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EU Ecolabel criteria revision for Footwear

16th April 2015, Brussels



EU Ecolabel Criteria Development for footwear DRAFT Timeline

- 1. May 2015:** Final Criteria proposal and technical report to send to EUEB
- 2. June 2015:** EUEB Meeting, collecting comments on the final draft proposal
- 3. November 2015:** EUEB Meeting, RegCom vote

Restructuring of the DRAFT criteria proposal

Addressed aspects	November 2014 EUEB proposal		Criteria proposal (April 2015)	
Origin of raw materials	1	Materials origin	1	Origin of hides and skins, wood and cork, and man-made cellulose fibres
	2	Reduction of water consumption	2	Reduction of water consumption and restrictions in tanning of hides and skins
Processes	3	Emissions from the production of materials	3	Emissions to water from the production of leather, textile, and rubber
	4	Volatile Organic Compounds (VOCs)	4	Volatile Organic Compounds (VOCs)
Chemical substances and formulations	5	Hazardous substances present in the final product	5	Hazardous substances and mixtures in the product and shoe components
	6	Restricted Substances List	6	Restricted Substances List
Durability	7	Parameters contributing to durability	7	Parameters contributing to durability
Resource management/ Waste phase	8	Waste and energy management during footwear assembly		<u>Withdrawn</u>
Social Requirements	9	Social Requirements	8	Social Requirements
Packaging	10	Packaging	9	Packaging
	11	Information on the packaging	10	Information on the packaging
Use phase	12	Information appearing on the Ecolabel	11	Information appearing on the Ecolabel

Assessment and verification- Preamble

1. *General threshold* is proposed to be replaced by criteria – specific % w/w limit, as follows:

- 10% w/w - Criterion 1 - traceability of the origin of natural materials (with the exclusion of Criterion 1(a)ii);
- 3% w/w - Criterion 2,3,4 - production process of selected composing materials and final product (VOCs);
- 3% w/w - Criterion 6 - Restricted Substances List – material testing against specified chemicals;
- Criterion 7, 8, 9, and 10 – not referred to materials criteria
- Criterion 5(a) (SVHC) – no threshold. Criterion 5(b) (CLP)- proposed 3% w/w for materials- **discussion point**

2. *Criteria applies* to the final product, where specified any homogenous materials or articles that form part of the final product.



Proposed changes

Rationales

Criterion 1: Origin of hides and skins, cotton, wood and cork, and man-made cellulose fibres

1a(i) Hides and skins

Only raw hides and skins from animals raised for milk and/or meat production are allowed to be used into the production of leather that is destined

1a(ii) Exempted hides and skins

Raw hides and skins originated from **extinct, extinct in the wild, critically endangered, endangered, vulnerable, near-threatened, and not-evaluated species**, according to the categories established by International Union for Conservation of Nature (IUCN) Red List of Threatened Species, shall not be used.

1(b) *Cotton that contains equal or more than 70% weight by weight of recycled content is exempted from the requirement of Criterion 1(b)*

1b(ii) Cotton production according to IPM principles and restriction on pesticides

Specific verification for non-use of specific pesticides for IPM cotton has been integrated into sub-criterion 1b(ii).

Splitting of the criterion 1 into 1(a)i and 1a(ii)

- To specify the origin of hides and skins used (10 %w/w)
- To exclude the use of IUCN classified species
- Categories listed adapted to IUCN classification

- In line with the EU Ecolabel criteria for textile
- Pesticides verification refers to the IPM schemes
- The IPM schemes should be accepted as proof of compliance with the sub-criterion.

Proposed changes	Rationales
<p>Withdrawn: Origin of natural rubber</p>	<ul style="list-style-type: none"> Limited market availability. Subject for the next revision
<p>1(d) <i>Man-made cellulose fibres that contains equal or more than 70% weight by weight of recycled content is exempted from the requirement of the Criterion 1(d)</i></p>	<ul style="list-style-type: none"> In line with the EU Ecolabel criteria for textile
<p>Criterion 2: Reduction of water consumption and restrictions in tanning of hides and skins</p>	
<p>2. Division of the criterion in two parts 2</p> <p>2(a) Water consumption</p> <p>2(b) Restrictions in tanning of hides and skins</p>	<ul style="list-style-type: none"> To improve document clarity (?) On-going compliance verification
<p>2(a) Water consumption for calfskin was integrated under general category skins (45 m³/tonne)</p>	<ul style="list-style-type: none"> Requirement simplification: Previous proposal was 40 m³ for calfskin. BREF specifies that 40 or more m³ of water are needed for the processing of 1 tonne of calfskin
<p>2(b) Move of the requirement of Cr-free tanned skins for children from Criterion 1(a) to Criterion 2(b)</p> <ul style="list-style-type: none"> 10% w/w cut-off removed 	<ul style="list-style-type: none"> Precautionary principle



Proposed changes	Rationales
Criterion 3: Emissions to water from the production of leather, textile, and rubber	
<p>3(b) <i>Fibres that contains equal or more than 70% weight by weight of recycled content is exempted from the requirement of Criterion 3 (b)</i></p> <p>Narrowing of the scope to textile finishing processes Finishing processes shall include the thermosetting, thermosoling, coating and impregnating of textiles.</p> <p>Simplification of the criterion to the requirement on COD test.</p>	<ul style="list-style-type: none">• In line with the EU Ecolabel criteria for textile specific exemption for recycled cotton is proposed• Verification ability
Criterion 4: Volatile Organic Compounds (VOCs)	
<p>4. VOC emission 20g/pair for PPE Footwear</p>	<ul style="list-style-type: none">• EUEB feedback. Technical parameters for materials cementing in heavy boots.
Criterion 5: Hazardous substances and mixtures in the product and shoe components	
<p>The presence in the final product, and any homogenous materials or articles that form part of the final product, of substances that meet the criteria for classification with the REACH or CLP hazards listed, shall be restricted in accordance with sub-criterion 5(a) and 5(b).</p>	<ul style="list-style-type: none">• Harmonization with EU Ecolabel for computers. Reflects the key approach of the previous version.

Criterion 5: Hazardous substances and mixtures in the product and shoe components

5(a) Restriction of Substances of Very High Concern (SVHC's)

Removal of 3% w/w threshold for materials that should be screened

5(b) Restriction based on CLP hazard classifications

Applies to the final product and any homogenous materials or articles that form part of the final

The use of substances or mixtures which change their properties upon processing so that the identified hazard no longer applies are exempted from the requirements (e.g. polymers and monomers or additives which become covalently bonded with polymers).

5(b) Removed derogation for ATO and flame retardants

- Harmonization with EU Ecolabel for computers. Reflects the key approach of the previous version.
- Skin contact aspect
- Criterion 5(b) : should 3% w/w materials threshold be maintain?

According to ECHA Guidance : Bioavailability usually describes the passage of a substance from the site of absorption into the blood of the general (systemic) circulation, thus meaning systemic bioavailability.

Harmonised with EU Ecolabel for textile.

- Following stakeholders feedback flame retardants are not commonly used to achieve fire-proof requirements
- RSL requires ATO test for polyester fibre: limit 260 ppm (below 0.1%)

Proposed changes	Rationales
<p>5(b) Substances groups to which Criterion shall apply</p> <ul style="list-style-type: none">• Biocides;• Dyestuff (including pigments and varnishes);• Auxiliary carriers, levelling, blowing and dispersing agents, surfactants• Fatiquoring agents;• Solvents;• Print thickeners, binders, stabilizers, and plasticizers;• Flame retardants;• Cross linking agents;• Water, dirt, and stain repellents	<ul style="list-style-type: none">• Verification capacity• Key substances groups identified

Proposed changes

Rationales

Criterion 6: Restricted Substances List

- | | |
|---|---|
| <ul style="list-style-type: none">• The final product, specific substances, materials or recipes used in the listed production stages shall not contain hazardous substances specified under the Restricted Substances List (RSL) at or above the indicated concentration limits or according to the specified restrictions.• The RSL shall be communicated by the applicant to all its material suppliers. Verification and testing requirements are specified in the RSL | <ul style="list-style-type: none">• Reflects industry best practice |
|---|---|

Proposed changes	Rationales
Criterion 6: Restricted Substances List	
<p>Narrowing the scope of verification</p> <ul style="list-style-type: none"> • <u>Withdrawn</u>: Requirement for surfactants, detergents, softeners, and complexing agents • VM: 1 mg/kg for PVC • PAHs: Regulation (EU) No.1272/2013 , Test method: AfPS GS 2014:01 PAK 	<ul style="list-style-type: none"> • Verification ability of footwear manufacturer • Industry voluntary agreement, harmonisation with EU Ecolabel for Furniture • Harmonisation with REACH, other EU Ecolabel PGs, change in the test method
Energy and waste management	
Withdrawn	Quantitative verification not possible

Proposed changes	Rationales
Criterion 8: Social requirements	
<p>Fundamental conventions of the ILO:</p> <ul style="list-style-type: none"> (i) Child Labour: (No. 138, 182); (ii) Forced and Compulsory Labour: (No. 29, 105); (iii) Freedom of Association and Right to Collective Bargaining: (No. 87, 98); (iv) Discrimination: (No. 100, 111) (v) Working Hours: (No. 1) (vi) Remuneration: (No. 131) (vii) Health & Safety: (No.170, No.155) 	<ul style="list-style-type: none"> • Aligned with EU Ecolabel for Computers
Criterion 9: Packaging	
<p>Separation of requirement for paper and cardboard, textile, and plastics packaging</p> <p>Change of the requirement for recycling material content for textile from 80 to 70%</p>	<ul style="list-style-type: none"> • Aligned with the approach of 70% recycles content in textile fibre
Criterion 10: Information on the packaging	
<p>10(a) Removed reference to water resistance</p> <p>10(b) The optional label with text box shall contain the following text:</p> <ul style="list-style-type: none"> (i) Natural origin raw materials sustainably managed (in case Criterion 1 (b), (c), or (d) applies) (ii) Reduced pollution in production processes 	<ul style="list-style-type: none"> • Applicable to specific models • To better reflect environmental objectives of criteria set

Key Questions to EUEB:

1. Shall on-going verification be required? If yes, to which extend?

- **Option A:** Shall we consider periodical re-submission of verification that the criteria are met
- **Option B:** Shall we require the on-going verification under CB request?

2. **Criterion 5 (b)- Hazardous substances and mixtures in the product and shoe components:** *How should we address the % w/w threshold for materials that should be screened against the restrictions based on the CLP hazard classification.*

- **Option A:** No material threshold
- **Option B:** *The criteria shall apply to any individual material used in the shoe uppers or soles with a total weight of more than 3 % w/w*
- **Option C:** *With the exemption specified below, the criterion applies to any individual material used in the shoe uppers or soles with a total weight of more than 3 % w/w . All materials and articles used in lining and socks should be verified against the requirements of criterion 5(b).*



Thank you for your attention

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