

EGMF position paper

Comments on the ‘Empowering the consumer for the green transition’ Initiative

23 May 2022

Representing the major garden, landscaping, forestry and turf equipment manufacturers, so-called the outdoor power equipment industry, EGMF welcomes the EU initiatives aiming to encourage more sustainable consumption patterns and empower consumers. We particularly support the European Commission’s objective to incentivise them to play a more active role in the green transition by enabling informed purchase decisions.

In this context, we welcome the opportunity to provide feedback to the Commission’s legislative [proposal](#) on amending Directives [2005/29/EC](#) and [2011/83/EU](#) as regards to ‘Empowering consumers for the green transition’ through better protection against unfair practices and better information. EGMF acknowledges the need to provide consumers with environmental/sustainability information that is understandable, straightforward, and not misleading.

To guarantee that the Commission’s initiative leads to positive impacts, we would like to stress several important factors:

EU level approach

EGMF strongly supports a unified approach at the European level since outdoor power equipment is often designed for the overall EU and global markets. We stress that all measures must be based on EU standards and law, rather than individual Member States’ individual initiatives and interpretations.

Today, the proliferation of sustainability logos, labels, and marks in the different EU Member States, being voluntary or mandatory, results in more confusion for the consumer. They also damage the functioning of the EU Internal Market as they create new trade barriers. This is particularly true when national requirements impose the use of national logos and marks, while penalising the use of other symbols – a notorious example being the French Reparability Index¹.

Harmonisation and overlap avoidance

Furthermore, we would like to call the EU institutions to ensure the full harmonisation of the use of standards and application of EU legislation. In particular, we urge the careful assessment, design and implementation of the two respective directives in terms of overlapping with other legislative initiatives. Among others, this includes the Commission’s proposed revised Ecodesign for Sustainable Products Regulation (ESPR), the upcoming legislative proposal on Substantiating Green Claims using the PEF/OEF methods, and any other labelling measures.

¹ <https://www.ecologie.gouv.fr/indice-reparabilite>



Lastly, we underline that the multiplication of mandatory information, labels, and marks can be challenging, especially for smaller hand-held machines, which can be mitigated through the abovementioned considerations.

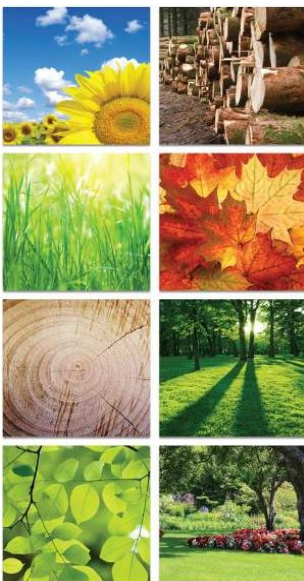
Information requirements

In addition to clear and precise information, we believe that the process of consumer empowerment through education has great potential. Focusing only on remedies, like labels, is not enough to change consumer behaviours – they need to be complemented by additional educational measures, like promoting environmental literacy and awareness-raising campaigns.

Lastly, any new information requirements should take into consideration whether it is actually useful to the consumers and correspond to their needs. Therefore, we will support labels that are logical, easily understood, and refer to transparent criteria, while punishing misleading or vague such.

EGMF would be happy to participate and further support the future work on this topic and field.

For further information, please contact: EGMF Secretariat, secretariat@egmf.org



The European Garden Machinery Industry Federation – EGMF – has been the voice of the entire garden machinery industry in Europe since 1977. With 30 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe.

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