

**QUESTIONNARIE TO ANALYSE THE EXISTING SCOPE, MARKET SEGMENTATION, and ENVIRONMENTAL PERFORMANCE FOR FOOTWEAR**

**Stakeholders Consultation Document**



**March 2013**

*Please submit the questionnaire before* ***Monday 8th of April*** *to ensure that all comments can be fully considered in this process to:* [*JRC-IPTS-FOOTWEAR@ec.europa.eu*](mailto:JRC-IPTS-FOOTWEAR@ec.europa.eu)



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For further information regarding this questionnaire, please contact:

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or visit EU Ecolabel Website for Footwear : [http://susproc.jrc.ec.europa.eu/footwear/index.html](http://susproc.jrc.ec.europa.eu/footwear%20/index.html)

# Introduction

## Objective

The EU Ecolabel criteria are designed to promote the use of the most environmentally friendly products. The main objective of this project is to revise the EU Ecolabel criteria for Footwear with respect to the current definition set by the Commission Decision No 2009/563/EC. The need for revision is mainly supported by the revised Regulation on the EU Ecolabel (No 66/2010) and the Commission Statement of 19 March 2009 (ENV G2). During this process some criteria may be amended, withdrawn or introduced.

Among other points, the revision process addresses the possible expansion of the scope for this product group and, consequently, the revision of the EU Ecolabel criteria to accommodate other types of leather-made products. Hence, one of the particular objectives is to determine the product group covered by the EU Ecolabel for Footwear and Leather products. Based on this definition, the EU Ecolabel criteria shall be reviewed so that they can apply to all products within analysed category, addressing the most important environmental impacts from the Life Cycle Assessment perspective. Hence, the questionnaire refers to footwear and leather goods covered by the extended scope proposal.

The objective of the first questionnaire is to check the validity of product group scope and definition, to analyze the need for the existing criteria modification, and to make a preliminary identification of the industry "best practices" to improve the environmental performance of the product group under revision.

After the scope and product group definition will be confirmed, a second questionnaire will be sent out in order to analyze more deeply each of the criteria area. They will be revised in light of the stakeholder input with respect to the market and innovative products and technologies.

## Current criteria

The framework of the Commission Decision No 2009/563/EC that sets EU Ecolabel criteria for footwear defines the objectives of the criteria and the background for the assessment and verification requirements (functional unit, cut-off limit). The aims of the criteria are described as being:

*"limiting the levels of toxic residues, the emission of volatile organic compounds and promoting a more durable product."*

The criteria document under revision consists of ten criteria intended to meet this specific aim, addressing the following environmental issues:

1. Dangerous substances in the final product
2. Reduction of water consumption
3. Emission from the material’s production (limitation of water pollution)
4. Exclusion of use hazardous substances (up until purchase)
5. Use of VOCs during final assembly of shoes
6. Energy consumption
7. Use of recycled material for packaging
8. Information on the packaging
9. Information appearing on the Ecolabel
10. Parameters contributing to durability

The listed set of criteria should be carefully analysed during the revision process in order to specify the need to introduce relevant changes that address the actual state–of-the-art of targeted industry.

## Commission Statement as to the next Revision

In conjunction with the adoption of the criteria document on March 2009, several statements were submitted by Member States relating to issues should be addressed/investigated further in the next revision. Thus, the revision of the EU Ecolabel for Footwear must at least address the following concerns raised by the Commission Statement (19 March 2009/ ENV G2):

* the use and environmental impact of all fluorinated substances (e.g., including PFAS) which might be used for the footwear (e.g. for impregnation) need to be assessed in the revision
* stricter limits on emissions should be based on the best value in BAT/BREF;
* emissions related to synthetic materials, i.e., plastic/polymers, should be addressed
* inclusion of waste phase of materials in the evaluation;
* regulation or exclusion of materials that are problematic in the waste phase;
* evaluation of PFAs and the related environmental problems;
* evaluation of PVC and the related environmental problems;
* evaluation of formaldehyde in leather.

# Questionnaire

How to complete the questionnaire:

The questions unless separately specified refer to the EU Ecolabel Board (hereinafter EUEB) and to stakeholders registered to take part in the criteria revision process. We would nevertheless appreciate if, according to your knowledge, you could address the questionnaire as much as possible.

Please provide your contact details in the table below:

Your contact details:

|  |  |
| --- | --- |
| Title: |  |
| Name: |  |
| Company/Organisation |  |
| Organisation Type (e.g. Industry, NGO): |  |
| Job Title/Position: |  |
| Address: |  |
| Postal Code: |  |
| Country: |  |
| Telephone Number: |  |
| Email: |  |
| Web: |  |

To answer the questions, please cross the boxes or/and fill in some figures. Each time, you are kindly asked to provide additional information, comments or proposals.

## Environmental Performance of Company: General Concerns

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| **These questions are addressed to stakeholders:**  **Quality and chemical safety**  How do you assure the quality and chemical safety of product at different stages of the production process? *Please specify the methods used:*  When analysing the product chemical safety, do you use a specific Restricted Substances List (RSL)?  **YES  NO**  If "YES", please specify the origin of the RSL  **Internal  External  Other**  If “Other”, please specify:  If "YES" could you kindly attach a copy of RSL document |
| **Life Cycle Assessment**  Have you carried out any Life Cycle Assessment of your products or obtained an Environmental Product Declaration or any related document(s)?  **YES  NO**  If "YES", would you kindly attach available documentation |

## How does your organization work with CSR (Corporate Social Responsibility)

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| **These questions are addressed to stakeholders:**  Have your organization signed national/international declarations, e.g. “Global Compact”?  **YES  NO**  If "YES", please submit further details: |
| Does your organization work according to an international scheme or standard, e.g. SA8000 or ISO26001, or does it hold one of these certifications?  **YES  NO**  If "YES" please submit further details: |
| Is your company or any of your production sites certified to an industry or third party CSR scheme?  **YES  NO**  If "YES" please submit further details, including the schemes and nature of the production sites certified: |

## Applications

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **These questions are addressed to stakeholders:**  Have you ever applied or considered to apply for the EU Ecolabel for footwear?  **YES  NO**  If "NO"", what were the obstacles?  **Cost**  **Timing**  **Quick and seasonal Evolution of Fashion Industry**  **Stringency of Criteria**  **Others**  If “Others”, please specify:  If you applied for the EU Ecolabel for footwear, did you get the label?  **YES  NO**  If you were not awarded "The Flower", on what basis was your application rejected?   |  |  | | --- | --- | |  | **Please specify** | | **Criteria 1** |  | | **Criteria 2** |  | | **Criteria 3** |  | | **Criteria 4** |  | | **Criteria 5** |  | | **Criteria 6** |  | | **Criteria 7** |  | | **Criteria 8** |  | | **Criteria 9** |  | | **Criteria 10** |  |   Did your organization apply for other scheme (for example Nordic Swan, Blue Angel, Milieukeur, Öko-Tex, etc)?  **YES  NO**  **If "YES", please specify which scheme**: |
| Do you have any suggestions to improve the current criteria document? |

## Handling applications

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| **These questions are addressed to the EUEB**  How many EU Ecolabel applications for footwear have you dealt with, or are you dealing with, based on the current criteria set? Please specify and give the number. |
| What are the obstacles that prevent an application to be finalised?  **Cost**  **Timing**  **Quick and seasonal evolution of Fashion Industry**  **Stringency of Criteria**  **Others**  If "Others", please specify:  Have you ever denied the EU Ecolabel licence for footwear product group because one of the criteria was not fulfilled?  **YES  NO**  If YES, which criteria?   |  |  | | --- | --- | |  | **Specify** | | **Criteria 1** |  | | **Criteria 2** |  | | **Criteria 3** |  | | **Criteria 4** |  | | **Criteria 5** |  | | **Criteria 6** |  | | **Criteria 7** |  | | **Criteria 8** |  | | **Criteria 9** |  | | **Criteria 10** |  | |
| Do you have any suggestions to improve the criteria document? If "YES" please specify: |
| What do you think would increase the number of licenses within this product group? *Please specify actions you would recommend:* |

## Scope of the EU Ecolabel criteria document

According to the Commission Decision No 2009/563/EC the product group Footwear: “(…) *shall comprise all articles of clothing designed to protect or cover the foot, with a fixed outer sole which comes into contact with the ground. Footwear shall not contain any electric or electronic components.”*

Before completing these questions we invite you to review the product group scoping document attached to the mail with questionnaire form. This document contains a technical analysis of the feasibility of scope extension.

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| Do you think the present scope and definition of the criteria document is adequate and precise?  **YES  NO**  If "NO" please specify: |
| In your opinion, should the scope be extended as follows: “*The product group ‘footwear and leather products’ shall comprise all articles of clothing or accessory*  *- Either designed to protect or cover the foot,*  *- Or made of leather and designed as decorative or functional accessory, such as belts, bags, gloves, and other leather articles normally carried in the pocket …*”?  **YES  NO**  Please provide arguments, comments or alternative proposal: |
| The framework of the current EU Ecolabel Decision defines the material cut-off limit as: “*Any upper shoe components weighing less than 3 % of the whole upper part shall not be taken into account for the application of the criteria. Any sole shoe components weighing less than 3 % of the whole outer sole shall not be taken into account for the application of the criteria.”*  Should the cut-off limit:  **Be lower, such as: % Be higher, such as: % Remain at 3%**  **Please, specify your reason if you propose any change in the current threshold:**  For footwear, should upper and sole shoe components remain differentiated?  **YES  NO**  In case of the possible scope extension, should the cut-off limit defined in the framework of the criteria document under revision also refer to the different types of leather-made products (e.g. belt, bag…)?  **YES  NO** |
| The functional unit is one pair of shoes. Requirements are based on shoe size 40 Paris point. For children's shoes the requirements apply for a size 32 Paris point (or the largest size in the case of maximum sizes smaller than 32 Paris point).  Do you think the present functional unit is adequate and precise?  **YES  NO**  If "NO" please specify:  Do you have any proposal for additional functional unit, should the scope be extended:? |
| In case of the possible scope extension, do you consider it appropriate to introduce a minimum content of leather in the leather goods other than footwear?  **YES  NO**  If "YES", could you specify the threshold that should be required, expressed as the minimum % per weight or/and area of product)?  **80 %  90 %  95 %  … % \***  Does the minimum leather content requirement depend on the product type (e.g. belt, bag…)?  **YES  NO**  If YES, please specify which products, other than footwear, and the typical minimum leather content  *Please provide arguments, comments or additional proposals:*  *\*Please specify the unit* |

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| **These questions are addressed to the EUEB:**  Have producers or any other interested party had difficulty in understanding the scope of the product group, or encountered difficulties because the product was not covered within the current scope and definition?  *Please specify if relevant:*  Have you ever denied the EU Ecolabel licence for the footwear product group because of a product not being covered by the current scope and definition?  **YES  NO**  If yes, please specify: |
| **These questions are addressed to the stakeholders:**  Do you have any difficulty in understanding the scope of the product group?  **YES**  **NO**  If YES, please specify:  Have you ever been denied the EU Ecolabel licence for the footwear product because of a product not being covered by the current scope and definition?  **YES  NO**  If YES, please specify:  Would you be interested to apply for the EU Ecolabel for small leather goods, not included in the current scope of the product group?  **YES  NO**  If YES, please specify: |

## Market and materials overview

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **These questions are addressed to the EUEB:**  Please, fill in the tables below indicating annual market figures representative for your country?  *You may fill out the tables with absolute (surface, weight, number of pairs\*) or relative values (%). Please specify the year and the unit used. Please try and normalise to surface if possible.*  Please, indicate **the leather sector segmentation** according to the final destination of leather   |  |  |  |  | | --- | --- | --- | --- | | **Destination of leather produced in your country** | **Surface (m²)** | **Weight (kg)** | **%** | | Footwear |  |  |  | | Furniture |  |  |  | | Automotive |  |  |  | | Garments |  |  |  | | Gloves |  |  |  | | Belts |  |  |  | | Bags |  |  |  | | Wallets |  |  |  | | Small articles carried in pocket |  |  |  | | Other leather products |  |  |  | | Total |  |  |  |   Please, indicate **the footwear sector segmentation** according to the use and the main type of material:   | **Use** | **Numbers of pairs** | **%** | **Materials** | **%** | | --- | --- | --- | --- | --- | | Casual |  |  | Leather |  | | Formal |  |  | Plastics |  | | Athletic |  |  | Textiles |  | | Safety |  |  | Rubber |  | | Indoor |  |  | Wood |  | | Fashion |  |  | Others |  | | Waterproof |  |  |  |  | | Others |  |  |  |  | |

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| --- | --- | --- | --- | --- | --- | --- | --- |
| **These questions are addressed to stakeholders:**  Which type(s) of products are addressed by your organisation?   |  | | --- | | **Footwear** | | **Gloves** | | **Belts** | | **Bags** | | **Wallets** | | **Small Articles carried in Pocket** | | **Others** |   If “Others”, please specify: |
| Which market segments are addressed by your organisation?   |  |  | | --- | --- | | **Gender** | **Price Category** | | **Man** | **Luxury** | | **Woman** | **Fine** | | **Children** | **Medium** | |  | **Economical** | |  | **Others** | |  |  | | **Main materials used** | **Use (Footwear)** | | **Leather** | **Casual** | | **Plastics** | **Formal** | | **Textile** | **Athletic** | | **Natural Rubber** | **Safety** | | **Wood** | **Indoor** | | **Cork** | **Fashion** | | **Others** | **Waterproof** | |  | **Others** |   If "Others", please specify: |
| Which types of leather are mainly used in manufacturing your leather products?   |  |  |  | | --- | --- | --- | | **Type of leather** | **Approx. percentage in reference to the total amount of leather used (%)** | **Main products that the leather is used to manufacture** | | **Bovine Leather** |  |  | | **Sheep Leather** |  |  | | **Goat Leather** |  |  | | **Kid Leather** |  |  | | **Pig Leather** |  |  | | **Chromium Tanned Leather** |  |  | | **Vegetable Tanned Leather** |  |  | | **Aldehyde Tanned Leather** |  |  | | **Coated leather** |  |  | | **Laminated leather** |  |  | | **Other Types of Leather** |  |  | | **None** |  |  |   If “Other Types of Leather”, please specify:  If you use coated or laminated leather, please specify kind of covering material:  What average proportion of leather per weight\* is used in the products you manufacture (for a reference product in relation to final product weight)\*?   |  |  |  |  | | --- | --- | --- | --- | | **Product type 1: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** | **Product type 2:**  **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** | **Product type 3:**  **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** | **Product type 4:**  **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** | | **Very low (< 5%)** | **Very low (< 5%)** | **Very low (< 5%)** | **Very low (< 5%)** | | **Low (5-25%)** | **Low (5-25%)** | **Low (5-25%)** | **Low (5-25%)** | | **Medium (25- 50%)** | **Medium (25- 50%)** | **Medium (25- 50%)** | **Medium (25- 50%)** | | **High (50-75%)** | **High (50-75%)** | **High (50-75%)** | **High (50-75%)** | | **Very high (> 75%)** | **Very high (> 75%)** | **Very high (> 75%)** | **Very high (> 75%)** |   \*If the requested data are expressed in other units please fill in the information and additionally specify the unit.  ***Please append details if necessary for additional products:***  Is the leather used by your organization granted any kind of certification that proves its origin and/or sustainable environmental practices within the supply chain (e.g. LWG rating, EcoSure, etc)?  **YES  NO**  If YES, please specify: |
| Which of the following innovations do you incorporate into your product:   |  | | --- | | **Organic fibre** | | **Recycled content** | | **Materials certified for sustainable environmental practices** | | **Renewable materials** | | **Others** |   Please specify the material, the % of content, and the certification scheme, if applicable: |
| Please indicate leading companies with good environmental practices: |

## [Assessment of the need for the current criteria amendment](#_top)

### Criteria revision

Please indicate which of the criteria you believe may need revision.

|  |  |  |  |
| --- | --- | --- | --- |
| How in your opinion should the criteria evolve: | | | |
| 1. Dangerous substances in the final product\* | Shall be reviewed (cf. Article 6.6. and 6.7. of the EU Ecolabel Regulation EC/66/2010) | | |
| 1. Reduction of water consumption | Keep | Modify | Remove |
| 1. Emission from the production of material (Limitation of water pollution) | Keep | Modify | Remove |
| 1. Exclusion of use hazardous substances (up until purchase)\* | Shall be reviewed (cf. Article 6.6. and 6.7. of the EU Ecolabel Regulation EC/66/2010) | | |
| 1. Use of VOCs during final assembly of shoes | Keep | Modify | Remove |
| 1. Energy Consumption | Keep | Modify | Remove |
| 1. Use of recycled material for packaging | Keep | Modify | Remove |
| 1. Information on the packaging | Keep | Modify | Remove |
| 1. Information appearing on the eco-label | Keep | Modify | Remove |
| 1. Parameters contributing to durability | Keep | Modify | Remove |
| *If you suggest* ***removing*** *the criteria, please provide reasoning justifying your response in the box below.*  *If you suggest* ***modifying*** *the criteria, please submit an alternative proposal with reasoning substantiating this modification* in the box below.  \*Note: the Criterion 1 and 4 will be analysed jointly. | | | |
| 1. Dangerous substances in the final product\* |  | | |
| 1. Reduction of water consumption |  | | |
| 1. Emission from the production of material (Limitation of water pollution) |  | | |
| 1. Exclusion of use hazardous substances (up until purchase)\* |  | | |
| 1. Use of VOCs during final assembly of shoes |  | | |
| 1. Energy Consumption |  | | |
| 1. Use of recycled material for packaging |  | | |
| 1. Information on the packaging |  | | |
| 1. Information appearing on the eco-label |  | | |
| 1. Parameters contributing to durability |  | | |
| Is there any other environmental aspect or criteria area which you think should be additionally covered?  **YES  NO**  If "YES", please specify your answer and provide additional comments and/or proposals substantiated by rationales: | | | |
| Is it feasible to set up the limit of water consumption for materials or production stages other than leather?  **YES  NO**  Please, specify and submit reasoning substantiating your response: | | | |
| Is it feasible to introduce the requirement on waste management system?  **YES  NO**  Please, specify: | | | |
| Are hazard statements applicable to any substance commonly used in footwear and leather products? Please refer to the attached table from [Appendix I.](#_APPENDIX_I:)  **YES  NO**  If YES, please specify which substance:  Could you give examples of hazardous substance(s) that you have substituted by more environmentally friendly alternative  **YES  NO**  If YES, please specify which substance and applicable hazard statement: | | | |

### [Assessment and verification revision](#_top)

Please indicate assessment and verifications that you believe may need revision.

|  |  |  |  |
| --- | --- | --- | --- |
| Are the current assessment and verification methods sufficient and practical?  **YES  NO**  If NO, please specify: | | | |
| How in your opinion should the criteria assessment and verification methods evolve:  \*Note: the Criterion 1 and 4 will be analysed jointly. | | | |
| 1. Dangerous substances in the final product\* | | Keep | Modify |
| 1. Reduction of water consumption | | Keep | Modify |
| 1. Emission from the production of material (Limitation of water pollution) | | Keep | Modify |
| 1. Exclusion of use hazardous substances (up until purchase)\* | | Keep | Modify |
| 1. Use of VOCs during final assembly of shoes | | Keep | Modify |
| 1. Energy Consumption | | Keep | Modify |
| 1. Use of recycled material for packaging | | Keep | Modify |
| 1. Information on the packaging | | Keep | Modify |
| 1. Information appearing on the eco-label | | Keep | Modify |
| 1. Parameters contributing to durability | | Keep | Modify |
| *If you suggest* ***modifying*** *the criteria, please submit an alternative proposal with reasoning substantiating this modification* *in the box below.* | | | |
| 1. Dangerous substances in the final product\* |  | | |
| 1. Reduction of water consumption |  | | |
| 1. Emission from the production of material (Limitation of water pollution) |  | | |
| 1. Exclusion of use hazardous substances (up until purchase)\* |  | | |
| 1. Use of VOCs during final assembly of shoes |  | | |
| 1. Energy Consumption |  | | |
| 1. Use of recycled material for packaging |  | | |
| 1. Information on the packaging |  | | |
| 1. Information appearing on the eco-label |  | | |
| 1. Parameters contributing to durability |  | | |

# [APPENDIX I:](#_top)

Hazard statement according to CLP 1272/2008 for hazardous substances

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| --- | --- |
| ***Hazard statement according to CLP 1272/2008/EEC*** | ***Associated risk phrases according to Directive 67/548/EEC*** |
| H300 Fatal if swallowed | R28 |
| H301 Toxic if swallowed | R25 |
| H304 May be fatal if swallowed and enters airways | R65 |
| H310 Fatal in contact with skin | R65 |
| H311 Toxic in contact with skin | R65 |
| H330 Fatal if inhaled | R23; R26 |
| H331 Toxic if inhaled | R23 |
| H340 May cause genetic defects | R23 |
| H341 Suspected of causing genetic defects | R68 |
| H350 May cause cancer | R45 |
| H350i May cause cancer by inhalation | R49 |
| H351 Suspected of causing cancer | R40 |
| H360F May damage fertility | R60 |
| H360D May damage the unborn child | R61 |
| H360FD May damage fertility. May damage the unborn child | R60-61 |
| H360Fd May damage fertility. Suspected of damaging the unborn child | R60-63 |
| H360Df May damage the unborn child. Suspected of damaging fertility | R61-62 |
| H361f Suspected of damaging fertility | R62 |
| H361d Suspected of damaging the unborn child | R63 |
| H361fd Suspected of damaging fertility. Suspected of damaging the unborn child | R62-63 |
| H362 May cause harm to breast-fed children | R64 |
| H370 Causes damage to organs | R39/23; R39/24; R39/25; R39/26; R39/27; R39/28 |
| H371 May cause damage to organs | R68/20; R68/21; R68/22 |
| H372 Causes damage to organs through prolonged or repeated exposure | R48/25; R48/24; R48/23 |
| H373 May cause damage to organs through prolonged or repeated exposure | R48/20; R48/21; R48/22 |
| H400 Very toxic to aquatic life | R50 |
| H410 Very toxic to aquatic life with long-lasting effects | R50-53 |
| H411 Toxic to aquatic life with long-lasting effects | R51-53 |
| H412 Harmful to aquatic life with long-lasting effects | R52-53 |
| H413 May cause long-lasting harmful effects to aquatic life | R53 |
| EUH059 Hazardous to the ozone layer | R59 |
| EUH029 Contact with water liberates toxic gas | R29 |
| EUH031 Contact with acids liberates toxic gas | R31 |
| EUH032 Contact with acids liberates very toxic gas | R32 |
| EUH070 Toxic by eye contact | R39-41 |
| H334 May cause allergy or asthma symptons or breathing difficulties if inhaled | R42 |