labelled theoretical performances and delivered actual performance.
- The EPBA is therefore concerned that unregulated proliferation of EPLs could damage the free movement of goods within the EU, add costs upon industry and confuse consumers.

We need a common framework which is LCA based and goes beyond just CO₂ labelling

- We believe a common framework is essential if businesses are to compete on a level playing field throughout the EU. This requires the development of uniform and robust methodologies by which the environmental, economic and social impacts may be determined as well as systems to validate their findings and deal with transgressors.
- The information presented to consumers needs to take into account all the relevant environmental factors across the life cycle of batteries, not just one attribute such as CO₂. In particular the use phase is of great significance for portable batteries since there is a strong correlation for performance and lifetime between the battery chemistry and the appliance in which it is used; this is where consumers can exercise the greatest influence and where the benefits will be maximised.

The EPBA recommends a voluntary industry-based approach that is technically accurate & easily understood by consumers

- The information needs to be presented in a way that is technically accurate and easily understandable by consumers throughout the EU. The limitation of space on batteries and their packaging means that alternative communication sites could be necessary.
- In view of these factors the EPBA prefers an industry led voluntary approach to sustainability. Industry is best placed to do this because we are the custodians of the up to date information required to determine all the relevant environmental, economic and social impacts over the life cycle of our products. Furthermore we are the authority on developments in technology and evolution of market trends which are additional critical factors for ensuring accurate and useful communications with our consumers.
- We are at the early stages of developing an appropriate environmental assessment methodology and the right communication tools for all types of batteries and their applications. We anticipate gradual and progressive release of this information for consumers and other parties as our work continues.

In Summary

The EPBA members are committed to helping consumers make informed decisions concerning their battery purchases. Our aim is to provide them with all the relevant information so that they can choose the battery which both economically and environmentally suits their intended use.

We undertake to provide and inform consumers with complete power solutions, which are sustainable across their life-cycle.