The Nordic Swan – From past experiences to future possibilities

The third evaluation of the Nordic ecolabelling scheme

Kristiina Aalto, Eva Heiskanen, Charlotte Leire and Åke Thidell

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Förord

Miljömärket Svanen inrättades 1989 av de nordiska konsumentministrarna från Finland, Island, Norge och Sverige.

Danmark trädde in i Svanen 1997. Sedan 2006 är det miljösektorn som ansvarar för Svanen på nordisk nivå.

Svanen är ett konsument- och miljöpolitiskt verktyg vars syfte är att å ena sidan ge konsumenten klar och tydlig miljöinformation om produkter (varor och tjänster) och å andra sidan stimulera produktutveckling som tar hänsyn till miljön. Produkterna skall också vara av god kvalitet och vara trygga med avseende på hälsoaspekter. Undersökningar visar att Svanen är ett av Nordens mest kända varumärken och en konkret och framgångsrik symbol för det nordiska samarbetet – ett varumärke vi har anledning att vara stolta över och värna.

De slutsatser och rekommendationer som lämnas i nu föreliggande utvärderingsrapport om bl.a. möjligheter och hinder för ytterligare harmonisering/koordinering mellan Svanen och Blomman och mellan Svanen och andra informationsverktyg ger underlag till den fortsatta processen och kan bidra till att föra frågorna ytterligare ett steg framåt. Rapporten ger också ett underlag för att gå vidare med frågan hur man inkluderar klimatfrågan inom ramen för miljömärkningen.

Vi vill också välkomna intresserade deltagare till det seminarium som Sverige i egenskap av ordförandeland i Nordiska ministerrådet 2008 genom SIS Miljömärkning AB ska arrangera i vår. Utvärderingen kommer att ligga till grund för seminariet och ambitionen är att ytterligare kunna ventilera några av rapportens frågeställningar och fördjupa dess analys och rekommendationer.

Nyamko Sabuni
Konsumentminister, Sverige

Andreas Carlgren
Miljöminister, Sverige

Preface

The present evaluation was contracted by the Nordic Council of Ministers in a context when responsibility for the Nordic Swan recently had been turned over to the Ministers in charge of environmental affairs. The evaluation aims to contribute to further analysis and planning by the Nordic Council of Ministers and the Nordic Ecolabelling Board. Further recommendations and action plans will also be developed in a seminar funded by the Nordic Council of Ministers and organised by the Ministry of Integration and Gender Equality (Sweden) in the spring 2008.

The evaluation has been conducted by a project group from the National Consumer Research Centre (Kristiina Aalto and Eva Heiskanen) and the International Institute for Industrial Environmental Economics (IIIEE) at Lund University (Charlotte Leire and Åke Thidell). The project was supported by a steering group consisting of the following persons: Søren Mørch Andersen (Danish Environmental Protection Agency, Denmark), Marita Axelsson (Ministry of Integration and Gender Equality, Sweden), Isa-Maria Bergman (Finnish Environment Institute, Finland), Mats Ekenger (Nordic Council of Ministers), Kjersti Larssen (Ministry of Children and Equality, Norway), Anita Lundström (Swedish Environmental Protection Agency, Sweden) and Claus Egeris Nielsen (National Consumer Agency, Denmark).

Acknowledgements are also due to the national ecolabelling bodies and companies in Denmark, Finland, Iceland, Norway and Sweden; actors that have all provided important information for the evaluation. The project group has been also supported by information and comments by the Nordic Co-ordinator of the Nordic Ecolabelling Board, Mr. Björn-Erik Lönn.

Summary

The current evaluation of the Nordic Swan ecolabel was contracted by the Nordic Council of Ministers in a context when responsibility for the Swan label recently had been turned over to the Ministers in charge of environmental affairs. The previous evaluation was conducted in 1998–2000. One of the main topics for the current evaluation was to study the relations between the Nordic Swan and the EU Eco-label in the Nordic countries, to compare the differences and similarities between the two systems and to examine the prospects for co-ordination and harmonisation of the two schemes. Other issues addressed include the implementation of the Nordic marketing strategy for the Swan, some current governance issues in the scheme, as well as the relations between the Swan and other environmental information systems and the integration of climate issues in the Nordic Swan.

Similarities and differences between the Nordic Swan and the EU Eco-label

The Nordic Swan and the EU Eco-label are two very similar systems for third-party ecolabelling of products and services. Over the past eight years, some of the original differences between the schemes have decreased. In the Nordic countries, the fact that the schemes are operated by the same ecolabelling secretariats serves to further co-ordinate the schemes on an operational level. The two ecolabelling schemes have published criteria for 18 overlapping product groups. There have been attempts to harmonise the criteria. Thus, the labelling criteria have become more similar, even though very few products have exactly the same criteria.

One major difference, however, is the number of product groups with ecolabelling criteria. The number of product groups with EU Eco-label criteria (26) is still less than half that of the products included in the Nordic Swan (67). Unless the revision of the EU Eco-label brings about a radical change, this difference is likely to persist in the coming years. The Nordic Swan has obviously been able to create a well functioning system for criteria development, which is also reflected in the increasing trend to produce common sets of criteria for families of products and common modules. The environmental relevance of the Swan criteria appears to have improved since the previous evaluation (1998–2000), at least as concerns the range of product groups.

There are also differences in the governance structures of the two schemes: The EU Eco-label has a different legal basis and a more com-

plex and multilayered governance structure, in which the European Commission and the national authorities have a prominent role alongside the national ecolabelling bodies.

A major difference between the schemes is their financial basis in the Nordic countries. In all Nordic countries, the turnovers of the Nordic Swan scheme were many times those of the EU Flower in 2006. The ecolabelling secretariats are able to derive about three-fourths of their annual budgets from license fees. In contrast, the EU Eco-label, due to the smaller number of licenses and the lower license fees, is highly dependent on public funding.

Market reception and public awareness of the Nordic Swan and the EU Eco-label

The Swan remains the dominant label in the Nordic countries, with at about six times more licenses in Denmark, and an even more overwhelming dominance in the other Nordic countries. The EU Flower is gaining some ground in some countries, in particular in Denmark, and in some product groups (e.g., textiles). There are, however, product groups in both schemes in which no licenses are awarded.

There are some differences among the Nordic countries in terms of the respective positions of the Nordic Swan and the EU Eco-label. Our interviews showed that there is scepticism about the credibility of the EU Eco-label in some countries and industries. However, there are also differences between industries. The companies' views of the two systems depended, to some extent, on their market position and the geographical area in which they market their products. The choice between the Nordic Swan and the EU Flower is mostly made on pragmatic grounds that relate to marketing advantages.

The Swan label is very well known among consumers in the Nordic countries. The Nordic Ecolabelling Board has devoted particular attention to communication and marketing in recent years. It has identified key values of the Swan that should form the basis for all communications: *credibility*, *dynamism* and *engagement*. The national ecolabelling secretariats have internalised these values and value propositions and implemented them on the national level. Overall trust in the Swan has grown over the years, and the increased interest in the Swan indicates that a growing number of companies are subscribing to these value propositions. All in all, marketing of the Swan has improved significantly since the previous evaluation and has become highly strategic and professional. Moreover, the 'Nordic focus' has been strengthened in information and marketing strategies, whereas the actual marketing and communications work is done on the national level and in response to national needs.

The development of the EU Eco-label has implications also for the future of the Swan, as the two schemes operate in parallel, make use of partly the same expert and other human resources, and there is demand

for both schemes among companies. Nordic ecolabelling bodies have only limited influence on the development of the EU Eco-label, but should take its development into account when devising future marketing strategies.

Possibilities for co-ordination and harmonisation of the Nordic Swan and the EU Eco-label

The issue of co-ordination and harmonisation of different ecolabelling schemes has been on the agenda for years. One of the central issues in the latest evaluation of the EU Eco-label (EVER 2005) was the relation between the EU Eco-label and national labelling systems. The EVER (2005) study views co-ordination and harmonisation as an alternative to the abolishment of one or the other types of schemes. Thus, it also includes the possibility of the EU Eco-label and national schemes gradually approaching each other over an extended period of time.

A number of attempts to co-ordinate and harmonise processes have been made, both among national labelling schemes and between national labelling schemes and the EU Eco-label. The Nordic countries have developed a case-by-case approach to co-ordination and harmonisation. This approach has been a workable solution, which has also led to increasing similarity in labelling criteria. Important drivers for harmonisation include the need to cut down on the work and resources spent on developing criteria and the license holders' perceived desire for equivalent criteria. The license fee structure was identified as another issue in which co-ordination is needed. If the two schemes are to continue to exist side by side, there should be consistency between the license fees, and companies should have stronger financial incentive to use both labels side by side.

Opinions concerning the EU Eco-label differ between the Nordic countries. Denmark strongly favours a more rapid harmonisation, while the stand of the other Nordic countries is to benefit from the strong market position of the Swan. The upcoming revision of the Regulation concerning the EU Eco-label involves many uncertainties. A common Nordic position would be desirable, and even though national positions differ, there are common interests in promoting co-ordination between the Nordic Swan and the EU Eco-label by supporting the development of the EU Eco-label criteria on the basis of existing national criteria sets.

Current governance issues: grounds for public support and the majority principle

There are three types of public support provided to ecolabelling: *financial support, public endorsement and integration into existing and new product, consumer and environmental policies* (e.g., via public procurement). The type of support has an effect on both the credibility and the market potential of the Nordic Swan. In terms of public funding, the evaluation

found that the Nordic Swan is on a sound financial basis, even though more public funding may be necessary for some specific issues or in the case of an individual country like Iceland. Another potential issue is the financial support needed for the administration of the EU Eco-label. On the other hand, the current level of self-financing and the 'self-financing culture' of the Nordic ecolabelling bodies ensure responsiveness to market needs. In addition, an important issue concerning public support is integration of the Swan into existing policies, such as green public procurement, and overall public endorsement by authorities.

Another topical governance issue relates to the majority principle, which was introduced in 2003 in order to speed up the decision process and improve the capacity of the Nordic Swan organisation to operate effectively in a changing operating environment. The evaluation found that the majority principle is supported by most participating countries. Denmark has called for a specifying of this principle. This was, however, due to events surrounding the voting on one specific set of criteria, those for printing companies. There were concerns that the approval of these criteria would lead to the withdrawal of many license-holders, but this has not been the case. Nonetheless, the need for more detailed rules for when the majority principle is not appropriate is still on the Danish agenda.

The Nordic Swan and other environmental information systems

There are a number of information systems that involve overlapping or closely similar issues and interests to those of Nordic ecolabelling. *It is to a large extent possible to use different environmental information systems in synergistic ways.* Ecolabelling could be combined with, for instance, LCA in terms of criteria development and EMS in terms of validation and data generation. There are many reasons for utilising these synergies: cost savings, the goal of making it easier for producers to use a relevant mix of information systems, a wish to increase the understanding of environmental information, etc. It is obvious that the Nordic system benefits from many of these information systems in criteria development. In order to support producers and other actors in utilizing these synergies to their full extent, the opportunities need to be made more visible. Our conclusion is that there is a need to more systematically build up the knowledge base and to collect and disseminate good examples to information system administrators, ecolabelling criteria developers, industry associations, public procurement officers, etc.

Moreover, the environmental issues included in Nordic ecolabelling are increasingly discussed in a broader sustainability context, including also social issues. The Nordic Swan has maintained a pragmatic approach towards new aspects of sustainable consumption and has included them when appropriate. The Nordic Ecolabelling Board has defined the position of the Nordic Swan vis-à-vis sustainability issues, but has not yet

engaged in a broader debate on fundamental issues (for more details, see recommendations, Section 9.2).

Climate issues and the Nordic Swan

Climate change has rapidly climbed to the top of the environmental agenda in many countries. In this context, increased attention and demand for information has led to a number of industry and third-party initiatives in climate labelling. Nonetheless, creating credible and comparable climate labels involves many unresolved problems, such as methodological issues and the risks involved in the proliferation of labels.

The evaluation found that *the Nordic Swan can benefit in many ways from the current attention to climate issues*. The fact that the Swan takes into account a range of environmental issues – as well as health, quality and some social issues when necessary – is a definite advantage in this respect.

Climate change has implications for the Nordic Swan in terms of (1) *inclusion in criteria* (2) *relevance of product groups* and (3) *communications*. The Nordic ecolabelling bodies have acknowledged the opportunity provided by climate issues and launched investigations into how well the criteria address climate-relevant issues. In recent years, the Nordic Swan has also targeted product groups that are gaining interest due to the current attention to climate and energy. Some climate-relevant products (e.g., transportation) are still controversial within the Swan, but there seems to be more openness to address products with large environmental problems, if labelling can bring about significant improvements, as well. The Nordic Ecolabelling Board has addressed climate issues in its 2008–2010 strategy. There may also be a need to consider the development of a detailed strategy for factoring climate issues into the selection of product groups to complement and specify the RPS principle for this particular issue. Most immediately, however, the Nordic Swan needs to develop a climate communication strategy and address its stakeholders with relevant information. In particular, need was found for more systematic co-operation with other parties communicating about climate issues, and for more information exchange and collaboration with the authorities responsible for climate policies.

Recommendations

On the basis of the evaluation, the following recommendations can be made (for more details, see Section 9.2):

- 1) Initiate a more detailed study of license-holders' preferences for the Nordic Swan and the EU Eco-label (*Nordic Council of Ministers and national governments*)
- 2) Define a common vision of the desired future state for ecolabelling in the Nordic countries and elaborate the path towards it using a

- back-casting exercise (*Nordic Ecolabelling Board and national governments*)
- 3) In the medium to long term, prepare for a potential scenario in which companies increasingly turn to the EU Eco-label in some product groups, in terms of marketing, product group differentiation and funding implications (*Nordic Ecolabelling Board*)
  - 4) Promote common interests in the gradual co-ordination of the Nordic Swan and the EU Ecolabel by influencing the operating procedures of the EU Eco-label (*national governments*)
  - 5) Analyse the financial viability of the EU Eco-label for the national competent bodies (*national governments, Nordic ecolabelling secretariats*)
  - 6) Analyse and manage changes introduced by the revision of the EU Eco-label Regulation (*national governments, Nordic Ecolabelling Board and national secretariats*)
  - 7) Consider the implications of more active harmonisation in terms of market position, dynamics, pros and cons of linkages to government, the future role of ecolabelling, and in particular, funding (*national governments*)
  - 8) Elaborate and discuss the concept of harmonisation, its purpose, and the parties that should benefit from it (*national governments, Nordic Ecolabelling Board*)
  - 9) Maintain the current level of financial support for the Nordic Swan for national ecolabelling bodies (*funding authorities in each country, Nordic Council of Ministers*)
  - 10) Closely follow the development of sustainability labelling and consider developing a more systematic long-term strategy (*Nordic Ecolabelling Board*)
  - 11) Make better use of potential synergies with other information systems through intensified co-operation, including workshops, liaisons and joint projects with other labelling, information and certification systems (*NMRIPP Group, Nordic Ecolabelling Board and national ecolabelling secretariats*).
  - 12) Continue the good work in Nordic information and marketing strategies and intensify joint projects with companies, the public sector and other labelling systems (*Nordic Ecolabelling Board and national ecolabelling bodies*).
  - 13) Increase overall support for ecolabelling by taking it into account in environmental, consumer and product policies within the context of integrated product policy (*NMRIPP Group, national authorities*), increase systematic co-operation with green public procurement and other policy instruments (*Nordic Ecolabelling Board*).
  - 14) Develop a communication strategy for the EU Flower in the Nordic countries (*national ecolabelling bodies, funding authorities*).

- 15) Develop a common communication format for climate aspects of the Swan for the general public, companies and the relevant authorities (*Nordic Ecolabelling Board together with other organisations communicating on climate issues*)
- 16) Set up an ad hoc working group to analyse the need for more detailed rules concerning the use of the majority principle (*Nordic Ecolabelling Board, Nordic Council of Ministers*)

List of Abbreviations

CSR	Corporate Social Responsibility
EMAS	Environmental Management and Audit Scheme
EMS	Environmental Management System
EN	European Standard
EPA	Environmental Protection Agency
EPD	Environmental Product Declaration
EUEB	European Union Eco-labelling Board
GEN	Global Ecolabelling Network
GPP	Green Public Procurement
GRI	Global Reporting Initiative
IPP	Integrated Product Policy
ISO	International Organisation for Standardisation
KEPI	Key Environmental Performance Indicator
LCA	Life Cycle Assessment
NCM	Nordic Council of Ministers (Nordiska Ministerrådet)
NGO	Non Government Organisation
NEB	The Nordic Ecolabelling Board (Nordiska Miljömärkningsnämnden)
OECD	Organisation for Economic Co-operation and Development
RPS	Relevance Potential Steerability
SCP	Sustainable Consumption and Production
SME	Small and Medium Sized Enterprise
UNEP	United Nations Environment Programme
WTO	World Trade Organisation

1. Introduction

The Nordic Swan environmental labelling scheme has been in operation since 1989. It was launched by the Nordic Ministers in charge of consumer affairs, who were responsible for the scheme on a Nordic level until 2006. Since the initiation of the scheme, two major evaluations have been conducted, as well as a number of regular surveys and studies on specific topics. The aim of the current evaluation is to:

- 1) Examine recent developments and challenges since the previous evaluation, reported in 2001,
- 2) Summarise current achievements and challenges for the Nordic Swan system,
- 3) Address a number of topical issues and changes in the operating environment of the Nordic Swan, such as its relations with the EU Eco-label and other environmental information systems, as well as the current and future role of climate issues within the Nordic Swan labelling scheme.

The evaluation was contracted by the Nordic Council of Ministers in a context when responsibility for the Nordic Swan recently had been turned over to the Ministers in charge of environmental affairs. In this context, the Nordic Swan represents an instrument that holds potential for increased interest and attention in the future. The Nordic Swan is also an important instrument in the promotion of sustainable consumption and production (SCP) and integrated product policy (IPP).

The evaluation addresses a number of other key audiences. In the Nordic Countries, a number of state officials have responsibilities that pertain to the Nordic Swan system, and each country needs to make regular decisions concerning public support and funding of the system. Moreover, a current topic that officials in the Nordic countries need to take a stand on is the revision of the EU Eco-label regulation.

Other important audiences for the evaluation include those involved in operating the scheme on a Nordic and national level. The evaluation is likely to also raise interest among other stakeholders, such as companies holding or considering licenses to use the Nordic Swan label, as well as non-governmental organisations. Importantly, the label is financed through license fees and public funding, both ultimately paid for by the general public. Thus, the general public is likely to have an interest in the progress and potential for future development of the Nordic Swan.

The assignment for the evaluation team includes the following questions that the evaluation should address (Annex 1):

- A. The relations between the Nordic Swan and the EU Eco-label: the respective position of the systems in the Nordic countries
- B. Comparison and clarification of differences and similarities between the Nordic Swan and the EU Eco-label
- C. Possibilities for co-ordination and harmonisation, taking into account the ongoing work on revising the Eco-label Regulation
- D. Grounds for public support for ecolabelling
- E. What are the possibilities for co-operation and collaboration among the Nordic Swan and other environmental information systems in the Nordic Countries (e.g., environmental product declarations, environmental management systems other than EMAS and ISO 14001, product panels, key environmental performance indicators (KEPIs), life cycle assessments, corporate social responsibility, ethical labelling, etc.)
- F. How well have Nordic information strategies to inform the general public on the Nordic Swan label worked?
- G. How are climate issues dealt with in the Nordic Swan system?
- H. What are the consequences of the majority decision principle of the Nordic Council of Ministers in criteria selection and the choice of different product groups (with the product group of printed products as the starting point)?

Consequently, the evaluation is more of an analysis of the current situation than an evaluation in traditional terms, as there are no criteria or reference points against which to evaluate. Moreover, the mandate for the evaluation does not call for an analysis of the effectiveness of the Nordic Swan, but the evaluation report does suggest some further studies that could enable such an analysis.

The analysis is based on documentary material, previous surveys and statistical analysis, as well as interviews with key actors and stakeholders of the Nordic Swan scheme. Interviewees include members of the Nordic Ecolabelling Board, the national ecolabelling boards and the national secretariats managing the scheme, and the EU Ecolabelling Board. A number of public authorities and experts dealing with environment and consumer issues were also interviewed in the different Nordic countries. Moreover, interviews have been conducted with company and industry association representatives in the Nordic countries in key industries from the perspective of the Nordic Swan. A detailed overview of the parties interviewed is presented in Annex 2. In addition, the evaluation data include observations made and informal discussions held at two Nordic Ecolabelling seminars: *The Swan up until 2010, Common Nordic Ecolabelling Board and Secretariat Meeting* in Reykjavik, October 20, 2007 and the *Global Ecolabelling Network Conference* in Lund, November 6–7, 2007.

The evaluation has been conducted within a limited time frame (October – December 2007) and with a relatively small budget. Hence, it has not been possible to systematically interview all relevant parties. The interviewees have been selected with a view to bringing forth key issues for the evaluation. For example, the company representatives were selected to access the perspectives of companies that have chosen either the Nordic Swan or the EU Eco-label, and they are not necessarily otherwise representative of companies in their respective countries. Moreover, there have been limited resources for collecting new statistical data. In many cases, it has also been difficult to find comprehensive datasets or sets of statistics. On many issues, our analyses thus focus on illustrating key features and challenges rather than on providing a systematic overview.

The report is structured as follows. Chapters 2–4 focus on the relations between the Nordic Swan and the EU Eco-label. Chapter 2 provides an overview of the history of the systems, the main recommendations of the previous evaluations, and current issues that are topical for these schemes. Chapter 3 focuses on a comparison of the Nordic Swan and EU Eco-label system in terms of principles, product groups addressed and criteria developed. Chapter 4 deals with the market reception and public awareness of the two ecolabelling systems, and it also evaluates recent marketing strategies applied in the Nordic countries. Possibilities for co-ordination and harmonisation of the Nordic Swan and the EU Eco-label are discussed in Chapter 5. Chapter 6 deals with two current governance issues in the Nordic Swan scheme: the grounds for public support and the consequences of introducing the majority principle in the decision making on product groups and criteria. Chapter 7 considers potential co-operation between the Nordic Swan and other environmental information systems. Chapter 8 addresses the topical issue of climate change and explores how the Nordic Swan has addressed the challenge of climate issues. Chapter 9 presents a summary of the main findings and the recommendations of the evaluation.

2. The Nordic Swan and the EU Eco-label: history and current issues

2.1 History of introducing the Nordic Swan and the EU Eco-label in the Nordic countries

The Nordic Ecolabelling Scheme, the Swan label, was adopted in 1989 by the Nordic Council of Ministers. Norway and Sweden were involved from the beginning, Finland joined in 1990 and Iceland in 1991. Denmark initially chose to take an observational role while waiting for the establishment of the EU Ecolabelling scheme. Denmark was the only Nordic EU member at that time. Since 1998, Denmark is also a part of Nordic Ecolabelling Scheme.

The EU Eco-labelling scheme was established in 1992. One of the ideas when establishing the scheme was to replace the existing national and regional ecolabelling systems in Europe. This, however, did not happen in the years that followed. When the EU Eco-labelling scheme was revised in 2000, the relation between national labelling systems and the EU Eco-label was once again one of the most hotly debated issues. The final regulation, nonetheless, allowed the national labelling systems to continue in operation. Currently, 30 countries participate in the EU Eco-labelling scheme (the EU-27 and three non-EU countries, Liechtenstein, Norway and Iceland). Alongside the EU Eco-label and the Swan, there are 13 national eco-labels in operation in the European Union, as listed in chapter 5.

The aim of both the ecolabelling schemes is to award an eco-label to products and services with reduced environmental impacts. Both the schemes are voluntary. Criteria are established for individual product groups. The idea of the schemes is to communicate to consumers that an eco-labelled product has been carefully assessed and has been found to make less of an environmental impact than other similar competing products. In this way, the schemes aim to stimulate environmentally sound product development and to reduce environmental stress.

2.2 Previous studies and evaluations

The Nordic Swan scheme has been evaluated several times and from different points of view. Previous evaluations of the Swan were con-

ducted in 1994–1995 (Nordisk Miljömärkning 1995) and in 1998–2000 (The Swan label from... 2001). In addition, a number of specific topics have been analysed since the last evaluation.

The EU Eco-label has undergone a major revision in 2000, when the European Ecolabelling Board was introduced as a new central body tasked with setting the product group criteria and promoting the scheme. The EU Eco-label has latest been evaluated for its revision in 2005. The evaluation report from 2005 includes also recommendations for the harmonisation of ecolabelling schemes.

The following text presents the main highlights from these previous evaluations, first pertaining to the Nordic Swan, and then to the EU Eco-label.

The Nordic Swan

The most recent evaluation of the Swan was conducted in 1998–2000. The evaluation was made by a cross-sectional Nordic working group under the Nordic Council of Ministers. It also drew on the results of the reports: “*Nordiska konsumenter om Svanen – livsstil, kännedom, attityd och förtroende*” (Nordiska konsumenter om Svanen...1999) and “*Evaluation of the Environmental effects of the Swan Eco-label – final Analysis*” (Evaluation of the Environmental... 2001).

In summary, the Swan label was found to have become a very successful system during its ten first years. The Swan’s greatest strength was seen in its power to communicate a complex message in a simple form. Yet, it was also noted that the ecolabelling tool has limited possibilities to influence total consumption as well as consumers’ use of goods and services. The Swan is also dependent on acceptance and involvement by both industry and consumers. According to the working group, the main goal for the Swan should be to contribute to consumption with less impact on the environment and in this way contribute to implementing the strategy for a sustainable Nordic area together with other political initiatives. The evaluation made the following recommendations:

- The role of the Nordic Swan vis-à-vis other environmental information systems should be defined more clearly. Similarly, the potential for synergy effects with other environmental policy instruments should be investigated more closely. Moreover, it was proposed that a closer analysis should be conducted into possibilities for co-ordination and possible harmonisation with the EU Eco-label.
- The Nordic Swan should establish a common quality system for criteria development, and establish criteria development and common licensing procedures on the basis of the relevant international and EN standards.

- The Swan should make more explicit its contribution to Nordic environmental and consumer policy goals. The criteria development should be based on the available knowledge regarding the environmental impact the focused products have. The evaluation also recommended that operative interim goals and indicators for the environmental and consumer policy effects of the Swan should be defined and regularly evaluated.
- The Nordic profile should be strengthened and further developed. The procedures and practices should be as similar as possible between the national secretariats. Moreover, the evaluation recommended that broad representation and relevant competence should be ensured in the expert groups responsible for criteria development.
- A marketing strategy should be determined for the Swan on the Nordic level. The target groups and profile should be clarified. Moreover, the Swan's environmental profile should be strengthened by concentrating on ecolabelling in environmentally relevant areas.
- The working group suggested that the aim of self-financing should be abolished. A minimum level for national public contributions should be established, which should be related to part of the costs for the criteria development and contribute to a stronger Nordic profile. A uniform fees system in the participating countries and better co-ordination with the EU Eco-label fees were called for.
- The working group recommended that the Nordic Ecolabelling Board can take decisions about criteria with a qualified majority (3/4), and that the decision concerning pilot studies of product groups can be made with a simple majority (3/5). It also recommended that a common model for settling disputes should be drawn up for handling potential licensing conflicts.

A number of studies were launched to further investigate the impacts of these recommendations. An analysis of the decision process of the Swan label was conducted in 2001–2002, including suggestion for new organisation model (Thiberg 2002). This study recommended moving the administration of the Nordic Swan entirely to the Nordic level, but its suggestions (apart from the majority principle, which it also supported) were not implemented.

Moreover, the role of the Swan in relation to environmental product declarations and other environmental information systems has been analysed (Edlund, Leire & Thidell 2002). The purpose of the study was to demonstrate existing and potential synergies between the Swan and the other systems. The study was conducted by using information from case studies covering the product groups painting services, paper products and building materials, including interviews with representatives from producers and concerned organisations related to the appointed product groups. The results pointed out that there is a need for clarifying the na-

ture of different systems. Especially some arguments against ecolabelling revealed obvious misunderstandings. Some considered that ecolabelling does not give competitive advantages, costs too much, does not differentiate between products, is only geared to the Nordic market or is not flexible enough. The conclusion was that if there is an increasing need for environmental information and the pressure is strong enough, the producers will provide the information system the customers prefer. Based on an analysis on the synergies, barriers and opportunities, a new vision was formulated for further work with the Swan labelling.

Finally, a project aimed at further developing the marketing of ecolabels in Nordic countries was concluded in 2007 (Helgadottir 2007a). This study analysed the existing experiences gained in Nordic countries and identified features contributing to the success of marketing efforts. Its particular aim was to contribute to better marketing in countries in which the Swan is less well known. The results of this study are discussed in more detail in chapter 4.2.

The EU Eco-label

The EU Eco-label underwent a major revision in 2000 on the basis of the experiences accumulated in the first years of operation. The key revisions introduced in the revised regulation (EC No 1980/2000) included the creation of the European Union Eco-labelling Board (EUEB), widening the scope to cover services as well as products, reinforced stakeholder participation, changes in the fee structure, increased emphasis on the promotion of the scheme, reinforced transparency and methodology, and reinforced co-operation and co-ordination with the national Eco-label schemes.

The scheme has most recently been evaluated together with the EMAS scheme (EVER 2005). As concerns the EU Eco-label, the evaluation study concluded that the original ideas behind the voluntary scheme are still valid and desirable: The EU Eco-label provides EU consumers with an environmental certification they can trust, and it can give businesses the opportunity to use one label for all their pan-European or global marketing. The evaluation showed that the Eco-label has contributed to setting targets for better environmental product performance, it has influenced the demand for suppliers to meet high environmental standards, and it is used by companies in their marketing. The interviews indicated that both users and non-users support the continuation of the EU Eco-label, and that the concept of the EU Eco-label is preferred to that of national labels. Yet the evaluation also revealed that there is still low awareness and uneven geographic take-up of the label, and that there are insufficient product group categories. The evaluation also concluded that the EU Eco-label suffers from cumbersome procedures and organisational structures, that the fees and the cost of getting the label are per-

ceived as barriers, and that there is a lack of perceived public purchasing benefits.

The evaluation (EVER 2005) made seven main recommendations for developing the EU Eco-label:

- *Changes to the current institutional framework* were recommended for consideration; in particular the make-up of the decision making board of the Eco-label needs to be more representative of all stakeholders of the scheme.
- *Improving the attractiveness* of the Flower by setting fiscal policy incentives, and by stimulating market demand through green public procurement, better regulation and mutual reinforcement among eco-labels.
- *Attracting more license holders* by making more product groups available and by reducing the number of criteria for each product group.
- *Promotion and marketing* of the scheme, aimed at raising the awareness of consumers, professional purchasers, retailers, potential license holders and other stakeholders, either by direct promotion and marketing activities and/or by activities that support promotion and marketing by companies.
- *Harmonising ecolabelling schemes*: three possible ways to proceed were proposed, i.e., (1) for Eco-label criteria to be adopted by national schemes; (2) for national criteria to be adopted by the Eco-label when possible; or (3) to transform the EU Eco-label into a sort of “umbrella” scheme.
- *Support measures for applicants*, including (1) technical measures, relating to the provision of know-how and tools and financial incentives and (2) measures relating to the possibility of subsidising or reducing the costs that applicants currently face.
- *Extension of the EU Eco-label towards sustainability* by gradually introducing some modifications into the scheme that could respond in the long run to the possibility of an EU sustainability label.

In order to further support the revision process, a public consultation was organised in 2007 as an online questionnaire survey (closed-ended questions). The report (Public Consultation 2007) drew the following conclusions:

- It noted continuing strong support for the EU Eco-labelling concept and third-party verification.
- It also noted support for changing the organisational framework of the EU Eco-label, with strong support in favour of a new Ecolabel Board including stakeholders representation with voting rights, as

well as enabling ‘fast tracking’ of revisions, corrections and appeals of criteria and producing standardised Eco-label criteria documents.

- A large majority (86%) agreed that the EU Eco-label product group criteria must be realistically applicable across the whole of the EU. Yet more than two-thirds also considered it important to make the scheme interesting for ‘front runners’.
- Almost two-thirds of those participating in the consultation agreed that it should be mandatory for Member States to use Eco-label criteria (or equivalent), where possible, in public procurement tendering processes.

It is worth noting, however, that the number of stakeholders participating in the consultation was limited, the selection of respondents was not systematic and participation by the different Member States was uneven. Moreover, the consultation format (closed-ended questions) provided limited opportunity to discuss issues, specify questions or raise new questions. Nordic viewpoints and perspectives on the evaluation of the EU Eco-label, and in particular the issue of harmonisation, are presented in more detail in chapter 5.2 of the present report.

From the perspective of the Nordic Swan, many issues in the operating environment are evolving rapidly and involve large uncertainties. Both the Nordic Swan and the EU Eco-label have undergone significant organisational transformations since their inception. In particular, the Swan has made progress in some aspects identified in the previous evaluation (Evaluation of the environmental... 2001).

While it is not the primary task of this evaluation to make a detailed analysis of the progress since the previous evaluation, some key developments from the perspective of the present evaluation can be pointed out:

- The Nordic profile has been reinforced in some areas. In particular, marketing has become more professionalised and more sophisticated. Systematic strategies have been drawn up for product group selection, market analysis, core value propositions and target group identification (see sections 3.3 and 4.5 for more details). Nonetheless, the license fee structures in the different Nordic countries remain somewhat different, even though similar license fees were recommended in the previous evaluation
- There are also differences among the Nordic countries in terms of financial basis, i.e., self-financing vs. state financing. There have been no explicit calls to reintroduce the self-financing principle, and the notion that public funding is needed for criteria development is widely accepted. In spite of the recommendations of the previous evaluation, however, there is no common agreement among the Nor-

dic countries about a minimum level of state funding (see section 3.2).

- The relations vis-à-vis the EU Eco-label have evolved. The EU Eco-label has gradually penetrated into some Nordic markets, even though the Nordic Swan has maintained its position as the dominant eco-label in all Nordic countries (see sections 4.1–4.4). As recommended in the previous evaluation, the Nordic Ecolabelling Board has established an explicit strategy for co-ordination and harmonisation, and the Nordic countries have adopted an increasingly active role in this work (see sections 5.2 and 3.3).

At the same time, the operating environment has also changed:

- International trade has increased – both beyond the Nordic Countries and beyond the European Common Market¹.
- Ecolabelling has grown globally, and the Global Ecolabelling Network (GEN) has taken an active role in information exchange and activities supporting the co-ordination of national and regional ecolabelling schemes.
- New information and certification systems have gained ground, in particular in the field of social and global responsibility issues.
- In recent years, global environmental awareness has grown, and in particular, concern about climate change has climbed to the top of the environmental agenda.

The operating environment of the Nordic Swan is thus evolving rapidly. One of the issues that complicates the work of the present evaluation is the current status of the EU Eco-label Regulation. The revision process has been ongoing for a number of years. According to the most recent information, the draft EU Regulation is expected to be published in April 2008. The European Commission's plans concerning the EU Eco-label are thus not accessible for the present evaluation.

Similarly, there is rapid development in the field of climate labelling. The Nordic Swan has taken a number of steps to address climate issues, but at the same time, various other parties are working on climate labelling schemes (see chapter 8 for more details). The current evaluation is based on information available at the end of December 2007.

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¹ For example, foreign merchandise trade (1996-2006) grew on average 6 % per year, while world GDP grew by 2.5% per year (WTO 2007).

3. Comparison of principles, product groups and criteria in the Nordic Swan and the EU Eco-label

This chapter aims to make an overall comparison of how the two systems, the Nordic Swan and the EU Eco-label, are governed and how they operate. First, an overview is given of the principles guiding the systems. Then a more detailed analysis is made of product groups addressed and labelling criteria developed in the two schemes. An overview is also given of the governance, management and application procedures. Finally, Nordic actors' viewpoints on relevant similarities and differences between the systems are addressed.

3.1 Guidelines and principles of the Nordic Swan and the EU Eco-label

Both labelling systems contribute to reduced environmental impact from consumption by means of a voluntary eco-label that is easy to recognise. Both also aim promote environmentally sound product development. They promote environmentally superior goods and services with good quality and performance. They set stringent environmental criteria for specific product groups. Applicants are required to provide declarations of compliance with the criteria together with appropriate supporting documentation. Nordic Ecolabelling secretariats follow up the environmental requirements and control visits may also be made. The principles of the both labelling systems are largely the same, but they are formulated in somewhat different ways. Accordingly, there are differences in the practices of decision making.

Both labelling systems have documented guidelines and principles on how the systems are governed and operated. These documents define the governance structures, management procedures, principles and policies of the systems (see Annex 3).

In both ecolabelling systems, the criteria are prepared through a very thorough process including market analyses, stakeholder consultations and environmental assessments. Moreover, when preparing or revising criteria, the existing criteria for similar product groups in other ecolabelling systems are analysed.

Developing and adopting the Swan criteria

When developing criteria for a new Swan product group, consideration is taken of the product's impact on the environment throughout its life cycle. In order to select the product groups that are most suitable for ecolabelling, the Nordic Swan scheme investigates their relevance, potential and how they can be controlled ("RPS-analyses"):

- Relevance is assessed on the basis of the environmental problems caused by the product group and the scope of such problems.
- Potential is judged by looking at the possible environmental gain within the product group, i.e. the difference between the existing products and technical innovations that are realistic in the near future.
- Steerability is a measure of the degree to which ecolabelling can affect the activity, the problem or the requirement.

All three criteria must be fulfilled to justify criteria development for a new product group.

According to the principles of Nordic ecolabelling, the criteria are developed by a group of experts, including representatives of stakeholders. Each proposal goes out for a public review. After this, the criteria documents are processed by the ecolabelling bodies appointed by the relevant authorities in the Nordic countries. The criteria are finalised by the Nordic Ecolabelling Board. After 3 to 5 years the criteria are reviewed. Approval of the criteria requires a majority decision in the Nordic Ecolabelling Board.

Developing and adopting EU Eco-label Criteria

Proposals for the definition of product groups and ecological criteria are made either on the request of the European Union Eco-labelling Board (EUEB) or by the Commission. Priority product groups are listed in the joint working plan. The latest list was published in Spring 2002. It includes 33 product groups, seven of which are services.

The Commission gives a mandate to the EUEB to develop or review the eco-label criteria. On the basis of these mandates the selected EUEB member (the Lead Competent Body), supported by a working group and the Commission, drafts appropriate eco-label criteria and the assessment and verification requirements related to these criteria. The EUEB takes into account the results of feasibility and market studies, life cycle considerations and an improvement analysis. A regular feed-back process to the EUEB is ensured. Next, the criteria are agreed on by the various Commission services in an Inter Service Consultation. Finalised criteria are submitted to the Regulatory Committee of national authorities and voted upon. If the Committee takes a favourable view of the proposal, the Commission proceeds with its adoption and publication. Otherwise, the Committee submits the proposal to the Council of Ministers for decision.

The objective of the EU Eco-label is to widen the scope of each product group progressively, for example to include also certain products for professional use. According to the Prioritisation Methodology², the principles for selecting and prioritizing new product groups are very similar as those in the Nordic Swan scheme. For example, the product groups selected for criteria development must have a clear impact in terms of reducing environmental burdens. The new objectives of the EU Eco-label mean greater similarity with the Swan.

3.2. Comparison of governance, management and operation

In the Nordic countries, both ecolabelling systems are governed and managed by the same bodies. National comments to draft criteria and other issues of policy are developed by the national ecolabelling boards. Marketing, application and control operations are managed by the national ecolabelling secretariats for both the Nordic Swan and the EU Flower. These common organisations serve to coordinate and harmonise the systems on an operational level. In spite of these similarities, there are some underlying differences in governance and management structures (see Table 1)

Table 1 Governing bodies of the two systems

The Nordic Swan	Role and responsibilities
Nordic Council of Ministers	• Approves goals and principles • Provides funding for the Nordic co-ordination and for the secretariat of the Nordic Ecolabelling Board
Nordic Ecolabelling Board	• Makes decisions of principle and operative decisions concerning ecolabelling, e.g. • Draws up annual work plans and reports • Approves product groups and criteria • Appoints members to expert groups that draft criteria • Decides principals for communications and marketing and co-ordinates implementation of the communications and marketing strategy
National ecolabelling bodies (secretariats)	• Mandated by the national authorities to manage the schemes on a national level • Cover the costs of criteria development and licensing (partly with financial contributions from the national authorities for criteria development) • Manage the licensing process • Co-ordinate the advisory work of national ecolabelling boards
National ecolabelling boards	• Consists of authorities and other stakeholders • Advise the ecolabelling bodies • Appoint members to the Nordic Ecolabelling Board

(to be continued)

² EU Eco-label [<http://ec.europa.eu/environment/ecolabel> 25.9.2007]

Table 1 (continued)

The EU Eco-label	
European Parliament and Council of the European Union	• Adopt/revise Regulation on Community Eco-label Award Scheme
European Commission	• Provides annual budget and secretariat for the EUEB • Provides funding for Lead Competent Body for drafting criteria • Establishes Community ecolabel working plan (including priority product groups) • Mandates EUEB to draft ecolabelling criteria • Approves criteria for submission to the Regulatory Committee • Translates and publishes criteria in the Official Journal • Promotes the use of the EU Eco-label
Regulatory Committee	• Consists of national authorities or their mandated delegates • Approves criteria • Approves Working Plans
European Ecolabelling Board (EUEB)	• Consists of representatives of the national competent bodies + Consultation Forum of relevant interested parties • Consulted on the working plan • Responsible for drafting criteria • Selects Lead Competent Body for drafting criteria • Hosts Policy Management Group, Co-operation and Co-ordination Management Group and Marketing Management Group implementing Work Plan (2005–2007)
Ad hoc working groups	• Open for participation by interested parties • Draft criteria for labelling
National competent bodies	• Mandated by the national authorities to manage the schemes on a national level • Cover the costs of licensing, national marketing efforts, work for EUEB and commenting on draft criteria (partly with financial contributions from the national authorities) • Manage the licensing process • Ensure transparency and active involvement of stakeholders • Seek opinions at national level of interested parties (in the Nordic countries, via national ecolabelling boards) • Promote the use of the EU Eco-label

Governance structure

The EU Eco-label has a more complex and multilayered governance structure. In contrast to the Nordic Ecolabelling Board, the European Ecolabelling Board is more of a preparatory and consultative body. The EUEB submits its proposals to the Commission. The final decisions concerning criteria, work programmes and other policy issues are taken by the Regulatory Committee of national authorities.

Moreover, the EU Eco-label has a somewhat more distinct connection to EU legislation and the EU bureaucracy. It is based on a regulation and complementary Commission Decisions. Also, the ecolabelling criteria are officially adopted and published as Commission Decisions in the Official Journal of the European Union. The Nordic Swan is ultimately governed by decisions of the Nordic Council of Ministers (NCM) on the fundamental rules of procedure of the Nordic Ecolabelling Board, but the NCM or its committees do not deal with details of the system (except in exceptional situations).

Due to this different governance structure and legal basis, the role of national authorities is slightly different in the two systems. In the Nordic Swan, national authorities influence the budget of the system via financial

contributions from the state budget and financial contributions to the Nordic Ecolabelling Board from the budget of the Nordic Council of Ministers. In addition, state administrators hold positions of responsibility in some of the national ecolabelling boards. As a result, although national authorities do not have the final decision concerning criteria for the Nordic Swan, the decisions in the Nordic Ecolabelling Board are based on the positions of the national ecolabelling boards, which in turn are made up of a variety of stakeholders. Thus, national authorities have a more prominent role in the EU Eco-label than in the Nordic Swan.

The EU Eco-label has also elaborated its relation to green public procurement (GPP) in more detail, along with other specific EU policies for sustainable consumption. For example, the Working Plan for 2005–2007 (2006/402/EC) stresses the need to inform public procurement officers of the opportunities for using the EU Eco-label criteria as a procurement tool, and a number of plans are underway to produce dedicated information for public procurement officers.

Other relevant features of governance systems are transparency and inclusiveness. Both of these are key principles in both systems, but they are implemented in slightly different ways. In the EU Eco-label, stakeholder participation is ensured via the permanent representation of some core stakeholder associations in the EUEB and by policies to collect stakeholder input for criteria drafting. In addition, the work of the Ad Hoc Working Groups drafting the criteria is open for all interested parties, including companies from outside Europe. Nonetheless, a number of organisations have noted that there is a lack of transparency in some stages, most notably, the work of the Commission Services after they have received proposals for ecolabelling criteria from the EUEB (EBB 2005; EU Eco-label Presidency Meeting 2007).

Management and operation

In spite of the differences in governance structure, the day-to-day management of application and awarding procedures is almost identical. Both the Nordic Swan and the EU Eco-label are managed by the same secretariats in all Nordic countries. They are presented as equivalent systems on the secretariats' websites, even though more positive attention is often devoted to the Swan (see Annex 4).

In the management and governance of the Nordic Swan, more attention has also been devoted to management procedures on the operational level – an issue that has received less attention in the EU Eco-label policy documents or work programmes. The Nordic Swan has made an explicit commitment to ISO 14024, the standard for Type 1 ecolabelling, as well as EN standard 45011 (certification bodies) and ISO 9000 (process quality). Application procedures are governed by the Regulations for Nordic Ecolabelling and set detailed requirements for the application and inspection process as well as for issues of confidentiality and dispute resolution.

The management principles for dealing with applications are of Nordic origin, but they apply to the procedures for both the Nordic Swan and the EU Eco-label in the Nordic countries.

It is worth noting that the budgets of the systems are somewhat different, both in terms of size and structure (Table 2). In 2006, the budgets of the Swan were many times those of the EU Eco-label, in all the Nordic countries.

Table 2. Funding 2006

	EUR	%	EUR	%
Denmark				
License fees	793 000	47	99 400	12
State funding ³	912 000	53	735 400	88
Total	1 705 000		834 800	
Finland				
License fees	724 000	75	38 000	34
State funding	235 000	25	74 000	66
Total	959 000		112 000	
Iceland				
License fees	6 500	10	-	
State funding	59 500	90	-	
Total	66 000		-	
Norway				
License fees	1 051 098	80	17 000	
State funding	255 652	20	453 000	
Total	1 343 000		470 000	
Sweden				
License fees	2 920 000	93	60 000	20
State funding	235 000	7	235 000	80
Total	3 155 000		295 000	
All Nordic countries				
License fees	5 496 500	77	214 400	9
State funding	1 731 500	23	1 497 400	91
Total	7 228 000		1 711 800	
NCM for Nordic secretariat/ Commission for EU Eco-label	384 000		88 300 ⁴	
Grand total	7 628 750		1 800 100	

The share of license fees in the budget of the Swan has been dominant, amounting to 77% of the combined budgets of all Nordic countries in 2006. In contrast, the EU Eco-label is mostly reliant on public funding. Due to the larger scale and market penetration of the Swan in the Nordic countries, more administration time is also devoted to the Swan than to the EU Eco-label in most countries. The income from licenses in the case of

³ In Denmark, the state funding for ecolabelling is not allocated separately for the Nordic Swan and the EU Eco-label. Thus, the division of the funding is made purely for the purpose of our evaluation, and does not represent the official position of Ecolabelling Denmark.

⁴ The Commission's funding of the common administration of the EU Eco-label is about 1.36 million euro. The contribution from Denmark, Finland and Sweden to the total European budget was about 6.5% in 2006. Thus we have estimated the Nordic contribution to central administration of EU Ecolabel in 2006 to about 88 300€

the Swan is derived from a larger number of companies than in the case of the EU Eco-label.

The Commission's annual budget for the EU Eco-label is relatively small, less than 1,4 MEUR in all, which includes the budgets for criteria development and revision (about 100,000 EUR) and marketing (about 335,000 EUR). In this respect, the budgets are not fully comparable, as the costs for criteria development of the Swan are largely included in the budgets for the national secretariats.

From the license applicants' perspective, the operation of both systems is the responsibility of one single secretariat, and the systems for application, verification and compliance control for the two different labels are almost identical. The main difference is that the EU Eco-label does not require periodic control of license holders during the validity period of the criteria. Moreover, the licenses for the EU Eco-label are valid in all participating countries, whereas the Nordic Swan requires registration in order to be used in another participating country, and part of the revenues are distributed to the Nordic countries where the products are sold. Finally, another main difference between the systems is the license fees, which are somewhat lower for the EU Eco-label than for the Nordic Swan (Table 3).

Table 3. License fees for ecolabels in Nordic Countries in 2007 (EURO)

Swan label (EUR)	Denmark	Finland	Norway	Sweden
Application fee, first	465	2000	2085	1960
Extension of licence	0–465	1000		max. 980
Renewal of licence	465	1000	1040	980
Addition or change of a parallel trade name		200		
Annual fee, for the annual turnover of labelled product, %	0.4	0.4	0.4	0.3
Annual fee, for the annual turnover of labelled service, %	0.4	0.15–0.4*	0.15–0.4*	0.3*
Min. annual fee		675	1 305	980
Max. annual fee	33 270	34 000	39 080	38 160
Exchange rate	7.452 DKK	1 EUR	7.676 NOK	9.173 SEK
EU Eco-label (EUR)	Denmark	Finland	Norway	Sweden
Application fee	465	1000	1 565	(300–)1300
Renewal of licence		500		
Annual fee, for the annual turnover of labelled product, %	0.15	0.15	0.15	0.15
Min. annual fee	500	500	500	500
Max. annual fee	25 000	25 000	25 000	25 000

* Special fee structure for printing companies, fees/ton of paper used

It is worth noting that there are some differences between Nordic countries in license fees of ecolabels, both in price levels and in the ways of pricing, even though the Nordic Ecolabelling Board recommends the same or similar pricing systems and levels. Denmark has the lowest application fee for the Swan and, accordingly, their application fee is the same both for the Swan and for EU Eco-label. In the other Nordic countries the application fee of the Swan is about the same and much higher

than in Denmark. There are also slight differences in the fees for annual turnover of the Swan labelled products. In most case it is 0.4% for products, but it varies more for services.

In Finland, Norway and Sweden the EU Eco-label fees are cheaper than the Swan label fees, both in terms of application fees and the annual fees as a percentage of annual turnovers. According to EU regulations, other EU Eco-label fees are fixed, but the application fee can vary between 300 to 1300 EURO (table 3). It is the lowest in Denmark (about 465 EURO), but in Sweden it can vary from 300 to 1300 EURO as the EU regulations allow. In Norway, the fee is the highest, over 1500 EURO, which is even more than the EU recommendation. The application fee covers the costs of processing the application. The annual fee for the use of the label is 0.15% of the annual volume of sales of the product within the Community. Discounts of 25% are provided for SMEs and developing countries from the application fee, and companies with EMAS registration or ISO 14001 certification can receive a 15% discount from the annual fee (Nordic ecolabelling secretariats' websites).

3.3. Comparison of product groups and criteria

The history of criteria development

The Nordic Swan system has developed criteria for a significantly larger number of product groups than the EU Eco-labelling system (Figure 1). After two years in operation, by the end of 1991, the Nordic Ecolabelling Scheme, criteria for four product groups were ready and the first license applications were filed toward the end of the same year. After five years in operation, about 30 criteria sets were ready and more than 100 licenses had been awarded.

The Nordic Swan has been effective in developing criteria for new product groups. At present, there are criteria available for 66 product groups and the number of awarded licenses is about 1430. At the same time, existing criteria are regularly revised. The EU Eco-labelling system has produced criteria at a slower pace. After 15 years of operation, the EU Eco-label has published criteria for 25 product groups, 18 of which are identical or at least partly similar to those addressed by the Nordic Swan, and has awarded the eco-label to 473 companies (status October 2007).

Figure 1. Criteria for product groups to be labelled developed within the Nordic Swan and the EU Eco-labelling scheme⁵

It is, however, difficult to make a straightforward comparison of the number of criteria for product groups available for ecolabelling in the two systems and in different years. Some of the criteria documents include criteria for multiple products. For example, the present Swan criteria for sanitary products deal with a range of different products, such as disposable breast pads, diapers, sanitary towels, incontinence care products, tampons, cotton buds, cotton wool, toothpicks, underlays, draw sheets, bed linen, wash cloths and surgical gowns. All these products are now included under one criteria document, whereas formerly they were represented by separate criteria documents.

The criteria for product groups are categorised differently by the operators of the two systems. Moreover, each Nordic ecolabelling secretariat has its own system in grouping the Swan label criteria. In order to facilitate the comparison of the two systems the products are categorised in Table 4 into nine groups according to product type or context of use. Groups 1–5 and 8 were constructed mainly on the basis of product type, whereas groups 6–7 were formed on the basis of context of use. The last group, “miscellaneous products”, includes products that do not clearly fall into any of the groups defined (for more details, see Annex 5).

In all product group categories, the Swan has more criteria than the Flower. In the category of ‘services’ (included in the scheme since 2000), the EU Eco-label has, as of now, only published two sets of criteria (‘tourist accommodation services’ and ‘camp site services’), whereas criteria documents exist within the Nordic Swan label for many other services as well. Similarly, there are no criteria published in the EU Eco-

⁵ Data from SFS Ecolabelling, status December 2007

label system for car or boat care products or cleaning products for professional use, whereas there are many criteria documents in these categories within the Nordic Swan system. However, the criteria for all purpose and sanitary cleaners, as well as the criteria of shampoos and soaps, include products for professional use, too.

Table 4. Product groups and number of criteria in the groups in Swan and EU Eco-label systems

	Number of criteria in Swan system	Number of criteria in EU Eco-label system
Cleaning products for household use	5	4
Cleaning products for professional and industrial use	4	0
Personal hygiene and cosmetics	3	1
Appliances, machines etc.	8	7
Paper products	7	2
Products for housing and garden	17	6
Car related products	4	0
Services	8	2
Miscellaneous products	10	3
Total number (October 2007)	66	25

Former studies (Evaluation of the environmental... 2001) have found that the main part of product groups covered by the Swan label are environmentally significant, even though some of the product groups were found to be of marginal importance (e.g. coffee filters, grease-proof paper, writing instruments and closed toilet systems)⁶. The environmental relevance of the Swan criteria was evaluated by analysing whether relevant environmental problems are considered and whether they are considered in a reasonable manner. Accordingly, it was analysed whether there is support from the scientific community or from the authorities regarding the priorities made in the criteria. (Evaluation of the environmental... 2001)

Moreover, it was found that the environmental parameters considered in the criteria were largely relevant from an environmental perspective. Despite of that, however, the Swan label's potential to directly influence the total environmental load in society was found to be limited in the evaluation. The main reason for the limited influence was that the Swan does not cover environmentally significant areas such as transportation and foodstuffs. Moreover, significant parameters related to the use phase of products were not possible to influence effectively by means of ecolabelling, because of the small number of ecolabel licenses, i.e., limited market acceptance. (Evaluation of the environmental... 2001)

Since the beginning of 2000, the number of Swan criteria has increased from 52 to 67 by the end of 2007 (see Annex 6). Furthermore, the number of product groups included in one criteria set has increased even more because of the previously mentioned development of including multiple products in one criteria set. Besides, the market acceptance has

⁶ ÅF-IPK (2000). Utvärdering av Svanmärkningen. Del A - "Direkta miljöeffekter"

grown during the same time period (2000–2007), as the number of licenses has doubled (from about 780 to 1430).

Similarities and differences in product group criteria

For the present evaluation, it has not been possible to make a detailed comparison of all the 18 product groups for which criteria exist for the Nordic Swan and the EU Flower. Thus, this section is partly based on interviews with national ecolabelling secretariats, and a more detailed analysis of specific criteria.

Interviews with ecolabelling secretariats⁷ and an overview analysis of criteria and background documents indicated that the criteria can be divided into four groups in terms of similarities and differences:

- 1) Swan criteria documents that have been to some extent harmonised with EU Flower criteria: e.g. paints and varnishes (adopted as such), PCs⁸, dishwashing liquids and white household appliances (mostly harmonised, some small differences).
- 2) EU Flower criteria documents in which the Nordic criteria have served as a model due to influence by Nordic countries: e.g. printing and copy paper (the EU criteria are a bit simpler), tissue paper (not exactly the same due to changes by the Commission)
- 3) Criteria that are clearly different: e.g. hotels, all-purpose and sanitary cleaners, textiles, heat pumps
- 4) Joint Swan/Flower project: chemicals list for common reference.

In order to illustrate the extent of similarities and differences within these different groups, we compare the criteria documents for three different products in the following. The products selected for illustration are the criteria for dishwashers (group 1, Swan criteria partly harmonised to EU Flower), tissue paper (group 2, EU Flower criteria based partly on Swan) and hotels/accommodation services (group 3, harmonisation unsuccessful/unfeasible). However, as mentioned, the Nordic Swan and the EU Eco-label describe the criteria in a different manner and use different kinds of reference values, something that impedes a straightforward comparison of the criteria documents.

Case criteria: Dishwashers

There have been attempts to harmonise the Swan criteria within the EU Eco-label criteria for white household appliances. Therefore, the dishwasher criteria of the Swan label and EU Eco-label are very similar. They both use the same standard methods of measurements (EN 50242⁹) and

⁷ In particular, Sinikka Karppelin and Leena Nykvist-Kuusola from SFS Ecolabelling

⁸ PCs are a product group in which harmonisation was done among three labelling systems: the EU Eco-label, the Nordic Swan and the German Blue Angel.

⁹ EN 50242 Electric dishwashers for household use. Test methods for measuring the performance. EN Standard.

refer to the classification of the mandatory EU energy label¹⁰. In addition to the items in the energy label, both ecolabels have restrictions on flame retardants and the Swan also has restrictions on heavy metals. In most items, the Swan label has tougher requirements than the EU Eco-label. Only the criterion for energy efficiency is less tough than that of the EU Eco-label (see Annex 7, Table 9). According to market analyses (Dish washers 2006) there should be many dishwashers that could pass both ecolabel criteria, but only one dishwasher in Sweden has the Swan label and none have the EU Eco-label in any European country.

Case criteria: Tissue paper

Attempts were made to make the EU Flower tissue paper proposal similar to the Swan criteria, but some changes were made by the Commission Services, which reduced the similarity.

The Swan-label document defines the product group: “Swan-labelled tissue paper consists of fibres from sustainable forestry and/or recycled fibres and the production process has taken place with low levels of emissions being released into the air and water. Energy consumption during production is low and the quantity of chemicals dangerous to health and the environment has been limited both during production and in the paper product itself.” The EU Eco-label emphasises the same factors as the Nordic Swan in its criteria document on Tissue Papers. In addition to virgin and recycled fibres, the EU Eco-label also accepts non-wood fibres as a raw material for tissue paper.

The structure of the ecolabel criteria documents is different. Criteria for Swan labelling of paper products encompass a wide range of requirements that are divided into three modules. The Basic Module (Swan labelling of paper products – Basic Module) contains requirements regarding forest management, emissions, energy and waste in pulp and paper manufacturing. The Chemical Module (Swan labelling of paper products – Chemical Module) covers requirements for chemicals used in the production of pulp and paper. The Supplementary Modules include an overview of all the requirements specific to a Swan-labelled product, such as tissue paper. To be awarded a Swan licence, the applicable criteria of all the three documents must be fulfilled. The EU Eco-label criteria for tissue paper are all in one document.

Both the criteria contain many detailed requirements and restrictions, but the reference values are, again, different. The EU Eco-label refers the limit values per “kg air dried tonne” and the Swan “kg/tonne 90% pulp”, so the limit values are not directly comparable. Nonetheless, the items on which requirements are placed are very similar (see Annex 7, Table 10, note that the table does not contain all the details).

The Swan requires that certified wood used in production must be certified by a third party in accordance with an applicable forestry standard.

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¹⁰ Council Directive 92/75/EEC with regard to energy labelling of household dishwashers.

The EU Eco-label requires that the principles and measures aimed at ensuring sustainable forest management shall correspond to the internationally agreed guidelines. Thus, there is not much difference between the requirements for sustainable forest management; the criteria refer to similar agreements in different ways. There is, however, difference in the requirements for verification, as the Swan requires third-party certification.

In the Nordic countries, there are 48 tissue paper products with Swan label licences and one with the EU Eco-label (see Annex 5).

Case criteria: Hotels

During the revision of the Swan hotel criteria, it was thoroughly examined to what extent the Swan criteria can be harmonised with the Flower criteria. Only very limited harmonizing was possible (Hotels and youth hostels 2007, p.23). The first obvious difference is that the Swan sets criteria on Hotels and in contrast, the EU Eco-label's definition is boarder and covers Tourist accommodation. However, both criteria sets aim to limit the environmental impacts with many detailed requirements and also provide suggestions on how to make improvements that promote sustainable development. The main points of the two criteria are shown in Table 5 and more detailed information is collected in Annex 7, Table 11.

Table 5. The structure of hotel criteria in the Nordic Swan and in the EU Eco-labelling systems

Swan label		EU Eco-label	
Hotels and youth hostels	Description of criteria.	Tourist accommodation	Description of criteria
Limit values	The energy limit value and in addition to the limit value of water, chemical products, or waste management must be fulfilled. Hotel classification (3 groups) and geographical location is taken into account when setting the limit values.	Limit values.	—
Mandatory requirements (over 30 items)	All items must be fulfilled.	Mandatory requirements (37 items).	All items must be fulfilled.
Point score requirements (67 items)	60% of the total score for section Operation and maintenance and 65% of the total score requirements must be achieved.	Optional criteria (47 items, possible max. 77 points).	Must correspond to total of 16.5 points.

The requirements of the Swan label of Hotels and youth hostels are divided into limit values, mandatory requirements, and point score requirements. All mandatory requirements must be fulfilled and of the four limit values, the energy requirement and one further requirement (water,

chemical products, or waste management) must be fulfilled. In addition, 65% of the total score from point score requirements must be achieved. There are no constraints as to which sections points come from with the exception that 60% of the total score for Operation and Maintenance must be achieved. It is also possible to get bonus points and extra points in certain situations.

The limit values of energy, water, chemical products, and waste vary depending on the type of operations being conducted. Establishments are therefore divided into three classes referring to the establishment of restaurant turnover versus the total turnover for restaurant and lodging, and to the percentage of lodging occupancy. The mandatory limit value for energy (kWh/year/m² or kWh/year/guest night) refers to the total energy consumption. The limit value for energy takes into account both the classification and the geographical location of the hotel (The Swan Hotel criteria 2007).

The requirements of the EU Eco-label of hotels is divided into mandatory requirements and optional criteria (score requirements). All mandatory criteria must be fulfilled. All optional criteria must correspond to a total of 16,5 points out of possible 77 points. But the EU Eco-label does not take into account the size or the location of hotel, and there are no limit values for e.g. energy or water consumption like in the Swan criteria. Instead, the requirements for reducing energy or water consumption are very similar, but the structure of the two sets of criteria are different (see Annex 7, Table 11).

In the Nordic countries, there are 133 hotels or youth hostels that have the Swan label license, and 9 that have the EU Eco-label (see Annex 5).

3.4 Viewpoints on similarities and differences

The previous presentation is largely based on official documents. For the present evaluation, the interviewees were asked about their views on the major similarities and differences between the systems. In this section, we discuss the systems as viewed by 'insiders', i.e., members of the national ecolabelling secretariats and boards. The viewpoints of license holders and the business community are discussed in section 4.2. in connection with market aspects.

Those closely involved in ecolabelling (secretariats and chairpersons/coordinators) do not see major differences of principle between the systems. Nonetheless, there is a general agreement that the Nordic Swan scheme is more professionally and efficiently organised. In terms of governance, one important difference is that the Swan is governed by the national and the Nordic ecolabelling boards, with representatives from authorities and interest organisations. As concerns the EU Eco-label, the final decisions are made by the Commission and by the Regulatory

Committee of National Authorities, so the ecolabelling bodies and their stakeholders have less of an influence on the outcomes.

Interviewees frequently mentioned that the EU system is much slower to produce criteria, partly due to the complex decision structure. For example, according to the Finnish secretariat members, the Inter Service Consultation within the Commission has in some cases drawn out the criteria approval process for even years. The Nordic Swan is considered to be better organised, due to many years of experience and due to the lighter governance structure. It was also mentioned that the Swan criteria documents are also more user-friendly and informative.

As for the selection of product groups, one view is that the EU Eco-label has still not developed a viable strategy for its product group range¹¹. In comparison, the Swan has improved its product group selection procedure over time. Currently, the product group development for the Swan is based on both need and feasibility (in accordance with the RPS model, see section 3.1). A different kind of concern is that the EU Eco-label risks “failing if it succeeds”, i.e., if the label attracts a large number of producers (but license fees do not cover costs), additional resources are also needed to deal with the increased demand. Moreover, the Swan has developed its own approach to mapping market and industry interests, which is an important part of the operating culture of the ecolabelling secretariats.

As regards the underlying criteria, the ecolabelling organisations view the difference between the Swan and the EU Eco-label as relatively small. However, EU Eco-label criteria come about in a way that can be considered more ad hoc than for the Swan, both in terms of environmental relevance of the criteria and in terms of project management. For example, the Swan aims to apply its requirements within one product group across all countries without taking into consideration the countries’ different capacities, and the EU Eco-label, on the other hand, has a more politicized criteria selection process, and as a result individual countries can influence the criteria setting. Many interviewees also indicated that the slow development of criteria for the EU Eco-label causes frustration among Nordic organisations, who would like to see more results from the work they invest in the EU Eco-label.

Both systems emphasise inclusiveness and transparency, but some of those involved commented that the EU Eco-label is less transparent in how it deals with comments gained from stakeholders. Others, on the other hand, mention the open invitation for stakeholders to participate in the Ad Hoc Working Groups. The Nordic Swan has a more systematic process for sending out draft criteria for public review (with 60 days time

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¹¹ The EU Eco-label Regulation (EC 1980/2000) and the Working Plans for 2002-2004 and 2005-2007 do address the issue of product group selection, however. The Working Plan for 2002-2004 presented a checklist for priority product groups, including environmental, market and other issues. While the method for developing priority product groups is not exactly the same as the RPS system, it constitutes a comparable approach, at least in terms of principles applied.

for commenting) and for responding to comments received, which is based on the traditional Nordic 'remiss' system.

From the national secretariats' perspective, one of the major differences concerns the funding structures and budgets of the two systems. The Flower is more dependent on public funding, and has lower license fees, which makes it attractive to some companies but also less economically viable for the secretariats striving for a large share of self-funding. One of the Finnish interviewees argued that the revision of the EU Eco-label should address the finances of the system by allocating a proper budget to the EUEB and obligating Member States to allocate a certain level of national funding to the Flower. In Norway, the EU Eco-label is subsidised by the Swan, as the state funding does not fully cover the costs.

All Nordic countries work to keep both eco-labels running in parallel. In Denmark, however, there is a stronger political desire to promote the EU Eco-label. The impression of the Danish secretariat is that the two main representatives of industries, Dansk Industri and Dansk Erhverv, are positive towards the EU Eco-label. In contrast, the viewpoint in Norway is that letting the EU Eco-label take over the position of the Swan is a rather unrealistic option in the near future, and there is no expressed political wish to do so, either.

Some different viewpoints on the future relation between the EU Eco-label and the Swan in respect to the product group focus areas emerged in the interviews:

- It was argued that EU Eco-label should concentrate its activities in product groups that are purchased in all countries.
- It was questioned whether it makes sense for the two labels to cover the same product groups. The EU Eco-label would be useful for products that are traded internationally. For other products, local conditions are more important.
- Some interviewees argued that if 'competition' by the EU Eco-label intensifies, services could constitute a new 'core competency' for the Nordic Swan in the future, because they are usually both produced and consumed locally.
- It was suggested that using common baseline criteria could facilitate the development of information about product contents.

3.5 Concluding remarks

The Nordic Swan and the EU Eco-label are two very similar systems for third-party ecolabelling of products and services. Over the past eight years, some of the original differences in the schemes have decreased (e.g., services and professional purchasers have been included in the EU

Eco-label). In the Nordic countries, the fact that the schemes are operated by the same ecolabelling secretariats serves to further co-ordinate the schemes on an operational level.

A major difference is the number of product groups available for ecolabelling. The number of product groups with EU Eco-label criteria is still less than half that of the products included in the Nordic Swan. Unless the revision of the EU Eco-label brings about a radical change, this difference is likely to persist in the coming years. For example, the Working Plan 2005–2007 for the EU Eco-label has set the target of producing criteria for two new product groups per year, with an aim to publish criteria for 30–35 product groups by 2010.

The Nordic Swan has been able to create a well-functioning system for criteria development, which is also reflected in the increasing trend to produce common sets of criteria for families of products (e.g. sanitary products, working machines for parks and gardens) and common modules such as those for paper products. The environmental relevance of the Swan criteria appears to have improved since the previous evaluation (2001), at least as concerns the range of product groups. Even though transportation and food are still not included in the scheme, criteria have been developed for many areas related to transportation, including the ongoing work to develop criteria for biofuels.

Nordic countries have also been active in harmonising the Swan criteria vis-à-vis those of the EU Eco-label, and in introducing the Swan criteria as a basis for the EU Eco-label. Thus, the labelling criteria have become more similar, even though very few products have exactly the same criteria. Nonetheless, the Nordic ecolabelling bodies are not fully satisfied with their attempts to influence the development of EU Eco-label criteria.

A major difference between the schemes is their financial basis in the Nordic countries. The ecolabelling secretariats in Sweden, Norway and Finland are able to derive at least three-fourths of their annual budgets from license fees. In contrast, the EU Eco-label, due to the smaller number of licenses and the lower license fees, is mostly dependent on public funding. Thus, if the EU Eco-label were to gain a larger share of the total number of licenses in the future, the financial basis of the schemes would need to be reconsidered.

Assessing the performance of the Nordic Swan scheme or comparing it with that of the EU Eco-label requires systematic indicators. It has been difficult to assemble even the dataset used for the present evaluation due to the variety of ways in which the different countries keep records of licenses, finances and similar issues. A systematic scheme for compiling annual performance indicators would enable the Nordic Ecolabelling Board to monitor developments on a regular basis.

4. Market reception and public awareness of the Nordic Swan and the EU Eco-label

This chapter examines how the Nordic Swan and the EU Eco-label have been received by the market and by the general public in the Nordic countries. First, the numbers of licenses awarded are examined. Then, we turn to awareness and understanding of the labels among the general public. Next, license-holders and other companies' views on the usefulness of the different labels in product development and marketing are highlighted, and finally, the results of strategies for informing the public about the Nordic Swan are addressed.

4.1 Numbers of licences awarded

In the Nordic countries, the Nordic Swan system is clearly the more popular in terms of overall number of licenses awarded. Among the 25 criteria developed within the EU Eco-label scheme, there are seven product groups in which no licenses have been awarded (all household appliance groups¹², two types of computers, and the new criteria for soaps and shampoos), and three product groups in which only two licenses have been awarded (growing media, light bulbs, and televisions). In the Nordic Swan system, only four (acceleration advisors, light sources, refrigerators and freezers, and toys) of the 66 product criteria have no licenses awarded (status October 2007). In seven of the Swan product groups, only one license exists (alternative dry-cleaning, dish washers, durable wood, hand roll services, lubricants, printed wiring boards, and vehicle tyres) and three product groups had two only licenses (adhesives, compressors, and industrial cleaning and degreasing agents).

Altogether, more than 1400 licenses to use the Nordic Swan label have been awarded to more than 1800 licence-holders (Nordic ecolabel secretariats' websites October 1, 2007). The greatest number of Swan licenses by product group has been awarded to supermarkets/grocery stores (278, most of them for Swedish ICA), printing companies (262), and detergents (the criteria include both all purpose and sanitary cleaners, 241 in all).

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¹² Washing machines, vacuum cleaners, refrigerators and dishwashers

According to EU statistics (EU ecolabel websites November 8, 2007), 88 licenses (as defined as “companies with the Ecolabel”) to use the EU Eco-label have been awarded in the Nordic countries, and according to Nordic ecolabel websites, 101. The difference is most likely due to Nordic secretariats listing products sold within the country, but with licenses awarded in another country.

The countries involved in the EU Eco-label system have awarded a total of 473 licenses to use the EU Eco-label by the end of September 2007¹³. The largest number of licenses by product group are awarded for tourist accommodation services (121) and for textile products (71). Likewise, in the Nordic countries, most of the EU Eco-label licenses are awarded for textile products (42), and indoor paints and varnishes (11). The largest numbers of the Flower licenses are awarded in Italy (144), France (82) and Denmark (60)¹⁴. Six countries have awarded no licenses to use the EU Eco-label, one of which is Iceland. Figure 2 indicates the numbers of Swan and EU Eco-label licenses awarded in the Nordic countries.

Figure 2. Number of the Nordic Swan and the EU Eco-label licenses awarded in the Nordic countries

Within the Nordic ecolabelling system, the Nordic countries have more than 1400 licenses to use the Nordic Swan label. The largest number of licenses have been awarded in Sweden (more than 900, for about 3000

¹³ By the end of 2007 total 514 licenses and 92 licenses to use the EU Eco-label in Nordic countries have been awarded. (<http://ec.europa.eu/environment/ecolabel/pdf/marketing/stats/stats.pdf>)

¹⁴ According to Danish ecolabelling statistics there are nearly 70 products with EU license in Denmark. (www.ecolabel.dk). Respectively in Norway there are more products with EU Eco-label than according to EU statistics.

individual products)¹⁵. In Denmark, more than 400 licenses have been awarded (more than 2600 products) and in Norway, 320 licenses (about 1370 products). In Finland, the numbers of Swan licenses are slightly smaller (more than 200 licenses, about 1200 products). In Iceland, the numbers are clearly smaller compared to the other Nordic countries: about 10 Swan licenses had been awarded by the end of 2007. Figure 3 presents a breakdown of licenses awarded by product category in both labelling systems (status October 2007).

Figure 3 Nordic Swan licenses awarded in different Nordic countries and EU Eco-label licenses in all Nordic countries by product category.

Figure 3 indicates that the product categories ‘Cleaning products for household use’ and ‘Services’ are the most popular. In the product category of ‘Appliances and machines’, however, there are only few Swan licenses and no Flower licenses, even though this product group has been designated as one of the environmentally relevant product groups (Evaluation of...2001). One reason might be the “competing label”, the mandatory energy label¹⁶, which includes information on energy consumption in the use phase, and on the most important product performance features.

In addition to licenses awarded, another indicator of market penetration is the market share of ecolabelled products. We have not, however, been able to compile comparable data on the market shares of products labelled with the Nordic Swan and the EU Eco-label for the present study, except for a few illustrations.

¹⁵ It is difficult to calculate each product exactly, because the same license may include a number of different product names, and for example product variants in different colours or with different perfumes, which makes it difficult to discern when we are considering different products.

¹⁶ The energy label is mandatory e.g. for dishwashers, refrigerators, freezers and washing machines within this product category.

Market shares of products labelled with the Nordic Swan have been analysed mainly in terms of non-food groceries, i.e., 'daily goods', for which comprehensive market analyses are easy to make on the basis of cash register data from the retail chains. Some indications of the current market shares of these products include the following:

- Comparative data are available from Denmark, where the market share of Swan-labelled products is 15.2% in non-food groceries¹⁷, and the market share of the EU Eco-label is 1.3% for the same group of products¹⁸.
- In Finland, market data are only available for Swan-labelled products. The market share for non-food groceries is 43%, with much variation between individual product groups¹⁹.
- Earlier data (Helgadottir 2007a) indicate that the growth of market shares of Swan-labelled products in the non-food groceries sector seems to have been steady since 1998 in most Nordic countries.

Many of the more recent product groups within the Swan (such as small houses, heat pumps, etc.) are other than mass consumption items. It is therefore difficult to obtain data on the market shares of different brands within such product groups. Moreover, products with the EU Eco-label are often in different product categories than Swan-labelled products. In some countries, there are very few products with the EU-Ecolabel in the market. Further research could perhaps develop some illustrations via selected product groups.

4.2 Public awareness, trust and understanding of the two schemes

Surveys indicate that the Nordic Swan has steadily increased its public recognition in the Nordic countries. In the mid-1990s, the Swan label had gained a common recognition of more than 70% of Finland, Norway and Sweden while the recognition in Iceland was at a modest 30%. The knowledge level concerning the Swan label has increased in the Nordic

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¹⁷ With significant differences between different products, i.e., Deodorants: 2.0%; Wet wipes for babies: 9.0%; Soap etc. (excl. hair products): 3.7%; Shampoo: 3.9%; Conditioner: 1.6%; Babyoils and ointments: 21.1%; Skin lotions: 9.9% (adults 8.4%, babies/children 28.6%), Textile detergents: 18.6%, Dishwashing detergents: 8.8%; Cleaning products: 2.0%, Sanitary cleaners: 5.4%; Kitchen rolls: 35.9%; Toilet paper: 38.5%; Paper hankchiefs: 4%

¹⁸ Textile detergents: 0.4%; Dishwashing detergents: 0.2%; Cleaning products: 1.9%; Sanitary cleaners: 0.7%; Kitchen rolls: 5.7%; Toilet paper: 3.7%

¹⁹ Toilet paper 74%; Kitchen rolls 92%; Laundry detergents 4%; Dishwasher detergents 7%; All-purpose cleaning agents 34%; Sanitary cleaning agents 3%; Dishwashing liquids 3%;

countries since 1998²⁰. At that time, about every second respondent (48%) said the idea of the brand is to be “environmentally friendly” and every fifth (19%) identified the Swan as an “environmental brand”. Respectively in 2004 more than the half of the respondents (57%) chose “environmentally friendly” and every fourth (26%) “environmental brand”. However, less than 5% thought of the Swan as a official Nordic environmental brand or Nordic brand. (Helgadottir 2007a, 45)

The most recent survey from 2006 shows the Swan label is extremely well-known today²¹. Among the Swedes and the Finns over 90% recognise the label (Taloustutkimus 2006). In Norway, the label is recognised by 85% of the respondents (Miljømerkning årsrapport 2006), and in Denmark, by 75% (Danish Standards 2006). The Taloustutkimus (2006) survey also shows that the Swan evokes positive associations, e.g., 77% of Swedes consider that the Swan makes a brand extremely reliable. More than 80% of Swedish consumers consider that Swan labelled products are less harmful for the environment, the respective percentage in the Nordic countries is on average 74%. Nonetheless, less than one-tenth of the respondents in any of the countries are still aware that the Swan is an official environmental label. There has been little change since the previous survey in 2004: recognition of the Swan has perhaps grown slightly in Denmark (2004: 68%) and Iceland (2004: 55%). (Taloustutkimus 2006).

The most recent survey (Taloustutkimus 2006) also indicates that the image of the Nordic Swan has developed positively, and mostly in the direction aspired to in the Nordic Ecolabelling Board marketing strategy. The respondents from all Nordic countries associated the label with the word ‘environment’, but also with the terms ‘future’ and ‘credibility’. In particular, associations with the term ‘future’ had grown in the total Nordic sample since 2004, with the most visible growth in Finland and Norway. Additionally, the Finnish respondents associated the Swan strongly with ‘quality’, whereas this association was not equally strong in the other Nordic countries.

The EU Eco-label was not as well-known as the Swan. It was correctly recognised by a small group of 11% of EU-25 citizens in 2006. Among the Nordic countries, the Danish consumers are most familiar with the correct meaning of the label, i.e., 30% identified it as an ‘environmental products and services label’ (Danish Standards 2006)²². In

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²⁰ On behalf of the Nordic Ecolabelling, surveys have been conducted to find out the awareness of Swan label in the Nordic countries, every other year since 1998, and in Iceland since 2000. The surveys are carried out as personal interviews. (Successful marketing... 2007, p.37–40)

²¹ The design of the Taloustutkimus (2006) survey instrument makes it difficult to assess exactly how many know the correct meaning of the Swan, because respondents are allowed to select multiple ‘correct’ and ‘incorrect’ interpretations of the label. Thus, while the share of correct interpretations such as ‘environmentally friendly’ (52%), ‘environmental brand’ (21%) and ‘environmentally tested’ (6%) are predominant, it is impossible to calculate the total share of ‘correct’ interpretations.

²² This figure differs from the share identified in the Ecolable Flower Week (2006) report, in which an incorrect translation was given of the text on the label, which obviously confused the respondents. This is why the survey was repeated with correct wording by Danish Standards.

Finland, 24% of the respondents identified the correct meaning of the label, whereas the respective shares are somewhat lower in Sweden (17%) and Norway (15%) (Eco-label Flower week 2006). The different surveys are difficult to compare owing to differences in wording and overall survey design, but it is clear that the Nordic Swan is more well known than the EU Eco-label, as a larger share gave at least one correct interpretation of the meaning of the Swan (Taloustutkimus 2006) than was the case in the survey on the EU Eco-label (Eco-label Flower week 2006).

The reasons for the differences are most likely partly due to the marketing efforts devoted to the Swan (see section 4.5). A broader reason may be that the Swan has managed to create (at least in part of the market) a 'virtuous cycle' of large numbers of criteria and licenses and market visibility, which in turn enables forceful marketing campaigns. The EU Eco-label has not yet been able to build up similar 'critical mass' in most of the Nordic countries.

The 'virtuous cycle' of the Swan involves a further aspect. Widespread public recognition, in turn, creates brand value that supports the marketing of the label to new potential license-holders. For example, in Finland, the Swan has been among the ten most respected brands for many years.

The statistics indicate that the Swan serves the purpose of providing credible consumer information very well. A summary of a large number of existing studies in the Nordic countries concluded that consumer trust in the information is a prerequisite for its use²³, regardless of how the information is conveyed. The trustworthiness of information provided by producer claims was reported to be low. Currently, short and simple information systems controlled by a third party, i.e. eco-labels, seem to be preferred by most consumers. (Leire & Thidell 2004)

The statistics (and our interviews), however, also underline the observation that Leire & Thidell made (2004), that consumers do not know much about how the Swan scheme is organised, or in what ways labelled products are superior to non-labelled ones. The study recommends more readily available and accessible information for consumers in order to support the credibility and informative potential of the Swan. Additionally, the role of shop display and sales personnel as ecological gatekeepers bears potential for stimulating the demand for environmentally benign products.

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²³ There are also some indications that the Nordic Swan can have an impact on consumer behaviour. A recent study from Denmark (Bjørner et al. 2004) examined the impact of the Nordic Swan on purchasing of labeled vs. non-labelled daily goods such as toilet paper, paper towels and detergents. The study indicates that the Nordic Swan has had a significant effect on consumers' choice in some product groups like toilet paper, and most likely has an effect together with other instruments on a larger number of product groups.

4.3 License-holders' and industry associations' views on the Swan vs. the Flower

The general impression of the Danish, Finnish, Swedish and Norwegian license holders that were interviewed for the evaluation is that there is a difference between the Swan and the EU Eco-label in terms of both recognition and credibility on the market. In Iceland, the situation was described as being less clear-cut, because even though the Swan is not very well established, it is currently much better known than the EU Eco-label.

In general, the license-holders chose the Swan on the basis of market recognition and demand. They did not see a significant difference between the criteria, but all agreed that the Swan is more well-known in Nordic consumer markets. However, there are also differences between the Nordic countries and various industries, as the following examples from different countries illustrate.

- In Norway, the EU Eco-label is least well known, and according to the interviewees, references to the European Union do not always evoke positive connotations. Thus, Norwegian license holders of the Swan were not very interested in even considering the possibility of using the EU Eco-label. One Norwegian interviewee argued that the EU Flower is very poorly known and cannot even be compared with the Swan.
- In Sweden, the retail trade has been very active in promoting and even requiring the Swan label, which has significantly contributed to its popularity. One Swedish license-holder had a quite indifferent opinion on the two labels claiming that they prefer to use their own environmental information. Another license holder claimed that the Swan and the EU Eco-label are comparable in terms of the product groups that they should cover. The same actor mentioned, however, that they believe that only one eco-label can be the most successful regionally.
- Danish companies present the strongest arguments in support of the EU Eco-label. In Denmark, the Confederation of Danish Industries is of the opinion that the EU Eco-label is more relevant for them. One important argument for this is that Danish companies export to the European market. Ecolabelling is seen as a quality label and if criteria for the EU Eco-label are missing, the producers go for the Swan. Therefore, Danish companies that use the Swan hope to be able to use it also in southern parts of Europe. However, the Confederation wants to focus on one system and that is the EU Eco-label, also for financial reasons. They think that the two systems should be harmonised. The Confederation has kept to this line of thought since they were connected with the Nordic Ecolabelling scheme ten years ago.

- In Finland, all the companies interviewed agreed that the Nordic Swan is better known and more credible in the consumer market and that it has an excellent reputation. There are some indications, however, that companies operating in business-to-business markets are becoming increasingly interested in the EU Eco-label. One of the companies interviewed, for example, used the Swan mainly because EU Flower criteria have not yet been published for the product group. Companies opting for the EU Eco-label presented a number of reasons, such as recognition by European and international customers and lower license fees, as well as the possibility to gain public attention by being the first license-holder in a certain product group.
- In Iceland, a study of license holders' and non-license holders' views (Helgadóttir 2007b) indicated that more marketing and support is required even for the Swan. On the other hand, one Icelandic interviewee indicated that because the Swan has not yet built up a strong brand in Iceland, license-holders might not feel strongly about supporting the Swan if the Flower were to gain more dominance.

Some of the interviewees in the different Nordic countries stressed the differences between the schemes in terms of credibility. For example, the Swedish paint industry has not taken a formal position in regard to the choice of the two eco-labels; however, the impression of an interviewee from this industry was that "the Swan will take over". Many considered that the criteria for the EU Flower are less stringent. The EU Eco-label was even characterised as "something of a light-version of the Swan". Others, however, did not see a significant difference between the criteria.

Companies operating in global markets (Finland, Iceland), and even some more domestic companies had a clear preference for an internationally recognised label, while recognizing the merits and overall strong image of the Nordic Swan. One Finnish company claimed that they would prefer to have one fully international ecolabel, endorsed by the United Nations, for example, and this company thought that the EU Flower has better chances of becoming a universal model, e.g., for the Chinese ecolabel. This company also argued that the EU Eco-label is more 'official' than the Nordic Swan, both in terms of how it is governed and in how it is presented to the public²⁴.

The companies' views of the two systems depended, to some extent, on their market position and the geographical area in which they market their products. The choice between the Nordic Swan and the EU Flower

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²⁴ While this is an individual comment, it may be worth exploring further, in particular as the Nordic Swan has attempted in recent years to downplay some of the connotations of an 'official' image (see, e.g., Helgadóttir 2007a). This company representative stressed the 'official' nature of the EU Eco-label as a positive aspect. It would be worth following up whether this viewpoint is more widely shared by companies, and whether consumers see a difference between the two schemes in this respect, and whether such a difference would have a positive or negative value for consumers.

is mostly made on pragmatic grounds that relate to marketing advantages, but for some, there are also issues of principle involved (Table 6).

Table 6 Reasons among license-holders for supporting/choosing one ecolabel over another

Reasons for supporting/choosing the Swan	Reasons for supporting/choosing the Flower
• Well-known and respected label • Customers appreciate / require • Stringent criteria • Relevant for the Nordic region • No Flower criteria exist for product group	• Internationally recognised • Preference for one harmonised label • Lower license fees • Possibility to be the first license-holder in a product group • More 'official'

4.4 Information and marketing strategies for eco-labelled products and services in the Nordic countries

The previous chapters have discussed some of the results of the information and marketing efforts made for the Swan during the past few years. This section analyses the information and marketing strategies applied in the Nordic countries, and considers their relation to the results obtained²⁵.

The previous evaluation (The Swan label from... 2001) identified information and marketing as aspects of the Swan scheme in which the Nordic profile should be strengthened. It proposed that a common Nordic marketing strategy should be drawn up describing the positioning of the Swan, identifying key product groups and measures to increase acceptance for certain product groups, as well as target groups for communications. The Nordic Ecolabelling Board has addressed these issues in its triannual strategy documents²⁶.

The preparation of these documents, as well as an increased exchange of information on the Nordic level concerning marketing and communications, have clearly increased professionalism and sophistication in the public information and marketing efforts of the Nordic Swan organisations. In other words, the 'Nordic focus' has been strengthened in information and marketing strategies. Nonetheless, actual marketing and communications work is done on the *national level*, because this is where the resources are. There are also local needs and national market conditions that must be taken into account. Thus, there are some differences

²⁵ This section is based on existing documents and studies (Strategies 2002 & 2005, Leire & Tidell 2004; Successful marketing...2007, annual reports of the ecolabelling secretariats), on interviews with ecolabelling secretariats, companies in the different countries and consumer authorities, as well as on an analysis of communication materials (websites, brochures, etc.).

²⁶ The strategy for 2002–2004 (Strategy 2002) focused on guidelines for market analysis in the selection of new product groups for labelling (described below in more detail), whereas the strategy for 2005–2007 focused on target groups for information and marketing (Strategy 2005) (more details below). Moreover, NCM financed a study on consumer understanding and use of environmental labelling (Leire & Tidell 2004) and a study assembling the experiences gained in marketing the Swan and identifying key success factors (Successful marketing... 2007).

among the participating countries in the implementation of the marketing strategy and in adapting it to local conditions.

Market analysis

Visibility of the Swan in the market is important in order to support public information campaigns, and vice-versa: public information is important to create demand for labelled products. The choice of product groups and the availability of Swan labelled products in these groups also reflects on the environmental and communicative profile of the Swan. Since the 2002–2004 strategy, Nordic ecolabelling has placed increasing focus on market analysis before starting the preparation of criteria for new product groups (Strategy 2002) in order to judge whether the market potential is sufficient to merit the resources needed for criteria development. The following aspects have been targeted as important for market analysis (in addition to the RPS system, see section 3.1):

- Public interest and topicality of environmental problems related to the product group.
- Market structure, e.g. competition within the industry and importance of the Nordic market for producers
- Competition from other labels or environmental information/certification systems.
- Consumers' need for advice, e.g. complexity of the environmental problems related to the product group.

A further aspect to be considered in market analysis was pointed out by one interviewee: the choice of product groups can influence the prospects for other product groups. This can be the case if there are closely related types of products in terms of criteria; if products are used in the same purchasing situation, or the new products can provide synergies in the sense that they can promote environmental awareness or the level of green decisions. There is a further possibility for spin-off effects on other products, i.e. the creation of criteria for laundry shops can result in a demand for ecolabelled detergents.

Increased focus on market analysis has, according to the interviewees, led to the development of criteria that have a good potential to attract license-holders. Nonetheless, it has also been argued that even more could be done to target the criteria in a way that leads to visibility of licenses in new product groups. Because the Nordic countries have somewhat different industry structures, some product groups have not attracted license-holders in all countries. It has also sometimes happened that producers show interest in the criteria development process, but change their minds and choose not to label their products after the criteria have been approved.

Communication strategy

The Nordic Ecolabelling Board (NEB) devoted particular attention to communication and marketing in its strategy for 2005–2007. It identified the key values of the Swan that should form the basis for all communications: *credibility* (thoroughness, competence and documentability), *dynamism* (proactivity, flexibility and change orientation) and ‘*engagement*’) (engagement, topicality, activeness, goal orientation). In more detail, these values were defined in terms of the following value propositions:

- 1) *Objective evaluation*: i.e., operation on a non-profit basis, focus on directing consumption and production toward the most environmentally sound alternatives, thus leading to an objective evaluation of the companies that the Swan deals with.
- 2) *Simplest way to environmentally sound consumption*: i.e., consumers do not need to learn about all different environmental aspects and their importance because the Swan does the job for them.
- 3) *The most well-known environmental certificate in the Nordic countries*: i.e. providing the most cost-effective way for a producer to indicate its environmental commitment.

The 2005–2007 strategy of the NEB also defined a distinct message to be used, for example, in advertising campaigns: “The future is created now”. This message attempts to crystallise the values of the Swan. It has been used, e.g., in television marketing campaigns featuring small children as the stakeholders of the future, as well as in information campaigns and on the websites.

The interviews indicate that national ecolabelling secretariats have internalised these values and value propositions quite well, and they are visible also in the public and marketing communications. Also the stakeholders interviewed agree, by-and-large, that the image of the Swan reflects these values and value propositions.

Previous studies indicate that the most difficult of these values to implement is dynamism: the image of the Swan is not always perceived of as very dynamic (Leire & Thidell 2004; Helgadottir 2007a). This was also reflected in the interviews, e.g. when concerns were raised that young people might be more attracted to Fair Trade and similar labels. Creating dynamism is also largely dependent on the way the external environment discusses the Swan: according to an interview from Norway, the label is used as a general symbol for environmental issues in the media, and has thus managed to take on some (dynamic) life of its own.

Among the value propositions, there is perhaps still some way to go before the Swan is ‘the most cost-effective way for a producer to indicate its environmental commitment’ in all product groups. This is evident in the fact that self-claims are still used (e.g. many laundry detergents in

Finland) and some manufacturers prefer other environmental labels or other forms of communicating their environmental commitment. During the course of the history of the Swan, there have also been members of the business community who contest the 'objectivity' of the Swan, partly because of a general lack of enthusiasm about Type I third-party ecolabels. Overall trust in the Swan has grown over the years, however, and the increased interest in the Swan indicates that a growing number of companies are subscribing to these value propositions.

Target groups

The Nordic Ecolabelling strategy for 2005–2007 also defined some specific target groups for information and marketing. As concerns *consumers*, a 'mid-group' in terms of environmental consciousness was identified as the most important target group²⁷, because those who are very environmentally conscious would actively process information on their own accord²⁸, and it would be too resource-consuming to try to change the attitudes of those who are indifferent or negative. In terms of *business*, all companies that can fulfil the Swan criteria were defined as the target group, with a special focus on large companies and the public sector as creators of demand. Thus, professional purchasers are a group targeted with special initiatives. The strategy also stressed the role of *alliances and co-operation* with other organisations that have the same goals. In particular, co-operation with the retail trade was mentioned, as well as the need to clarify relations with competing systems and potential adversaries.

The current communication strategy addresses many of the issues identified in the previous evaluation and in previous studies (The Swan label from... 2001; Leire & Thidell 2004; Helgadottir 2007a). Perhaps one of the issues that might merit some more attention is the role of the salespersons in communicating additional information to consumers about the Swan. This was highlighted in Leire & Thidell (2004): because consumers do not take the initiative to find out about the label, they should be provided with this information to ensure and maintain credibility. It is expected that in particularly the 'mid-group', identified as a key target group, would be in need of additional information, e.g., via salespeople.

Collaboration with stakeholders was also identified in the project about developing the marketing of the Swan label (Helgadottir 2007a) as a key success factor. It was found that manufacturers prefer common PR campaigns rather than joint advertising. The importance of good customer relationships was stressed – and this is indeed an issue to which the

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²⁷ The term 'mid-group' refers to a common way of segmenting consumers into 'very environmentally conscious', 'uninterested' and in between them, a 'middling' group of consumers who are somewhat interested but require more information or interventions in order to become active.

²⁸ One could argue, however, that this is an important group because they often guide their friends in the mid-group.

national ecolabelling secretariats have devoted increasing attention. License-holders were in general pleased with the information they had received from the national secretariats and the practical help and joint marketing and PR efforts. In Iceland, however, work to develop good customer relations has only just started, and a number of measures to improve co-operation with and among companies have been identified, even though lack of human resources and training are a persistent problem (Helgadottir 2007b).

In Sweden a special ‘Swan Club’ has been initiated for companies and other organisations purchasing Swan labelled products. Similar initiatives have been made in other Nordic countries, too. Ecolabelling Norway provides guides and information (including legal aspects) to professional purchasers on how they can use ecolabelling in order to ease their work.

According to the interviews, Sweden has been very successful in marketing campaigns together with businesses. The secretariats in Norway and Denmark have co-operated very successfully with the public sector and voluntary organisations. The secretariat in Finland has co-operated, in particular, with other labelling systems, such as organic food. There have been different special initiatives, target groups and messages in the countries (explained by different market preferences and conditions), but all in all, the Swan (and to some extent also the EU Eco-label) have been very visible in all four countries.

According to the recent study (Helgadottir 2007a), the role of business and consumer markets vary in the different Nordic countries: while they are about 50-50 in Sweden, Norway and Denmark, the business-to-business market makes up about 70% of the Finnish Swan labelled market. Nonetheless, the national secretariats have underlined the importance of the consumer market and consumers as key target groups for communications. This is because business and public purchasers also need an individual motivation to actively choose the Swan.

Apart from the ‘mid-group’ identified in the 2005–2007 strategy, Nordic ecolabelling secretariats have identified parents of small children (in particular mothers) as a key target group (Helgadottir 2007a). There is some variation between the countries as to how much focus should be placed on segmentation, and how well a detailed Nordic market segmentation strategy fits in with the realities in different countries. Children and health effects have, however, been identified as a key ‘selling point’ for the Swan (Leire & Thidell 2004; Helgadottir 2007a). Thus, parents of small children have been targeted more or less in all countries, an orientation that fits with the ‘future-oriented’ message of the Swan.

Recent marketing campaigns

Recent marketing campaigns have made good use of the communication strategy and experiences accumulated. Target groups have been defined

more clearly and co-marketing together with partners has been intensified (see Table 7).

Table 7. Summary of key marketing efforts in the Nordic countries in the past few years

Denmark	2006
	Baby week for expecting parents and parents of small children (initiated and funded by Ecolabelling Denmark, participation from retailers, NGO's, and local municipalities)
	Participation in campaign initiated by the Danish Ministry of Environment: Green Responsibility
	2005–2006
	Participation in campaign initiated by Visit Nordjylland on ecolabelled camp-sites and hotels
Finland	Participation in the campaign "Houses in the future" initiated by the Municipality of Køge – a whole new neighbourhood with Swan labelled houses
	2005
	Ecolabels on Go-cards (target young people)
	Participation in campaign for washing machine initiated by ASKO Vølund
Finland	2006–2007
	Campaign for young adults (youth media)
	2005–2006
	Campaign for professional purchasers
	2005
Iceland	Parents of small children (brochures, presentations at fairs)
	Television campaign Swan the future
	Standing campaign: printed products (designated website, newsletter & presentations at fairs)
Iceland	2005
	Newspaper marketing campaign to increase familiarity of the Swan
Norway	2006
	Climate campaign (with NNV)
	A pilot project "The Eco Square" for aware consumption in cooperation with COOP
	The consumer day as a joint arrangement with a number of public organisations and authorities in the consumer area and the national television
	2002–2006
Sweden	Good start campaign for parents of small children
Sweden	2007
	Campaign for consumers- How much of a Swan are you? to influence consumers to buy more environmentally-sound products
	Joint campaign with ICA for discounts on Ecolabel products.
	Breakfast seminars for influentials and purchasers
	Participation in 3 trade fairs on Nordic Ecolabel products and services and launching of Nordic Ecolabel trademark (Hard Rain, Smaka på Stockholm, Book Fair, Inter-food).
Sweden	TV-show (Äntligen Hemma) on Nordic Ecolabel products
	2006
	Newspaper ads for climate change issues
	Cooperation with ICA food store chain for discounts for Nordic Ecolabel products
	Breakfast seminars for influentials and purchasers
Sweden	2005
	Campaign for professional purchasers in the tourist industry
	Campaign for first Nordic Ecolabel house
	Campaign for first Nordic Ecolabel heating pumps
	Breakfast campaign for climate change issues
Sweden	Campaign to launch ICA food store chain
	Newspaper ad campaign for the EU Flower and Nordic Ecolabel trademark
	Cooperation with newspaper METRO on ads
	Seminars for travel managers

All countries have placed a special focus on consumer marketing, and parents of small children have been a particular target group in all countries. This focus has been most pronounced in Norway and Denmark, with very forceful campaigns directed at parents of small children via, e.g., daycare centres. In Iceland, marketing to the public has focused on creating general awareness and increasing knowledge of the Swan label, which has been successfully accomplished (Helgadóttir 2007a).

In Finland, the focus has been less on consumer marketing: special target groups have also included professional purchasers and customers of printing houses. A campaign targeted at young people is an example of a consumer-oriented campaign, which was deemed quite successful by the interviewees. Nonetheless, it was remarked that in Finland, the Swan label is not very visible in supermarkets or for ordinary consumers. This is believed to be partly due to lower engagement by the retail chains than in other Nordic countries, and it is hoped that the situation will change now that one of the retail chains has made a commitment to the Swan label.

Nordic actors' comments and ideas on marketing and information strategies

The Nordic actors interviewed were very satisfied with the marketing and information strategies, as could be seen in section 4.3. We received, however, some individual ideas and suggestions for improvement, which are listed below:

- More information for consumers about what the label means for different product groups (especially services).
- More visibility in supermarkets and in the customer magazines of the retail chains.
- More visibility in the media (PR rather than marketing).
- Marketing the Nordic Swan for SMEs as a simple, concrete yet professional step in developing an environmental management system.
- Designated communications and 'tools' for public purchasers and differentiation of public purchasers in groups according to their different needs.
- Public purchasing of Swan products should be made more visible to ordinary 'customers' and employees.
- It should be stressed that the Swan includes the climate aspect: "Labelled products are better also climatewise". Stronger connections should be built to sustainability and climate issues in order to capitalise on the public and corporate interest in these issues.
- Establishment of a common website/portal for all Nordic countries allowing importers to search all Swan labelled products available.
- More information on ongoing work (e.g., draft criteria) should be provided in English from the start.

4.5 Concluding remarks

The Swan remains the dominant label in the Nordic countries, with at about six times more licenses in Denmark, and an even more overwhelming dominance in the other Nordic countries. The EU Flower is gaining some ground in some countries, in particular in Denmark, and in some product groups (e.g., textiles). There are, however, product groups in both schemes in which no licenses are awarded.

On the basis of our limited selection of interviews, there is a demand for both labels, depending on the product group, market and strategic positioning of the company. The existence of two broadly equivalent labels, however, creates a challenge for public communications. In order to support the parallel development of the two schemes, it is also important to clarify the position of the EU Flower. Our interviews showed that there is scepticism about the credibility of the EU Eco-label in some countries and industries, which our interviewees partly attributed to an overall scepticism about the European Union. One important issue to communicate to the business community and the general public is the active role of the Nordic countries and the Nordic ecolabelling bodies in the EU Eco-labelling scheme.

The development of the EU Eco-label has implications also for the future of the Swan, as the two schemes operate in parallel, make use of partly the same expert and other human resources, and there is demand for both schemes among companies. Nordic ecolabelling bodies have only limited influence on the development of the EU Eco-label, which depends also on other Member States, the Commission and ultimately, license-holders in different countries. If the EU Eco-label continues to grow, there will be more overlapping criteria, and also more imported products bearing the Flower in the Nordic market. Both schemes should have a good reputation and a clear positioning vis-à-vis one another. One approach for Nordic countries to plan their strategy concerning the EU Eco-label, is to define the ideal future situation, and use a “backcasting exercise” (see, e.g. Höjer and Matsson 2000) to set medium- and short-term targets for reaching the desired future goals. Backcasting is a way to connect desirable long-term future scenarios to the present situation by means of a participatory process. In Nordic ecolabelling, it could serve as a way to mobilise stakeholders around a common long-term vision, as well as to identify bottlenecks for reaching that vision and solutions for surmounting them.

As concerns marketing of the Nordic Swan, we can conclude that the Swan label is very well known among consumers in the Nordic countries, though there is still clearly room for improvement in Iceland. Moreover, there is not much knowledge on how consumers interpret the label in detail for specific product groups. All in all, however, marketing of the Swan has improved significantly since the previous evaluation and has

become highly strategic and professional. This has included identifying clearly what is offered, to whom, and how to reach them. Moreover, strategic stakeholders, such as public purchasers, have been identified. The license-holders that we interviewed were very satisfied with the level of service provided to them by the ecolabelling secretariats in Finland, Denmark, Sweden and Norway.

The Swan brand has value that contributes to a ‘virtuous cycle’ of public recognition, demand among companies and visibility in the market, which in turn increases the possibilities for successful marketing communications promoting the Swan. With the current marketing budgets, there is little that we could suggest doing differently in the Nordic ecolabelling bodies (apart from Iceland, where resources are needed for basic management and marketing activities). There is a need to retain some scope for national adaptations of the Nordic marketing strategy, however, because local conditions are quite different in the Nordic countries.

One particular issue requires more attention, however. There has been increasing focus on joint marketing efforts, but this is a point worth reinforcing even further. In particular, authorities have been supportive of the Swan in some countries (Denmark, Norway), but less in others (Finland, Iceland). This is a point on which the authorities responsible for sustainable production and consumption in general, and the Swan in particular, should be more active. Good experiences in co-operating with NGOs in some countries show that more could be done in this area, as well.

The present analysis is based on a small selection of license-holders. A more thorough study should be conducted to discover the needs and perceptions of Nordic companies in different industries concerning the relations between the Nordic Swan and the EU Eco-label. This research could also support the market analysis efforts of the Nordic ecolabelling bodies and clarify open questions. Thus, an interview study in selected industries, followed up by a representative survey of a broader set of industries is recommended.

Co-marketing with producers is a successful practice developed by the Nordic system to make it more attractive for producers to actually apply for licenses. This has contributed to increasing the number of products carrying the Swan on the market. The Nordic system, in which the producers pay annual fees in relation to the turnover in individual countries, gives incentives to engage in co-marketing because the effort can pay back both via the direct fees and because the increased visibility of the logo stimulates others to follow. The producer in the EU Ecolabel system pays only in the country that issued the license. Thus the incentives for stimulating other producers than the domestic ones are small. Without a solid financing system, there is thus a risk that ecolabelling bodies devote less marketing attention to producers, the key clients of an ecolabelling scheme, potentially leading to fewer products in the market.

5. Possibilities for co-ordination and harmonisation of the Nordic Swan and EU Eco-label

The issue of co-ordination and harmonisation of different ecolabelling schemes has been on the agenda for many years. It has gained momentum in connection with the revision process of the EU Eco-label. Beyond the EU Eco-label, however, co-ordination and harmonisation are discussed also outside the EU, for example within the Global Ecolabelling Network. In the following, we first present the recommendations of the evaluation of the EU Eco-label (EVER 2005), and discuss some of the practical solutions identified. We then turn to Nordic actors' viewpoints regarding ideas for co-ordination and harmonisation.

5.1 Options for co-ordination and harmonisation: previous experiences and suggestions

EU Eco-label position and suggestions

The latest broad-scale evaluation of the EU Eco-labelling scheme was published in 2005 (EVER 2005). One of the central issues in this evaluation was the relation between the EU Eco-label and national and/or regional labelling systems (e.g., the Swan).

The results indicated that “there is no clear preference for either national labels or the EU Eco-label by producers, although when considering the long term the EU Eco-label is more often preferred. National labels are not perceived as more successful than the EU Eco-label. [...] The presence of national labels alongside the EU Eco-label in neither considered as being positive or negative – there is disagreement about whether they compete with each other. In any case, harmonisation is seen as being the only effective solution to be pursued. There is very little support for the options of abolishing either the EU Eco-label or the national labels” (EVER 2005, Executive Summary p.6).

The EVER Study (2005) perceives co-ordination and harmonisation as alternatives to the abolishment of one, or the other, type of scheme. In this context, co-ordination and harmonisation refer to a range of measures, including identical institutions running the schemes, identical performance criteria for the same product groups, identical application procedures, identical costs, identical support for application, identical test methods, comparative criteria and common working groups. Under the

notion of co-ordination and harmonisation, the EVER study also includes the possibility of the EU Eco-label and national schemes gradually approaching each other, over an extended period of time.

The evaluation presented three options for the harmonising of ecolabelling schemes (EVER 2005, pp 106–109):

- 1) *National adoption of EU Eco-label criteria*: This would mean that the new regulation would make it mandatory for national label systems that have different criteria for the same product group to either withdraw that product group from the label or to adopt the EU criteria: word for word. The evaluation judged that political consensus on this measure ‘might be very low’.
- 2) *EU Eco-label adoption of national criteria*: This would mean that the EU would agree to adopt the criteria from national schemes for product groups that are not covered by the EU Eco-label. Nonetheless, the evaluation concluded that this option would rarely be applicable, because in most cases there would be more than one scheme having criteria for such product groups.
- 3) *EU Eco-label as an “umbrella scheme”*: This would mean that the EU Eco-label would take into consideration the existing national sets of criteria and define ‘common baseline criteria’ for the specific product group. The national labels would be allowed to add additional or more restrictive criteria for process and production methods. Development of new criteria would be done in the national ecolabelling schemes, and harmonised to define common EU Eco-label criteria.

European and international experiences

About fifteen ecolabelling systems for products and services are available in the European community (see Table 8).

Table 8. Identified Ecolabelling schemes in the European Community and Candidate Countries

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• The EU Eco-label
• The “Nordic Swan”
• AENOR Medio Ambiente (Spain)
• “El Distintiu” (Catalonia)
• “NF-Environnement” (France)
• “Der Blaue Engel” (Germany)
• “Umweltzeichen” (Austria)
• “Milieukeur” (Netherlands)
• “Bra Miljöval” (Sweden)
• TCO (Global/Sweden)
• Environmental Label (Croatia)
• Environmental Label (Hungary)
• National Programme of Environmental Assessment and Ecolabelling (Slovak Republic)
• Environmentally Friendly Product Ecolabel (Czech Republic)
• Polish Ecolabelling Programme (Poland)

A number of attempts to co-ordinate and harmonise processes have taken place, both amongst the national labelling schemes, and between national labelling schemes and the EU Eco-label. One of the most widely discussed examples is the Austrian approach to harmonisation on a case-by-case basis. The purpose of the Austrian approach is to first adopt the EU criteria and then leave it to the applicants to decide which label they should apply for, based on the same criteria. In concrete terms, this implies that the Austrian system evaluates the European criteria when there is an overlap of product group or when a new product group is considered. When the EU Eco-label criteria fulfil the Austrian requirements, the European criteria can be adopted as such, or subject to only minor changes. The license-holder uses the Austrian label for the domestic market and the EU Eco-label outside Austria. So far there are just a few product groups that have criteria approved and harmonised within the Austrian scheme, such as criteria for hotels. Moreover, Austria has an agreement with the *Blue Angel* to harmonise some product groups.

GEN initiative GENICES

The Global Ecolabelling Network (GEN) has considered the element of co-operation between various ecolabel schemes within its agenda already for many years. Joint drafting of criteria and formal co-operation (e.g. mutual recognition) were mentioned in the strategic plan for 2001–2005. GEN recommends a *gradual* approach to mutual recognition, starting with co-operation and exchange of information, the establishment of mutual confidence on the basis of standards and codes, and the mutual recognition of testing and verification. This process lays the foundation for joint environmental criteria development, leading to mutual recognition.

In 2003, GEN launched the methodology, principles, structure, key components, and other features of a system called “GEN Internationally co-ordinated ecolabelling system – GENICES”. The drivers are, among others, in the increasing rate and influence of globalisation, the growing attention to environmental issues, as well as the need to respond to arguments concerning trade impacts. A pilot test was conducted in 2005 between the ecolabel systems in Taiwan and New Zealand and further, common criteria development was tested between the ecolabelling systems in Taiwan, Japan, Korea and Thailand. The Nordic scheme has, through co-operation in GEN, maintained a project running with Japan in order to develop a set of common core criteria for copy machines and set up a system of mutual recognition of control. Catalonia has also, in some cases, adopted EU criteria into its own ecolabelling scheme. The GEN annual meeting in 2007 stressed the need for going further in the GENICES process.

Organic production and labelling regulation

One approach for the harmonisation of labelling schemes that can serve as a reference point is the new EU regulation on organic production and labelling of organic products (8620/07). The European Commission leads this system, whereas the National Competent Authorities are responsible for the scheme in the Member States. The Regulation sets uniform standards for organic production and labelling requirements aiming to harmonise the concept of organic production for the Member States. Regarding production standards, it sets a common ground (similar to the notion of common core/ baseline criteria). However, on this same note, Member States may apply *stricter* rules to organic production provided that they do not restrict marketing of organic products that are originally produced in other Member States. It allows for some flexibility, but exceptions from the standards must be kept to a minimum, and they may only apply for a limited period of time.

Furthermore, it is also obligatory that all pre-packed products be labelled with the EU organic logo in order to give equal information to consumers. This is a legal requirement for marketing organic food products within the European single market. Yet, national and private logos may be used in parallel.

According to the evaluation group, this requirement could be seen as parallel to the EVER study's above-mentioned first option for harmonisation of national/regional ecolabelling schemes and the EU Eco-label, (i.e. the national adoption of EU Eco-label common core/baseline criteria.) However, there are some important differences. In contrast to ecolabelling, organic farming and labelling as such do not represent or require a life-cycle approach regarding all of the environmental impacts of a particular product. Thus, the conditions for organic farming criteria are fairly homogeneous throughout the EU, which is not always the case for production (and preparation) of various goods and services. Another important difference is the connection to the European Common Agricultural Policy (CAP) and the system of farming subsidies. These subsidies, which most farmers rely on, have no parallel for manufacturers.

5.2 Existing Nordic approach and actors' views

Existing Nordic approach to co-operation and harmonisation

The existing Nordic approach is based on the Nordic Ecolabelling strategy for 1999–2001, in which an explicit stand was taken on relations to the EU Eco-labelling:

“The Flower supports the vision of the Nordic Swan and we will thus co-operate constructively with the Flower. Co-operation and harmonisation can take place on three levels:

- 1) Harmonisation of criteria: In order to facilitate the situation for applicants, we strive to harmonise the documents in question, without compromising on Nordic environmental requirements. Thus it can concern criteria items, test methods, layout, etc. as well as its ability to influence the EU Flower to set the same high environmental requirements as exist in our criteria.
- 2) Adoption of the Flower's criteria: If there exists criteria documents for the Flower with a level of requirements that satisfy the environmental goals and philosophy of the Nordic Swan, the Nordic Swan can decide that these documents shall also apply for the Swan label.
- 3) Phase-out of the Swan's own criteria: If we in addition view that the Flower is highly attractive for both producer and consumers, and at the same time the EU Eco-labelling system has been able to demonstrate operating procedures that bring about equal or higher environmental benefits than the Nordic Swan, in this case parallel Swan criteria can be phased out."

The Nordic approach, with the above listed alternative actions to harmonise, has been applied on a case-by-case basis, with a focus on the first two options. Nordic countries have been active in influencing the criteria development for the EU Flower. Moreover, the criteria of the EU Flower have been adopted for the Nordic Swan – as such or in a modified form – in many cases (see section 3.3 for more details).

Interviews (from Finland, Sweden and Norway) indicate that this case-by-case approach has provided a workable solution, which has also led to increasing (if not full) harmonisation. At the current stage, it seems that most Nordic actors support a strong role for the Swan continuing also into the future. Thus, among the option suggested by the EVER report (2005), having the EU Eco-label act as a baseline for national and regional labelling systems – which could also allow for the adoption of more stringent local criteria – appears to be the closest to the preferred solution amongst the Nordic actors²⁹.

Pros and cons for harmonisation and co-operation are discussed among the Nordic countries. Important drivers for harmonisation mentioned include: the need to cut down on the work and resources spent on developing criteria, and also, license holders would like to have the same criteria for each product group available for ecolabelling. The Swedish secretariat claims that the drivers for a harmonisation mainly derive from national and regional ecolabelling systems, rather than from the EU Eco-label. The Danish secretariat, on the other hand, perceives that it is first the EU and the authorities, but also the consumers, that are keen to

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²⁹ Nonetheless, it was noted that it is not always the case that the Nordic criteria are more stringent, and that the EU Eco-label criteria can thus form a baseline. In some cases, more stringent criteria have been proposed for the EU Eco-label than exist in the Nordic Swan. If the EU Eco-label criteria are accepted as a baseline, then it would no longer be possible to have less stringent criteria within the Nordic Swan.

achieve a system of harmonisation. The Finnish secretariat representatives pointed out that a lot of co-ordination and harmonisation has already been undertaken, and the Nordic countries are the most active member states in doing this. The staff of the EU Eco-labelling Board argued that the producers' opportunity to use the same label in the Common Market is the main driver for harmonisation.

Barriers that were mentioned include that the decision making process differs between countries, and the desire to shape your own label – to have your own flagship – can be strong. The strong market position that the Swan currently enjoys was also said to reduce the motivation for harmonisation, as the Swan is perceived to be well known and deemed credible by consumers and purchasers. Moreover, environmental priorities differ considerably amongst the member countries. Therefore, the possibility to harmonise criteria in regards to the environmental impacts of toxic substances is better than that with energy production methods (due to Nordic differences in electricity generation), or health aspects. A Finnish secretariat representative also mentioned that barriers to harmonisation do not necessarily arise only from different Member States, but also within the Commission Services. In some cases, for example, the Commission Services have introduced changes in draft versions of criteria based on national/regional schemes, which were largely acceptable to the EUEB.

According to Ecolabelling Denmark, a harmonisation of ecolabelling criteria is needed, either by harmonising all criteria or specifically by using core criteria. In either case, they emphasised that the market should influence the decision, for which they recommend a market survey to be conducted. The viewpoint of the Danish ecolabelling board is similar, but the argument is clearer that the Nordic Swan eventually needs to be phased out for the sake of using Nordic resources on only one eco-label, the EU Eco-label. The Danish board anticipates that the EU will step in and increase the push for harmonisation.

Harmonisation and co-ordination have been on the agenda of the EUEB Co-operation and Co-ordination Management Group. According to the Finnish ecolabelling secretariat, Nordic countries (especially Sweden) have already been active in setting up a database of existing criteria documents issued by national labelling systems. This database was handed over to the Commission, but has not been recently updated. More recently, the focus of this group has shifted toward co-ordination of the EU Eco-label with EMAS and other EU-level policy instruments. There has been little active work in harmonisation efforts since.

With regard to the business community, some of the license holders interviewed were in support of a completely harmonised system, in which there eventually would exist only one label. Nonetheless, we also heard views supporting the core values of the Swan, both in terms of Nordic criteria and in terms of the steadfast reputation generated by the Swan.

Moreover, some of the license holders (in particular, in Norway) had no interest whatsoever in the EU Flower. Irrespective of their positions toward harmonisation, few license-holders had suggestions regarding how harmonisation should be accomplished in practice. A generally held viewpoint, however, was that there should be more and clearer information for the public about the roles of these two schemes, and more co-ordinated marketing efforts.

Our interviews pointed out that the criteria are not the only aspect of these two schemes that need co-ordination and harmonisation. The license fee structure was identified as another issue in which co-ordination is needed. If the two schemes are to continue to exist side-by-side, the differences between the license fees are likely to have marking implications. It was suggested that options should be explored for offering license holders the use of both labels at the price of the Swan label. Because there are only limited product groups with labelling criteria within the EU Eco-label, it was also suggested that perhaps it is worth exploring whether the EU Eco-label could approve the Swan or other national/regional labels as acceptable for labelling accordingly under the Flower scheme, if Flower criteria do not yet exist. These options, however, require more financial calculations as well as more systematic databases of equivalences between the criteria within these two schemes.

Opinions concerning the EU Eco-label differ between the Nordic countries³⁰. Whereas Denmark strongly favours the EU Eco-label, other Nordic countries value the strong market position of the Swan. They favour a pragmatic approach to harmonisation on a case-by-case basis and following updates as to the developments of European criteria, and thus searching for similarities to adjust to, when suitable. This difference can be explained by both historical backgrounds and different national organisations and priorities. One should also keep in mind that Denmark did not join the Nordic system from the start because they preferred, and still want, only one European system. For Denmark, the Swan is seen as an intermediary solution until the EU Eco-label is strong enough to serve the same purpose.

Thus, Denmark wishes for a faster co-ordination of the two schemes. The current slow co-ordination and the weaker position of the Flower is claimed to be due to a lack of sufficient interest in promoting the EU Eco-label. In general, the arguments for harmonisation are:

- The similarities of the two systems. Two systems can be confusing for users.
- The EU Ecolabel covers a larger market, which is important for international trade but would also imply larger environmental benefits.
- The EU Ecolabel is cheaper, not least for SMEs.

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³⁰ The different views were visible, for example, in a discussion held at the Nordic Ecolabelling Board and Secretariat Meeting in Reykjavik, October 20, 2007.

- The differences in the criteria documents are perceived of as having minor importance as there will always be different opinions on priorities, sufficient levels of requirements and suitable test methods.

In Norway, the interest in the EU Eco-label scheme is weaker than that for the Swan. Norwegian license holders do not view harmonisation as an urgent (or desirable) issue. They consider that the current work is sufficiently good, and that the EU members (Denmark, Finland and Sweden) can already influence the EU Eco-label through their participation. Norway's view is that harmonisation is not a good idea if the criteria requirements have to be lowered. Instead, the Swan should go ahead and pave the way for ecolabelling at large.

In regards to the Swedish view, it is perceived that the best alternative for harmonisation would be that the EU Eco-label should adopt national criteria in the absence of own criteria. According to a Finnish interviewee, one such 'fast track' adoption experiment has been made (Swan and other national labelling criteria for lubricants), but the processes turned out to be slower than expected.

We have not heard any expressed arguments against co-ordination or co-operation, but most interviewees in the other Nordic countries, save Denmark, emphasise the strong position of the Nordic Swan and the slow progress of the European system. They suggest that the EU system must achieve a similar position before a major shift will be materialised. This is not expected in the near future. In addition, it has recurrently been mentioned that the EU system has to be financially viable; currently it does not pay its costs.

5.3 Concluding remarks

Currently, there is willingness for co-operation, co-ordination and harmonisation in the European as well as in the global ecolabelling community. We can conclude that this is also the case in the relation between the Nordic and the European systems. There is practical work that promotes harmonisation and co-ordination. One example is that the Swan and the Flower are introduced as equally useful, in terms of provision of information material, an effort that is especially important in Denmark. Also, as outlined in the underlying strategy of the Nordic Ecolabelling Board, work on harmonisation and adoption of criteria is also taking place. There are, however, only few examples of fully harmonised criteria.

So far, the general Nordic interest in the possibilities, regarding the incorporation of the Flower, are primarily a matter of a *gradual introduction* of common product group definitions and requirements in criteria and test methods. In Denmark, however, there are voices urging for a more drastic consolidation of the Nordic Swan and the EU Eco-label. A

decision to shift from the Swan to the EU Eco-label would have to be taken by the Nordic Council of Ministers, as the head of the Nordic scheme, and by the governments of the Nordic countries. In this regard, the role of the ecolabelling secretariats and the national ecolabelling boards is more advisory, and therefore the experiences collected from the ecolabelling organisations should be taken into consideration when making decisions.

We have not found any opposition against harmonisation, but rather a difference in the expectations and wishes amongst the Nordic countries. Whereas Denmark aims to work to harmonise the Swan with the European system, other countries are still waiting to see how the EU Eco-label develops.

Most of those interviewed until now consider that a common Nordic position vis-à-vis the proposal for a revised EU Eco-labelling regulation would be desirable, yet unlikely due to different priorities and attitudes pertaining to the two systems. There are both historical and organisational reasons for the different positions of the national bodies. In addition, we want to add that the public scepticism vis-à-vis the European Union, in particular in Norway and Sweden, may contribute to a weaker market position and lower expectations for a drastically improved situation of the EU Eco-label in these countries.

A final remark on the findings is that, according to various statements in the interviews, it seems that there is a liberal use of the terms harmonisation, co-operation and co-ordination. Further, a common understanding of the different terms is lacking. We believe that the lack of such understanding risks undermining a constructive discussion on the topic, and that it only triggers a more political, rather than factual, debate on the possibilities.

6. Current governance issues in the Nordic Swan

Topical governance issues of the Nordic Swan relate to reforms implemented as a result of previous evaluations. These include the issue of public support to the Nordic Swan labelling scheme. Another topical issue is the Nordic system for decision making, which was converted from a consensus to a majority decision-making system, since the previous evaluation report.

6.1 Grounds for public support

There are three types of public support provided to eco-label secretariats: public financial support and subsidies or grants, green public procurement (GPP) and authorities' endorsement of ecolabelling, for example in connection to green consumption campaigns. The type of support has an effect on both the credibility and the strategy of ecolabelling. On the other hand, ecolabelling is by nature a market-based instrument, which also serves as an incentive for the secretariats to continually improve their performance.

The previous evaluation (The Swan label from... 2001) found that ecolabelling is given high priority in terms of a consumer and environmental policy instrument in all Nordic countries. It was also found to be mainly based on public funding when first established. The aim at that time was to make the system self-financing. Since the 1996 Guidelines for Nordic Ecolabelling, the aim has been a uniform fee structure, and that the fees should at least cover the costs for licensing and administration. It was also argued that a purely self-financing system might lead to conflicts between environmental and revenue considerations in criteria development, which could jeopardise the credibility of the label. Moreover, the evaluation argued that public financing should be provided because the label supports core environmental policy aims. Further, the evaluation indicated that the ecolabelling criteria can be seen as a sort of technical infrastructure, similar to technical standards. Not least, the presence of indirect environmental effects (i.e., effects on producers not applying for the label, but using its criteria for their internal product development) emphasised a similar argument, or supporting point, demonstrating the need for public funding. These producers receive useful environmental information 'for free', and accordingly, if the labels were self-

financing, this information would be paid for by those using the label and also paying the license fees.

The previous evaluation concluded that public financing should be provided at least for the development of criteria. It should be maintained at least at the present level, and that the requirement for self-financing should be abolished. Moreover, it recommended that Nordic financing should be increased to facilitate a strong Nordic profile. In 1998, nearly 1/3 of the combined resources (59,6 million DKK) derived from public budgets and 2/3 from license fees (The Swan label from... 2001, 43–44). In recent years, the share of public funding has decreased, and the Nordic Swan has gained a larger share of its income from license fees (see section 3.2).

Nordic viewpoints on the current state of public funding were collected by interviewing representatives from the national ecolabelling secretariats and the national ecolabelling boards. An interviewee from the Danish ecolabelling board stated that a need to be more self-financed could imply less trustworthiness, because the current commitment by the authorities ensures credibility and quality³¹. At the same time, they mentioned that it is healthy to have to be business-minded for the sake of preventing the system from becoming too bureaucratic. The Confederation of Danish Industries, on the other hand, commented that because ecolabelling gets economic support from the state, prioritisation and strategies for choosing product groups should be scrutinised.

According to the interviews, higher financial support could be useful for the sake of the criteria development, i.e. to develop the Swan further. Increased financial support would provide the means by which the Swan could expand into new areas. A division of 75% self-financing and 25% state financing was mentioned as optimal. In terms of the EU-scheme, public financing was reported to be needed primarily for administration of the EU Eco-label, as the expenses that occur for the secretariats for the EU Eco-label are larger than the revenues.

Typically, the interviewees were satisfied with the current level of public funding. Some were of the opinion that even more funding would be appreciated, but it was acknowledged that it is not likely to be available due to government productivity programmes and overall downsizing of government expenditures.

In Iceland, a need for greater public support was identified. Incomes generated from license fees are low, and funding is thus needed for marketing and communications. There is also a need to increase the public funding to secure basic operations that are necessary regardless of how many licenses are in operation.

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³¹ One commentator suggested that one possible solution to this problem is the division of criteria development and license processing into two separate organisations. Nonetheless, this would not be likely to reduce the need for public funding for criteria development.

A counter-argument to increased government involvement identifies the concerns regarding the potential negative trade effects. This could be emphasised if the label was perceived to favour domestic production standards, or if foreign companies have difficulties in accessing information regarding the labelling scheme. Dröge (2001) has argued that such effects may emerge for private labelling schemes, as much as for government-funded ones. Further, private labelling schemes can be more difficult to control or counter via WTO mechanisms. A report by UNEP (2006, p. 30), identifies, for example, that the German Blue Angel is not necessarily considered as being within direct government control, even though it operates under the auspices of a government agency. Nonetheless, the issue is far from resolved (UNEP 2006).

Public support, however, is also a broader issue than merely public funding. Policy makers can support ecolabelling in many ways, for example via public endorsement and by integrating it into existing and new product, consumer and environmental policies. Public endorsement means that authorities and politicians know about environmental labelling and take a clear stand in favour of eco-labelled products. Integration into existing policies can occur, for example, via green public procurement, by referencing ecolabelling as a way to meet conformity with environmental legislation (e.g., the EuP Directive) or by regulating manufacturers' self-declared claims (and thus encouraging producers to use third-party certified eco-labels).

Public support in the form of public endorsement and policy integration was viewed as insufficient. The interviewees believed that many government officials in charge of policies that could make use of the Nordic Swan or its criteria know very little about the system. In Finland, this was believed to be the case in particular concerning the Ministry of Trade and Industry, which is the ministry in charge of the Nordic Swan in Finland. In addition to consumer policy (in which the Swan is well known and used) it also deals with a number of related policies, such as 'energy using products', domestic climate change issues, public purchasing and innovation policy.

6.2 Consequences of the majority principle in the choice of product groups and criteria selection

The background to this section of the evaluation is primarily the concern regarding the evolution of the criteria set for "printed matter" into the product group "printing companies" and the processing of this issue in the Nordic Ecolabelling Board. The evolution of this specific criteria set (when turning from a *product focus* to the *development of criteria for a service*), is a process which extends over a five year period, as described in Annex 8.

The Nordic Council of Ministers changed the rules of procedure of the Nordic Ecolabelling Board on August 13, 2003. Until this time, all decisions had been made on the basis of the consensus principle, whereas the new rules of procedure allowed a number of decisions to be made by a qualified majority (3/4). Accordingly, decisions concerning the choice of product groups for criteria development, definition of product groups, decisions concerning expert groups, as well as approval of criteria for product groups were shifted from a consensus decision to the above described majority vote. This change in the rules was made in order to speed up the decision process and improve the capacity of the Nordic Swan organisation to operate effectively in a changing operating environment (see TemaNord 2001).

The impacts of the majority principle have been discussed in an extended memorandum for the Nordic Ecolabelling Board by the Nordic co-ordinator³². The background which stimulated this document derived from a request by Denmark to discuss the application of the majority principle. Here, specific reference was made to the decision on revision of ecolabelling criteria for “printed matter” in December 2005. In short, it was a matter of Danish concern at the early phase, which grew into a strong position of hesitation when the decision was taken. Accordingly, when an unanimous Danish board was against this change, but was voted down by a majority consisting of the other countries. Questions were raised as to the need to elaborate the decision-making principles and whether is such a case, the majority principle should be used or not.

According to the memorandum, discussions were held shortly after the introduction of the majority principle in October 2003 regarding situations in which it would not be suitable. In these discussions, the countries agreed that the majority principle would not be suitable if the decision would seriously undermine respect for the Nordic Swan in an opposing country, or if it would distort competition.

The debate on principles in the printed matter/printing company criteria decision pertained to whether the rules should be specified for situations in which a majority vote is not appropriate due to unreasonable consequences for a member country. On the specific issue under discussion, there were several kinds of objections raised. Amongst them: Is the transformation from product-oriented criteria to service criteria an issue of principle? Is the fact that the national ecolabelling board in one country is unanimous sufficient to justify an issue to be considered a matter of principle? Should a strong reaction from the producers be a reason for non-decision or postponing the decision? Or when one actor claims that important information is missing but underway, is this sufficient reason to postpone the decision?

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³² PM till Nordiska Miljömärkningsnämnden (NMN). Behandlingen vid oenighet mellan länderna. Hur har problemen lösts efter att NMR gick ifrån kravet om konsensus? 7 juni 2006/ B-E Lönn

We find that there were several motivations given for the Danish Eco-labelling Board's position, but we cannot determine whether a single concern was the most important one, or even say that any of the ones we point at is among the relevant ones. On the other hand, the core of the dispute may not be the criteria *per se*, but instead the decision-making process as such.

The printing industry, led by Graphic Association of Denmark (GA), voiced critique against the background work. It argued that the proposed final criteria covered did not encompass all the relevant environmental aspects. Furthermore, the industry claimed that their suggestions were not taken into account and that the review process was manipulated in terms of the number of companies that had been consulted. Moreover, there were (and to some extent still are) principal objections against ecolabelling criteria for services in Denmark. Further the Swedish Graphic Companies' Federation also voiced some level of critique, but did not make much of an issue regarding the debate. Their main concern was the fee system, which rapidly was renegotiated and changed by SIS Ecolabelling. The Swedish companies have since accepted the new criteria.

The above-mentioned memorandum describes the 14 cases before the printing company criteria case in which there was a level of disagreement amongst the member countries following the introduction of the majority principle. There were four instances of formal voting and debate during this period and amongst these different cases, there was little in common. The case of the revision of criteria for 'printed matter' to 'printing companies' was the only one in which the party losing the vote, Denmark, had appealed, arguing that the nature of the decision required that minority interests should be protected. Because the existing cases of disagreement have varied significantly, and because the spirit of the consensus principle is still largely upheld in the way issues are dealt with, the memorandum concluded that it would be difficult to unequivocally *pre-define* conditions under which the majority principle would be invalid.

Such a debate continued further, as reflected by other cases. Later on, the discussion regarding principles concluded with the postponing of the criteria for ecolabelling of dialysis equipment during autumn 2007. The three NEB members who were interviewed about this issue have all stated that the dialysis equipment criteria set is in fact a very different kind of case. In the printing company case, it was a matter of revising old criteria and most of the information was already in place. Further, the old version of the criteria set was about to expire – a decision was urgent. The approval regarding the case of dialysis equipment criteria could more easily be postponed as it was a new task at hand. No license holders were expected to suffer from the short delay.

The issue of when to consider a decision a 'decision of principle' was later brought up in the Nordic Ecolabelling Board. According to the minutes, all national boards declared at that time that they approved the situa-

tion as it then stood (NEB Dec. 7, 2006) and that the case could be expected to be closed. On the other hand, there have also been proposals, and some attempts, to further formalise the decision-making in the Nordic Ecolabelling Board.

Actors' views

Views from the different Nordic countries were accessed for the present evaluation by interviewing representatives from the national ecolabelling boards and the secretariats.

The secretariats in Denmark, Sweden, Finland, Iceland and Norway prefer the majority principle over a consensus principle. According to the ecolabelling secretariats and the boards, the majority principle has also brought about a number of positive effects, in the way that it:

- facilitates the decision making process;
- supports the representatives of the national secretariats in justifying the agreement within their organisation;
- helps to maintain the Swan as a dynamic tool;
- forces voting; and
- helps to clarify the issues at hand, by making the positions clearer.

Another advantage of the majority principle is that it is possible to argue for a position in the Nordic Ecolabelling Board without risking a stalled process. Differences are thus made visible.

A comparison of the two different cases: that of printed matter/printing companies and that of the dialysis equipment issue does not fully capture the core issue. The problem is that problematic situations occur partly due to the inherent unclarities in the formal process, partly due to differences between the Nordic countries.

The interviews conducted demonstrate that there are differing opinions concerning the majority principle among the Nordic countries. The interviewees in Denmark appeared more concerned. Most still supported the majority principle, yet would like to incorporate the protection of a minority opinion in certain cases, and emphasised that conditions are still lacking in regards to how and when to use the majority principle. This issue was raised in the Nordic Ecolabelling Board by the Danish chairperson (NEB meeting March 23, 2006). The Confederation of Danish Industries suggested that complete national unity should allow for veto right.

Interviewees in other countries acknowledged the situation, but did not view it as alarming and furthermore, advocated majority decisions without additional modifications. It was stated that the majority principle can be used with common sense, i.e., in cases of dispute, the decisions have been postponed to later meetings in order to sort out particular problems. Voting has only been used when negotiations reach a conclusive

end. This applies also to the Finnish interviewees, who were unconcerned about having been voted down on two occasions. They noted that the new decision-making system has not resulted in the formation of blocs or the systematic overruling of one country.

While most of the interviewees do not see the need for modifications, we found some opinions supporting a return to the previous consensus system. In particular from Danish representatives, we obtained more or less elaborated suggestions for specifying the procedure regarding the decision-making process in the Nordic Ecolabelling Board. One suggestion was that when a certain percentage of a national board is against a criteria set, the decision should be postponed, or a new public review should be established. It was argued that a case could be defined as an issue of principle when a considerable portion of a national board expresses support to a “no” vote. This could, e.g., be an agreement requiring 2/3 of a board that would allow for asking for a new review. It could also be an absolute number of board members that should be required.

6. 3 Concluding remarks

To conclude, in our interviews, there are no strong objections or problems mentioned associated with the current level of public support for the Nordic Swan. Our impression is that the Nordic Swan is on a sound financial basis, even though more public funding may be necessary for some specific issues or in the case of an individual country, such as Iceland. On the other hand, the current level of self-financing ensures responsiveness to market needs. We did, however, find that the public support needs to be greater (than present level) in the case of the EU Eco-label, in which license fees bring in less revenue for this particular scheme.

An important issue concerning public support is the integration of the Swan into existing policies, such as green public procurement, and overall public endorsement by authorities. Here, we found differences amongst the Nordic countries – with Denmark and Norway setting a good example in terms of public support for marketing efforts and joint campaigns.

The majority principle does not seem to cause any major problems in the decision making in the Nordic system. Yet as in the Danish case, its application has created some situations that should, if possible, be avoided. It is not obvious, however, how the problem should be solved. Some alternative solutions are explored below.

The previously rejected proposal (Nordisk Miljömärkning p. 83) to organise the Swan as a truly Nordic system without national boards, had the intention to shift the discussions from primarily being instilled between the member countries (national boards) to becoming more of a Nordic discussion among interest groups, such as environmental, con-

sumer, industry and trade groups. A shift today would probably be both time-consuming and cause new problems before the organisation settles.

Other directions could be to go back to the consensus principle or allow slightly different criteria in the Nordic countries. Regarding such suggestions, however, we did not find much support for any of these solutions.

A further option suggested is the initiation of a new process for the elaboration of detailed rules. These rules would identify situations in which the majority principle is not appropriate. Such a process risks being both time-consuming, and also shifts the attention of the system from issues regarding ecolabelling towards more formal matters. When applied in practice, it might cause new and unforeseen problems. Our conclusion is therefore that the present system, with careful and responsible use of the majority principle, should be maintained. However, it could still be worth the effort to investigate what possible rules are needed in order to make the process more predictable.

7. The Nordic Swan and other environmental information systems

In addition to the EU Ecolabel, a number of other labelling, certification and information management systems are widespread in the Nordic countries. These systems can provide possibilities for co-operation with the Nordic Swan, or they may complement it. This chapter first includes an overview of the available environmental information systems, with a focus on particular systems that include possibilities for synergies. The current views of Nordic actors, regarding potentials for co-operation, are presented and finally, concrete examples of co-operation are discussed.

The Swedish Environmental Protection Agency (EPA) concluded, in a comprehensive study pertaining to information concerning the environmental impact of products that there is a weak co-ordination of information tools. The reason is that they are developed with different aims. They are based on different legislations and agreements without efforts to synergise between them, which may lead to decreased efficiency. In many cases companies' internal information systems for environmental aspects are not connected to or integrated with other information systems (Naturvårdsverket 2005, p. 44).

A Danish study started with a vision there information from manufacturers and suppliers could be co-ordinated in order to provide the customers' needs for information. This study analysed the barriers and opportunities for an integrated information system for product-related issues. The study covered the following instruments: ecolabelling, environmental management systems, environmental product declarations and material data and safety sheets, and suggested that priority should be given to co-ordination between the EU Flower, EMAS and environmental product declarations, as there are differences that could be explained by weak co-ordination.³³

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³³ Dansk Toksikologi Center (2005) Integrated Information in the Product Chain in Naturvårdsverket (2005) Information om produkters miljöbelastning [Swedish EPA Information on environmental impacts of products] Rapport 5526, 2005. page 97

7.1 Environmental information systems with potential synergies

The previous evaluation from 2001 discussed, amongst other questions, the relationship of the Nordic Swan to other voluntary environmental policy instruments (Evaluation of the environmental...2001, pp 66–68). The starting point was in the principles of Integrated Product Policy (IPP), which aims to co-ordinate and integrate existing environmental policy instruments. It identified the complementary and reinforcing role of the eco-labels present in the Nordic markets, in particular via the existence of a common website where different labels present themselves jointly. Further reinforcement could, according to the previous evaluation, be achieved when the Swan harmonises demands with other systems such as production of organic cotton for textiles and forest certification for furniture and paper products.

It was also mentioned that the Nordic Swan addresses product specific environmental parameters when it may be politically or practically impossible to use other policy instruments. The report mentioned green purchasing and design for environment as initiatives being further promoted through ecolabelling. Furthermore, the report identified potential synergies if the ecolabelling criteria would be used for formulation and implementation of other product-related goals and strategies used in EMS for specification of demands on purchased products.

According to the 'Environmental Philosophy' (Miljöfilosofi, 2000) of the Nordic Swan, it is a voluntary system in which the requirements are always at least as demanding as regulatory requirements in the Nordic countries. The Nordic Swan label can be reinforced when it harmonises its requirements with other systems, as in the case of ecological farming (textile products), forest certification (furniture, paper products) or the mandatory EU Energy Label (appliances).

Other related requirements, for instance related to social labelling (work conditions, occupational health and safety), have been recurrently discussed in various Nordic forums since the early 1990s. However, the conclusion has been that the Nordic Swan should not include such issues on a regular basis. It was justified by the environmental focus of the Nordic Swan and the difficulties to properly verify the requirements for actors who may be far away. However, social aspects are considered in the criteria development in a pragmatic way when it is considered relevant, for instance in the cases of textiles and toys.

Environmental Management Systems (others than EMAS and ISO 14001)

An environmental management system is a guide or a tool for a systematic and holistic approach to environmental issues within companies. It aims to create and maintain environmental work with clear objectives, targets and responsibilities, in combination to procedures for follow-up

and reporting. Apart from the two major schemes, EMAS and ISO 14001, a plethora of less formal EMSs were also generated as a response to the perceived cost and additional administration perceived in industry. Some of them, for instance *the Norwegian Eco-lighthouse*, include performance requirements.

Producers of products covered by, or that are in close reference to a product group subject to the Swan, could use the criteria for the identification of significant aspects and build their EMS in order to support the fulfilment and verification of the requirements, as stated by the Swan. Thus, ecolabelling could, which was also mentioned in the previously evaluation, serve as guidance for the EMS, via a benchmarking technique (Naturvårdsverket (2005, p. 74) or as an information source.

Key Environmental Performance Indicators

The Key Environmental Performance Indicator (KEPI) concept could be used either for single industries, or corporations, but also in regarding life-cycle studies. The KEPIs are often related to the production process but could also relate to a functional unit in a life-cycle study. The basic idea is to develop and define a limited number of quantitative indicators for key areas: such as waste generation, CO₂ and other air emissions, water use, energy consumption, resource consumption, etc. The KEPIs could vary substantially, due to the fact that they could be defined differently, depending on their purpose and on the industry using them.. However, there also exist highly accepted indicators, especially in some industry sectors. Often it appears that the EMSs of the producers are devised in such a way to generate the desired indicators that they would prefer to work with.

Correspondingly, indicators are used in ecolabelling criteria in order to set and communicate a required performance level needed for a particular trait or requirement in the lifecycle process. In the criteria development, there has been an overall tendency towards using, when possible, an indicator that have been used or accepted by the targeted industries.

Life-cycle assessment

Life-cycle assessment (LCA) is tool for gathering and assessing information as to the environmental implications of a product, from cradle to grave. This tool has been used already for a number of years and has a standardised method, which is described in the ISO 14040 series. Input information could be specific in terms of a particular product or built-on, in addition to generic information from LCA databases.

It is often suggested that life-cycle data should be used within ecolabelling schemes. The reason for this is that the Swan bases its criteria on life-cycle considerations, and thus it could use LCA data to identify some of the most significant and targeted aspects within the criteria requirements. This approach is however not new, the secretariats have used

LCAs in criteria development when relevant studies have been available. However, they do not take the lead to produce full LCAs for this purpose. LCAs do have a certain level of weakness regarding hazardous substances, which is an important aspect taken into account within the Swan system. In addition, an inherent limitation of ecolabelling is that there remain difficulties in regulating certain aspects which may arise far away in the country of origin, or downstream at the point of purchase. One barrier then, for the further use of LCA, appears to lay in the accessibility to relevant studies.

EPD (Environmental Product Declaration Type III)

Certified EPDs (Type III) are a structured form for communicating LCA findings for specific product groups. The aim is to provide more detailed and neutral information without any further evaluation required of the client, who instead then has the responsibility to evaluate it. EPDs are primarily aimed at business-to-business relations and professional purchasing, specifically in relation to situations in which more and detailed information is needed for products not suitable or covered by eco-labels.

The development of an EPD follows a standardised method according to ISO 14025: besides an LCA conducted according to ISO 14040, the EPD should build upon Product Category Rules (PCR), already developed by interested parties whom issue the EPD in an open consultation process.

It has sometimes been mentioned that EPDs could be used in ecolabelling criteria development when LCA data is not available or as a benchmark for compliance with the ecolabelling criteria, in order to make the interpretation easier for the user. There are however, some important barriers: the most fundamental being the principal idea of providing information without any evaluation, and the lack of an external verification of the said data. The certification process for the EPD is primarily a matter of methodological compliance, rather than the verification of the data. Furthermore, it can include difficulties in verification of information from the producer's supply chain, and synchronised updates in relation to product modifications and criteria revisions. In addition, the PCR and the Swan criteria need to be harmonised, in order to display similar information, as well as the fact that the EPDs focus on business-to-business products.

Corporate Social Responsibility (CSR)/ Global Reporting Initiative (GRI)

Many enterprises, especially those which are large and global, issue either sustainability reports or social responsibility reports, describing their activities and initiatives in the area. These reports are often produced at a corporate level with aggregated information from a number of production units in multiple countries. The Global Reporting Initiative (GRI) has strived to achieve a harmonised or standardised framework for these

reports, which attempts to include economic, environmental, and social impacts.

Ecolabelling primarily relates to products and services, while CSR reporting is related to the information regarding corporate level performance included a number of aspects – not always related to relevant aspects of the Swan. Thus, the connection in terms of synergies between the two systems is rather weak. However, product-related issues are included in the GRI framework and eco-label compliance could thus be reported.

The GRI stipulates indicators and reporting parameters for the environmental aspects typically in regards to emissions, effluents and waste from production. All of which might be used also in ecolabelling criteria. However, the difference between aggregating information at the corporate level and collecting information which is related to a specific eco-labelled product, should be acknowledged.

Green Public Procurement

Another important product policy to consider, green public procurement (GPP), has gained increasing levels of attention in European and Nordic IPP policies. Public purchasing makes up about 16% of the GDP in Europe, and thus represents a significant market to target in order to 'green' product and service consumption. If public purchasers co-operate, they can also wield significant market power and influence the environmental aspects of related products and services. The public sector can also act as a reference, demonstrating a 'good example' to ordinary consumers, showcasing more environmentally benign consumption patterns.

The connection between ecolabelling criteria and requirement in private and public purchasing is frequently mentioned in the literature (e.g. Naturvårdsverket 2005, p 74). Criteria document were, for instance, used for the first commonly used questionnaires/declarations for GPP in Swedish municipalities,³⁴ but also in other Nordic countries. The issue is thereby not new to either the organisations that are developing the requirements for GPP, or to the Swan scheme. There exist ongoing dialogues (on a more or less frequent basis) between the bodies adhering to GPP systems in the Nordic countries and the national secretariats. However, there do exist some barriers for further co-ordination. Amongst these barriers, are included: legal constraints associated to public procurement systems, and also regarding the different prime target groups and subsequent product groups, as defined by the requirements.

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³⁴ The Västernorrland Binder, which later was adopted by EKV.

7.2 Concrete examples of co-operation among environmental information systems

The information gathering provided some interesting approaches to examine and also utilise synergies that exist between ecolabelling and other environmental information systems.

EMS, KEPIs and LCA in the Danish printing industry

The Graphic Association of Denmark conducted a major study in 2003/04 (Johnsen et al., 2006) using LCA as a tool to analyse the former Nordic criteria for printed matter backed up with experiences from about 50 Danish enterprises within this particular sector. The project had the aim of balancing the weight, in terms of the different environmental aspects of the product, which was an issue for discussion, as to when the criteria should be revised.

This study demonstrates a way to use LCA both as a background for environmental improvements, and as a foundation for ecolabelling criteria development. Furthermore, it also describes the potential (and varying) effects resulting from the combination of environmental management systems alongside ecolabelling schemes. The reports provide a number of synergistic effects, generated by environmental management in combination with ecolabelling. For instance, environmental benefits could be achieved, under certain conditions “if the criteria document is used as the basis for the environmental management scheme” (Johnsen et al. 2006, p 13). Moreover, the LCA project is constantly fed with information regarding the development of criteria for printed matter, within the EU Eco-label, led by SIS Ecolabelling.

In their advisory role, *The Graphic Association of Denmark* utilises the Swan criteria systematically in terms of assessing members’ information on how to structure EMSs and make use of KEPIs. The intention is to provide support to printing companies who may wish to apply for the Nordic Swan.

A Swedish printing company mentioned that the main benefit from their membership in the Swan license system is the well-structured environmental management – and not a stronger market position.

Green public procurement – a concrete example of successful Nordic co-operation

There are evident existing and potential synergies between the Swan label and green public purchasing (GPP). From the perspective of green public procurement, the Swan label can firstly serve as a tool by which to identify more environmentally adapted products. For example, a survey conducted under the auspices of the NMRIPP³⁵ group indicated that 60–70 % of ‘active’ Nordic public purchasers use the Swan label for this purpose

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³⁵ NMRIPP group, The NRP group that works with IPP

(Kippo-Edlund et al. 2005). For purchases in which a competitive tender is required however, it is not permitted to *require* that suppliers make use of a specific label. Thus, reference needs to be made to the criteria of the Swan label, and the Swan needs to be specified as *one way* to provide documentation of compliance with the product requirements. Moreover, the criteria documents of the Swan label can serve as a useful information tool for public purchasers.

In order to assist public purchasers, the national secretariats utilise direct special information to inform this target group through a variety of means. This includes: information meetings, brochures, legal requirements and openings, procurement guides and questionnaires, and partnership forums, such as “Svanenklubben” (the Swan Club) in Sweden.

In recent years, co-operation between the Swan label and green public purchasing, within municipalities and other levels of government, has intensified. A concrete example is the Nordic co-operation on GPP criteria, which is funded by the Nordic Council of Ministers and governed by the NMRIPP group. This project, running from 2007 to 2008, aims to develop a system of harmonised purchasing criteria for 11 important product areas. This will be done in order to ease the work of purchasers and suppliers in the Nordic market. The aim, then, is to develop a common set of criteria in terms of content, format and documentation of compliance. The project is led by GRIP Centre in Norway, and it involves representatives from every Nordic country. Moreover, the Nordic Ecolabelling Board is actively engaged in the project by developing criteria for one of the product areas.

The Nordic GPP criteria project is a good example of how co-operation can be enhanced through a common project with goals that are important for both parties. Such co-operation is needed also in the field of GPP in the future. The interviews revealed that there is also a further need for information regarding the Nordic Swan within (green) public purchasing. For example, the work of a Finnish working group on green public purchasing has indicated that the details of the Swan criteria, or even of the operation of the Swan scheme, are not fully known or understood by all those involved in public purchasing. Further, it is also discussed that the Swan is not fully trusted by all purchasers or suppliers. Thus, both the Swan and the GPP communities should continue to devote resources to common works within this area.

7.3 Nordic actors' views on potential co-operation and generation of synergies

The interviewees primarily suggested six areas in which further synergies could be exploited. These six areas are discussed below.

Joint marketing and consumer education

The most familiar labels which may have a slightly different focus (the Swan, organic labelling, Fair Trade, etc.) could provide consumer information jointly at the point of purchase. Accordingly, in both stores and markets – the place for purchase – information provision could help to facilitate the distribution of various information fields, supporting these different labelling schemes, and explain similarities and differences. This is already happening in some cases, at least to some extent.

Including additional aspects: ethical and health aspects

The idea of broadening the scope of the Swan to include both social and health issues has been voiced at increasing rates, as a thought or suggestion to include in further investigations or expansion of its scope. This may lead to a closer co-ordination with other labelling schemes, such as the *Fair Trade* label. The rationale primarily highlights the changes in consumer attention, which could be viewed as parallel to the current discussion about climate labelling. There are, on the other hand, those who oppose such developments, stating a justification that the Swan is an *eco-label* and that accordingly, there are practical difficulties to expand the scope and include such requirements in the criteria. Hence, it is important to define the meaning of the Swan – should the focus on environmental issues be maintained or should it be a broader to define products more on the basis of a ‘sustainability’ label?

“On one hand, it is not desired that the Swan label is used on an “unethical” product. On the other, the criteria for the Swan and for ethical labelling differ and it is important to keep to the core competences.”

There have also been discussions with representatives from the Fair Trade label on a national level, however without decisions of actual measures taken. One reason is that both the responsibility for the criteria development and the control, as to the level of compliance, are placed in other countries. Nordic bodies that utilise Fair Trade products (and labels) are primarily promoting the products, and thus it has been suggested that contacts for potential fruitful co-operation should be made with the international body of the Fair Trade system. It should be mentioned that the Fair Trade label mainly label agro-products and that currently the only overlap with the Swan is textiles.

The Nordic Council decided in September 2007 *not* to act on the creation of a Nordic Global responsibility label. A review process (before the decision was taken) concluded that the issue is important, but acknowledged the complexity and difficulties to control the production methods. And thus, compliance with all mentioned and required criteria, which is important for the trustworthiness of a labelling system, was considered. It was concluded that there exist already a number of international initiatives in place, and more labels could be confusing. Thus it could be bet-

ter to develop existing labels, i.e. the EU Ecolabel alongside the Nordic Swan.³⁶

Life-cycle assessment (LCA) and EPD (type III)

Life-cycle information and LCAs are recurrently mentioned as interesting sources for information when new criteria are developed within the Swan scheme. This has, as mentioned above, been the case over the years. However, the potential depends also on the ability to get a hold of them. It could be mentioned that the European Commission has recently initiated work related to a number of relevant areas, which include the examination of background work being undertaken via the *Eco-design Directive*, and how it can be used to help develop criteria for the EU Ecolabel, to explore the use of work within the LCA platform, and to generate a possibility for the requirement of consultants to consider what is available at the LCA platform when drafting new criteria for the EU Ecolabel.

It has also been mentioned that EPDs could facilitate the development of eco-label criteria, whilst others state that the EPD system is yet undeveloped and thus should be limited to its practical use.

Green public procurement

Several interviewees mentioned that there should be a tighter connection between the ecolabelling criteria and the development of requirements for products and services subject to public procurement. The products should meet certain performance requirements in both cases.

“For GPP, ecolabels can make it possible to have concrete goals, however not that the work connected to GPP and the ecolabel are linked.”

A lacking co-ordination in terms of the verification processes between the Nordic Swan and the criteria for GPP, as monitored by the Swedish Environmental Management Council (MSR), were mentioned by the trade representatives regarding hygiene products (The Swedish Association of Industrial and Institutional Hygiene Products). They propose both a better co-ordination and a kind of *mutual recognition* in terms of compliance so that the products which meet the MSR criteria are regarded as equal to eco-labelled products within the GPP scheme.

Information requests from customers/questionnaires to suppliers

It has been mentioned that industries are asked about environmental issues by many actors. Beside the above-mentioned information systems, there are also questionnaires and declarations that probably are related to supplier evaluations as stipulated within EMSs. Mostly, such questions

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³⁶ Nordic Council. Medborger- og Forbrugerudvalgets betænkning over Medlemsforslag om nordisk mærke for globalt ansvar, A 1401/medborger, 25th of September 2007.

target similar aspects, but often in somewhat different ways. Filling out and replying to them all, individually, is regarded as very time-consuming and frustrating when similar information could potentially be provided right away, but not in the requested format. Co-ordination and synergies between information requests is highly desired, although it is beyond the scope of potential for synergies between ecolabelling and other information systems.

First steps toward EMS and CSR for service-sector SMEs

One interviewee working with environmental management in small companies suggested that the Nordic Swan has many distinct synergies within the development of corporate environmental management systems and also in regards to corporate social responsibility. In particular, for service-sector SMEs, the Nordic Swan could serve as a first – concrete, simple and yet professional – step to developing environmental management systems and social responsibility. If this type of synergy were to be exploited in its full extent, according to the interviewee, this would require more attention to ‘ethical’ issues in the criteria for *all product groups* in order to avoid the risk of a company which utilises the Swan label for a particular product, from being found out to behave unethically in a particular social issue.

The Danish board would like to see more cooperation between actors involved with various environmental information systems. They state that most of these actors already know each other, however that their knowledge and experiences should be better exchanged. In Norway, for example, there seems to be a system for exchange that is already in place. The so-called co-operation forum allows for meetings between actors from ecolabelling, the Norwegian system for EMS (Miljøfyrtorget), green purchasing guidance (Innkjøpspanelet) and GPP.

7.4 Concluding remarks

A number of studies have indicated and show that there are synergy effects that could be more widely utilised. Suggested explanations for the weak co-ordination between the information systems are listed below.

- They have been developed by different actors (industry, NGO, policy-makers, consultants, etc.),
- They have been developed with different aims (internal and external information use, documenting, decision-making),
- They have been developed to provide different kinds of information (certain aspects e.g. hazardous chemicals, production site specific, corporate level, life-cycle, evaluated, “neutral”, etc.),

- They have been developed to be presented in different formats, units, etc,
- They have been developed for different target groups (professional buyers, consumers, industry),
- They have been developed with different administrations/supervising bodies,
- They have been developed at different times,
- They have been developed in different geographical contexts.

There is an apparent wish to find synergies and to better co-ordinate between different product-related information systems. These are explained by, for instance:

- More cost-efficient information management.
- Accessibility to information.
- Avoidance of confusion from information overflow.

The issue has been discussed and investigated in different forums. One strand of the discussion proposes stronger co-ordination in the system development, which requires more or less radical and over-arching changes of several systems, such as the EU Flower and EMAS. Another strand seeks actual examples and opportunities for synergistic use of information within the present systems, without claiming substantial reforms of the information systems. There is not necessarily a conflict between the two, but they could be viewed as different strategies with different implementation periods.

We can conclude that, in general, there are inherent barriers for integration between several of the existing systems, due primarily to different aims in regards to communication, different target groups for the information, principal differences of the systems, producer/product specificity of the information, etc. Barriers in specific cases, such as for using EPDs for developing ecolabelling criteria, demonstrate that there is a variety of them. One of the most fundamental barriers then, in this case, may be the principal idea of providing information without any evaluation and the lack of external verification of data. Further, the certification process for the EPD is primarily a matter of methodological compliance, rather than verification of data. Moreover, there exist difficulties in verification of information from the producer's supply chain. Thus, it can be difficult to receive synchronised updates in relation to product modifications and criteria revisions.

Barriers aside, a number of examples exist as to how opportunities for synergies can be materialised. One such example is the combination of building EMSs and complying with the Swan within Danish printing industry. In general, it seems that particular cases have emerged from individual initiatives by persons with knowledge about and possibilities

to influence the implementation of a particular information system. In practice, it appears that the synergies are best gained from the needs generated in real situations. However as yet, we have not found common overarching or general synergies. Rather, they appear to be implemented on a case-by-case basis. Thus, there is no easily accessible or collected system of information as to how to benefit best from potential synergies.

8. How are climate issues dealt with in the Nordic Swan?

This chapter examines recent developments in climate labelling. On the basis of existing research and expert discussions, the way in which the Nordic Swan has addressed climate issues in criteria development and product group selection is evaluated. Finally, Nordic actors' views on future development needs and ideas on how to respond to the climate challenge are presented.

8.1 Recent developments in climate labelling

Climate change has rapidly climbed to the top of the environmental agenda in many countries. It has also become an issue for consumers, and demand for information on the climate impact of products has grown. For example, according to a survey by Accountability (2007), 60% of respondents in the US and the UK want companies to provide more product-based information at the point of sale and half would rather do business with companies that are working to reduce their contribution to global warming. The same survey indicated that consumers do not trust information from businesses on climate change, and they want more independent assurance of such product information. (Accountability 2007). As another example, in a survey on the Swedish public from summer 2007, 73% of consumers say they would always or often prefer to buy climate-labelled foods and 40 % say they would be willing to pay 10% more for them (SIK-seminarium 2007).

Increased attention and demand for information has led to a number of industry and third party initiatives in climate labelling, as the following examples indicate:

- In Europe, the maybe most renowned attempt called Carbon Trust has been initiated by the UK retailer, Tesco. By commissioning research into carbon footprint measuring, Tesco is attempting to define the information that industry uses to measure and define a carbon footprint. Three companies have signed up to trial the Carbon Trust labelling initiative ("digging for Tesco's green label credentials," 2007).
- Similar to Carbon Trust, a US initiative is driven by Timberland, which is trying to recruit other companies to develop a standardised method for verifying carbon emissions. The companies are conduct-

ing inventories of their products' carbon emissions and considering labelling their products (boston.com).

- A US initiative to calculate 'carbon footprints' has been taken by Carbonfund.org, a non-profit organisation working with climate change. The organisation issues a product certification label that is aimed at increasing awareness of products and companies that are "eliminating their carbon footprint"³⁷ (Carbonfund.org, 2007).
- 'Carbon footprints' have raised significant interest, in particular, in the pulp and paper industry. In autumn 2007, the Confederation of European Paper Industries (CEPI) issued a new tool for calculating the carbon footprint of paper and board (printweek.com; cepi.org).

The European Commission has also identified the need to look further into the issue of climate change. The stated reason is that the general public, retailers and politicians are calling for information on the climate impact of products and services. The Commission is currently launching a study with the objective to see what methods there are to measure CO₂ footprints, and to assess how the CO₂ information can be used in the EU Eco-label in an appropriate way. Possible approaches include the potentials to add different information and to reinforce the climate focus to better communicate CO₂ information. In practice, one possibility could be that an EU Eco-label product could have, next to the EU Eco-label, a number showing the specific carbon impact. The Commission emphasises, however, that changes must be made with caution, mainly because the EU Eco-label is and should remain a multi-criteria label, and because the CO₂ debate is a fairly recent and contentious topic.

The most prominent initiative in the Nordic countries is the Swedish initiative for climate labelling of food. Here the initiators are an organisation for organic production, KRAV, and the producers' quality label, Svenskt Sigill. They have planned for climate-labelled food for a long time already and have established goals for 2008 to have 10 climate-labelled food products on the market and that 25% of the population will be aware that climate labelling exists. The plan is for climate labelling to be a value-added certification for organic or sustainably produced food. The ministers of Agriculture, Integration and Gender Equality and Environment have presented a positive stance on climate labelling of food products. Their view is that this type of labelling should be voluntary and developed by product chain actors. Moreover, climate labelling in the food industry is seen as an inspiration for other sectors to follow. Some Swedish food companies have also expressed their support for the

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³⁷ A product's carbon footprint represents the total amount of carbon dioxide added to the environment throughout the production and lifetime of that product. This includes the sourcing of raw materials - drilling for oil, for example - for the product, manufacturing it, delivering it to supermarkets, the energy requirement for its consumption by purchasers and its disposal.

scheme, while others have some concerns about its implementation³⁸ (SIK-seminarium 2007).

A number of existing schemes also have an obvious link to climate issues via energy issues, and may thus receive increasing attention due to the topicality of climate and energy issues. These include the mandatory EU Energy Label for appliances and mandatory declaration of fuel consumption/CO₂ emissions for cars. The current type of energy labels on the market regard the use phase as opposed to the production phase, which is the case for the climate labelling discussion. However, some interesting findings have been made in regard to consumers' attitudes to graded energy labelling. A report on Danish consumers (Jensen et al. 2002) found that consumers perceive the energy labelling "A-label" as especially interesting because of the possibility for the consumers to make savings during the use phase. However, it was found that consumers had missed information about other environmental aspects of the products.

Another climate-relevant labelling scheme that has gained increasing attention from consumers in some countries pertains to 'green electricity'. For example, labelling systems for 'green electricity' are operated in Finland and in Sweden (among the Nordic countries), by the Finnish Association for Nature Conservation and the Swedish Association for Nature Conservation.

Problems involved in climate labelling

Even though climate labelling has become increasingly popular, creating credible and comparable climate labels involves many (largely unresolved) issues. These include, for example (Carlsson-Kanyama 2007):

- Which stages of the product life cycle are included within the scope of the label? Some food labelling schemes, for example, have merely focused on transport distances, which may be misleading.
- Moreover, should the label merely focus on CO₂ emissions, or on other greenhouse gases such as methane and nitrous oxide?
- Should emissions be calculated using full LCAs, energy analyses or input/output analyses?
- What data are used: environmental data from national statistics, company data, default/general data, IPCC data, or supplier information?
- How should the information be presented: a symbol for good or bad climate "behaviour", a symbol for worse or better than the average, or in the form of kg GHG per 100 grams?

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³⁸ Findus is positively regarding climate labelling of food. The retail chain ICA "does not mind" climate labelling, but fears that new labels can confuse consumers. There is a danger in going too fast – the knowledge gaps are still big. It is more important that the sector works on collecting and creating the data that is needed. ICA has consulted SIK to make life cycle assessments of about one hundred of their own brand products. The ICA representative has proposed building a solid knowledge base during 2008 for later evaluation of the opportunities for a climate label.

Different climate labelling systems have solved these issues differently. For example, the methodology developed by Carbon Trust estimates the total emission of GHG in CO₂-equivalents from a product across its life cycle, including in-use emissions. The methodology outlines a technique for identifying and measuring the individual GHG emissions from each activity in the supply chain process step and a framework for attributing these to each output product. The first draft of the methodology is based on a number of carbon supply chain measuring pilots. The methodology tries to strike a balance of being analytically rigorous and at the same time simple and practical to apply by businesses. (Carbon Trust 2007)

At present, climate labelling clearly involves a number of uncertainties and unresolved issues. There are fundamental differences and limitations related to certain choices of types of labels, certain kind of information to consider, comparisons (within or between product groups), generic or specific information for the products, accuracy of data, etc. Moreover, there is a genuine concern that climate labelling can become misleading for consumers, in particular if it is connected to overall claims about 'eliminating carbon' or 'climate neutrality'.

Last but not least, the transport part of the life cycle may be a concern, because if it is taken into consideration, it will most likely also be viewed as a trade barrier.

8.2 How are climate issues dealt with in the Nordic Swan?

The relation between climate change and other kinds of requirements in the Nordic ecolabelling scheme are governed by the Guidelines for Nordic Ecolabelling and by the 'Environmental Philosophy' of the Nordic Ecolabelling Board. For example, the principles for addressing climate change are addressed in the Guidelines for Nordic ecolabelling (19.6.2001). The principle is to define the environmental impacts throughout the entire life cycle of the product and to select a limited number of relevant criteria. Emissions to air are included as important environmental issues, along with raw materials selection, energy and resource consumption, emissions to water and land, noise, odour and waste. Moreover, the Nordic Ecolabelling Board has addressed climate issues in its 2008–2010 strategy by emphasising that new and revised criteria address the emissions of greenhouse gases where relevant, and that the Nordic Swan aims to be a useful tool for consumers also in climate issues.

Nordic ecolabelling has closely followed the increased public attention to climate issues for a number of years. In 2005, the Nordic Ecolabelling Board commissioned a 'climate assessment' of the criteria of the Swan label (Haltbrekken 2005). The overall conclusion was that the

Swan poses climate relevant requirements in most areas, and can be considered a climate policy instrument and useful for consumers who want to “safely” contribute less to their emissions from purchases.

Haltbrekken’s (2005) assessment offered a *review of the criteria* for 10 product groups with criteria pertaining to energy consumption, transports and the use of greenhouse gases to replace ozone-depleting substances. It also pointed to some *product groups in which the criteria should address climate issues*. The assessment also raised some more fundamental issues in how the Swan label system contributes to climate change mitigation. These issues pertain to *product groups that are relevant for the climate but are not included in the labelling scheme* (e.g., vehicles and large buildings), the *low market share of Swan-labelled products in climate-relevant product groups* (e.g., appliances, boilers and paper products) as well as *limited communication on climate issues*. The recommendations pertaining to these issues are briefly summarised below.

In terms of climate issues in the Swan criteria, Haltbrekken (2005) analysed the product groups (1) supermarket grocery stores (2) copying machines (3) base module for paper products (4) small houses (5) hotels (6) light sources (7) personal computers (8) refrigerators and freezers (9) boilers and burners for liquid and gas, and (10) shampoos and soaps. A number of recommendations were made concerning, e.g., transports, cooling agents, customer information, information on climate change in the criteria documents, energy efficient appliances and alternative energy sources. Moreover, the assessment concludes that if there is a desire to place more emphasis on climate issues, more points could in the future be awarded on the basis of climate-relevant criteria, points could be subtracted for deficiencies in climate aspects, or some climate-relevant criteria could be made obligatory (i.e., hurdles). A number of product groups are also mentioned that should include climate-relevant criteria for maximum energy use (e.g., boat motors and carwash), transports (laundries), or maximum weight of packaging/contents (e.g., toner cassettes).

Apart from the recommendations pertaining to the existing criteria, the three more fundamental issues raised by Haltbrekken (2005) are highly relevant. (1) According to the assessment, the most effective way to combat climate change would be to increase the sales of climate-relevant products that bear the Swan label. (2) Moreover, the study pointed out that even though climate issues are indeed included in a number of criteria documents, they are rarely explicitly discussed or effectively communicated to the public. (3) The development of new criteria for climate-relevant products would be another effective approach to increase the impact of the Swan label on climate change mitigation. Examples of these products or service providers are cars, driving schools, public transport, freight transport, conference organisers and facilities, large (apart-

ment) houses and chargers. A further climate-relevant product group not mentioned by Haltbrekken (2005) is food.

Of these three issues, points (1) and (2) are relatively compatible with the existing principles and mode of operation of the Nordic Swan label. The third point, however, might present some problems or imply changes in existing operating principles. For example, an increased focus on transports may be incompatible with the Swan label's principles. Eco-labels do not include environmental impacts from transport due to 1.) avoiding trade barriers, 2.) difficulties with the follow-up/control by the certification bodies, 3.) post "point of purchase" and consumers' travels cannot be controlled and thus included. EPDs on the other hand, do include transport issues but use general values for an assumed transport distance.

Furthermore, the discussion on suitable product groups for the Nordic Swan is related to both excluded product groups such as food and what were previously called "black" products, such as cars or pesticides, which were deemed too polluting to merit being awarded the Swan. The previous evaluation and the NEB Strategy 1999–2001 have specified this principle as referring to "products that can damage the total credibility of the scheme" (and mentioned water scooters and cigarettes as examples). Nonetheless, considerations of which products are suitable for labelling are still an issue. For example, the notion that cars are 'polluting products' re-emerged when it was suggested that criteria should be developed for cars, even though other considerations (such as existing labelling systems for cars) were more dominant in the decision to shift the focus of this work to biofuels. Transports as such has been proposed as a product group for the Swan (just like it is for the Swedish Good Environmental Choice Label) and criteria development was initiated. However, the project was abandoned due to resistance to including services and some disputes regarding the principles and methods for the criteria. Finally, the RPS model should be applied when a new product group is considered. Even if a product group is highly relevant from an environmental point of view, the potential for change and/or opportunity for stimulating market changes could be small.

The relationship between ecolabelling and climate change was discussed extensively at the GEN (Global Ecolabelling Network) conference in Lund, November 6–7. Nordic viewpoints voiced at this conference included the following:

- In general, climate issues were considered important, although it was agreed that the Nordic Swan addresses multiple environmental issues, and should continue to do so in the future. Because of the importance of and public interest in climate change, it may in the future be necessary to improve the climate profile of the Nordic Swan, e.g., by making a declaration of how climate issues are addressed in the criteria

development and providing information in connection with the label stating that carbon emissions are below a certain limit.

- Transport and renewable energy sources are problematic issues for the Nordic Swan due to the very different shares of various energy sources in the Nordic countries. Average rates of CO₂ emissions for, e.g. grid electricity vary greatly between the countries, and setting a suitable level for all countries is difficult.

8.3 Nordic actors' views on future developments

There is general agreement among the interviewees that climate issue provide an opportunity for the Nordic Swan to raise its profile and gain increased attention. In particular in Finland and Iceland, it was emphasised that “the Swan should not miss the climate train”. Many were sure that climate labels would appear on the Nordic market, and agreed that the Swan should take a clear position with respect to them. Quite a few pointed to the risk of a new proliferation of environmental labels and the potential of misleading consumers.

At the same time, there was widespread support for the multi-criteria, life cycle focus of the Swan labelling criteria: other environmental issues should be considered alongside climate issues. Almost all the respondents were aware of the problems in measuring climate impacts: existing climate or ‘carbon footprint’ labels involve a number of methodological debates. An expert view was that climate labelling (in particular for food products) is in any case not the right policy instrument to address the climate issue. Economic instruments are far more effective.

It is the impression of the secretariats that, so far, regional differences have influenced the criteria setting. For example, the Nordic countries emphasise different environmental impacts to different extents; the toxic substance issue is more stressed in Denmark and Norway while the climate issue more so in Sweden. The transportation aspect is mentioned to be influenced by the different energy politics in the Nordic countries. Similarly, it was claimed by the secretariats that the Swan has earlier put less of a focus on the energy aspect than has the EU Eco-label, for the reason that energy in Norway is considered rather clean.

It was stressed that it is imperative that license holders know that the climate issue is properly dealt with in a number of ways:

- Addressed in relevant criteria.
- There is a sufficient level of requirements.
- The climate issue is balanced vis-à-vis other issues in the criteria, such as hazardous substances.

As concerns the Swan criteria, most of the respondents were satisfied with the extent to which they address climate issues. Some criticisms were also voiced. Some argued that greater efforts should be made to include transports in the criteria, and that requirements for vehicles used for services should be more stringent. Others pointed to the large number of criteria for some product groups, and argued that environmentally significant issues such as energy use should gain more attention.

As regards product groups, many of the respondents argued that the Swan label has taken up many climate-significant product groups in recent years. Biofuels, heating systems, fireplaces, heat pumps and transports were mentioned as product groups that have been considered or where criteria exist or are under development. Services were mentioned as a product groups in which the Swan can have a positive impact on carbon dioxide emissions. A new suggestion was to develop criteria for heating system services. Some interviewees, however, argued that climate issues should not dominate product group selection and criteria development to the extent that other issues are totally overlooked.

Communication of the climate benefits of the Swan label was an area where almost everyone agreed that the Swan could do better. In most countries, the increasing focus on climate issues within the Nordic Swan has not been visible to outsiders. In Norway, the Swan organisation has however been active in communicating the need to contribute to climate change mitigation to companies, and has worked together with the Norwegian Association for Nature Conservation to initiate a national climate awareness campaign (which also presents the possibilities of the Swan as a climate instrument). Ecolabelling Norway has further published substantial information on the issue on their website.

More efforts should be devoted to communication to the general public, companies, but also to communication of the climate benefits of the Swan to (and together with) environmental authorities and other environmental experts. There is also an emerging debate about the environmental and social costs of some climate protection measures (e.g. biofuels), and the Nordic Swan could capitalise on this debate. It was argued that the Swan has a balanced approach to climate issues, and, according to one interviewee, the Swan should make use of its experience and long history and 'capture' the climate debate.

Other suggestions mentioned in the interviews include efforts to:

- Address the climate issue through transport and fuel choices in the product group range.
- Better communicate the current focus on the energy aspect in the Swan.
- Display concrete advantages of Swan-labelled products compared to other products.

- Alongside the Swan label, include information that the labelled product's CO₂ emissions are below a certain level.
- Introduce a separate, informative climate label (CO₂ emissions of this product).
- Explore the idea of providing carbon offset services or developing criteria for labelling reliable carbon offset services.
- Include a separate section in criteria documents on 'how climate issues are addressed'.
- Calculate the overall climate impact of the label and communicate this to, e.g., authorities in charge of climate policies.

From the perspective of the ecolabelling system representatives, the Swan is keen on keeping its broad scope and cannot highlight one environmental problem more than others. Due to recent discussions, however, there is a possibility for a stronger focus on climate aspects during the next strategy period (2008–2010), mainly in regards to the choice of product groups. This is supported by the fact that the Nordic Ecolabelling Board has defined principles for addressing climate issues in its 2008–2010 strategy.

8.4 Concluding remarks

We believe that the Swan can benefit in many ways from the current attention to climate issues. The fact that the Swan takes into account a range of environmental issues – as well as health, quality and some social issues when necessary – is a definite advantage in this respect.

The Nordic ecolabelling bodies have acknowledged the challenge and opportunity provided by climate issues. In our opinion, it is good that Nordic ecolabelling and national ecolabelling bodies are making a close analysis of the criteria and product groups included in the Swan label. It is important to make sure that climate issues are addressed in the best possible way in all product groups. A detailed analysis should also include quantitative calculations of the climate benefits of Swan-labelled products. This work should receive additional funding, and authorities in charge of climate issues should support it.

In recent years, the Nordic Swan has targeted product groups that are gaining interest due to the current attention to climate and energy. In particular, the ongoing development of labelling criteria for biofuels represents a timely response to the climate challenge. In new, energy-related products, the Swan has particular advantages as the criteria address product performance (which consumers of novel products may be uncertain about), and the life cycle perspective helps to avoid a transferring of environmental problems from one life cycle stage or environmental medium to another. Some climate-relevant products (e.g., transportation) are still

controversial within the Swan, but there seems to be more openness to address products with large environmental problems, if labelling can bring about significant improvements, as well. All in all, however, a more detailed strategy for factoring climate issues into the selection of product groups seems to be worth developing to complement and specify the RPS principle for this particular issue.

It is urgent that the Nordic system develops a climate communication strategy and addresses its stakeholders with relevant information. It seems that the Swan has credibility in the specific climate issue, but relevant and updated information is also a service to the clients and thus a way to maintain the reputation of the Swan brand. In particular, there should be more systematic co-operation with other parties communicating about climate issues, and more information exchange and collaboration with the authorities responsible for climate policies.

There are currently many initiatives underway for climate labelling, even though few labels have appeared on the market yet. Climate impacts of products and services are calculated using a variety of approaches, and there appears to be more development work to do. We do not suggest that Nordic ecolabelling engages in developing yet another climate label. This is partly because of the uncertainties related to methodology, market acceptance and trade issues, but also the 'spirit' of the Nordic Swan. If NCM considers there to be a need for one, the competence of the Nordic ecolabelling organisation is probably well suited to host a climate label. However, a decision on a new climate label should probably be taken by NCM – not the ecolabelling organisation itself.

Some of the media coverage of climate change may be superficial, but the Nordic public is also devoting serious attention to climate issues. Thus, there is likely to be increasing public debate about climate labelling, climate impact calculations, and potential negative environmental and social impacts of climate policy measures and climate-related products. The experience of the Nordic Swan in addressing a range of issues and estimating the potential for labelling using the RPS method is a definite asset in this context, and we encourage the Nordic ecolabelling bodies to engage more actively and visibly in the climate debate.

9. Conclusions and recommendations

A number of questions were specified to serve as a basis for the current evaluation:

- A. The relations between the Nordic Swan and the EU Eco-label: the respective position of the systems in the Nordic countries
- B. Comparison and clarification of differences and similarities between the Nordic Swan and the EU Eco-label
- C. Possibilities for co-ordination and harmonisation, taking into account the ongoing work on revising the Eco-label Regulation
- D. Grounds for public support for ecolabelling
- E. What are the possibilities for co-operation and collaboration among the Nordic Swan and other environmental information systems in the Nordic Countries (e.g., environmental product declarations, environmental management systems other than EMAS and ISO 14001, product panels, key environmental performance indicators (KEPIs), life cycle assessments, corporate social responsibility, ethical labelling, etc.)
- F. How well have Nordic information strategies to inform the general public on the Nordic Swan label worked?
- G. How are climate issues dealt with in the Nordic Swan system?
- H. What are the consequences of the majority decision principle of the Nordic Council of Ministers in criteria selection and the choice of different product groups (with the product group of printed products as the starting point)?

The conclusions and recommendations that follow in this chapter are structured according to the same order as the questions. It is our impression that the Nordic Swan is a healthy and well-operating scheme, which is the reason for very few recommendations on the Nordic system per se. In contrast, the relations between the Nordic Swan and the EU Eco-label include issues that are debated and on which Nordic governments and the Nordic Council of Ministers need to take a stand. The Nordic countries have made commitments to both schemes, and many of the following conclusions and recommendations deal with issues that arise when operating the two schemes in parallel.

9.1 Conclusions

A. The relations between the Nordic Swan and the EU Eco-label: the respective position of the systems in the Nordic countries

The Swan maintains a strong market position in all Nordic countries (to a somewhat smaller extent in Iceland). It is well recognised and known. Awareness and knowledge of the EU Flower is increasing but lags behind that of the Swan. In addition, the Swan has produced a larger number of criteria and issued significantly more licenses. Despite the larger potential market and the lower price of the EU Eco-label, there is a greater demand for the Swan in the Nordic market.

Both systems operate side by side and make use of common resources. It is likely that the Swan and the EU Eco-label will be able to co-exist for the next years without radical changes. Increased co-ordination of the schemes has been supported by efforts to harmonise criteria documents in a case-by-case approach. There are also joint marketing efforts between the systems, in particular in Denmark. In the other countries, the EU Flower is less visible in the public information and marketing of the ecolabelling bodies.

Interviews with companies indicate that there is a demand for both labels. There are two ways of reasoning among producers: Some appreciate and use the Swan on Nordic markets due to its market recognition and strong reputation. Others wish to have a label that is valid for larger markets, and some producers choose to use the EU Flower in combination with the Swan or as a stand-alone label also in the Nordic countries. So far, there are no signs of a radical shift in the demand for the two ecolabels among the contacted license holders (though it is worth noting that no systematic study has been made).

B. Comparison and clarification of differences and similarities between the Nordic Swan and the EU Eco-label

At present, the similarities between the EU Eco-label and the Nordic Swan as ecolabelling schemes are greater than their differences. Both our limited comparison and interview findings indicate that there are no major differences between the criteria in the Nordic and the European systems. In a number of criteria there are however some differences related to Nordic preferences, priorities and overall stringency. More obvious differences relate to the fact that the European system has produced fewer ecolabelling criteria and awarded fewer licenses. This may be a consequence of the more complex administrative and political structure of the EU Eco-label and the limited financial resources devoted to the scheme by the Commission.

One of the important differences in the schemes is their financial basis. Whereas the Nordic Swan, in most countries, is able to bear a large

share of its costs via license fees, the EU Eco-label is largely dependent on public funding. This creates a problem for the private organisations managing the systems.

The future of the EU Eco-label regulation is very uncertain, both in terms of contents and in terms of timing; the pending revision has frequently been postponed. This has made it difficult to assess the future of the relations between the Swan and the EU Eco-label.

C. Possibilities for co-ordination and harmonisation, taking into account the ongoing work on revising the Eco-label Regulation

It is likely that both systems can operate side by side for at least the coming five to ten years. Nordic countries have been very active in co-ordination and harmonisation of the Swan and the EU Eco-label, both by adopting or adapting EU criteria for the Swan and in offering Swan criteria as a basis for the EU Eco-label. Full harmonisation has not always been possible, but increasing harmonisation has been achieved. Different Nordic countries have different views on a number of co-ordination and harmonisation possibilities. In spite of the many differences in views, there is much common ground to build on.

Our study pointed out that in addition to the co-ordination and harmonisation of criteria documents, there is a need to focus on co-ordination of the marketing of the schemes. Various options for joint marketing have been identified, such as the systematic development of financial incentives for companies to use both labels side-by-side.

D. Grounds for public support for ecolabelling

Our interviews did not indicate any strong objection or problems associated with the current level of public support for the Nordic Swan. Our impression is that the Nordic Swan is on a sound financial basis, even though more public funding might be necessary in some specific areas or in the case of an individual country like Iceland. On the other hand, the current level of self-financing and the ‘self-financing culture’ of the Nordic ecolabelling bodies ensure responsiveness to market needs. The only potential issue is the financial support for the administration of the EU Eco-label, which may need more substantial and long-term commitment from the governments if the number of licenses will continue to grow in the future. It is not likely that the EU Eco-label will reach even the level of self-financing achieved by the Swan in the foreseeable future.

Another important issue concerning public support is integration of the Swan into existing policies, such as green public procurement and overall public endorsement by authorities. Here we found differences among the Nordic countries, with Denmark and Norway setting a good

example, but less support of this kind available in the other Nordic countries.

E. What are the possibilities for co-operation and collaboration among the Nordic Swan and other environmental information systems in the Nordic Countries?

There are a number of information systems that involve overlapping or closely similar issues and interests to those of Nordic ecolabelling. It is to a large extent possible to use different environmental information systems in synergistic ways. Not least could ecolabelling be combined with, for instance, LCA in terms of criteria development and EMS in terms of validation and data generation. There is a range of reasons for utilising these synergies: cost savings, the goal of making it easier for producers to use a relevant mix of information systems, the wish to increase the understanding of environmental information, etc. It is obvious that the Nordic system benefits from many of these information systems in criteria development. For a more extensive utilisation of the synergies also by producers and other actors, it is necessary to expose these opportunities. Our conclusion is that there is a need to more systematically build up the knowledge and collect good examples to spread among information system administrators, ecolabelling criteria developers, industry associations, public procurement officers, etc.

Moreover, the environmental issues included in Nordic ecolabelling are increasingly discussed in a broader sustainability context, including also social issues. The Nordic Swan has maintained a pragmatic approach towards new aspects of sustainable consumption and has included them when appropriate. The relation of the Nordic Swan vis-à-vis sustainability issues has been defined in the long term, but has not yet engaged in a broader debate on fundamental issues (for more details, see recommendations).

F. How well have Nordic information strategies to inform the general public on the Nordic Swan label worked?

Marketing and information strategies have become increasingly professional in the Nordic countries, and a good balance has been found between Nordic strategy development and national marketing efforts. Increased recognition and increased numbers of licenses are some of the results of this work. Our interviews and the secondary data collected indicated that Nordic ecolabelling has made a very good effort and achieved good results in this area.

Some areas for further development were identified. These include increasing joint marketing with authorities, other official bodies and non-governmental organisations. Here some countries have been more suc-

cessful than others. In the future, more efforts will also be needed in developing the market strategy for the EU Eco-label and co-ordinating the marketing of the Nordic Swan and the EU Eco-label.

G. How are climate issues dealt with in the Nordic Swan?

The current high visibility of climate change provides an opportunity to raise the profile of the Swan, in particular in countries where it has not been so visible previously. The climate debate is very hot at the moment. It is likely that also the (potentially adverse) environmental effects of climate measures will gain even more attention and that as climate labels proliferate, the debate on climate labelling methodology and potentially misleading claims will intensify. This could create increasing demand for the expertise available within Nordic ecolabelling and the type of information provided by the Swan.

Until now, the Nordic Swan has addressed climate issues in criteria setting and product group selection, and some minor areas for improvement can be identified. Less attention has yet been devoted to communicating the benefits of the Swan in a climate change context. Communication strategies for the climate issues have thus far been low-key, and are now seen as in need of improvement.

H. What are the consequences of the majority decision principle of the Nordic Ecolabelling Board in criteria selection and the choice of different product groups (with the product group of printed products as the starting point)?

There is widespread support for the majority principle and it is considered effective, even though voting has been rare. Most participants find the current system sufficiently good and do not advocate any changes. In one individual case (the printing company criteria), the majority principle has led to a result that has not been satisfactory for one country (Denmark). The need for specification of how and when to apply majority voting was called for by primarily Danish stakeholders. The practical concerns surrounding the printing company criteria have subsided, but the issue of principle is still on the agenda of the parties concerned.

9.2 Recommendations

A. The relations between the Nordic Swan and the EU Eco-label: the respective position of the systems in the Nordic countries

- 1) We recommend initiating a thorough attitude survey of license holders concerning their rationale and preferences for one or another la-

bel, backed up by a more comprehensive set of personal face-to-face interviews. This is primarily a task for the governments as EU members, rather than the NCM or the Nordic scheme, but a joint effort is reasonable as both sides would benefit from the results.

- 2) In order to define a common vision of the desired future state for ecolabelling in the Nordic countries and elaborate the path towards it, we recommend a backcasting exercise. The method could be used to evaluate the necessary changes and how realistic and desirable the path is. In our view this should be initiated by Nordic Council of Ministers together with Nordic Ecolabelling Board, the national governments, the national secretariats and the ecolabelling stakeholders – however, with inputs from consumer, environmental and industry authorities in order to place it in an IPP context.
- 3) In the medium to long term, we suggest preparing for a potential scenario in which companies increasingly turn to the EU Eco-label in some product groups. This creates some challenges and opportunities:
  - Marketing: The existence of two ‘official’ systems with sometimes even different criteria is a marketing and communications challenge. There is also a need to explore the conditions for possible contributions from the Swan to EU Eco-label. This should be a joint effort of the NEB and/or the national ecolabelling bodies and the national authorities responsible for the EU Eco-label.
  - Product group differentiation: Some argue that the EU Eco-label is likely to, or ought to, gain more ground in globally traded products. In contrast, services present a locally based opportunity for the Swan. In the future, this might be something to consider alongside the RPS and market criteria for product group selection, and is an issue for the NEB to explore in more detail.
  - Funding: The application and license fees for the EU Eco-label provide less revenues per license than those of the Nordic Swan. Thus, the ecolabelling bodies are more dependent on public funding. This being the case, it is important to ensure that this public funding is budgeted for on a regular basis, that it provides a secure source of income for the ecolabelling bodies, and that it does not burden the finances of the Nordic Swan. This requires a long-term commitment by the Nordic governments.

B. Comparison and clarification of differences and similarities between the Nordic Swan and the EU Eco-label

- 1) Nordic countries have worked actively to co-ordinate the Nordic Swan with the EU Eco-label. It is a common interest to continue and intensify work in this area. Potential common interests ensure that the expertise developed within the Nordic Swan is utilised in further work on the EU Eco-label. In order to support co-ordination with the Nordic Swan (and other national schemes), it is important to ensure that full use is made of existing work in the Nordic and national schemes when developing the EU Eco-label criteria. This cannot be done unilaterally by the Nordic Swan organisation, but requires pressure by national authorities on the EU Eco-labelling scheme.
- 2) The Nordic governments and the national ecolabelling secretariats should analyse the financial viability of the EU Eco-label for the national competent bodies. Today, the share of state funding in the Nordic system is fairly low due to the large number of issued licenses and, in comparison with the European system, higher fees. In order to develop, the EU Eco-label would require guaranteed and increased state funding at least in the short- to mid-term perspective and probably also in the long term.

C. Possibilities for co-ordination and harmonisation, taking into account the ongoing work on revising the Eco-label Regulation

- 1) Uncertainties about future strategies in the Nordic countries are primarily related to the revision of the European system and what it will result in. So far, the signals from the Commission indicate that there will be more formalised processes for criteria development, compliance control and a set of European common core/baseline criteria, which the Nordic scheme has to take into account and manage. A closer analysis of these aspects is needed when the proposal for the new regulation for the EU Eco-label is issued. This is a task both for the national authorities and the Nordic Ecolabelling Board and the national secretariats.
- 2) A more active harmonisation with the aim for integration is an issue for both NCM and the national governments to decide upon rather than for the Nordic ecolabelling system. The main aspects to consider before such a decision were analysed in chapters 2–4, including:
  - Current and expected future market positions
  - Current and expected future dynamics of the systems
  - Future role of ecolabelling in GPP, eco-design, integration with other information systems and policy instruments
  - Pros and cons of the eco-label's connection to political level vs. independence

- Need for “sustainability labelling”
  - A solid funding system, which is one of the most important and problematic issues.
- 3) In order to support the development of a consistent strategy, the notion of a harmonisation needs to be further elaborated and discussed among relevant stakeholders, with input from the license holder survey proposed in recommendation 1. The valid questions are what is the purpose of a harmonisation and for whom? Should a harmonisation take place focusing on product groups (harmonising the product group definitions), criteria (use of existing criteria or creation of core/baseline criteria), or financial structure (creating incentives)? The consequences and results of the different possibilities for harmonisation need further exploration. This is a task for the national governments in co-operation with the Nordic Ecolabelling Board.

D. Grounds for public support for ecolabelling

- 1) The national responsible authorities should maintain the current level of financial support to the national competent bodies for the work with the Nordic Swan and carefully follow the needs for additional funding for the EU Eco-label in order to avoid the risk of negative attitudes that may follow an under-financed system. Furthermore, we suggest that the approach of using joint forces in campaigning could be further explored in order to reinforce public awareness of the environmental implications of consumption and how concerned consumers can be guided by the eco-labels. This can be promoted by the Nordic marketing strategy. However, it requires that national secretariats integrate information and marketing strategies with relevant authorities in each country.

E. What are the possibilities for co-operation and collaboration among the Nordic Swan and other environmental information systems in the Nordic countries

- 1) The Nordic Swan (NEB and national ecolabelling bodies) should closely follow the development of sustainability labelling. It would also be worthwhile to develop a more systematic long-term strategy in this area, based among, e.g., the following questions:
- What should ecolabelling be in the future? Should it keep its environmental focus or go towards sustainability? What new competences would then be required?
  - How should ecolabelling be prepared for and include new trends among aware consumers? Ethical, health and climate related issues are probably not the last issues for consumer

attention. A precautionary approach would be to monitor such changes but to also prepare to change accordingly.

- 2) In order to make better use of potential synergies with other information systems and environmental instruments, we recommend intensified co-operation. The NEB and national ecolabelling bodies should organise regular information exchange workshops. It is also worthwhile to explore the opportunities to establish regular liaisons with other labelling and certification systems, for example, through shared board members. Joint projects together with other labelling systems, certification bodies and green public procurement information schemes are a practical way to exploit potential synergies. This effort can also be promoted by the activities of the Integrated Product Policy Group of the Nordic Council of Ministers (NMRIPP group).

F. How well have Nordic information strategies succeeded to inform the general public on the Nordic Swan label worked?

- 1) This good work should be continued. Nordic ecolabelling bodies should also continue and intensify joint projects with companies, the public sector and other labelling systems. Common Nordic contributions to this work could include compiling a common database of marketing campaigns and results. Documentation of good results can attract new partners for co-operation. Moreover, a common Nordic website/portal should be established to facilitate information search.
- 2) In some countries (e.g. Finland, Iceland), the responsible authorities should also intensify their (also non-financial) support for ecolabelling by taking it into account in environmental, consumer and product policies. Ecolabelling should have a clearer role in the context of integrated product policy. The Nordic Swan has compiled important and useful information that is not always fully used, illustrated by the fact that authorities do not necessarily know enough about ecolabelling. The NEB and national ecolabelling bodies and authorities should make a common effort to draw the Swan more into the IPP context through systematic co-operation with green public procurement and other policy instruments. This effort can also be promoted by the activities of the Integrated Product Policy Group of the Nordic Council of Ministers (NMRIPP group).
- 3) In relation to the marketing and communications issues involved in operating two similar schemes (see recommendation 1), there will be a need for a communication strategy for the EU Flower in the Nordic countries. We suggest that the national secretariats together with funding authorities elaborate the strategy(ies) under Nordic co-ordination for mutual learning and consistent messages.

G. How are climate issues dealt with in the Nordic Swan system?

- 1) The NEB should develop a common communication format for climate aspects of the Swan. This could be based, for example, on calculations of the potential climate aspect benefits of the Swan in different product groups (and where necessary, different countries). Product groups in which climate issues are relevant should be highlighted. Also, it should be made clear how the Swan addresses other environmental issues in these product groups (e.g., heat pumps, boilers and burners, biofuels) and how it makes sure that there is an appropriate balance between climate and other environmental, health and product performance aspects. Climate aspects should be communicated to the general public, companies and authorities in charge of climate and other relevant policies. It is, however, necessary to acknowledge the inherent limitations of ecolabelling and to find ways to explain and manage issues that are not covered, such as transport of goods, perhaps by pointing out supplementary information consumers could use when they want to consider all climate aspects of their consumption. Where appropriate, other organisations involved in climate communications and education should be involved in the work.

H. What are the consequences of the majority decision principle of the Nordic Ecolabelling Board in criteria selection and the choice of different product groups?

- 1) In the past, weak or lacking procedures have caused problems for the Nordic system, which a certain level of formalisation has contributed to reduce. The specific decision making process in the NEB is not that easy to penetrate and we cannot suggest any detailed rules that do not involve the risk of leading into new problematic situations. Thus, we suggest that a small *ad hoc* group with representatives from the NEB (and potentially the Nordic Council of Ministers; formally responsible for the procedures in the NEB) analyse the situation and try out some different principles that can guide the decision-making without re-introducing the veto or risking the dynamics of the system. We acknowledge that this process as such may lead to new frictions but we still think it deserves the small efforts.

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Sammanfattning

Föreliggande utvärdering av det nordiska miljömärkningssystemet Svanen genomfördes på uppdrag av Nordiska ministerrådet i samband med att ansvaret för systemet nyligen förts över till miljöministrarna. Den förra utvärderingen genomfördes under 1998 – 2000. Ett huvudämne för denna utvärdering var att belysa relationer mellan den nordiska Svanen och EU:s miljömärke (Blomman) i de nordiska länderna, att jämföra systemens skillnader och likheter och att undersöka möjligheter för koordinering och harmonisering av de två systemen. Andra frågor som belystes omfattar genomförandet av Svanens nordiska marknadsstrategi, aktuella aspekter av systemets styrning, relationer mellan Svanen och andra miljöinformationssystem, samt integreringen av klimataspekter i den nordiska Svanen.

Skillnader och likheter mellan den nordiska Svanen och EU:s miljömärke

Den nordiska Svanen och EU:s miljömärke är två likartade system för tredjeparts miljömärkning av varor och tjänster. Flera av systemens ursprungliga olikheter har minskat sedan den förra utvärderingen för åtta år sedan. Omständigheten att det är samma miljömärkningssektariat som administrerar de båda systemen i de nordiska länderna främjar koordinering av systemen i den dagliga verksamheten. De båda miljömärkningsystemen har tagit fram kriterier för 18 överlappande produktgrupper och det har gjorts ansträngningar att harmonisera dem. Därmed har miljömärkningskriterierna närmat sig varandra även om mycket få produktgrupper har identiska krav.

En viktig skillnad är emellertid antalet produktgrupper med miljömärkningskriterier. Antalet produktgrupper med kriterier för EU-Blomman (26 st.) är fortfarande mindre än hälften av Svanens antal (67 st). Om inte den nu pågående revisionen av EU:s miljömärke medför en radikal förändring är det troligt att denna skillnad består under de närmsta åren. Det nordiska systemet har uppenbarligen lyckats skapa en väl fungerande organisation för kriterieutveckling vilket också framgår av i den ökande omfattningen av gemensamma kriteriedokument för hela produktfamiljer och gemensamma kriteriemoduler. Miljörelevansen för Svanens kriteriers verkar också ha förbättrats sedan den förra utvärderingen (1998 – 2000), åtminstone beträffande valet av produktgrupper.

Det finns också skillnader mellan de två systems ledningsstrukturer: EU:s miljömärke har en annan legal bas och fler nivåer där EU-Kommissionen och nationella myndigheter har en framträdande roll bredvid de nationella miljömärkningsorganisationerna. En ytterligare viktig skillnad är den finansiella basen. År 2006 var Svanens omsättning i

de nordiska länderna många gånger större än motsvarande för EU-Blomman. Miljömärkningssekretariaten täcker ungefär tre fjärdedelar av budgetintäkterna för Svanen med licens- och årsavgifter. EU:s miljömärke, med färre licenser och lägre licensavgifter, är i huvudsak beroende av offentlig finansiering.

Marknadens mottagande och allmänhetens medvetenhet om den nordiska Svanen och EU:s miljömärke

Svanen är fortfarande det dominerande miljömärket på de nordiska länderna med ungefär sex gånger fler utfärdade licenser i Danmark och en än större dominans i övriga nordiska länder. EU-Blomman gör dock landvinningar i några länder, speciellt i Danmark och inom några produktgrupper (t.ex. textilier). Det finns emellertid produktgrupper i båda systemen utan några utfärdade licenser.

Det finns skillnader i Svanens och EU-Blommans respektive ställningar i de nordiska länderna. Våra intervjuer visade att det finns tvivel om EU-Blommans trovärdighet i några länder och branscher. Det finns emellertid också skillnader i synsätt mellan producenter; företagets syn på de två systemen beror till del på deras marknadsposition och vilka marknader de agerar på. Valet mellan Svanen och Blomman görs huvudsakligen på pragmatiska grunder som relaterar till marknadsfördelar.

Svanen är mycket välkänd bland konsumenter i de nordiska länderna. Nordiska miljömärkningsnämnden har under senare år ägnat speciell uppmärksamhet åt kommunikation och marknadsföring. Den har identifierat Svanens nyckelvärderingar som fungerar som bas för all kommunikation: *trovärdig*, *dynamisk* och *glödande*. De nationella miljömärkningssekretariaten har infört och tillämpat dessa värderingar och värdegrunder på nationell nivå. Den allmänna tilltron till Svanen har ökat genom åren och det ökade intresset för Svanen visas av att ett tilltagande antal företag håller med om dessa värderingar. Generellt har marknadsföringen av Svanen blivit mer strategisk och professionell och därigenom väsentligt förbättrad sedan den förra utvärderingen. Den nordiska inriktningen har dessutom stärkts i informations- och marknadsstrategier även om det faktiska marknadsförings- och kommunikationsarbetet genomförs på nationell nivå och som svar på nationella behov.

EU-Blommans utveckling får även konsekvenser för Svanen då systemen fungerar parallellt, använder till viss del samma experter och personal, och det finns efterfrågan för båda systemen bland producenterna. Nordiska miljömärkningsorganisationer har endast begränsade påverkansmöjligheter på EU:s miljömärke men bör beakta dess utveckling när framtida marknadsstrategier upprättas.

Möjligheter för samordning och harmonisering av den nordiska Svanen och EU:s miljömärke

Frågan om samordning och harmonisering av olika miljömärkningssystem har varit aktuell i flera år. En av de centrala frågeställningarna i den senaste utvärderingen av EU:s miljömärke (EVER 2005) var just relationen mellan EU-Blomman och nationella miljömärkningssystem. EVER-studien ser samordning och harmonisering som ett alternativ till ett avskaffande av något av märkningssystemen. Den rymmer därför också möjligheten av att EU:s miljömärke och nationella system gradvis närmar sig varandra över en längre tidsperiod.

Det har gjorts ett antal försök till samordning och harmonisering av arbetsprocesser både mellan olika nationella miljömärkningssystem och mellan nationella system och EU:s miljömärke. De nordiska länderna har utvecklat ett fall-till-fall-förfarande för samordning och harmonisering. Detta tillvägagångssätt har varit en fungerande lösning som också har medfört ökad överensstämmelse mellan miljömärkningskriterierna. Viktiga drivkrafter för harmonisering är behovet av att minska arbets- och resursinsatserna för kriterieutveckling och licensinnehavares förväntade önskan om likartade kriterier. Avgiftssystemet identifierades som ett annat område för samordning. Om de två miljömärkningssystemen även fortsättningsvis ska verka sida vid sida bör avgiftssystemen vara konsekventa och producenter bör få starkare finansiella incitament att använda dem.

Åsikterna om EU:s miljömärke skiljer sig mellan de nordiska länderna. Danmark förespråkar starkt en snabbare harmonisering medan utgångspunkten i övriga nordiska länder är att dra nytta av Svanens starka marknadsposition. Den pågående revisionen av Förordning om ett gemenskapsprogram för tilldelning av miljömärke rymmer ännu flera oklarheter. En gemensam nordisk ståndpunkt kunde vara önskvärd, men även om de nationella positionerna skiljer sig åt finns ömsesidiga intressen i att främja samordningen mellan de två miljömärkningssystemen genom att stödja utvecklingen av kriterier för EU-Blomman baserade på befintliga nationella och nordiska kriterier.

Aktuella ledningsfrågor: grunder för offentligt stöd och majoritetsprincipen

Det finns tre former av offentligt stöd till miljömärkningen: *finansiellt, samhällets bekräftelse samt integrering i befintlig och ny produkt-, konsument- och miljöpolitik* (t.ex. genom offentlig upphandling). Typen av stöd påverkar både Svanens trovärdighet och marknadspotential. När det gäller ekonomiskt stöd konstaterar utvärderingen att den nordiska Svanen står på en god finansiell bas även om ytterligare offentliga medel kan bli nödvändiga för speciella ändamål eller i ett enskilt land såsom Island. Dagens nivå för självfinansiering och de nordiska miljömärkningssekreteriatsens självfinansieringskultur säkrar snabba svar på marknadens behov.

En annan möjlig frågeställning gäller finansieringsbehovet av EU:s miljömärkes nationella administration. En ytterligare viktig aspekt av offentligt stöd till Svanen är systemets integration i befintliga miljöpolicies så som grön offentlig upphandling, och att olika myndigheter uppmärksammar systemet gentemot allmänheten.

En ytterligare fråga för systemets styrning berör majoritetsprincipen som infördes i den Nordiska miljömärkningsnämnden under 2003 i syfte att påskynda beslutsprocessen och öka organisationens effektivitet. Utvärderingen fann att majoritetsprincipen har ett brett stöd i de flesta medverkande länderna. Den danska organisationen har emellertid efterfrågat specificeringar av hur principen ska tillämpas till följd av händelser kring röstningsförfarandet för ett speciellt kriteriedokument, nämligen det för tryckerier. Det fanns en oro för att fastställande av dessa kriterier skulle medföra att många licensinnehavare drog sig ur systemet, vilket dock inte har varit fallet. Behovet av mer detaljerade regler för när majoritetsprincipen inte är tillämplig är emellertid fortfarande på den danska dagordningen.

Den nordiska Svanen och andra miljöinformationssystem

Det finns ett antal informationssystem med överlappande eller snarlika områden och aspekter som Svanen tar upp. *Det finns goda möjligheter att använda olika miljöinformationssystem på samverkande sätt.* Miljömärkning kan kombineras med t.ex. LCA i kriterieutveckling och EMS för validering och framtagande av data. Det finns flera skäl för att utnyttja dessa synergier: kostnadsbesparingar, underlätta för producenter att använda en lämplig kombination av informationssystem, förbättra förståelsen för miljöinformation, m.m. Det är uppenbart att det nordiska miljömärkningssystemet gagnas av flera av dessa system vid kriterieutveckling. För att stödja producenter och andra aktörer i att fullt ut dra nytta av synergierna behöver möjligheterna synliggöras. Vår slutsats är att det finns ett behov av att mer systematiskt bygga upp kunskapsbasen och att samla in och sprida goda exempel till de olika systemens organisationer, kriterieutvecklare inom miljömärkningen, industri- och producentorganisationer, offentliga inköpare, m.fl.

De miljöfrågor som omfattas av nordisk miljömärkning diskuteras i ökande grad i ett vidare hållbarhetssammanhang, vilket även inbegriper sociala frågor. Svanen har intagit en pragmatisk hållning till dessa nya aspekter av hållbar konsumtion och infört dem när det befunnits lämpligt. Nordiska miljömärkningsnämnden har fastställt Svanens position i relation till hållbarhetsfrågor men det har ännu inte engagerat sig i en bredare debatt om de fundamentala frågeställningarna (för mer detaljer, se rekommendationer i avsnitt 9.2).

Klimatfrågor och den nordiska svanen

Klimatfrågan har snabbt klättrat till en topplacering på miljödagordningen i många länder. I detta sammanhang har ökad uppmärksamhet och krav på information medfört ett antal industri- och tredjepartsinitiativ för klimatmärkning. Att skapa trovärdiga och jämförbara klimatmärken medför icke desto mindre flera ännu olösta problem, t.ex. metodfrågor och risker förknippade med ett större antal märken på marknaden.

Utvärderingen fann att *den nordiska Svanen kan dra nytta av klimatfrågans nuvarande uppmärksamhet på flera sätt*. Det faktum att Svanen tar hänsyn till en rad olika miljöaspekter – så väl som hälsa, kvalitet och sociala frågor när det behövs – är en klar fördel i detta sammanhang.

Klimatfrågor har konsekvenser för Svanen genom (1) att de ingår i kriterierna (2) produktgruppernas relevans samt (3) kommunikation. De nordiska miljömärkningsorganisationerna har sett potentialen som klimatfrågan innebär och initierat undersökningar om hur väl kriterierna speglar klimatrelaterade frågor. Under senare år har Svanen också inriktats mot produktgrupper som fått ökad uppmärksamhet till följd av dagens intresse för klimat- och energifrågor. Några klimatrelevanta produktgrupper (t.ex. transporter) är fortfarande kontroversiella inom det nordiska systemet men det förefaller finnas en större öppenhet för produktgrupper med stora miljöproblem om märkningen också kan medföra betydande förbättringar. Nordiska miljömärkningsnämnden har tagit upp klimatfrågor i sin strategi för 2008–10. Det finns också ett behov av att överväga en utveckling av en detaljerad strategi för hur klimataspekten ska tas med vid val av produktgrupper som komplement och för att specificera RPS-principen särskilt för denna fråga. Det mest omedelbara behovet för den nordiska Svanen är emellertid att utveckla en klimatkommunikationsstrategi och förse Svanens intressenter med relevant information. Speciellt fann vi ett behov av en mer systematisk samordning med andra aktörer som kommunicerar klimatfrågor och ett större informationsutbyte och samarbete med myndigheter med klimatpolitiskt ansvar.

Rekommendationer

Baserat på utvärderingen kan följande rekommendationer ges (se kapitel 9.2 för detaljer):

- 1) Inled en mer detaljerad undersökning av vilka förtjänster licensinnehavare ser med den nordiska Svanen och EU:s miljömärke. (*Nordiska ministerrådet och nationella regeringar*)
- 2) Fastställ en gemensam vision för miljömärkningens önskade ställning i de nordiska länderna och utarbeta en väg mot den genom ett "back casting"-förfarande. (*Nordiska miljömärkningsnämnden och nationella regeringar*)
- 3) Förbered för ett möjligt scenario där producenter i ökande grad övergår till EU:s miljömärke inom vissa produktgrupper genom att under-

- söka vad det kan betyda för marknadsföring, differentiering av produktgrupper och finansiering på medellång och längre sikt. (*Nordiska miljömärkningsnämnden*)
- 4) Främja gemensamma intressen för en successiv samordning av den nordiska Svanen och EU:s miljömärke genom att påverka EU:s miljömärkes operationella procedurer. (*nationella regeringar*)
  - 5) Analysera EU:s miljömärkes finansiella bärighet för de nationella miljömärkningsorganisationerna. (*nationella regeringar, nordiska miljömärkningssekreteriat*)
  - 6) Analysera och hantera de förändringar som införs inom ramen för revisionen av EU:s miljömärkningsförordning. (*nationella regeringar, Nordiska miljömärkningsnämnden och nationella sekretariat*)
  - 7) Överväg följderna av en mer aktiv harmonisering i termer av marknadsposition, dynamik, för- och nackdelar med kopplingar till regering/kommission, miljömärkningens framtida roll och, inte minst, finansiering. (*nationella regeringar*)
  - 8) Bearbeta och diskutera harmoniseringens grundtanke, dess syfte och vilka aktörer som skulle kunna dra nytta av den. (*nationella regeringar, Nordiska miljömärkningsnämnden*)
  - 9) Behåll nuvarande nivå för finansiellt stöd till de nationella miljömärkningssekreteriater för det Nordiska miljömärkningssystemet. (*finansierande myndigheter i de enskilda länderna, Nordiskt ministerråd*)
  - 10) Följ noggrant utvecklingen av hållbarhetsmärkning och överväg att utveckla en mer systematisk långsiktig strategi. (*Nordiska miljömärkningsnämnden*)
  - 11) Få ut mer av potentiella synergier med andra informationssystem genom ökat samarbete inom ramen för workshops, kontakter och gemensamma projekt med andra märkningsordningar, miljöinformations- och certifieringssystem. (*NMRIPP-gruppen, Nordiska miljömärkningsnämnden, nationella miljömärkningssekreteriat*)
  - 12) Fortsätt det goda arbetet med nordiska informations- och kommunikationsstrategier och intensifiera gemensamma projekt med företag, den offentliga sektorn och andra märkningssystem. (*Nordiska miljömärkningsnämnden, nationella miljömärkningsorganisationer*)
  - 13) Stärk det övergripande stödet för miljömärkningen genom att beakta den i konsument-, miljö och produktpolitik i samband med integrerad produktpolitik (*NMRIPP-gruppen, nationella myndigheter*), öka systematiskt samarbete inom grön offentlig upphandling och andra policyinstrument. (*Nordiska miljömärkningsnämnden*)
  - 14) Utveckla en kommunikationsstrategi för EU-Blomman i de nordiska länderna. (*nationella miljömärkningsorganisationerna, finansierande myndigheter*)

- 15) Utveckla ett gemensamt sätt att kommunicera Svanens klimataspekter till allmänheten, företag och relevanta myndigheter. (*Nordiska miljömärkningsnämnden*)
- 16) Tillsätt en särskild arbetsgrupp för att analysera behovet av mer detaljerade regler för hur majoritetsprincipen ska tillämpas. (*Nordiska miljömärkningsnämnden, Nordiska ministerrådet*)

Tiivistelmä

Pohjoismaisen ympäristömerkinnän arviointi tehtiin Pohjoismaiden ministerineuvoston toimeksiannosta ajankohtana, jolloin vastuu Joutsenmerkintäjärjestelmästä oli siirretty ympäristöministereille. Edellinen arviointi tehtiin vuosina 1998–2000. Nyt keskeisenä tehtävänä oli Pohjoismaisen ja EU:n ympäristömerkinnän (EU-kukan) välisen suhteen arviointi Pohjoismaissa, näiden kahden järjestelmän erojen ja yhtäläisyyksien vertailu sekä järjestelmien yhteistyö- ja yhtenäistämismahdollisuuksien arviointi. Niin ikään tarkasteltiin Joutsenen pohjoismaista markkinointistrategiaa ja muutamia järjestelmän hallinnollisia kysymyksiä. Lisäksi arvioitiin mm. Joutsenmerkinnän suhdetta muihin ympäristöinformaatiojärjestelmiin sekä sitä, miten Joutsenmerkinnässä on otettu huomioon ilmastomuutokseen vaikuttavat tekijät.

Joutsenen ja EU-kukan väliset erot ja yhtäläisyydet

Pohjoismaisen Joutsenmerkintä ja EU:n ympäristömerkintä ovat kaksi hyvin samankaltaista kolmannen osapuolen varmistamaa tuotteiden ja palvelujen ympäristömerkintäjärjestelmää. Viimeksi kuluneiden kahdeksan vuoden aikana järjestelmien väliset erot ovat kaventuneet. Järjestelmien käytännön yhteistyötä edistää se, että molempien järjestelmien toiminnasta vastaavat kussakin Pohjoismaassa samat ympäristömerkintäsihteeristöt. Ympäristömerkintäjärjestelmissä on 18 tuoteryhmää, joille on ympäristömerkintäkriteerit molemmissa järjestelmissä. Kriteerejä on pyritty yhdenmukaistamaan. Vaikka kriteerit ovat yhä samankaltaisempia, vain erittäin harvoilla tuotteilla on toistaiseksi samat kriteerit.

Järjestelmissä on eroa ennen kaikkea valmistuneiden kriteerien lukumäärän perusteella. EU-kukalla on kriteerejä (26) alle puolet Joutsenmerkinnän kriteerien lukumäärästä (67). Jolleivät EU:n ympäristömerkinnän uudistussuunnitelmat aiheuta merkittäviä muutoksia, ero kriteerien lukumäärässä ei muutu lähivuosina. Joutsenmerkinnässä on onnistuttu luomaan kriteerien valmisteluun tehokkaasti toimiva järjestelmä. Järjestelmällä on tuotettu yhä enemmän yhteisiä peruskriteerejä keskenään samantyyppisille tuotteille ja lisäksi tuoteryhmille yhteisiä moduulikriteerejä (esim. paperituotteille). Joutsenkriteerien merkittävyys ympäristön kannalta on kasvanut edelliseen arviointiajankohtaan verrattuna, erityisesti tuoteryhmiä on aiempaa kattavammin.

Järjestelmät eroavat toisistaan myös hallinnollisilta rakenteiltaan. EU:n ympäristömerkinnässä on erilainen lainsäädännöllinen perusta sekä monimutkaisempi hallintorakenne, jossa Euroopan Komissiolla ja kansallisilla viranomaisilla on näkyvä rooli kansallisten ympäristömerkintäelinten rinnalla. Myös järjestelmien rahoituksessa on merkittävä ero. Kai-

kissa Pohjoismaissa Joutsenmerkinnän liikevaihto oli vuonna 2006 moninkertainen EU-kukkaan verrattuna. Ympäristömerkintäsihteeristöt kattoivat kolme neljäsosaa Joutsenmerkinnän liikevaihdosta saamallaan lisenssimaksuilla. EU-kukan tuottamat lisenssimaksutulot puolestaan ovat vähäisen lisenssimäärän ja alhaisempien lisenssimaksujen vuoksi alhaiset ja järjestelmä on erittäin riippuvainen julkisesta rahoituksesta.

Joutsenen ja EU-kukan näkyvyys markkinoilla ja tunnettuus

Joutsen on johtava ympäristömerkki Pohjoismaissa. Tanskassa sillä on noin kuusinkertainen määrä lisenssejä EU-kukkaan verrattuna ja muissa Pohjoismaissa sen asema on sitäkin ylivoimaisempi. Tosin EU-kukka on saanut vähitellen jalansijaa, etenkin Tanskassa ja muutamissa tuoteryhmissä (esim. tekstiilit).

Pohjoismaiden välillä on eroja suhtautumisessa Joutsenmerkkiin ja EU-kukkaan. Haastattelumme osoittivat, että kaikissa maissa ja kaikilla teollisuuden aloilla EU-kukkaan ei täysin luotettu. Yritysten näkemykset ympäristömerkintäjärjestelmistä näyttivät riippuvan yrityksen markkina-asemasta ja maantieteellisestä alueesta, jolle he markkinoivat tuotteitaan. Valinta Joutsenen ja EU-kukan välillä tehdään usein käytännöllisin perustein: kummasta katsotaan saatavan enemmän markkinointitietua.

Pohjoismaiset kuluttajat tuntevat Joutsenmerkin hyvin. Pohjoismainen ympäristömerkintälautakunta on viime vuosina kehittänyt markkinointia ja tiedotusta. Joutsenmerkinnän tiedotuksen perustana olevat avainarvot ovat: luotettavuus, dynaamisuus ja sitoutuneisuus. Kansalliset ympäristömerkintäsihteeristöt ovat omaksuneet nämä arvot ja asiakkailleen lupaa- mat hyödyt ja toteuttaneet niitä kansallisesti. Luottamus Joutsenmerkintää kohtaan on kasvanut vuosien kuluessa. Yhä useammat yritykset ovat valmiita maksamaan luvatuista hyödyistä. Joutsenen markkinointi on kehittynyt edellisen arvioinnin jälkeen suunnitelmallisemmaksi ja ammatillisemmaksi. ”Yhteispohjoismaisuus” puolestaan on vahvistunut tiedotus- ja markkinointistrategiassa, kun taas käytännön markkinointi ja tiedotus on toteutettu kansallisella tasolla ja kansallisten tarpeiden mukaan.

EU-kukan kehitys vaikuttaa myös Joutsenmerkin tulevaisuuteen, koska järjestelmät toimivat rinnakkaisina ja hyödyntävät osittain samoja asiantuntijoita ja henkilöresursseja. Myös monet yritykset ovat kiinnostuneita molemmista järjestelmistä. Pohjoismaisilla ympäristömerkintälautakunnilla on ainoastaan rajalliset mahdollisuudet vaikuttaa EU:n ympäristömerkinnän kehittämiseen, mutta niiden on otettava huomioon tämä kehitys suunniteltaessa tulevia markkinointistrategioita.

Mahdollisuudet Joutsenen ja EU-kukan yhteistyöhön ja yhtenäistämiseen

Eri ympäristömerkintäjärjestelmien yhteistyö- ja yhtenäistämismahdollisuuksista on keskusteltu jo vuosia. Viimeisimmässä EU:n ympäristömerkinnän arvioinnissa (EVER 2005) yhtenä keskeisenä kysymyksenä oli

EU-kukan ja kansallisten ympäristömerkintäjärjestelmien suhde. Arviointiraportissa (EVER 2005) esitetään yhteistyötä ja yhtenäistämistä vaihtoehtona järjestelmien lakkauttamiselle. Näin ollen se sisältää mahdollisuuden EU:n ympäristömerkinnän ja kansallisten järjestelmien asteittaiselle lähentymiselle vähitellen.

Kansallisten ympäristömerkintäjärjestelmien kesken sekä niiden ja EU:n ympäristömerkinnän välillä on ollut lukuisia yhteistyö- ja yhtenäistämisyhteyksiä. Pohjoismaat ovat kehittäneen tapauskohtaisen lähestymistavan yhteistyön ja yhtenäistämisen edistämiseksi. Toimintatapa on osoittautunut toimivaksi ratkaisuksi ja on myös johtanut kriteerien samankaltaistumiseen. Yhtenäistämisen merkittävänä kannustimena on mainittu tarve vähentää kriteerien kehittämisessä tarvittavaa työtä ja muita resursseja. Lisenssinhaltijat puolestaan haluaisivat kullekin tuotteelle samankaltaiset kriteerit eri järjestelmiin. Yhtenä yhteistyötä edellyttävänä kohteena pidetään lisenssimaksujen rakennetta. Mikäli Joutsen ja EU-kukka säilyvät rinnakkaisina järjestelminä, maksujen tulisi olla yhdenmukaisia ja yrityksiä tulisi taloudellisin keinoin kannustaa käyttämään molempia merkintöjä rinnakkain.

Pohjoismaissa on erilaisia näkemyksiä ympäristömerkintäjärjestelmien yhtenäistämistä. Tanskassa kannatetaan nykyistä nopeampaa yhtenäistämiskehitystä. Muissa Pohjoismaissa halutaan pikemminkin hyödyntää Joutsenen vahvaa markkina-asemaa. EU:n ympäristömerkinnän ohjessääntöön on lähiaikoina tulossa uudistuksia, joiden sisällöstä ei vielä ole tarkkaa tietoa. Yhteispohjoismaainen näkemys olisi toivottava, vaikka kansalliset näkemykset eroavat toisistaan. Pohjoismailla on yhteisiä intressejä edistää Joutsenen ja EU-kukan yhteistyötä tukemalla EU-kukan kriteerien kehittämistä kansallisten ympäristömerkintäkriteerien pohjalta.

Ajankohtaisia hallinnollisia kysymyksiä: perusteluja järjestelmän julkiseen tukeen ja enemmistöpäätös

Ympäristömerkinnälle on kolmen tyyppistä julkista tukea: taloudellinen tuki, julkinen kannustus ja merkinnän yhdistäminen muihin tuote-, kuluttaja- ja ympäristöpolitiikan ohjauskeinoihin (esim. ympäristömyötäiset julkiset hankinnat). Julkinen tuki vaikuttaa sekä luottamukseen että Joutsenen mahdollisuuksiin markkinoilla. Joutsenen julkinen rahoitus on pääosin ollut riittävää, joskin lisää julkista rahaa tarvittaneen tietyissä erityiskohteissa sekä esimerkiksi Islannissa. Joutsenen nykyinen lisensseistä saatu omarahoitusosuus ja pohjoismaisten ympäristömerkintäelinten ”omarahoituskulttuuri” puolestaan varmistavat herkkyyden reagoida markkinoiden tarpeisiin. Sitä vastoin EU-kukan hallinto toimii vielä pitkälti julkisen rahoituksen varassa. Joutsenmerkki kaipaa kuitenkin muutakin julkista tukea kuin rahaa. Viranomaiset voivat tukea Joutsenmerkkiä sisällyttämällä se muuhun julkiseen ohjaukseen, kuten ympäristömyötäisiin julkisiin hankintoihin ja viranomaisten entistä näkyvämpään viranomaisyhteistyöhön.

Toinen ajankohtainen hallinnollinen kysymys on enemmistöpäätös, joka otettiin käyttöön vuonna 2003. Tavoitteena oli nopeuttaa päätöksentekoa ja parantaa Joutsenen organisaation tehokkuutta. Arviointimme osoitti, että enemmistöpäätöstä on kannatettu useimmissa maissa. Tanska on kuitenkin esittänyt tämän periaatteen tarkentamista huonojen kokemustensa pohjalta, jotka sillä on painolaitoksia koskevista kriteereistä äänestettäessä. Tuolloin heillä oli suuri huoli, että uusien kriteerien hyväksyminen johtaa monien lisenssihaltijoiden vetäytymiseen, mutta näin ei kuitenkaan käynyt. Tarve yksityiskohtaisempiin sääntöihin koetaan Tanskassa yhä tarpeelliseksi erityisesti siitä, milloin enemmistöpäätös on sopiva tapa tehdä päätöksiä.

Joutsenmerkintä ja muut ympäristöinformaatiojärjestelmät

Pohjoismaisen ympäristömerkinnän kanssa päällekkäisiä tai samantyyppisiä asioita käsitteleviä järjestelmiä on olemassa. Eri ympäristöinformaatiojärjestelmät voisivat yhä laajemmin hyödyntää toisiaan. Ympäristömerkki voisi hyödyntää yhä enemmän elinkaarianalyysiä (LCA) kriteerien kehittäessä ja ympäristöhallintajärjestelmiä (EMS) validoinnissa ja tietojen tuottamisessa. Monet seikat kannustavat järjestelmien yhteisten etujen (synergian) hyödyntämiseen: kustannussäästöt, tuottajien mahdollisuuksien helpottaminen erilaisten informaatiojärjestelmien samanaikaisessa käytössä, ymmärryksen lisääntyminen ympäristöinformaatiojärjestelmistä, jne. Pohjoismaisen ympäristömerkintä hyötyy selvästi muista järjestelmistä kriteereitä kehittäessään. Jotta myös tuottajat ja muut toimijat voisivat hyödyntää eri järjestelmiä nykyistä laajemmin, on tarpeen tuoda paremmin esiin näitä mahdollisuuksia. Käsityksemme mukaan tarvitaan systemaattisempaa tietojen ja hyvien esimerkkien kokoamista ja niistä tiedottamista informaatiojärjestelmien hallinnosta vastaaville, ympäristömerkintäkriteerien kehittäjille, teollisuuden yhdistyksille, julkisista hankinnoista vastaaville viranomaisille jne.

Ympäristöasioista, jotka sisältyvät Pohjoismaiseen ympäristömerkintään, keskustellaan yhä enemmän ja yhä laajemmissa kestävä kehityksen yhteyksissä, kuten sosiaalisten tekijöiden yhteydessä. Uusia kestävä kehityksen ilmiöitä on sisällytetty Pohjoismaiseen ympäristömerkintään mahdollisuuksien mukaan. Pohjoismaisen ympäristömerkintälautakunta on määrittänyt Joutsenmerkinnän ja kestävä kehityksen välisen suhteen, mutta toistaiseksi ei ole laajemmin keskusteltu periaatteellisista asioista (ks. lähemmin, luku 9.2).

Ilmastoasiat ja Joutsenmerkintä

Ilmastonmuutoksesta on nopeasti tullut monessa maassa keskeisin ympäristöasia. Lisääntynyt kiinnostus ja tiedotusvaatimukset ovat johtaneet moniin teollisuuden ja kolmannen osapuolen aloitteisiin ilmastomerkinästä. Luotettavan ja vertailukelpoisen erillisen ilmastomerkin kehittäminen sisältää kuitenkin monia ratkaisemattomia ongelmia, kuten me-

netelmälliset kysymykset ja erilaisten merkintöjen lisääntymisestä johtuvat riskit.

Arviointimme mukaan Pohjoismainen ympäristömerkintä voisi hyötyä monin tavoin lisääntyneestä kiinnostuksesta ilmastomuutosta kohtaan. Joutsenmerkinnän merkittävänä etuna on, että se ottaa huomioon monia ympäristötekijöitä, ja lisäksi terveyteen, laatuun ja myös sosiaalisiin tekijöihin liittyviä ominaisuuksia tarpeen mukaan.

Ilmastonmuutos on vaikuttanut Joutsenmerkintään monin tavoin, kuten (1) kriteereihin sisällyttäminen (2) tuoteryhmien merkittävyys (3) viestintä. Pohjoismaiset ympäristömerkintäelimet ovat olleet halukkaita sisällyttämään ilmastoasioita kriteereihin ja teettäneet selvityksiä siitä, miten hyvin kriteereissä ilmastoasiat on otettu huomioon. Viime vuosina on otettu merkinnän kohteeksi tuoteryhmiä, jotka ovat olleet kiinnostavia nimenomaan ilmasto- ja energiakysymyksen vuoksi. Osa ilmastomuutoksen kannalta merkittävistä tuoteryhmistä (kuten liikenne) on yhä kiistanalaisia ja Joutsenmerkinnän ulkopuolella. Avoimuus on kuitenkin lisääntynyt niitä tuoteryhmiä kohtaan, joilla on suuria ympäristövaikutuksia, mikäli merkinnällä voidaan saavuttaa selkeitä parannuksia. Pohjoismainen ympäristömerkintälautakunta on painottanut ilmastomuutosasioita vuosien 2008–2010 strategiassaan. Lisäksi on syytä harkita, tarvitaanko kiinnittää yksityiskohtainen strategia ilmastomuutoksen huomioon ottamiselle tuoteryhmiä valittaessa sekä täydentää ja tarkentaa RSP-periaatetta tältä osin. Pohjoismaisen Joutsenmerkinnän tulisi kehittää pikaisesti ilmastoviestintästrategia tarjotakseen sidosryhmilleen oleellista tietoa Joutsenmerkistä. Erityisesti tarvittaisiin entistä systemaattisempaa yhteistyötä muiden ilmastomuutoksesta viestittävien osapuolten kanssa. Lisäksi tulisi lisätä tietojen vaihtoa sekä yhteistyötä ilmastoasioista vastaavien viranomaisten kanssa.

Suosituks

Arvioinnin perusteella voidaan antaa seuraavat suositukset (ks. yksityiskohdat, kappale 9.2)

- 1) Tarvitaan yksityiskohtaisempi tutkimus lisenssinhaltijoiden käsityksistä Pohjoismaisesta Joutsenmerkinnästä ja EU:n ympäristömerkinnästä (*Pohjoismainen ministerineuvosto ja kansalliset hallitukset*)
- 2) Määritetään yhteinen visio ympäristömerkinnän asemasta Pohjoismaissa ja laaditaan sitä tukeva yksityiskohtainen kehittämissuunnitelma käyttäen back-casting-menetelmää (*Pohjoismainen ympäristömerkintälautakunta ja kansalliset hallitukset*)
- 3) Laaditaan pitkän ja keskipitkän aikavälin suunnitelma (markkinointi, tuoteryhmien erottuvuus ja rahoitus), joka edistäisi yritysten EU:n ympäristömerkinnän käyttöoikeuksien hakemista tietyistä tuoteryhmistä (*Pohjoismainen ympäristömerkintälautakunta*)

- 4) Edistetään yhteisiä intressejä ja lisätään asteittain yhteistyötä Joutsenen ja EU-kukan välillä vaikuttamalla EU:n ympäristömerkintäjärjestelmän toimintatapoihin (*kansalliset hallitukset*)
- 5) Analysoidaan EU:n ympäristömerkinnän taloudellinen elinkelpoisuus kansallisissa toimivaltaisissa elimissä (*kansalliset hallitukset, pohjoismaiset ympäristömerkintäsihteeristöt*)
- 6) Analysoidaan EU:n ympäristömerkintäjärjestelmän tulevan uudistuksen aiheuttamat muutokset ja huolehditaan tarvittavista toimenpiteistä (*kansalliset hallitukset, Pohjoismainen ympäristömerkintälautakunta, kansalliset sihteeristöt*)
- 7) Otetaan huomioon entistä aktiivisemmän merkintäjärjestelmien yhtenäistämisen vaikutukset järjestelmien markkina-asemaan, toimivuuteen, viranomaisvetoisuuden etuihin ja haittoihin sekä ympäristömerkinnän tulevaan rooliin ja rahoitukseen (*kansalliset hallitukset*)
- 8) Kehitetään ja keskustellaan aktiivisemmän yhtenäistämisen periaatteista ja tavoitteista sekä toimijoista, jotka hyötyisivät siitä (*kansalliset hallitukset, Pohjoismainen ympäristömerkintälautakunta, kansalliset sihteeristöt*)
- 9) Ylläpidetään Joutsenmerkin nykyinen julkisen taloudellisen tuen taso kansallisille ympäristömerkintäelimille (*kansalliset rahoittavat viranomaiset, Pohjoismainen ministerineuvosto*)
- 10) Seurataan tarkoin kestävä kehityksen merkinnän kehittämistä ja otetaan se huomioon entistä yksityiskohtaisemmassa pitkän aikavälin strategiassa (*Pohjoismainen ympäristömerkintälautakunta*)
- 11) Käytetään entistä paremmin hyväksi muista ympäristöinformaatiojärjestelmistä saatavat synergiaedut tiiviimmän yhteistyön avulla: työpajoja, yhteyshenkilöitä, yhteisiä projekteja muiden ympäristömerkintä-, ympäristöinformaatio- ja sertifiointijärjestelmien kanssa (*NMRIPP ryhmä, Pohjoismainen ympäristömerkintälautakunta, ja kansalliset ympäristömerkintäsihteeristöt*)
- 12) Jatketaan hyvää työtä pohjoismaisen tiedotus- ja markkinointistrategian kehittämiseksi ja vahvistetaan yhteisiä projekteja yritysten, julkisen sektorin ja muiden merkintäjärjestelmien kanssa (*Pohjoismainen ympäristömerkintälautakunta, kansalliset ympäristömerkintäelimet*)
- 13) Lisätään tukea ympäristömerkinnälle ottamalla se entistä paremmin huomioon ympäristö-, kuluttaja ja tuotepolitiikassa yhdenmätyn tuotepolitiikan (IPP) yhteydessä (*NMRIPP ryhmä, kansalliset viranomaiset*), lisätään järjestelmällistä yhteistyötä ympäristömyötäisten julkisten hankintojen ja muiden politiikkainstrumenttien kanssa (*Pohjoismainen ympäristömerkintälautakunta*)
- 14) Kehitetään Pohjoismaihin EU-kukan viestintästrategia (kansalliset ympäristömerkintäelimet, rahoittavat viranomaiset)
- 15) Kehitetään yhteinen viestintätapa kerrottaessa Joutsenen ilmastonmuutosasioista suurelle yleisölle, yrityksille ja viranomaisille (*Poh-*

joismainen ympäristömerkintälautakunta yhdessä muiden ilmastoasioista viestivien organisaatioiden kanssa)

- 16) Asetetaan työryhmä analysoimaan tarkempien sääntöjen tarvetta enemmistöpäätökseen käytössä (*Pohjoismainen ympäristömerkintälautakunta, Pohjoismaiden ministerineuvosto*)

Samantekt

Norræna ráðherranefndin samdi um að endurtaka mat á Norræna umhverfismerkinu Svaninum þar sem að umsjón með Svaninum hafði verið falin ráðherrum sem sjá um umhverfismál. Fyrri mat fór fram 1998–2000. Helsta atriði núverandi mats var að rannsaka sambandið milli Norræna Svansins og Evrópublómsins á Norðurlöndunum, að bera saman það sem er líkt og ólíkt með kerfunum tveimur og að skoða horfur hvað varðar samræmingu og samhæfingu kerfanna tveggja. Önnur atriði sem voru til umfjöllunar voru m.a. framkvæmd norrænnar markaðsáætlunar Svansins, málefni tengd stjórnunarháttum áætlunarinnar, auk tengsla Svansins og annarra upplýsingakerfa um umhverfismál sem og þáttöku Norræna svansins í málum tengdum loftlagsbreytingum.

Það sem er líkt og ólíkt með Norræna Svaninum og Evrópublóminu

Norræni Svanurinn og Evrópublómið eru tvö mjög svipuð kerfi fyrir umhverfismerkingu þriðja aðila á vöru og þjónustu. Síðustu átta árin hefur dregið úr þeim mun sem upphaflega var á áætlununum. Báðar áætlanir njóta góðs af þeirri staðreynd að sömu skrifstofur á Norðurlöndum sinna stjórnun beggja og sjá um samræmingu og aðlögun þeirra að markaði. Áætlanirnar tvær um umhverfismerkingu hafa sett viðmiðanir fyrir 18 vöru-flokka sem skarast. Reynt hefur verið að samhæfa viðmiðanirnar. Því hafa merkingar orðið líkari jafnvel þó fáar vörur hafi nákvæmlega sömu viðmiðanir.

Einn megin munurinn er hins vegar fjöldi vöru-flokka með viðmiðanir fyrir umhverfismerkingar. Vöru-flokkar með umhverfisviðmiðanir Evrópu-sambandsins (26) eru meira en helmingi færri en vöru-flokkar sem eru Svanmerktir (67). Ef endurskoðun á umhverfismerkingakerfi Evrópu-sambandsins knýr ekki á róttækar breytingar er líklegt að þessi munur haldist á næstu árum. Norræna Svaninum hefur greinilega tekist að móta virkt kerfi um þróun viðmiðana, en þetta endurspeglast einnig í tilhneigingu til að setja fram sameiginlegar viðmiðanir fyrir vöruhópa og algengar einingar. Umhverfislegt gildi viðmiðana Svansins virðist hafa lagast frá fyrri mati (1998–2000), í það minnsta hvað varðar úrval vöru-flokka.

Einnig er munur á eftirlits- og stjórnunarkerfi áætlanna tveggja: Evrópublómið hvílir á öðrum lagalegum grunni og er flóknari og eftirlits- og stjórnunarkerfið lagskipt þar sem framkvæmdastjórn Evrópubandalaganna leikur mikilvægt hlutverk ásamt landssamtökum um umhverfismerkingu.

Megin munurinn á áætlununum er þó fjárhagsgrunnur merkinganna á Norðurlöndunum. Velta áætlunarinnar um Norræna Svaninn var margföld á við Evrópublómið á öllum Norðurlöndunum árið 2006. Þrír fjórðu hlutar ársfjármagns þeirra skrifstofa sem sjá um umhverfismerkingu eru

leyfisgjöld. Vegna færri leyfa og lægri leyfisgjalda er Evrópublómið hins vegar mjög háð almennum fjárveitingum.

Markaðsviðtökur og almenningsvitund um Norræna Svaninn og Evrópublómið

Svanurinn er ennþá ráðandi umhverfismerki á Norðurlöndunum og eru um sex sinnum fleiri Svans-leyfi í Danmörku. Staðan er enn sterkari á hinum Norðurlöndunum. Evrópublómið vinnur á í sumum löndum, einkum í Danmörku, og í sumum vöruflokkum (t.d. vefnaðarvöru). Hins vegar eru vöruflokkar í báðum áætlunum sem ekki fá leyfi til merkinga.

Það er ákveðinn munur á Norðurlöndunum hvað varðar stöðu Norræna Svansins annars vegar og umhverfismerkis Evrópusambandsins hins vegar. Viðtöl okkar sýndu fram á það að í sumum löndum og atvinnugreinum er efast um trúverðugleika Evrópusblómsins. Þetta er þó breytilegt eftir atvinnugreinum. Álit fyrirtækja á kerfunum tveimur fór að vissu marki eftir markaðsstöðu þeirra og því landfræðilega svæði þar sem þau markaðssettu vörur sínar. Valið á milli Norræna Svansins og Evrópublómsins byggðist aðalega á hagkvæmni og tengist markaðslegum ávinningi þeirra.

Neytendur þekkja Svaninn mjög vel á Norðurlöndunum. Norræn nefnd um umhverfismerkingu hefur helgað sig sérstaklega miðlun og markaðssetningu síðustu árin. Hún hefur bent á þau meginatriði Svansins sem ættu að vera grundvöllur allrar miðlunar: *traust, athafnakraftur og þátttaka*. Þær skriftstofur sem sjá um umhverfismerkingu á landsvísu hafa tekið upp þessi gildi og tillögur að gildum og unnið að framkvæmd þeirra í hverju landi fyrir sig. Almennt traust á Svaninum hefur vaxið síðustu ár og aukinn áhugi á Svaninum táknar að fleiri fyrirtæki aðhyllist gílidis-tillögurnar. Á heildina litið hefur markaðssetning Svansins batnað verulega frá síðasta mati og telst hún skipulögð og fagmannleg. Auk þess hefur „Norræna þungamiðjan“ styrkst hvað varðar upplýsinga- og markaðsskipulag á sama tíma og vinnan á bak við markaðssetningu og miðlun fer fram á landsvísu og svarar þörfum hvers lands fyrir sig.

Þróun Evrópusamblómsins hefur einnig áhrif á framtíð Svansins þar sem áætlanir starfa hliðstætt, nýta sér að hluta til sömu sérfræðipækkingu og starfsfólk og þar sem eftirspurn er eftir báðum áætlunum frá fyrirtækjum. Norrænir aðilar sem sjá um umhverfismerkingar hafa takmörkuð áhrif á þróun umhverfismerkis Evrópusambandsins en ættu að taka mið af þróun þess þegar lagt er á ráðin um frekari skipulagningu markaðssetningar.

Samræming og samhæfingu Norræna Svansins og Evrópublómsins

Hugmyndin að samræmingu og samhæfingu mismunandi umhverfismerkinga hefur verið á dagskránni í mörg ár. Eitt helsta málefnið varðandi síðasta mat á Evrópublómið (EVER 2005) var að tengja Evrópska umhverfisverkið við merkingakerfi á landsvísu. EVER (2005) rannsóknin sýnir samræmingu og samhæfingu sem lausn fram yfir það að leggja niður eina eða fleiri áætlanir. Þetta býður því líka upp á þann möguleika að

umhverfismerki Evrópusambandsins og landsáætlanir nálgist hver aðra smátt og smátt á löngu tímabili.

Margar tilraunir hafa verið gerðar til þess að samræma og samhæfa þessi ferli, bæði innan ramma merkingaráætlana á landsvísu og í samvinnu milli þeirra og umhverfismerkis Evrópusambandsins. Norðurlöndin hafa þróað aðferð sem skoðar hvert tilvik fyrir sig þegar kemur að samræmingu og samhæfingu. Þessi aðferð hefur verið nothæf lausn sem hefur einnig leitt til líkari viðmiðana fyrir merkingar. Þeir þættir sem kalla hvað mest á samhæfingu eru m.a. þörfin á að draga úr vinnu og fjármagni sem eytt er í þróun viðmiðana og ósk leyfishafa um samskonar viðmiðanir. Einnig var bent á að samræma þarf samsetningu leyfisgjalda. Ef báðar áætlanir eiga að þrífast samhliða ætti að vera samræmi í leyfisgjöldum og fyrirtæki ættu að hljóta meiri fjárhagslega hvatningu til að nota bæði merkin samhliða.

Álit á Evrópublóminu er mismunandi á Norðurlöndunum. Danmörk óskar eftir hraðari samhæfingu en hin Norðurlöndin vilja njóta sterkrar markaðsstöðu Svansins. Endurskoðun reglugerðar um umhverfismerki Evrópusambandsins er á döfinni en henni fylgja margir óvissuþættir. Ákjósanlegast væri að Norðurlöndin væru á sama máli og þrátt fyrir að hvert land hafi sína skoðun eru sameiginlegir hagsmunir fólgnir í því að hvetja til samræmingar Norræna Svansins og umhverfismerkis Evrópusambandsins með því að styðja þróun viðmiðana fyrir Evrópublómið á grundvelli landsviðmiðana sem þegar eru fyrir hendi.

Stjórnunarhættir: grundvöllur fyrir stuðningi almennings og meirihlutareglan

Greina má þrenns konar stuðning almennings við umhverfismerkingar: *fjárhagslegur stuðningur, samþykki almennings og aðlögun að vöru sem þegar er til og nýrri vöru, neytenda- og umhverfisstefna* (t.d. með innkaupum hins opinbera). Stuðningur hefur bæði áhrif á trúverðugleika og markaðsmöguleika Norræna Svansins. Matið leiddi í ljós að almennar fjárveitingar tryggja Norræni Svanurinn fjárhagslegan grunn, jafnvel þó hugsanlega sé þörf á frekari fjárveitingum til einstakra mála eða tiltekinna landa eins og Íslandi. Einng er fjárhagslegur stuðningur nauðsynlegur fyrir stjórnsýslu umhverfismerkis Evrópusambandsins. Á hinn bóginn tryggir núverandi kerfi eigin fjármögnun og *stöðkerfi* fjármögnunar umhverfismerkingaráætlana á Norðurlöndunum. Auk þess er það mikilvægt með tilliti til stuðnings almennings að aðlaga Svaninn gildandi stefnu eins og umhverfishæfum opinberum innkaupum og almennu samþykki yfirvalda í umboði almennings.

Annað málefni tengt stjórnháttum og er ofarlega á baugi byggist á meirihlutareglunni sem tekin var upp árið 2003 til þess örva ákvarðanaferlið og auðvelda samtökum um Norræna Svaninn að ná árangri þrátt fyrir breytilegt starfsumhverfi. Matið leiddi í ljós að flest aðildarlönd styðja meirihlutaregluna. Danmörk hefur óskað eftir nánari lýsingu á

reglunni en það var vegna atburða sem tengdust atkvæðagreiðslu um viðmiðanir umprentsmiðjur. Sumir aðilar töldu að samþykkt viðkomandi viðmiðana myndi leiða til þess að margir leyfishafar misstu áhugann en slík varð ekki raunin. Engu að síður telja Danir enn að þörf sé á nánari reglum fyrir tilvik þar sem meirihlutareglan á ekki við.

Norræni Svanurinn og önnur umhverfisupplýsingakerfi

Ýmis upplýsingakerfi sinna atriðum er skarast við eða líkjast þeim mál-efnum sem tengjast umhverfismerkingum á Norðurlöndunum. *Að verulegu leyti er hægt að nota upplýsingakerfin á samverkandi hátt.* Hægt væri til dæmis að tengja umhverfismerkingu við vistferilsgreiningar (LCA) og þróun viðmiðana og við umhverfisstjórnunarkerfi (EMS) er varðar fullgildingu og gagnavinnslu. Það ermargt sem hvertur til samhæfingar á við-eigandi upplýsingum: sparnaður framleiðendum er gert auðveldara að samhæfa viðeigandi upplýsingakerfum, aukinn skilningur á umhverfisupplýsingum, o.s. frv. Greinilegt er að norrænu kerfin njóta góðs af mörgum þessara upplýsingakerfa við þróun viðmiðana. Til þess að hægt sé að styðja iðnað og þjónustu í því að notasamhæfðar merkingar þurfa kostirnir að liggja í augum uppi. . Niðurstaða okkar er að þörf sé á að safna markvisst þekkingu um málefnið og koma góðum sýnidæmum á framfæri við þá sem þróa og stjórna merkinga- og upplýsingakerfum sem og innkaupastjóra og markaðsgeiranum í hverri atvinnugrein.

Sífelld er meira rætt um þau umhverfismál sem falla undir norræna umhverfismerkingu í víðara samhengi við sjálfbæra þróun, þar með talin félagsleg málefni. Norræni Svanurinn hefur haldið fram sjálfbærri neyslu og tekur hefur aukið við viðmiðin í þeim anda. Norræn nefnd um umhverfismerkingu hefur skilgreint stöðu Norræna Svansins með tilliti til sjálfbærrar þróunar en hefur enn ekki tekið þátt í víðtækari umræðum um grundvallarmálefni í þessum málaflokki (sjá frekari upplýsingar í tilmælum í kafla 9.2).

Loflagsmálefni og Norræni Svanurinn

Loflagsbreytingar hafa skyndilega komist efst á blað hvað varðar umhverfismál í mörgum löndum. Vaxandi athygli á málinu og kröfur um frekari upplýsingar hafa leitt til þess að atvinnugreinar og hagsmunahópar hafa sýnt frumkvæði hvað varðar loftlagsmerkingar. Engu að síður fylgja því mörg óleyt vandamál að útbúa trúverðugar og sambærilegar loftlagsmerkingar, til dæmis aðferðir sem beitt er í og hættan sem felst í fjölgun merkinga.

Matið leiddi það í ljós að *Norræni Svanurinn nýtur á margan hátt góðs af þeirri athygli sem nú er beint að loftlagsmálefnum.* Sú staðreynd að Svanurinn spannar mörg umhverfismálefni, auk heilbrigðis-, gæða- og félagslegra málefna eftir þörfum, kemur hér í góðar þarfir.

Loflagsbreytingar hafa áhrif á Norræna Svaninn hvað varðar (1) *aðlögun að viðmiðunum*, (2) *tengingu við vörflokk* og (3) *miðlun*

upplýsinga. Norræn samtök um umhverfismerkingar viðurkenna að loftlagsmálefni hafi veitt þeim viss tækifæri og hafa rannsakað hversu vel viðmiðanirnar eiga við málefni sem tengjast loftslagi. Á síðustu árum hefur Norræni Svanurinn einnig sett stefnuna á vöruflokka sem eru að hasla sér völl vegna áherslunnar sem nú er lögð á loftlags- og orkumál.. Sumar vörur og þjónusta sem tengjast breytingum á loftslagi (t.d. samgöngur) eru enn umdeildar innan Svaninsins en fólk virðist einnig opnara gagnvart merkingu á vörum sem tengjast stærri umhverfismálum ef merkingar geta haft áhrif til að bætta ástandið.. Norræn nefnd um umhverfismerkingu er með loftlagsmálefni á dagskrá fyrir tímabilið 2008–2010. Einnig getur verið þörf á að íhuga þróun nákvæms skipulags með því að flokka loftlagsmálefni niður í úrval vöruflokka til viðbótar og útskýringar á RPS reglunni fyrir þetta tiltekna málefni. Mest liggur þó á að Norræni Svanurinn þrói með sér skipulagða miðlun loftlagsmálefna og veiti hagsmunaaðilum viðeigandi upplýsingar. Einkum er þörf á frekara kerfisbundnu samstarfi við aðra aðila sem miðla upplýsingum um loftlagsmálefni og á frekari upplýsingaskiptum og samstarfi við yfirvöld sem hafa umsjón með loftlagsstefnum.

Tilmæli

Byggt á viðkomandi mati má gefa eftirfarandi tilmæli (sjá nánari upplýsingar í kafla 9.2):

- 1) Gera skal nánari rannsókn á óskum leyfishafa varðandi Norræna Svaninn og umhverfismerki Evrópusambandsins (*Norræna ráðherranefndin og yfirvöld í hverju landi fyrir sig*)
- 2) Skilgreina skal sameiginlega sýn á þá framtíð umhverfismerkinga sem óskað er eftir á Norðurlöndunum og útfæra skal leiðina að slíkri framtíð með bakspá (*Norræn nefnd um umhverfismerkingu og yfirvöld í hverju landi fyrir sig*)
- 3) Undirbúa skal hugsanlegar aðstæður, til meðallangs tíma eða langs tíma litið, þar sem fyrirtæki kjósa æ oftast Evrópublómið í vissum vöruflokkum með tilliti til markaðssetningar, aðgreiningar vöruflokka og fjárhagslegra áhrifa (*Norræn nefnd um umhverfismerkingu*)
- 4) Efla skal sameiginlega hagsmuni af stigvaxandi samræmingu Norræna Svansins og umhverfismerkis Evrópusambandsins með því að hafa áhrif á starfsemi umhverfismerkis Evrópusambandsins (*Yfirvöld í hverju landi fyrir sig*)
- 5) Greina skal fjárhagslegan lífvænleika umhverfismerkis Evrópusambandsins fyrir viðkomandi samtök í hverju landi fyrir sig (*Yfirvöld í hverju landi fyrir sig, Norrænar skrifstofur sem hafa umsjón með umhverfismerkingum*)
- 6) Greina skal og hafa umsjón með breytingum sem til koma vegna endurskoðunar á reglugerð varðandi umhverfismerki Evrópu-

- sambandsins (*Yfirvöld í hverju landi fyrir sig, Norræn nefnd um umhverfismerkingu og skrifstofur í hverju landi fyrir sig*)
- 7) Íhuga skal áhrif virkari samhæfingar hvað varðar markaðsstöðu, kraft, kosti þess og galla að tengjast yfirvöldum, framtíðarhlutverk umhverfismerkinga og ekki síst fjárveitingar (*Yfirvöld í hverju landi fyrir sig*)
  - 8) Útfæra og ræða skal hugtakið samhæfingu, tilgang þess og þá aðila sem ættu að njóta góðs af því (*Yfirvöld í hverju landi fyrir sig, Norræn nefnd um umhverfismerkingu*)
  - 9) Viðhalda skal núverandi fjárhagsstuðningi við Norræna svanninn hjá samtökum sem sjá um umhverfismerkingar í hverju landi (*Fjárveitingaraðili í hverju landi fyrir sig, Norræna ráðherranefndin*)
  - 10) Fylgja skal vandlega eftir þróun sambærismerkinga og íhuga skal þróun kerfisbundnara langtímaskipulags (*Norræn nefnd um umhverfismerkingu*)
  - 11) Nýta skal betur hugsanlega samvirkni ásamt öðrum upplýsingakerfum með aukinni samvinnu, svo sem vinnufundum, samráði og samstarfsverkefnum í samvinnu við önnur merkinga-, upplýsinga- og vottunarkerfi (*NMRIPP, Norræn nefnd um umhverfismerkingu og skrifstofur sem hafa umsjón með umhverfismerkingum*).
  - 12) Halda skal áfram jákvæðu starfi hvað varðar norrænt upplýsinga- og markaðsskipulag og leggja skal áherslu á samstarfsverkefni í samvinnu við fyrirtæki, hið opinbera og önnur merkingakerfi (*Norræn nefnd um umhverfismerkingu og samtök sem sjá um umhverfismerkingar í hverju landi fyrir sig*).
  - 13) Auka skal heildarstuðning við umhverfismerkingar með því að taka mið af umhverfis-, neytenda- og vörustefnu innan ramma samþættrar vörustefnu (*NMRIPP, yfirvöld í hverju landi fyrir sig*) og auka skal kerfisbundna samvinnu hvað varðar umhverfisvæn opinber innkaup og önnur stjórnþæki (*Norræn nefnd um umhverfismerkingu*).
  - 14) Þróa skal skipulagða miðlun Evrópublómsins á Norðurlöndunum (samtök sem sjá um umhverfismerkingar í hverju landi fyrir sig, fjárveitingaraðili).
  - 15) Þróa skal sameiginlegt miðlunarsnið varðandi þá þætti Svansins sem snúa að loftslagsmálum fyrir almenning, fyrirtæki og viðeigandi yfirvöld (*Norræn nefnd um umhverfismerkingu ásamt öðrum samtökum sem miðla upplýsingum um loftslagsmálefni*)
  - 16) Setja skal saman sérstakan vinnuhóp sem mun greina þörfina á nánari reglum hvað varðar notkun meirihlutareglunnar (*Norræn nefnd um umhverfismerkingu, Norræna ráðherranefndin*)

Appendices

Annex 1. The assignment for the evaluation of the Nordic Swan by the Nordic Council of Ministers

PM

norden

Nordiska ministerrådet

Till

AU

Kopia

NMN/Björn-Erik Lönn, NMRIPP/Isa-Maria Bergman

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13 juni 2007

Uppdrag till utvärdering av Svanen

Bakgrund

Beslut om upprättande av miljömärket Svanen togs i november 1989 av de nordiska konsumentministrarna från Finland, Island, Norge och Sverige. Behovet av ett offentligt, trovärdigt miljömärke var stort i en tid med växande fokus på miljöfrågor från konsumenter, producenter och importörer. Olika miljömärken florerade fritt och det fanns ett behov av ett gemensamt marknadsinstrument. Danmark trädde in i Svanen 1997. Idag har ett ökat fokus på grön upphandling samt på certifierade miljöledningssystem medfört att miljömärkning fått en större roll också på andra områden än konsumentvaror. Svanen är en frivillig miljömärkning med ett gemensamt varumärke. Svanen är ett konsument- och miljöpolitiskt verktyg vars syfte är att å ena sidan ge konsumenten klar och tydlig miljöinformation om produkter (varor och tjänster) och å andra sidan stimulera produktutveckling som tar hänsyn till miljön. Produkterna skall också vara av god kvalitet och vara trygga med avseende på hälsofrågor.

Svanen skall vara respekterat och trovärdigt genom en objektiv värdering av produkters miljöeffekter, enklaste vägen till miljöriktig information och vara Nordens mest kända miljöstämpel på produkter. Svanen skall vara lönsam för företagen antingen i form av direkt ökad försäljning eller som en god miljöprofil som ger goodwill och över tiden en bättre konkurrenskraft.

Nordiska ministerrådet har fastställt arbetsordningen för Nordiska miljömärkningsnämnden (NMN) som består av de fem ordförandena för de nationella miljömärkningsnämnderna, föredragande experter och sekretariat. NMN's huvuduppgift är att besluta om val av produktgrupper och fastställa harmoniserade kriterier för Svanenmärkning samt besluta om riktlinjer för licensering. Besluten fattas enhälligt med undantag för frågor som gäller kriterier och val av produktgrupper där besluten fattas med kvalificerad majoritet.

För att kunna se om en produktgrupp är lämplig för miljömärkning har Svanen utvecklat en metod "RPS-analys" där miljömärkningens effekt blir belyst genom svar på frågorna: relevans (finns det ett miljöproblem och hur stort är det), potential (finns miljömässig förbättringsmöjlighet, dvs tillverkas produkten med olik miljöbelastning idag, eller kan belastningen minskas överlag) och styrbarhet (kan miljömärkning bidra till att lösa miljöproblemet). I tillägg till denna miljörelaterade värdering skall NMN också göra en marknadsmässig värdering av produktgruppen. Miljömärkningen

avses styra en stegvis anpassning av produkter till strängare miljökrav. Kriterierna revideras efter tre till fem år då licenserna måste förnyas.

Miljömärkningen i Norden omsätter årligen ca 60 miljoner DKK och har totalt ca 85 personer anställda. Verksamheten finansieras till ca 60 % med licensavgifter och resten med nationella bidrag. NMN's sekretariat finansieras av Nordiska ministerrådet med ca 2,3 m DKK årligen. Antalet licenser ökar och var vid årsskiftet 2006/2007 1 373 stycken omfattande över 5000 produkter. I Finland, Norge och Sverige hör Svanen till konsument- och näringssektorerna. I Danmark och på Island sorterar Svanen under miljösektorn.

Svanen har utvärderats 1994-95 och 1998-2000. Den första utvärderingen kartlade administrativa hinder för att utveckla en väl fungerande nordisk organisation, medan den andra belyste Svanen som miljö- och konsumentpolitiskt instrument (TemaNord 2001:522).

Två större frågor som den senaste utvärderingen ville gå vidare med var:
 - hur Svanen bäst kan samverka med andra miljöpolicyinstrument samt
 - hur Svanen och EU-Blomman kan koordineras och eventuellt harmoniseras.

De nordiska konsumentministrarna beslutade år 2001 att en utvärdering av den nordiska miljömärkningen borde ske under år 2006 mot bakgrund av att förordningen om EU-Blomman angav att revideringen skulle ske år 2006.

Förslaget från Europeiska gemenskapernas kommission rörande en reviderad förordning är försenad till tredje kvartalet 2007. Utvärderingen av EU-Blomman har pågått i två år och sista steget i processen avslutas i februari med en insamling av deltagande länders och intresseorganisationers svar på ett frågeformulär. Utvärderingen har givit stöd för en fortsättning av en gemensam miljömärkning i EU. Fortsatt harmonisering mellan EU:s märkningssystem och nationella system förespråkas. Önskemål finns också om bättre integrering mellan miljömärkningen och andra produktrelaterade miljöpolicyinstrument. De huvudsakliga resultaten är att Blomman har bidragit till att sätta miljömål på produkter, har påverkat efterfrågan på miljövänliga produkter och att deltagande företag använder Blomman i sin marknadsföring men man noterar också att det i allmänhet är en låg medvetenhet i EU om miljömärkningen och att användningen av Blomman är ojämnt spridd i länderna. Vidare att Blomman omfattar ett otillräckligt antal produktgrupper, att procedurer och organisation är byråkratiska, att licensavgifter och kostnader för att få använda Blomman ses som hinder hos företagen och att det saknas redovisning av nyttan av att använda Blomman i offentliga inköp.

På den internationella arenan styrs samarbetet med EU-Blomman inom EUEB, den europeiska miljömärkningsstyrelsen, genom en styrgrupp "Co-operation and Coordination" samt samarbetet med ett tjugotal märken genom Global Ecolabelling Network (GEN).

Ämbetsmannakommittén för Miljöfrågor (ÅK-M) beslutade i februari 2006 att genomföra en utvärdering av Svanen och 250 000 DKK är avsatt för detta i budgeten för 2007. NMN har föreslagit en jämförande analys av Svanen, EU-Blomman och andra miljörelaterade system från de offentliga förvaltningarnas synpunkt.

Uppdraget

Temat som föreslås är: "Svanen – miljömärkning i Norden – Blomman och

andra miljöinformationssystem i framtiden sett från de offentliga förvaltningarnas utgångspunkt. Visioner och målsättningar, förutsättningar och satsningar.”

Frågor som bör belysas är:

- Förhållandet mellan Svanen och EU-Blomman; systemens respektive ställning och roll i de nordiska länderna
- Jämförelser och förtydligande av skillnader och likheter mellan Svanen och Blomman
- Möjligheter till koordinering och harmonisering med utblick mot nya förordningen för EU-Blomman
- Grunderna för offentligt stöd av miljömärkningen
- Hur kan samarbete/samverkan ske mellan Svanen och andra miljöinformationsinstrument i Norden, t.ex. miljövarudeklarationer, andra miljöledningssystem än EMAS och ISO 14000-registreringar, produktpaneler, miljönyckeltal, livscykelanalyser, Corporate Social Responsibility, etisk miljömärkning m.fl. samt om nödvändig basinformation?
- Hur har nordiska informationsstrategier för att informera allmänheten om Svanenmärkningen fungerat?
- Hur hanteras klimataspekten i Svanensystemet?
- Vilka konsekvenser har majoritetsbesluten i NMN i kriteriefrågor och val av produktgrupper, med utgångspunkt i produktgruppen trycksaker, fått?

Dokument

- Ramkontrakt 2007 - 2009
  - Riktlinjer för nordisk miljömärkning 2001 (NMR-beslut)
  - Arbetsordning för NMN 2003 (NMR-beslut)
  - Regler och procedurer för miljömärkningsorganisationerna 2001
  - Regler för nordisk miljömärkning av produkter 2001
  - Strategi för 2005 – 2007 (revidering för 2008-2010 pågående)
  - Miljöfilosofi 2000
  - Kommunikationsplattform 2002
  - Evalueringen 1998 – 2000 (TemaNord 2001:522)
  - Svanens roll i förhållande till andra miljöinformationssystem och miljöledning (TemaNord 2002:517)
  - Rätt beslut vid rätt tidpunkt med högsta kompetens. Förslag till omorganisering av nordisk miljömärkning – Svanen. Från arbetsgrupp under ÅK-Konsument för utredning av Svanens beslutstruktur. September 2002 (Sven Thiberg)
  - Miljökommunikation för konsumenter – En nordisk handbok. Nordiska ministerrådet (ANP 2005:721)
  - Evalueringen av EU-Blomman
- http://ec.europa.eu/environment/ecolabel/consultation_en.htm

Tidsplan

Utvärderingen skall vara klar för redovisning i ett första utkast till AU's möte 12 december 2007 och i slutrapport den 31 januari 2008.

Budget

Avsatta medel i miljöbudgeten för 2007: 250 000 DKK

Genomförande

Utvärderingen skall genomföras av en konsult i samråd med miljö- och konsumentsektorn.

Styrgrupp: representanter för nordiska miljöarbetsgruppen för Integrerad Produktpolitik (NMRIPP) och NMRS.

Referensgrupp: nationella experter på Blomman och Svanen

Utvärderingen skall publiceras i NMR serie TemaNord.

Annex 2: List of contacted persons

Nordic Ecolabelling Board/ National Ecolabelling Boards

Ari Ekroos, FI
Bjørn-Erik Lönn, NO
Eva Smith, SE
Guro Fjellanger, NO
Helgi Jensson, IS
Nina Schiøtz, DK
Søren Mørch Andersen, DK

National Secretariats

Alvhild Hedstein, Stiftelsen Miljømerking, NO
Jesper Gruvmark, Miljømærkning Danmark, DK
Kerstin Sahlén, SIS Miljömärkning, SE
Leena Nyqvist-Kuusola, SFS Ecolabelling, FI
Lisbeth Engel Hansen, Miljømærkning Danmark, DK
Marianne Eskeland, Stiftelsen Miljømerking, NO
Ragnar Unge, SIS Miljömärkning, SE
Sinikka Karpelin, SFS Ecolabelling, FI

License holders/non-license holders

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Bjørn Rummelhoff, Scandic Norway, NO
Hans Johansson, The Swedish Graphic Companies' Federation, SE
Islandic license holders' views obtained from a survey by Birna Helgadóttir, Alta Consultants, IS
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Jari Korkalainen, Rautavaaran Metsäkartano, FI
Kerstin Lindvall, ICA, SE
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Magne Urrang, Norsk Medical, NO
Magnus Bodin, Alcro Beckers, SE
Marja Tuderman, UPM, FI
Niclas Ahlbom, Tradeka/Valintatalo, FI
Per Kjærsgaard, Dalum Papir, DK
Sami Lundgren, UPM, FI
Tina Sternest, Confederation of Danish Industries, DK

Environmental and consumer experts and authorities

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Birna Helgadóttir, Alta Consultants, IS
Bjørn-Erik Thon, Forbrukerombudet, NO
Elin Eriksson, IVL, SE
Karin Thorán, Kemikalieinspektionen, SE
Lars G. Lindfors, IVL, SE
Lars Haltbrekken, Norges naturvernforbund, NO
Riitta Jalkanen, National Consumer Agency, FI
Taina Nikula, Ministry of Environment, FI
Ylva Reinhard, Naturvårdsverket, SE

EU and other ecolabelling organisation

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Martin Büchele, European Commission, EU

Pavel Misiga, European Commission, EU

Partial interviews / information providers

Ann Charlotte Mähler, DNEX, SE

Antonia Simon-Stenberg, ColPalm, SE

Bengt Larsson, V-Tab, SE

Erica Permeklev, Husqvarna, SE

Ernst Leitnert, G&L Werbe und Verlags GmbH, AT

Hans Lindström, Stora Enso/Nymölla, SE

Karin Bergbom, SFS Ecolabelling, FI

Mats Karlsson, OP-kuvert, SE

Siv Olars, Svenska Fönster, SE

Timo Kantokorpi, Lönnberg Promo, FI

Tomas Kåberger, Sweden Energy Agency, SE

Ulrika Flodberg, IIH, SE

Annex 3: Main documents defining principles and guidelines of the Nordic Swan and the EU Eco-label

Nordic Swan guiding documents	Main principles established
Nordic Council of Ministers: Decision on goals and principles for Nordic ecolabelling (2001, amended 2003)	- Swan as voluntary, positive labelling scheme; role of Swan as consumer policy instrument and in Nordic IPP - Harmonised Nordic criteria - National management by private organisations - Openness of the process for interested parties - Label applied on application; mutual recognition among Nordic countries - Role and Rules of Procedure of the Nordic Ecolabelling Board (e.g., tasks, composition, decision procedures)
Nordic Ecolabelling Board: Miljöfilosofi 2001	- Defines sustainable development as vision; operationalises via system conditions - Identifies particular role of voluntary labelling: higher requirements than legislation; continual increase in stringency of criteria; balance between credibility, criteria level and number of licenses; dealing with conflicts when revising criteria; need for marketing; simplification of complex information for consumers - Environmental problems, environmental goals and labelling criteria - Prioritisation of environmental issues via RPS system: identifying products via which the label can have a significant environmental impact - Identifies sustainable vision, life cycle thinking, RPS, diverse studies, precautionary principle, market forces; expert groups and credibility and transparency as tools for ecolabelling - Guidelines for evaluating environmental impacts of ecolabelling
Nordic Ecolabelling Board: Strategies (1999–2001; 2002–2004; 2005–2007)	'specification of RPS system' 'niche for environmental work', e.g. relations to social and other issues 'what can be labelled', definition of product group 'strategy for co-operation with EU Eco-label' 'strategy for co-operation with other labelling systems' 'guidelines for market analysis' 'guidelines for target groups, marketing and communications'
Nordic Ecolabelling Board: Regulations for Nordic Ecolabelling of Products	- Governs relations between ecolabelling bodies and license-holders - e.g., application process; terms of validity of the license to use the label; control and monitoring; termination and revocation; dispute resolution; fees and costs

EU Eco-label guiding documents	
Regulation (2000)	▪ Voluntary, positive & selective scheme to provide consumers with accurate, non-deceptive but simple environmental information ▪ Involvement of engos and consumer organisations ▪ Mainly self-financing as an aim, avoid further costs for member states ▪ Include products with an interest for the internal market and environment ▪ Consistency with international standards, transparency ▪ Co-ordination with community environmental policy & quality certification schemes ▪ National ecolabelling schemes may exist but co-ordination should be increased ▪ Inclusion of services; inclusion of professional purchasers as 'consumers' ▪ Principles for product group selection ▪ Principles for defining environmental requirements ▪ Principles for selectivity of criteria and period of validity ▪ Need to establish in the working plan ▪ Principles for setting ecolabelling criteria ▪ Principles for awarding the label, verification and terms of use of the label ▪ Role of commission and member states in promoting the label ▪ Costs and fees ▪ Roles and responsibilities of the EUEB, consultative committee and competent bodies
Commission Decision on EUEB	▪ composition and funding of the EUEB ▪ rules for ad hoc working groups (e.g., participation of non-European interested parties) ▪ aim for consensus
Work Plan 2005–2007	▪ strategy for revision of the Eco-Label Regulation ▪ strategy for product group development ▪ strategy for market penetration, visibility and consumer awareness ▪ strategy for environmental benefits via green public procurement ▪ promoting synergies with EMAS ▪ co-operation with other ecolabelling schemes: co-ordination of product group development, joint promotion of ecolabels ▪ Joint actions to promote the ecolabel, increase stakeholder awareness, public purchaser awareness, support SMEs and distributors ▪ planned financing of the scheme, need to analyse whether budget needs to be increased ▪ reiterates that long-term objective should be to achieve self-financing of the Scheme, but feasible short term objectives needed

Annex 4: The Nordic Swan and the EU Eco-label as presented to the public on the websites of the Nordic ecolabelling secretariats: examples

The websites of the national secretariats present an official position, which does not stress the differences between the systems. The presentations are fairly similar on the websites of all Nordic countries. Both labels are acknowledged as official ecolabelling systems in the Nordic countries. For example, the Swedish ecolabelling secretariat presents the two labelling systems as follows:

“Just as the Nordic countries have joined together to produce an official ecolabelling system (the Swan), the EU has agreed on a common European ecolabel. The EU Flower works in more or less the same way as the Swan. Manufacturers must use samples and documentation to prove that their products meet the criteria with regard to the environment, health and performance. These requirements have been set by national organisations within the EU’s member countries, under the supervision of the European Commission.” (www.ecolabel.se)

In contrast to the other Nordic countries, the Danish ecolabelling website presents the systems together, whereas the other countries have separate sites for the two ecolabelling systems. (www.ecolabel.dk).

On the Norwegian website, ecolabelled products bearing the Swan and the Flower are also both presented on the same page (www.ecolabel.no). This allows users to search for ecolabelled products in general, irrespective of the type of label.

The website of the Finnish ecolabelling secretariat stresses that the differences between the systems are mainly geographical: the Nordic Swan aims to take into account the specific features of the Nordic environment (e.g., climate). The Finnish ecolabelling website argues that there is no significant difference in the stringency of requirements, but states that there are differences in the criteria. It also states that the Nordic Swan system tries to avoid developing criteria for product groups that are already included in the EU Eco-label system (www.ymparistomerkki.fi). Nonetheless, the website points out that there are more criteria available currently in the Nordic Swan system, and concludes by stating that according to an interview of Finnish license holders of the Nordic Swan, they were very satisfied with the Nordic Swan label and felt they had gained marketing advantages from it (www.ecolabel.fi 4.9.07).

Annex 5: Product groups and number of licences of the Nordic Swan and EU Eco-label systems in the Nordic Countries in October 2007

Swan label (Nordic ecolabel websites)	Licences/ license- holders	EU Eco-label (EU Eco-label websites)	Licences
Cleaning products for household use	506	Cleaning products for household use	12
Detergents (for floors, walls, sanitary, etc.)	241	All purpose cleaners and cleaners for sanitary facilities	5
Dishwasher detergents	45	Detergents for dishwashers	3
Floor care products	66	–	
Hand dishwashing detergents	31	Hand dishwashing detergents	3
Laundry detergents and stain removers	123	Laundry detergents	1
Cleaning products for industrial and professional use	30	Cleaning products for industrial and professional use	No criteria
Cleaning agents for use in the food industry	5	–	
Dishwasher detergents for professional use	17	–	
Industrial cleaning and degreasing agents	2	–	
Laundry detergents for professional use	6	–	
Personal hygiene, cosmetics	141	Personal hygiene, cosmetics	0
Cosmetic products	48	–	
Sanitary products	21	–	
Shampoo, body shampoo and soaps	72	Soaps and shampoos	0
Appliances, machines etc.	42	Appliances, machines etc.	0
Audiovisual equipment	3	–	
Computers, personal (including portable computers)	4	- Personal computers	0
		- Portable computers	0
Copiers, printers, fax machines and multifunctional devices	8	–	
Dishwashers	1	Dishwashers	0
Small heat pumps	3	Heat pumps	0
Refrigerators and freezers	0	Refrigerators and freezers	0
Washing machines	4	Washing machines	0
Working machines for parks and gardens	19	–	
–		Televisions	0
Paper products and printing companies	374	Paper products and printing companies	3
Coffee filters	12	–	
Copy and printing papers	27	Copying and graphic paper	2
Grease proof paper	13	–	
Paper envelopes	12	–	
Tissue paper	48	Tissue paper	1
Printing companies	262	–	

Swan label (Nordic ecolabel websites)	Licences/ license- holders	EU Eco-label (EU Eco-label websites)	Licences
Products for housing and garden	189	Products for housing and garden	15
Closed fireplaces	12	–	
Closed toilet systems	7	–	
Composters	12	–	
Durable wood	1	–	
Floor coverings	20	Hard and soft floor coverings	0
Furniture and fitments	36	–	
Indoor paints and varnishes	9	Indoor paints and varnishes	11
Light sources	0	Light bulbs	1
Microfiber clothes	4	–	
Primary batteries	23	–	
Oilburners and oilburner/boiler combinations	8	–	
Panels for the building	17	–	
Pellets	3	–	
Rechargeable batteries and battery charges	5	–	
Small houses	23	–	
Solid biofuel boilers	6	–	
Windows and Exterior doors	3	–	
–		Bed mattress	2
–		Growing media	0
–		Soil improvers	1
Car related products	57	Car related products	No criteria
Acceleration Advisors	0	–	
Car and boat care products	37	–	
Vehicle Tyres	1	–	
Vehicle wash installations	19	–	
Services	461	Services	15
Alternative dry-cleaning	1	–	
Cleaning services	11	–	
Hand towel roll services	1	–	
Hotels and youth hostels	136	Tourist accommodation service	9
Laundry service	7	–	
Photographic development services	21	–	
Restaurants	6	–	
Supermarket / Grocery Store	278	–	
–		Camp Site service	6

Swan label (Nordic ecolabel websites)	Licences/ license- holders	EU Eco-label (EU Eco-label websites)	Licences
Miscellaneous products	43	Miscellaneous products	43
Adhesives	2	–	
Compressors	2	–	
De-icers	4	–	
Lubricants	1	Lubricants	1
Outdoor furniture	4	–	
Printed wiring boards	1	–	
Textiles, skins and leather	18	Textile products	42
Toys	0	–	
Toner cartridges	5	–	
Writing Instruments	6	–	
–		Footwear	0
Total licence holders	1845		
Total licences (66 criteria)	1429	Total (25 criteria)	88

Annex 6: Swan criteria (1999 / 2007) and EU Eco-label criteria (2007)

Product groups marked **R** were identified as environmentally relevant (no **R** = not relevant) by ÅF-IPK (2000) (Evaluation of...2001). All the product groups were not evaluated by ÅF-IPK.

Swan criteria January 2000	Swan criteria October 2007	EU Eco-label criteria October 2007
Cleaning products for household use		
- All purpose Cleaners	Detergents (for floors, walls, sanitary, etc.)	All purpose cleaners and cleaners for sanitary facilities
- Sanitary Cleaners		
Dishwasher detergents	Dishwasher detergents	Detergents for dishwashers-
Floor care products	Floor care products	
Hand dishwashing detergents-	Hand dishwashing detergents-	Hand dishwashing detergents-
Laundry detergents R	Laundry detergents and stain removers	Laundry detergents-
Cleaning products for professional use		
	Cleaning agents for use in the food industry	
	Dishwasher detergents for professional use	
Industrial cleaning and degreasing agents	Industrial cleaning and degreasing agents	
	Laundry detergents for professional use	
Personal hygiene, cosmetics (most of the group: R)		
	Cosmetic products	
- Sanitary towels		
- Diapers, reusable		
- Diapers, disposable	Sanitary products (including over 10 products)	
- Incontinence care products		
Shampoos and soaps	Shampoo, body shampoo and soaps	Soaps and shampoos
Appliances, machines etc. (most of the group: R)		
Audiovisual equipment	Audiovisual equipment	
Computers, personal	Computers, personal	Personal computers Portable computers-
Copiers	Copiers, printers, fax machines and multifunctional devices	
Dishwashers	Dishwashers	Dishwashers-
Small heat pumps	Small heat pumps	Heat pumps
Refrigerators and freezers	Refrigerators and freezers	Refrigerators and freezers
Washing machines	Washing machines	Washing machines
Lawn movers (no R)	Working machines for parks and gardens	
		Televisions

Swan criteria January 2000	Swan criteria October 2007	EU Eco-label criteria October 2007
Paper products and printing companies (most of the group: <u>R</u>)		
Coffee filters (no <u>R</u>)	Coffee filters	
Printing papers	Copy and printing papers	Copying and graphic paper
Grease proof paper (no <u>R</u>)	Grease proof paper	
Packaging papers		
Paper envelopes	Paper envelopes	
Tissue paper	Tissue paper	Tissue paper
	Printing companies	
Printed matter		
Products for housing and garden (most of the group: <u>R</u>)		
	Closed fireplaces	
Closed toilet systems	Closed toilet systems	
Composters	Composters	
	Durable wood	
Floor coverings	Floor coverings	Hard and soft floor coverings
Furniture and fitments	Furniture and fitments	
	Indoor paints and varnishes	Indoor paints and varnishes
Light sources	Light sources	Light bulbs
	Micro fiber clothes	
Primary batteries	Primary batteries	
- Oilburners	Oilburners and oilburner/boiler	
- Oilburner/boiler combinations	combinations	
Panels for the building	Panels for the building	
	Pellets	
Rechargeable batteries and battery charges	Rechargeable batteries and battery charges	
	Small houses	
	Solid biofuel boilers	
Windows and Exterior doors	Windows and Exterior doors	
Wallpapers		Bed mattress
		Growing media
		Soil improvers
Car related products		
Boat engines	Acceleration Advisors	
Car care products	Car and boat care products	
	Vehicle Tyres	
	Vehicle wash installations	

Swan criteria January 2000	Swan criteria October 2007	EU Eco-label criteria October 2007
Services		
	Alternative dry-cleaning	
	Cleaning services	
Hand towel roll services	Hand towel roll services	
Hotels	Hotels and youth hostels	Tourist accommodation service
	Laundry service	
	Photographic development services	
	Restaurants	
	Supermarket / Grocery Store	
		Camp Site service
Miscellaneous products		
Adhesives	Adhesives	
	Compressors	
De-icers	De-icers	
Lubricants	Lubricants	Lubricants
Wooden furniture	Outdoor furniture	
	Printed wiring boards	
Textiles R	Textiles, skins and leather	Textile products
	Toys	
Toner cartridges	Toner cartridges	
Writing Instruments (no R)	Writing Instruments	
Correction fluids		Footwear
Total 53 criteria	Total 67 criteria	Total 26 criteria

Annex 7: Comparisons of Swan and EU Eco-label criteria

Table 9 Environmental criteria of Dishwashers in Swan and in EU Eco-label

Dishwashers	14 March 2007 – 30 June 2009	28 August 2001 - 28 Febr. 2009
First criteria starting	1991	1993
Environmental requirements		
Energy efficiency	Energy label class A, Energy index < 0,64	Energy index < 0,58
Water consumption	max 1,2 l /place setting	max 1,4 l /place setting
Dishwasher detergent /Prevention of excessive use of detergent	shall have clear volumetric markings on the detergent dispenser allowing the user to adjust the detergent quantity used according to the type and amount of load and its degree of soil.	shall have clear zoometric markings on the detergent dispenser allowing the user to adjust the detergent quantity used according to the type and amount of load and its degree of soil.
Noise	< 48 dB(A)	< 50 dB(A)
Marking plastic parts	..weighing more than 25 grams with marking specifying the material (ISO 11 469)	..weighing more than 50 grams with marking identifying the material (ISO 11 469)
Heavy metals	Substances based on cadmium, lead mercury or their compounds may not be added	No requirements
Flame retardants	Restrictions by Risk phrases, according to Eu chemical legislation	List of 12 specific forbidden substances
Recycling	at least 75% by weight can be re used or recycled (WEEE Directive)	Manufacturer shall offer the take-back free of charge, for recycling of the dishwasher and compounds...
Warranty & Spare parts/ Life time extension	Must provide a warranty that the dishwasher will work without fault at least two years. Spare parts shall be available for 10 years.	Guarantee for at least two years, and replacement parts shall be available for 12 years.
Requirements for efficiency and performance		
Cleaning performance	Must fulfil the requirements of cleaning performance class A on energy label (1.12) (EN 50242)	index more than 1.00, cleaning performance class A or B on energy label (EN 50242)
Drying performance	Must fulfil the requirements of drying performance class A on energy label (1.08) (EN 50242)	index more than 0.93, drying performance class A or B on energy label (EN 50242)
Other requirements		
Safety, the working environment and the external environment	Must follow the legislation in force in each country	...shall allow the user to select a program ... that work best at temperatures lower than 65 °C
Instructions	Many details about instruction of the correct use with regard to environmental impact and recommendations for the optimum use of energy, water and dish washer detergents.	Many details how to provide advice on the correct environmental use and for optimal use of energy, water and additives (detergent, salt, etc.) in the operation of the appliance.
Quality and regulatory requirements		
	...to ensure that the Swan requirements are fulfilled, the specified procedures must be implemented.	the applicant shall declare the compliance of the product with these requirements.

Table 10 Environmental criteria of Tissue paper in Swan and in EU Eco-label

Tissue paper	23 March 2006 – 31 March 2010	4 May 2001 – 4 May 2008
First criteria starting	2000	2001
Environmental requirements		
Fibers	Wood from sustainable managed forests or recycled fibers.	Wood from sustainable managed forests, recycled fibers or non-wood fibers
Harmful substances, etc. chemicals, not allowed	- bleeding of dyes or optical brighteners - slime control agents and antimicrobial substances - Perfumes, additives for body care functions (e.g. lotions)	- chlorine (for bleaching or wet-strength aids) - derivatives of alkyl phenol - curtain azo-substances - bleeding of dyes or optical brighteners - growth retardance of micro-organisms
Harmful substances, restrictions (products of recycled fibers)	Chloro-organic substances, formaldehyde, glyoxal, PCB	formaldehyde, glyoxal, PCB
Emissions into air and water	AOX, Carbon dioxide COD, Sulphur, Phosphorus, NO _x & Their total emissions,	AOX, COD Sulphur oxides, Carbon dioxide & combined emissions
Solid waste		Implementation of waste management systems: separation and use of recyclable material, recovering of materials for other uses, handling of hazardous waste
Use of energy	The requirements encompass limitations on the use of energy in the form of fuel and electricity. An energy score is calculated on the basis of the reference values produced with the aid of a technical description of production of pulps and paper and the manufacturer's information on total energy consumption used in production per tonne of pulp/paper.	< 11 Gjoule (30000 kWh) per tonne of paper produced
Product function	Requirements for absorptivity of kitchen towels and paper towels, and strength /perforation of kitchen towels. (Standardised tests) The toilet paper must not have wet strength.	Shall provide evidence to demonstrate that the product is fit for use. Details of tests required.
Packaging and consumer information	Must not be made of chlorine-based plastics and material must be usable for material recycling.	Minimum percentage of recycled fibres. Product packaging shall bear information on environmental benefits of the eco-label.

Table 11 Environmental criteria of Hotels in Swan and in EU Eco-label

	Hotels and youth hostels	Tourist accommodation service
	14 June 2007 – 30 June 2012	14 April 2003 – 30 April 2008
First criteria starting	1999	2003
The product group definition	A hotel offers guests rooms with beds including bed-linen, towels, shower/bath facilities, cleaning and breakfast. A youth hostel offers guests beds and access to toilets and shower/bath facilities included in the basic price.	Tourist accommodation service shall comprise the provision of sheltered overnight in appropriately equipped rooms, including at least a bed.
Environmental requirements		
Limit values	The limit value of energy and one further the limit value (water, chemical products or waste management) must be fulfilled. The limit values refers to consumption per year and the number of guest-nights per year.	
Mandatory requirements	Operation and maintenance (3 items) Hotel premises and purchased products (47 items) Guest rooms (1 items) Kitchen and dining room (4 items) Cleaning and laundry (5 items) Waste (3 items) Environmental procedures (10 items) Extra requirements for hotels with garden/ conference facilities (2/1 items)	Energy: (10 items), e.g. at least 22% of the energy shall be from renewable energy resources. Water: (10 items), e.g. the water flow of the taps and showers shall not exceed 12 litres/minute. Detergents and disinfectants: (2 items) Waste: (5 items), referring to waste separation and prohibition of disposable products Other services and general management (together 10 items)
Point score requirements	Achieved at least 65% of total max. possible score points (85) in areas of: - Operations and maintenance (11 items, at least 60% of 25 points) - Hotel premises and purchased products (17 items) - Guest rooms (11 items) - Kitchen and dining room (8 items) - Cleaning and laundry (11 items) - Waste (6 items) - Transport (3 items) Extra requirements for hotels with - restaurants (8 items, max. 7.5 p.) - conference facilities (6 items, max. 6 p.) - pool facilities (4 items, max. 4 p.)	The number of criteria complied with must correspond to a total of 16,5 points in areas of: - Energy (17 items) - Water (17 items) - Dangerous chemicals (5 items) - Waste (5 items) - Other services (8 items) - General management (5 items)

Annex 8: The Printed Matter/Printing Company criteria evolution

The shift in the product group definition from “printed matter” to “printing companies” has a long history in the Nordic system. In this document, we do not claim to give every detail of the development. It should rather be seen as an overview of how the issue has been discussed, what arguments have been voiced and what decisions have been taken. We have followed the specific case and related discussions in the minutes from meetings of the Nordic Ecolabelling Board (NEB) and other documentation on the NEB intranet “Livelihood” from late 1999 until December 2007. We will present a conclusion of our observations at the end of the annex.

Second and third generation printed matter criteria

The product group shift was proposed in a review of the expiring first generation criteria document for Printed matter in 2000–2001. The evaluation report (8 Feb. 2000, 9 p) mentioned the opportunity and the idea was tested in a license holder survey. Of the respondents, a majority in the Nordic countries expressed positive views on service-based criteria while an almost equal share was indifferent. Some of the negative responses pointed out that their companies already had EMSs in place.

The views of the national boards differed, however, before the NEB meeting in *March 23, 2000*: Sweden had a positive view and proposed a short assessment of potential problems involved in the change while Finland was hesitant. Denmark requested that the product focus should be maintained and asked for early information about potential changes in a separate document. General scepticism was voiced over demands on the environmental performance of the enterprises in relation to their products. Such demands could be expected to lead to discussions on the interface between eco-labelling and environmental management.

A PM (May 19, 2000, 3p) gave further arguments for a change in definition from product group to printing companies:

- There could be a risk of reduced environmental benefits when a smaller amount of eco-labelled products are produced despite an increasing number of issued licenses
- The printing companies may not market eco-labelled printed matter when they market themselves as having the license. Thus, the customer can easily believe that the license implies that whole production is Swan-labelled and will not demand for eco-labelled products.

A new product group definition could, on the other hand, hinder false marketing and increase the use of the Swan. Nevertheless, the secretariat leaders decided to maintain the product group definition as “printed matter”.

The NEB took a decision of principle on *June 16, 2000* that the product focus should remain and the criteria review should continue for a finalisation of the second generation criteria. The revised criteria document was approved by the NEB on *March 21, 2001*, to be valid until March 2005.

Fourth generation criteria – from printed matter to printing companies

About a year later, a situation analysis for printed matter by SMG Consulting (Jan. 2002, 22p) was presented to the NEB on *March 14–15, 2002*. It was decided that a PM should be presented at the next meeting on June 11, 2002. A PM (May 7, 2002 3p) as a summary of the presented analysis.

The PM was commissioned by the NEB with the aim of building knowledge on the conditions of the sector and opinions for future development of the criteria. The report suggested three future paths: 1. to continue as so far, 2. to establish a service strategy, 3. to niche the concept ‘Golden Swan’ and to conclude that alternative 1 would be the most realistic, though there could be also combinations of for instance alternative 2 and the (at that time) emerging EMSs. The board decided to take the report for information and circulate it among the national bodies for comments.

The evaluation of the second generation printed matter criteria was presented to the NEB at a meeting on *October 9–10, 2003*. The alternatives for future development of the criteria in the evaluation report (16 Sept., 2003, 34p) were picked from the mentioned report by SMG Consulting, including the adoption of service criteria.

The report mentioned that the re-definition into license-holding “printing company” could provide a wide range of eco-labelled products but in practice just mean a small fraction for the Swan: about 1% in Denmark, 2% in Norway, 5% in Finland and 7% in Sweden. The report acknowledged that the demand may be small but the large number of licenses could, on the other hand, indicate the opposite (approx. 45% of printshops in Denmark and Sweden with more than 10 employees had licenses). An alternative explanation was that the printshops used the license in communication with their clients but the eco-label did not reach the end consumers. The situation created confusion on what actually could be or had been labelled. The report concluded that the Swan should be based on printed matter both to increase public awareness of the logo and to send the right message to the end consumers. The authors of the report referred to the decision of principle from the 2000–2001 review of the criteria, according to which the criteria should maintain the product focus, and reproduced the former justifications. A possible alternative solution could, according to the authors, be a “semi-service” approach, like the one used for photographic development services.

The ‘front page’ introducing the case was more explicitly in favour of gearing the criteria towards the printing process and developing the product group to make it possible to ecolabel printing companies. In the suggested time frame the new criteria could be ready for approval in March 2005, which also provided the opportunity to prepare them in parallel with ongoing criteria development in the European system for printed matter. A two-year extension of the second generation criteria to 2007 was therefore proposed to allow a sufficient phase-over period for the new criteria.

The NEB accepted the evaluation report, assigned the secretariats to conduct the revision according to the proposed schedule and set an extension of the old criteria until March 14, 2007.

The product group was on the NEB agenda again on *March 15–16, 2005* under the heading “Proposal for revised criteria for printed matter”. The proposed new criteria set, Swan labelling of printing companies, was introduced to the board before it was sent for public review during April 8–June 8, 2005.

In the minutes from the NEB meeting of *June 10, 2005* it is mentioned under the heading “Revision of criteria for printing companies/printed matter” that the Danish eco-labelling board had [after the previous NEB meeting] discussed the proposed criteria document sent for review and in particular the change of product group from a clear product focus to a somewhat more service- or production-oriented set of criteria. The Danish board decided to ask the other national boards to take up the same discussion before the criteria would later be dealt with by the NEB. No further background documentation was provided since discussion of the issue was not announced beforehand.

When the criteria document came up for approval by the NEB on *December 14, 2005* it was entitled “Criteria for Printing Companies”. It was stated on the front page that the responses from the public review process indicated that the criteria change to a service focus was welcomed as satisfactory. In Denmark there was, however, explicit resistance in principle against eco-labelling of printing companies, while the other countries held more positive views.

The “Nordic compilation of the public review in printing companies 2005” basically confirmed this perception. 56 out of 105 responses rejected the proposal. 52 of the 56 opposing answers came from Danish reviewers. More than half of the responses came from Denmark. The picture had changed completely since the survey in the evaluation report from 2000, when the Danish printing companies represented the largest share in favour of a change to service criteria.

Reviewer [number of]	Supported proposal	Supported changes	Would not reply	Rejected proposal	Total	Reply rate [%]
Finland, 94	4	4	3	0	11	12
Denmark, 334	4	0	6	52	62	19
Norway, 107	6	5	9	2	22	21
Iceland, 30	0	1	0	0	1	3
Sweden, 601	3	2	2	2	9	1
Total, 1166	17	12	20	56	105	9

The massive Danish resistance to the proposal could largely be related to a joint answer by 35 reviewers opposing the change to service criteria. Moreover, international competition was seen as a barrier as the perceived small environmental gains did not appear to make up for the administrative burden. These reviewers and several others pointed out the low environmental significance. The Danish EPA opposed the proposal because it did not include discussion on the reasons for the change to service criteria.

The minutes from the related meeting give some background details: The Danish board had opposed the idea that the issue was to be dealt with at that particular meeting, with the objective that a decision would not be taken in opposition to a Danish vote. All other national boards had approved the proposal before the Danish meeting.

The meeting found that neither alternative views on the service concept nor the fact that one country's entire sector opposed the proposal could be seen as justified in principle and would thus require a consensus decision in the NEB. The proposal did not discriminate or support producers in favour of one country over the others. Next, the meeting went through the Danish objections one by one. The co-ordinator of the criteria development process verbally provided answers to the claims of the Danish board. The meeting didn't find that the criteria document needed to be revised in any aspect due to the Danish objections.

The NEB decided after voting against the Danish vote to approve the revised criteria for the eco-labelling of printing companies.

This decision did not bring the case to an end. In the following NEB meeting on *March 23, 2006* the Danish chairperson initiated a discussion on principles for the decision-making process in the light of the approval of the printing companies criteria. This was based on discussions in Denmark that followed the decision and the background of the other countries not taking the strong Danish position into consideration. The aim of the discussion was to find opportunities to build more positive attitudes in Denmark and to set a framework for the use of majority decisions at NEB meetings.

The minutes state that the meeting took part with the Danish views and that the decision-making process was discussed. In addition, the meeting decided to prepare a PM describing the situations where majority decisions could be used as background for further discussions.

The requested PM (June 7, 2006., 8pp) was distributed before the NEB meeting on *September 28, 2006*. The material was meant to be discussed in the national bodies, but both the Norwegian and the Finnish chairpersons declared that they were satisfied with the current rules and means for dealing with decisions. The meeting postponed any decisions on the issue to a next meeting. Before the meeting took place it was however concluded that no preceding national discussions has been held on the topic. Despite the lack of national talks the issue was to be brought up in an NEB meeting on *December 7, 2006*. In the minutes of the meeting we find that all national boards approved the present procedures which make it possible to vote down one country when it comes to criteria-related issues. In addition, the chairpersons concluded certain principles: when product groups will be re-focused from products to services, it should be stated early on in the process – in the evaluation phase. When one country needs more time to gather crucial information in relation to a criteria-related issue, the decision can be postponed by three months at most before a final decision by the NEB.

In the same meeting Denmark proposed to extend the old criteria document for printed matter which had been rejected by the other countries without formal voting. It was also noted that secretariats had received about 50 license applications for the new printing company criteria.

The criteria for printed matter was extended by six weeks in an NEB meeting on *March 14, 2007* to have time to facilitate the applications for the new criteria by April 30, 2007.

After this meeting both the majority principle discussion and the printing company issue disappeared from the NEB agenda. Decisions on criteria for dialysis equipment have however later on caused some discord on the board. We were asked to briefly mirror that case in this report through a few interviews.

The background is that the Swedish Ecolabelling board managed to postpone a decision because of lacking information, which was also one of the Danish arguments for postponing the adoption of the printing company criteria.

The three NEB members we have asked about the issue have all said that the dialysis equipment criteria is a very different kind of case. In the printing company case, it was a matter of revising old criteria and most of the information was already in place, and the old version of the criteria set was about to expire. A decision was, in other words, urgent. The definition of dialysis equipment criteria could more easily be postponed as it was a new task at hand. No license holders were expected to suffer from the short delay.

Concluding remarks

From a review of the NEB meeting minutes, it is not possible to identify the specific point when the change from product to service focus was formally decided for the printing company criteria. The review shows that a kind of mandate/assignment to carry out the reform was given to the working group at the NEB meeting of October 9 – 10, 2003. When the NEB was informed about the draft criteria proposal for public review at the meeting in March 2005 the change should have been apparent to everyone. Moreover, we notice that no objections were noted in the minutes from the October meeting of that year. According to the 'Nordic compilation of the public review in printing companies 2005', the secretariats had spread information about the new criteria in wider circles through a number of meetings during the year. It seems reasonable to assume that the information was there.

The objection against eco-labelling of services is an issue sometimes referred to as a principle. We have not, however, come across similar strong protests against criteria for other service sectors, such as photographic development services, supermarkets, hotels, etc. At present, it seems that there is a general approval of the eco-labelling of both products and services.

Both the change of attitude in the Danish printing industry in the time period between the two surveys (acknowledging that there was a time span between them and the number of enterprises involved was different) and the massive opposition within the sector could be explained by new and better knowledge or by co-ordinated actions. The resistance some reviewers reported against the costly and time-consuming administration of environmental issues, while competitors are not under the same obligation, is well known and, in our minds, the easiest to understand. It can be especially frustrating if the license holders don't believe in the shared objectives.

The NEB minutes do not indicate any evidence of efforts similar to the Danish resistance in any other Nordic country, which seems strange in the context.

We conclude that it is difficult to single out the most significant arguments against the new criteria. But there is a certain momentum to them, or else there would not have been such a strong reaction around the new criteria. We finally note that the NEB appears to have settled the issue in December 2006 and agreed on keeping the existing rules.