

EUROPEAN ENVIRONMENTAL  
CITIZENS ORGANISATION  
FOR STANDARDISATION



ORGANISATION EUROPÉENNE  
ENVIRONNEMENTALE CITOYENNE  
POUR LA NORMALISATION

## **Comments by ECOS on the revised preliminary EESC draft opinion**

of the Section for Agriculture, Rural Development and the Environment on  
**“Regrowing raw materials –  
development outlook for producing materials and energy”**

*ECOS, the European Environmental Citizens' Organisation for Standardisation is an association of NGOs active in the field of environmental protection, which themselves have more than 26 Mio. individual members. It has been created in 2002 as a non-profit association under Belgian law to enhance the voice of the environment within the European standardisation system. ECOS has been supported by the European Commission and EFTA. Its secretariat is based in Brussels.*

ECOS will specifically address section 3.4.5 "**European standards**" that states so far: **“Progress must be made in adapting and improving standardisation systems to take account of new biomass materials and technologies”**.

To reach environmentally ambitious standards in the field of “Regrowing raw materials for producing materials and energy”, ECOS sees the need to distinguish two phases: (i) the production of biomass and (ii) the transformation of biomass into materials, energy or fuel.

### **(i) The production of biomass**

ECOS thinks the fast move to bio-based products can potentially improve environmental and health performances, at the condition that the regrowing raw materials are produced and harvested in a verifiably sustainable manner. ECOS agrees with EEB, WWF and Birdlife International that an accreditation system is needed to prevent potentially negative ecological effects of the production of raw materials (deforestation, decrease of soil fertility, degradation of water quality, loss of biodiversity and emissions of pollutants to the atmosphere).

Because there is still a lot of work to be done to ensure that representatives of the environmental and consumers groups have a real influence in the “classical” standardisation process (ISO, CEN), ECOS recommends to initiate standards for this 1<sup>st</sup> phase within the framework of the ISEAL Alliance platform (International Social and Environmental Accreditation and Labeling).

#### *ISEAL Alliance*

The ISEAL Alliance is an association of leading international standard-setting, certification and accreditation organisations that focus on social and environmental issues. ISEAL members have in common that the standards and accreditation programs they develop are voluntary, truly international in nature and focusing on non-product related process and

production method certification. ISEAL members are also committed to ensuring that their activities are in line with international norms and do not act as barriers to trade.

The ISEAL Alliance Code of Good Practice for Setting Social and Environmental Standards<sup>1</sup> requires that interested parties “be provided with meaningful opportunities to contribute to the elaboration of a standard” and, “that participation reflects a **balance of interests** among interested parties in the subject matter and in the geographic scope to which the standard applies.” When stakeholders have confidence in the process and its legitimacy, differences among stakeholders can co-exist without disrupting the process. While these may seem fairly straightforward requirements, applying them in practice is much more complex.

Well-known initiatives of ISEAL members:

- *Forest Stewardship Council*<sup>2</sup> (FSC): FSC is a voluntary, market driven certification and trademark system that allows customers to choose products that promote responsible management of the world's forests. FSC accredits Certification Bodies to provide a credible assurance that they are competent and independent in providing certification services according to FSC Standards. To ensure continued compliance with FSC requirements, FSC Accreditation monitors FSC accredited Certification Bodies on a regular basis.

- *International Federation of Organic Agriculture Movements*<sup>3</sup> (IFOAM): the IFOAM Basic Standards (IBS) are a keystone of the organic movement. Democratically and internationally adopted, they reflect the current state of organic production and processing methods. The IBS are structured as "standards for standards." They provide a framework for certification bodies and standard-setting organizations worldwide to develop their own more detailed certification standards which take into account specific local conditions. IFOAM accreditation is awarded to certification bodies that use certification standards in their IFOAM accredited certification program that at least meet the IFOAM Basic Standards.

ECOS would like to draw the Committee's attention to an initiative of the **IATP**<sup>4</sup> (Institute for Agriculture and Trade Policy), member of ISEAL since September 2005. IATP has been developing a **set of sustainability standards for bioindustrial crop production**. IATP wants to provide a credible and transparent structure for producers, consumers and manufacturers interested in environmentally, socially and economically sustainable production of crops and forest products for bioindustrial purposes. IATP will make the standards broadly available in the US in 2006 and encourage a third-party certification. IATP is also thinking about developing site specific guidelines to its standards for Europe.

Given this existing framework relevant to ensuring a positive ecological balance of biomass production, ECOS thinks it would be very interesting for European stakeholders to develop the standards for this 1<sup>st</sup> phase in close collaboration with ISEAL and IATP.

## **(ii) The transformation of biomass into materials, energy or fuel**

As this second phase involves the industry sector, ECOS believes it will be difficult to avoid the classical standardisation process.

However, it has to be stressed again that it is difficult to include environmental considerations into and to be environmentally progressive within the framework of the classical standardisation process for various reasons (non-exhaustive list):

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<sup>1</sup> This Code is based on internationally-recognized standard-setting procedures that have been developed by ISO (Guide 59) and the WTO (TBT Agreement, Annex 3), and adapted to be more appropriate to voluntary process and production method (PPM) standards. Downloadable at

[http://www.isealalliance.org/documents/pdf/P005\\_PD4\\_Jan06.pdf](http://www.isealalliance.org/documents/pdf/P005_PD4_Jan06.pdf)

<sup>2</sup> <http://www.fsc.org/en/>

<sup>3</sup> [http://www.ifoam.org/about\\_ifoam/standards/accreditation.html](http://www.ifoam.org/about_ifoam/standards/accreditation.html)

<sup>4</sup> [http://www.iatp.org/enviroag/projects\\_bioindustrial.cfm](http://www.iatp.org/enviroag/projects_bioindustrial.cfm)

- the process is dominated by economic considerations and stakeholders, not by those of public interest,
- environmental stakeholders (NGOs, EPAs) don't even have a vote when standards are being adopted, even if they have participated in the elaboration of the respective standard;
- even when working on the basis of EC standardisation mandates, the results delivered by CEN are not subject to a regular independent compliance check, since the Commission does not have the staff resources to do this.

Existing standards in the field:

- European Standard EN14214 Standards for biodiesel: elaboration and adoption of standards concerning minimum requirement specifications including test methods for Fatty Acid MethylEster (FAME) as fuel for diesel engines or for space heating.

- In the field of *biofuels*: European Standard EN590 Specification for diesel fuel

CEN Technical Committees (TC) in charge<sup>5</sup>:

- TC 19 / WG 21 Development of standards on bioethanol
- TC 335 Standardisation of solid biofuels derived from pure biomass fraction

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**Note:**

National/regional member organisations of ECOS:

- Bellona (Norway)
- Bond Beter Leefmilieu Vlaanderen (Belgium)
- BBU–Bund Bürgerinitiativen Umweltsch. (Germany)
- BUND (Germany)
- Clean Air Action Group (Hungary)
- Danmarks Naturfreningsforening
- Deutscher Naturschutzring
- France Nature Environment
- Inter-Environnement Wallonie (Belgium)
- Stichting Natuur en Milieu (The Netherlands)
- Svenska Naturskyddsforeningen

European member organisations:

- BirdLife International
- European Environmental Bureau
- Friends of the Earth Europe
- WWF European Policy Office

<sup>5</sup><http://www.cenorm.be/cenorm/businessdomains/technicalcommitteesworkshops/centtechnicalcommittees/centechhnicalcommittees.asp>