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Reference: Request for statement 2007/70/133

Issue: The Swan Labelling of Fuel

Comments and standpoint: **Supports the proposal but with the following objections:**

Nordic Ecolabelling is developing criteria for the ecolabelling of fuel. In this context, Nordic Ecolabelling asks comments, especially, for two issues: (1) first, choosing between two alternative formulations of “criteria 7” concerning the measurement of energy consumption of biofuels, and (2) second, commenting on a particular presumption of the calculation model that is applied in a background study (Maria Grahn’s consultancy report) for the Swan labeling of fuel -report.

National Consumer Research Centre’s (NCRC) role is to study, anticipate and identify factors of change and risk in the consumer society, and to enhance the well-being of consumers. As its statement, NCRC comments on the following aspects of the ecolabelling of fuel proposal:

- In order to ensure that the Swan label for fuel provides additional value for consumers and helps them to select fuels based on environmental qualities, it is necessary that the Swan label applies *clear* and *easy-to-grasp criteria*.
 - Clearly, there is substantial equivalence between different types of biofuels and fossil fuels. The first alternative for criteria 7 builds on this idea by proposing that different types of biofuels should be compared, and measured accordingly, with different types of fossil fuels (e.g., the energy consumption of biodiesel should be compared with diesel; ethanol with petroleum, respectively). The second alternative criteria omits the idea of substantial equivalence.
 - Several psychological studies have indicated that consumers (or non-experts) tend to make judgments on new technologies and products on the basis of their previous experience and contextual associations (this form of reasoning has been called “availability heuristics”). In the case of fuels and motor vehicles, the traditional division between petroleum, diesel (and natural gas) provides an important frame of reference for consumers in their evaluation of different fuel properties.
 - The first alternative for “criteria 7” provides a clear and easy-to-grasp point of reference for the evaluation of biofuels, whereas the second alternative begs further questions, and requires further clarification.

- In order to ensure the *stability* and *robustness* of the ecolabel for fuel concept, attention has to be paid to the (management and) communication of uncertainties. Some of the following actions may prove helpful in this:
 - Transparency of information. The background models and reports should be open to all interested actors and organizations.
 - Communication of the uncertainties. As the case of Maria Grahn's consultancy reports indicates, there are uncertainties and ambiguities that are related to the definition of the environmental quality of fuels. Even though the basic idea of ecolabels is to simplify complex environmental questions and issues of decision-making, the communication of the uncertainty frames may be needed in order to strengthen the (scientific) credibility of the ecolabel concept.
 - Traceability of the products. It can be assumed that some fraction of the consumers that pay attention to the ecolabels in places like filling stations, may also want to have further information of the varieties of biofuels put under the Swan label for fuel ecolabel. Providing a product ID plus an internet-based product traceability service for ecofuels would strengthen the evidence base of the ecolabel concept.
 - Testing of the communicative validity of the ecolabel concept. The ecolabel for fuel is based on the increasingly common method of life cycle assessment. How the method and its results are understood by consumers is not a well-known issues. The communicative capacity of the ecolabel for fuel could be tested, and potentially increased, by applying some sort consumer testing (e.g., by organizing focus group discussions, in which the main principles and results of the life cycle analysis are presented and discussed by consumers).

Moreover, the social impacts of biofuels, in particular palm oil, have recently raised significant public debate. From this perspective, the proposal for criteria for biofuels may not sufficiently address the questions of consumers concerned by this debate. The minimum share of certified raw materials (20%) seems low, and requires further justification. Moreover, there is a lack of experience in how well the existing certification systems operate. Thus, the standards to be approved as indicating an acceptable certification system have not yet been identified in the criteria document. Annex 4, "Instructions for certification of biomass" provides some general guidelines. We would like to see an explicit reference to "occupational safety" among these guidelines, as the Nordic countries are well known for high levels of occupational safety and safety requirements exist also in ecolabelling criteria for other product groups. Furthermore, the national ecolabelling bodies will need further instructions on acceptable standards when the certification standards are eventually published.

In case of questions can be found in NCRC: Päivi Timonen, Eva Heiskanen, Mikko Rask, Kristiina Aalto.

Director

Eila Kilpiö

