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ASSESSMENT OF THE ECO- LABELLING SYSTEM IN THE REPUBLIC OF MOLDOVA, IN LINE WITH THE EU REQUIREMENTS

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1. OVERVIEW OF ECO-LABELLING RELATED ASPECTS

1.1 Introduction

The progress of civilization is inconceivable without a continuous intensification and expansion of economic activities of the society. The economic system builds upon the following three constituent elements: production, distribution, and consumption of goods and services. Given that any production and consumption imply using natural resources, which finally results in a certain impact on the environment, the interaction of society and nature is indispensable. Most oftentimes, natural resources are irrationally used, which can lead to unwanted irreversible changes in the state of the environment. The economic progress based on environmental degradation and depletion of natural resources cannot be accepted in the context of sustainable development.

Thus, being aware of the depth of this problem, the global community has been trying to influence the consumer conscience by different methods. An important role in this sense is attributed to raising the population's awareness of the benefits of the green economy. In the context of sustainable development, the green economy should be perceived as a mean of efficient use of natural resources, application of cleaner, low-carbon, and low-pollution technologies, and minimization of environmental risks.¹ The important features of such an economic model include:

- a) efficient use of natural resources;
- b) conservation and growth of natural capital;
- c) reduced pollution;
- d) low carbon emissions;
- e) prevention of the loss of ecosystem services and biodiversity;
- f) increase in income and employment.

Given the high saturation of commodity markets and the high degree of environmental pollution, one of the most important factors of commodity competitiveness in domestic and global markets is complying with high environmental requirements. For this purpose, a tool has been developed to inform the consumers about the environmental characteristics of the products, about the development, production, and use of the latter. The use of eco-labels at the international level was first proposed in 1992, at Rio de Janeiro World Summit – United Nations Conference for Environment and Development, where the sustainable development concept was presented to the heads of states and governments (120 countries). The main document “Agenda 21” (Chapter 4, item 4.21) adopted at the conference, stated that the governments of countries, in collaboration with the industrial sector, must contribute to the development and promotion of the extension of information programs the purpose of which is to introduce and disseminate the eco-labelling, as well as other information programs for products with ecological properties designed to help the consumer make informed choices.²

Subsequently, with the view to developing the world economy without leaving ecological debts to the future generations, it was decided to improve the ecological performance of products and

¹ *Environmental Strategy for 2014-2023, and Action Plan for its implementation, approved by Government Decision No. 301 of 24-04-2014;*

² *United Nations Conference on Environment & Development Rio de Janeiro, Brazil, 3 to 14 June 1992 AGENDA 21*
<https://sustainabledevelopment.un.org/content/documents/Agenda21.pdf>

services, as well as to influence consumer behaviour by developing international standards ISO³ on eco-labelling:

- ISO 14020: 2000. Environmental Labels and Statements. General Principles.⁴
- ISO 14024: 2018. Environmental Labels and Statements. Environmental Labelling of Type I. Principles and Procedures.
- ISO 14021: 2016. Environmental Labels and Statements. Individually Declared Environmental Statements (environmental label of type II).
- ISO 14025: 2006 Environmental Labels and Statements. Environmental Statements of Type III, Principles and Procedures (environmental declarations).

Additional guidance for environmental labels and declarations can be found in ISO 14026:2017 – Environmental labels and declarations – Principles, requirements and guidelines for communication of footprint information.

The labelling system has become not only a response to the population's concern about the worsening state of the environment, but rather proved to be an efficient method for stimulating the producers to introduce new eco-friendly technologies and processes aimed at ensuring a reasonable use of natural resources.

According to ISO 14020, eco-labelling represents a set of voluntary instruments aiming to stimulate the demand for products and services with fewer impacts on the environment by providing essential information on their life cycle, in order to meet the customer demand for environmental information. In other words, the main objective of eco-labelling is to help the consumer make an informed choice in favour of products that pose a lesser threat to the environment and/or of products produced by using the best green technologies.

1.2 Particularities and Types of Voluntary Environmental Eco-Labels

Eco-labelling is an activity that aims to determine a voluntary system for granting an environmental label to products with reduced impact on the environment and human health throughout the product lifecycle.

The International Standardization Organization (ISO) identified three types of voluntary labels:

- a) ***Environmental labels of type I*** conceived in order to enable the consumers to easily identify products that meet specific environmental standards. This system meets the requirements of standard EN ISO 14024. The criteria required to be met by a particular type of product are defined in advance by independent issuing organizations, which must be reviewed regularly and definitely. At the same time, the criteria set achievable limits, considering the relative impact on the environment. Thus, when requesting the certificate, the producer may request to be granted the right to use the label. The operator will be

³ DG Environment, European Commission, *Study on different types of Environmental Labelling (ISO Type II and III Labels): Proposal for an Environmental Labelling Strategy*, Charles Allison & Anthea Carter https://ec.europa.eu/environment/Eco-label/about_Eco-label/reports/erm.pdf;

⁴Environmental labels <https://www.iso.org/files/live/sites/isoorg/files/store/en/PUB100323.pdf>

granted a license that will allow him/her to use Type I eco-label on the assessed product only if the latter meets all the criteria preliminarily set by the independent third party.

Specific features of Type I eco-labels⁵:

- ✓ It is a voluntary, multi-criteria program developed by an independent third-party certification body.
- ✓ It indicates that a product is more appropriate for the environment, depending on lifecycle-based considerations.
- ✓ Environmental criteria are set by product categories. The criteria must set achievable limits, given the relative impact on the environment, as well as the measuring capacity and accuracy.
- ✓ Observance of environmental legislation.
- ✓ Environmental criteria and functional requirements must be checked through a regular defined review.
- ✓ Transparency at all stages of their development and operation, involving all stakeholders.

- b) ***Environmental labels of Type II*** – represent environmental statements of producers, importers, distributors or other interested parties, made upon their own responsibility, which take different forms: symbols, diagrams or inscriptions that are mentioned on the product or on the package. This international standard (EN ISO 14021) specifies the requirements for individually declared environmental statements, including symbols and diagrams that refer to the products. It describes the terms that are selected and commonly used for products that are intended to be labelled (e.g. „compostable”, “designed for dismantling”, “recyclable”, “biodegradable”, “recovered energy”, “rechargeable”, “recycled”, etc.), and provides qualifications for their use. In addition, this standard prohibits non-specific statements, such as “eco-friendly”, “green”, “sustainable” or “no emissions”. Such labelling of the products attracted consumers who were looking for ways to reduce adverse environmental impacts through their purchasing choices. However, these labels also threatened to confuse consumers. Without guiding standards and investigation by an independent third party, consumers could not be certain that the companies' assertions guaranteed that each labelled product was an environmentally preferable alternative.

Whereas the producers themselves can establish how many and which products characteristics they choose to underline, the consumers should check carefully to see if the selected criteria have any connection with the desired properties. In fact, practice shows that in the process of selecting particular characteristics, producers may sometimes overlook other criteria that would be much more informative for environmental and health reasons. The producers, importers, distributors, or other interested parties bear full responsibility for false or misleading product statements. However, since this standard lacks a methodology for independent testing and assessment of compliance with the established criteria, the degree of consumer credibility decreases significantly compared to other types of eco-labels.

⁵ ECOSIGN Sector Skills Alliance “Eco-design Basics / Concepte de bază privind Ecodesign” http://www.ecosign-project.eu/wp-content/uploads/2018/09/BASIC-UNIT-10-RO_Slides.pdf

Specific features of Type II eco-labels ⁶:

- ✓ Voluntary statement made by the organization itself.
 - ✓ Optional verification or certification by independent third parties.
 - ✓ The declarant is fully responsible for their statement.
 - ✓ There is usually one criterion.
 - ✓ These are statements, symbols or diagrams describing the specific environmental characteristics of the product.
 - ✓ These must be correct, and neither misleading nor causing misunderstandings.
- c) ***Environmental labels of Type III*** – include quantitative information about the product, based on pre-determined indices established by a third party after analyzing the product lifecycle. The objective of Type III environmental labels complying with the requirements of EN ISO 14025 is to provide quantitative information on the product lifecycle (in line with EN ISO 14040) and compare it with other products fulfilling the same function. To ensure a source of comparable information, calculation methods are common and credible due to inspection, review, and monitoring by an independent verifier. Unlike the eco-labels described above, the specific properties of the product are not assessed here, no certificate is issued, the environmental preference of the products is not defined, nor are there any minimum requirements to be met. The lifecycle assessment, which determines the „*ecological footprint*” of a product constitutes the basis of the so-called „*environmental statement*”.

Specific features of Type III environmental labels⁷ :

- ✓ Voluntary environmental statement.
- ✓ Mandatory verification by third parties.
- ✓ They provide quantified information on the product lifecycle (according to ISO 14040), comparable with other product fulfilling the same function.
- ✓ Get informed about the impact of a product on environment throughout its lifecycle. There are certain environmental indicators defined by product categories. These are classified by impact categories.
- ✓ Unlike Type I labels, Type III does not define the environmental preference of the products and does not set minimum requirements to be met.

1.3 Principles of eco-labels and environmental declarations

These principles are part of ISO 14020; they serve as a prerequisite for all the other standards in the series.⁸

⁶ *Ibidem p.4*

⁷ *Ibidem p.4*

⁸ <http://www.thegreenmarketoracle.com/2010/07/iso-principles-for-environmental-labels.html>

- 1) environmental labels and statements must be accurate, verifiable, relevant, and not misleading.
- 2) procedures and requirements for environmental labels and statements must not create unjustified barriers to international trade;
- 3) environmental labels and statements must be based on a sufficient scientific methodology to certify the use of accurate and reproducible data;
- 4) information on the procedure, methodology, and any criteria for ensuring environmental labels and statements must be accessible and provided upon request to all interested parties;
- 5) when developing environmental labels and statements, all the relevant aspects regarding the product or service lifecycle must be taken into consideration;
- 6) environmental labels and statements must not impede innovation that maintains or has the potential to improve environmental performance;
- 7) any administrative requirements or requests for information relating to environmental labels and statements must be limited to those necessary to establish compliance with criteria and standards applicable to labels and statements;
- 8) the process of drafting and developing environmental labels and statements should include open consultations with stakeholders;
- 9) the information on environmental aspects of products and services relevant to an environmental label or statement must be available to purchasers and to potential purchasers from the party making the environmental label or declaration.

1.4 Advantages of Eco-Labeling System

Environmental labelling is one of the most actively developing tool of environmental management in the last four decades. The following symbols can be used as a synonym for eco-labels: *environmental labels*, *labels*, *declarations*, and *eco-labels*. All of them are environmental distinctions applied to services, products or their packaging and indicate a high level of environmental safety of products.

- (1) The use of environmental labelling brings many benefits for various stakeholders, especially for consumers:
 - a) improving consumer awareness about the properties and quality of procured goods and assisting them in making an informed purchasing choice;
 - b) promoting the satisfaction of consumer demand for goods that have a lower negative impact on the environment;
 - c) indirect monitoring of compliance with environmental regulations and requirements underlying the use of eco-labelling.

According to specialists' opinion, the main incentives for producers of products and services to participate in eco-labelling programs are to increase market penetration and enhance the competitiveness of companies.⁹ The benefits that a company (organization) certified for the right to use the eco-label receives are the following:

⁹ Koehler D.A., Park C. *How Companies Are Making Eco-Labels Core to Sustainability Strategy*.

- a) reduction of production costs by reducing the energy, water, and raw material consumption;
- b) reduction of the amount of waste due to reorientation of processes that are based on low-efficiency technologies;
- c) reduction of transport costs by developing logistics schemes from a greening perspective;
- d) reduction of costs for preventing emergency situations and diminishing environmental risks;
- e) participation in international support programs and development of green businesses;
- f) increase of sales against the background of increasing the consumer demand for green products and services;
- g) possibility to introduce green products and services on the market;
- h) increase of corporate reputation and evidence of the effectiveness of company initiatives in the field of ecology and sustainable development;
- i) recognition of products at a international level, which enhances the enterprise competitiveness; access to sustainable public procurement and more demanding markets;
- j) shift consumers perception of the company and products.

In conclusion, we can mention that Eco-labelling is intended not only to help producers of environmentally friendly products to promote their products, but also, to increase their competitiveness on the market. An equally important task of eco-labelling is to provide consumers with a reliable criterion for choosing high-quality products.

Thanks to the information provided by the eco-label, the buyer can make a choice in favour of products that will not harm either their health or the environment. We can say that eco-labelling plays the role of a bridge between the manufacturer and the consumer, informing about the quality and environmental safety of products.

2. PARTICULARITIES OF THE EUROPEAN ECO-LABEL

2.1 *Legislative Aspects Related to the Community Eco-Labeling System*

In an effort to harmonize the eco-labelling programmes within the Member Countries, the European Union concerned about the implementation of a unified product labelling scheme. Thus, in 1992, the Council of Europe introduced a unified eco-labelling system at a Community level, by approving Regulation (EC) No. 880/1992¹⁰. This system was created with the view to motivate the economic entities to produce or purchase environmentally friendly products and services. Later on, on 17 July 2000, Regulation (EC) No. 1980/2000 of the European Parliament and of the Council on Setting Procedures for Granting Eco-Labels was enacted.¹¹ This regulation aimed to establish a system of voluntary granting of eco-labels for the promotion of products with low impact on the environment throughout their lifecycle and to provide consumers with accurate, non-deceptive, and scientifically established information regarding their impact on the environment. The experience gained in the context of applying Regulation (EC) No. 1980/2000 demonstrated the need for amending this eco-labelling system in order to increase its effectiveness and simplify its application. In this sense, for reasons of clarity and legal security, Regulation (EC) No. 1980/2000 was substituted by Regulation (CE) No. 66/2010 of the European Parliament and of the Council (EC) of 25 November 2009, on the EU Eco-Label. This Regulation lays down rules for the establishment and application of the optional EU eco-labelling system.

The EU eco-labelling system is part of the Community policy for sustainable consumption and production, which is aimed at:

- a) reducing the negative impact of consumption and production on the environment, health, climate, and natural resources;
- b) promoting products that have a high level of environmental performance, by using the eco-label;
- c) substituting hazardous substances with safer substances where possible in technical terms.

The main features of the European eco-label are:

- a) It is selective: it is only granted to products with the lowest impact on the environment.
- b) It is transparent: ecological criteria which must be met by the product are developed with the contribution of relevant stakeholders (representatives of the following sectors: industry, trade, environmental organizations, consumers, trade unions, etc.).
- c) It is voluntary: therefore, it does not create barriers to trade.
- d) Based on a multi-sector approach: the entire lifecycle of product/service is analyzed in order to study all the potential negative impacts on the environment.
- e) It has a European dimension: EU Eco-labelled products and services can be sold and marketed worldwide. They are especially targeted at EEA states (EU Member States and

¹⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992R0880&from=EN>

¹¹ <https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32000R1980&from=RO>

three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).¹²

The EU eco-label guarantees a high level of transparency, reliability, and scientific credibility, which satisfies the ecological requirements of the customers.



The logo of the European eco-label includes a green flower with letter „ε” (epsilon), tilted, of green color, like a flower, surrounded by 12 blue stars (Figure No.1).¹³

Figure No.1

Source: https://ec.europa.eu/environment/ecolabel/index_en.htm

Pursuant to Regulation (EC) No. 66/2010, the label can be granted to all goods or services distributed, consumed or used on the EU market, for a payment or free of charge, provided that the ecological criteria have been clearly established. However, it is important to mention that there are several exceptions. Thus, the EU eco-label does not apply to medicinal products for human or animal use, for medical devices by both consumers, and buyers. Today, the EU eco-label covers a wide range of products and services which are constantly expanding. **Product groups** which are labelled include: **cleaning products** (detergents for dishwashers, detergents for manual dish washing, all-purpose cleaners and detergents for bathrooms, soaps, hair shampoos and conditioners); **paper products** (absorbent paper, copy paper, and graphic paper); **home improvement products** (rigid flooring materials, indoor paints and varnishes, bed mattresses); **garden products** (soil improvers, culture substrates); **electrical and household appliances** (washing machines for household use, dishwashers for household use, refrigerators, TV-sets, electric lamps, pocket calculators/laptops, personal computers, vacuum cleaners); **footwear; textiles** (clothing, bed linen, interior textiles); **heat pumps; lubricants** and two types of **services (tourist accommodation and camping)**. The list of products and service-groups undergoes a constant research, evaluation, and completion process.

In March 2020, 1,456 licenses were granted to 70,692 products (goods and services) available on the market. The product-groups that registered the highest increase in number of products over the past reporting period are: indoor and outdoor paints and varnishes (+2292 products), hard surface cleaning products (+1,501 products), textiles (+746 products), wood, cork, and bamboo floor coverings (+732 products), and furniture (+413 products). The highest relative increase of the number of products was recorded for the following groups of products: furniture (+645%), wood,

¹² https://ec.europa.eu/environment/archives/Eco-label/tools/faq_en.htm#1

¹³ *Guidelines on EU Eco-Label* https://ec.europa.eu/environment/Eco-label/documents/logo_guidelines.pdf

cork, and bamboo flooring (+116%), interior cleaning services (+111%), and hard surface cleaning products (+77%), the latter currently counting 477, 1365, 19, and 3,457 products, respectively.

When analyzing the statistics regarding the number of eco-labelled products and services per country, we can see that Spain has the largest number of them (38%), followed by France (11%), and Germany (8,5%).

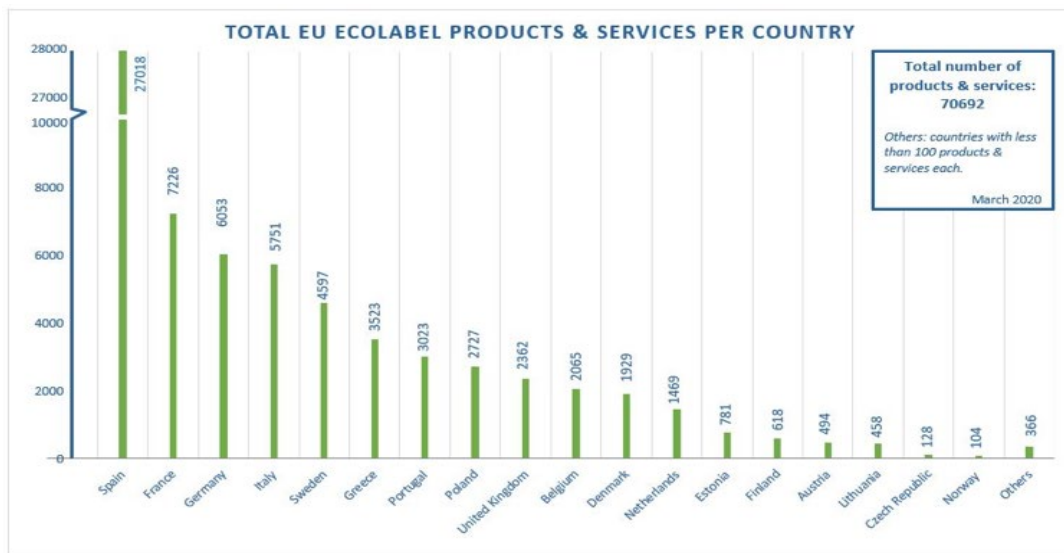


Figure No.2
Source: <https://ec.europa.eu/environment/Eco-label/facts-and-figures.html>

Out of the total 70,692 Eco-label products as of March 2020, the majority are indoor and outdoor paints and varnishes (61%), Textiles (10%), and absorbent paper and fabric piece goods (5%).

The main countries where the European eco-label was used most frequently are: Spain (12.6%), France (21%), and Germany (13%), as shown in Figure 1

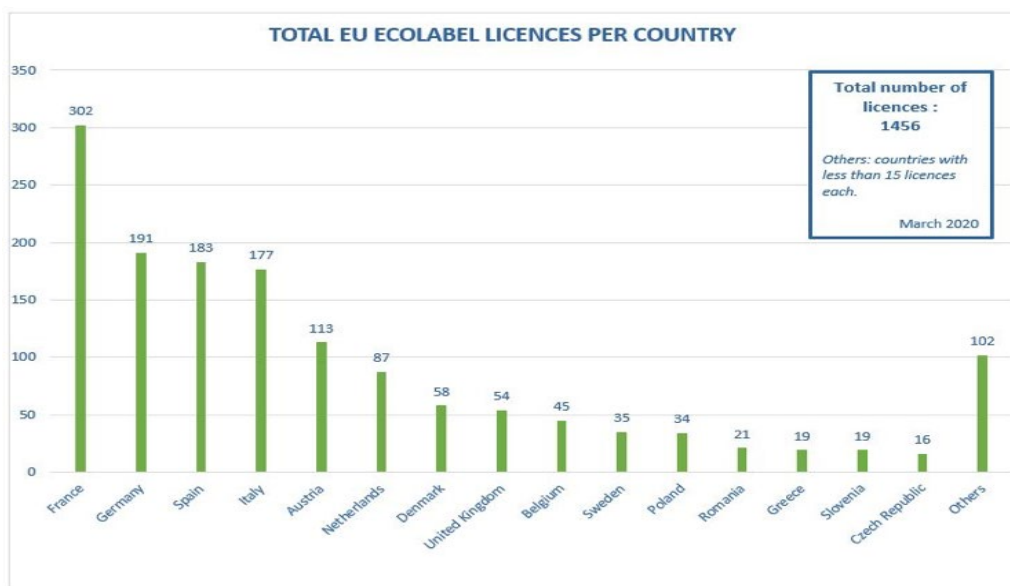


Figure No. 3
Source: <https://ec.europa.eu/environment/Eco-label/facts-and-figures.html>

As regards foodstuffs, the latter are currently not subject to EU eco-labelling. It should be mentioned that following the publication of a feasibility study assessing the possibility to include

foodstuffs and forage in the EU eco-labelling scheme in the future, the EU Eco-Labelling Council concluded in March 2012 that it would be useful to expand the EU eco-label to food and feed products. However, according to the study¹⁴, the presence of many well-established and credible labels of animal feed and drinks in the agrarian sector represents an obstacle in the long run. The EU eco-label cannot bring environmental benefits if the applicants are already certified and use other labels. In the worst case, it is even possible that the introduction of EU eco-label for food, drinks, and animal feed would lead to disagreements and confusion among consumers, which may lead to losing the trust in eco-labels, in general, and to a negative impact on the environment, globally. According to the study mentioned before, in order to guarantee benefits for the environment, it is essential to introduce a potential EU eco-label for food, drinks, and animal feed, so as to consolidate other well-established labels. This is most likely possible to do by focusing on products that are not covered by the existing labels.

2.2 General Requirements for the EU Eco-Label Criteria

The EU eco-label is granted to products and services produced or consumed on the Community market only if they meet the criteria set for this purpose. Criteria are set for each group of products in order to reduce the main impacts on the environment throughout the product lifecycle. Because the lifecycle of each product and service is different, the criteria are adjusted to address the unique characteristics of each type of product. Moreover, the criteria are set on the basis of scientific information on the entire lifecycle of products. The criteria for assessing the EU eco-label are developed through a transparent process by several stakeholders. Scientists, industry representatives, experts from a broad range of sectors and impartial non-government organizations participate in the development of environmental criteria. Each set of criteria for each group of products is subject to a number of discussion rounds between respective stakeholders. Finally, the criteria are approved by a decision of the European Commission. When setting such criteria, a number of aspects are taken into consideration, such as:

- a) the most significant effects on the environment, particularly the impact on climate change, on nature and biodiversity, on energy and resource consumption, on waste generation, on pollution through physical effects, as well as on the use and release of hazardous substances;
- b) substitution of hazardous substances with safer substances, as such, or use of alternative materials or designs, where technically possible;
- c) the possibilities for reducing the impact on the environment offered by the sustainability and reusable nature of products;
- d) the net ecological balance between the advantages and risks associated with the environment, including with regard to health and safety aspects at different stages of the lifecycle of respective products;
- e) if needed, the social and ethical aspects, for instance, making reference to international conventions and agreements in these areas, as well as to pertinent ILO standards and codes of conduct;

¹⁴ https://ec.europa.eu/environment/Eco-label/documents/Eco-label_for_food_final_report.pdf

- f) the criteria set for other eco-labels, particularly those officially recognised at national or regional level, EN ISO 14024 type I environmental labels, already existing for that products-group so as to enhance synergies;
- g) compliance with the principle of reducing the number of tests on animals to the extent possible.

The EU eco-label criteria shall include requirements intended to ensure that the products bearing the EU eco-label function adequately in accordance with their intended use. Eco-label criterias for a group of products are valid for a period between 3 and 5 years. Criteria are reviewed in order to reflect technical innovation, such as the evolution of materials, production processes or reduction of emissions, as well as changes on the market.¹⁵

After consulting the European Union Committee for Eco-labelling (EUCEE), the Commission, the member states, competent organizations (which differ from state to state, either the Ministry of Environment or a structure with special competences in labelling or performance assessment) and other stakeholders can initiate and lead the development and revision of criteria for the EU eco-labelling.

The revision of criteria is a complex process, carried out in several stages, with the possibility to involve the stakeholders in the processes:

- a) Proposal to include a new group of products or services;
- b) Proposal to manage the process of developing/reviewing the criteria for a group of products/services.

When the task of conducting the activity on drafting criteria is entrusted to other stakeholders, the latter must demonstrate that they have knowledge on the product in question, as well as capacity to conduct the process in a neutral manner and in accordance with the objectives of Regulation (EC) No. 66/2010. In this regard, consortiums consisting of more than one interest group shall be favored. The party initiating and leading the development or revision of the EU Eco-label criteria shall provide the supporting documentation set out in Annex I A to Regulation (EC) No. 66/2010 of 25 November 2009 (e.g.: a) preliminary report; (b) proposed draft criteria; (c) technical report supporting the proposed draft criteria; (d) final report; (e) a manual for potential users of the EU Eco-label, and, for competent organizations - (f) a manual for the authorities awarding public contracts).

It should be mentioned that the process of EU Eco-label criteria revision or development for a new group of products/services involves significant time and human resources. Hence, this complex process which is developed in close collaboration with the European Commission lasts two years, on average.¹⁶

¹⁵ <https://ec.europa.eu/environment/Eco-label/products-groups-and-criteria.html#:~:text=Every%20four%20years%20on%20average,and%20changes%20in%20the%20market.>

¹⁶ <https://ec.europa.eu/environment/Eco-label/criteria-development-and-revision.html>

Annex No. 1 shows the current situation, i.e. products/services the criteria for granting the Eco-label of which have been developed and finalized, and those which are in process of development.

However, pursuant to provisions of Article 7, paragraphs (2) -(3) of Regulation (EC) No. 66/2010 of 25 November 2009, in addition to the standard procedure for reviewing or developing EU Eco-label criteria, a simple procedure is also regulated:

- 1) In cases where the criteria have already been developed under another eco-labelling scheme which complies with the requirements of the EN ISO 14024 Type I eco-labels for a group of products for which no eco-label criteria have been established. Thus, any member state in which the other eco-labelling scheme is recognized may propose, after consulting the Commission and the EUEB, respective criteria to be developed within the framework of the EU Eco-labelling scheme. To this end, the simplified procedure for drawing up the criteria set out in Part B of Annex 1 to Regulation (EC) No. 66/2010 can be applied, provided that the proposed criteria have been developed in line with Part A of Annex I to Regulation (EC) No. 66/2010.
- 2) Where a non-substantial revision of the criteria is required, the simplified procedure set out in Part C of Annex 1 to Regulation (EC) No. 66/2010 may be applied.

2.3 EU Eco-Label Awarding Process and Conditions for Its Use

The European Eco-label system is valid and identical throughout Europe, which means that applications for the EU Eco-label are made through a single procedure that covers the entire European Economic Area.

Procedural steps for obtaining the European Eco-label:

- 1) Submission of the application by the economic operator for the granting of EU Eco-label.*

A competent body/authority is designated at the level of each EU member state. These are usually the ministries with competences in the field of environment.¹⁷ In order to benefit from the EU Eco-label, economic operators submit an application to the respective competent authorities, determined for each EU member state, taking into account the following circumstances:

- a) where a product originates in a single state – to a competent authority in that member state;
- b) where a product originates in the same form in several member states – to a competent body in one of those member states;
- c) where a product originates outside the Community – to a competent authority in any member state where the product has been or is to be placed on the market.

Guided by such circumstance, the EU member states designate one or more bodies responsible for the labelling process at a national level. Their operation is transparent, and their activities are open to the participation of all stakeholders. One of the requirements imposed by Regulation (EC) No. 66/2010 of 25 November 2009 is for the competent body to be independent of the organisation or the product it assesses. Thus, where a body belonging to a business association or professional federation representing undertakings involved in the design, manufacturing, provision, assembly,

¹⁷ <https://ec.europa.eu/environment/Eco-label/competent-bodies.html>

use or maintenance of products which it assesses, may, on condition that its independence and the absence of any conflict of interest are demonstrated, be designated as a competent body. Therefore, the impartiality of competent bodies, of their management staff and their evaluation staff, must be guaranteed.

Applications for the EU Eco-label shall include all the contact details of the operator, as well as the product group concerned and a full description of the products, as well as any other information requested by the competent body. The relevant documents shall be attached to the application, in accordance with the measure adopted by the Commission for establishing the criteria for the EU Eco-label of the product group concerned. Within two months of receipt of the application, the competent body concerned shall check whether the documentation is complete and shall notify the operator. The competent body may reject the application if the operator fails to complete the documentation within six months after such notification.

2) Evaluation of the Application and Product Eligibility

The competent bodies and their staff shall carry out the conformity assessment activities with the highest degree of professional integrity and the requisite technical competence in the specific field and shall be free from any pressures and incentives, particularly financial ones, which might influence their judgement or the results of their conformity assessment activities, especially as regards persons or groups of persons with an interest in the results of those activities. At all times and for each conformity assessment procedure and each type or category of products in relation to which it has been designated, a competent body shall have at its disposal the necessary:

- a) technical knowledge and sufficient and appropriate experience to perform the conformity assessment tasks;
- b) descriptions of producers in accordance with which conformity assessment is carried out, ensuring the transparency and the possibility of reproducing those procedures. It shall have appropriate policies and procedures in place that clearly distinguish between the tasks it carries out as a competent body and any other activities;
- c) procedures necessary to carry out its activity taking into account the size of an enterprise, its field of activity and structure, the degree of complexity of the technology used for the product concerned, as well as the serial or mass character of the production process;
- d) means to perform the technical and administrative tasks related to the conformity assessment activities in an appropriate manner and to have access to all necessary equipment or facilities.

If the documentation submitted by the operator is complete, the competent body shall assign a registration number to the product and verify that the product meets the EU Eco-label criteria and assessment requirements. Operators shall bear the costs of testing and assessment of conformity with the EU Eco-label criteria. Operators may be charged for the travel and accommodation costs where an on-site verification is needed outside the member state in which the competent body is based.

3) Awarding the European Eco-label

If the environmental criteria are met, the competent body shall conclude with each operator a contract governing the conditions for using the EU Eco-label (including provisions on the authorization and withdrawal of the EU Eco-label, particularly following the revision of

criteria). The EU Eco-label may be used on the products for which the EU Eco-label has been awarded and for their associated promotional material. The right to use the EU Eco-label shall not extend to the use of the EU Eco-label as a component of a trademark. It should be noted that the award of the EU Eco-label does not affect the environmental or other regulatory requirements of the Community or of national legislation, applicable at different stages of the product lifecycle. The competent body that has awarded the EU Eco-label to a product shall notify the Commission thereof. The Commission shall keep an evidence-register and update it regularly. The register shall be publicly available on a website dedicated to the EU Eco-label.

4) Monitoring and Control of the Use of the EU Eco-label

The control of the use of the EU Eco-label shall be carried out by the competent body in respect to products to which it has awarded the EU Eco-label. Controls can be:

- 1) *Planned* – checking regularly that the products comply with the EU Eco-label criteria and assessment criteria.
- 2) *Unannounced* – verifications performed when receiving a complaint/referral. These verifications may take the form of random spot-checks. At the same time, the competent authority that awarded the EU Eco-label to a product shall inform the user of the EU Eco-label of any complaint about the product bearing the EU Eco-label and may ask the user to respond to those complaints.

The user of the EU Eco-label shall allow the competent body that awarded the EU Eco-label to the product to carry out all necessary investigations for monitoring the permanent compliance of that product with the specific criteria of the product group and with the provisions of Regulation (EC) No. 66/2010.

Pursuant to Article 10, paragraph (1) of Regulation (EC) No. 66/2010, any false or misleading advertising or use of any label or logo which might be confused with the EU Eco-label shall be prohibited. Thus, where, after giving the user of the EU Eco-label the opportunity to submit observations, any competent body which finds that a product bearing the EU Eco-Label does not comply with the relevant product group criteria or that the EU Eco-label is not used in accordance with the provisions of Article 9 of Regulation (EC) No. 66/2010, shall either prohibit the use of the EU Eco-label on that product, or, in the event that the EU Eco-label has been awarded by another competent body, shall inform the respective competent body.

2.4 Costs of Using the EU Eco-label

Pursuant to Regulation (EU) No. 782/2013 of the Commission of 14 August 2013 on Amending Annex III to Regulation (EU) No. 66/2010 of the European Parliament and of the Commission on the EU Eco-label, in order to promote the use of the EU Eco-label and encourage the operators whose products meet the criteria for respective Eco-label, the costs of using it should be as low as possible, but still sufficient to cover the running costs of the EU Eco-labelling system.

It should be noted that the EU Eco-labelling system distinguishes three types of fees:

a) Application fee;

The application for the European Eco-label is subject to a processing fee. This fee shall not be lower than 200 EUR and not higher than 2,000 EUR. Nevertheless, pursuant to provisions of Regulation (EU) No. 782/2013, in case of small and medium enterprises and of operators from developing countries, the maximum application fee shall not be higher than 600 EUR, while the case of micro-enterprises, the maximum amount of the application fee shall be 350 EUR.

At the same time, it is worth mentioning the amount of the application fee reduction for some categories of applicants:

1. applicants registered under the Community Environmental Management and Audit Scheme (EMAS) - 30 %;
2. applicants certified on basis of ISO 14001 - 15 %

Moreover, the reduction is subject to the condition that the applicant commits to ensuring full compliance of its eco-labelled products with the relevant EU Eco-label criteria throughout the contract validity period and that this commitment is appropriately incorporated into its environmental policy and detailed environmental objectives. At the same time, one should note that the reductions are not cumulative, and if both conditions are met, only the largest reduction applies.

b) Annual fee

The competent certification body may require each applicant who has obtained the EU Eco-label to pay an annual fee. Therefore, the collection of an annual fee is at the discretion of the competent body.

A maximum ceiling has been set for the annual fee charged for the use of the Eco-label. This ceiling is:

- 18,750 EUR for microenterprises, SMEs and enterprises in developing countries;
- 25,000 EUR for all other enterprises.

This can be a lump sum, or a fee based on the annual value of sales within the Union of the product awarded the EU Eco-label. The period of the fee will begin from the date of the award of the EU Eco-label to the applicant. Where the fee is calculated as a percentage of the annual sales value, it cannot be more than 0,15% of that value. In the case of SMEs, micro-enterprises or applicants from developing countries, the annual fee shall be reduced by at least 25%.

c) Inspection fee

Given that the application fee and the annual fee do not cover the costs of third-party tests and verifications or on-the-spot inspections, the competent body may charge an inspection fee. This fee is usually covered by EU Eco-label applicants.

2.5 Romania's Experience in the Field of European Eco-labelling

According to the *National Strategy for Sustainable Development Romania -2030, adopted by the Romanian Government in the meeting of 9 November 2018, by Government Resolution No.*

877/2018¹⁸, Romania is implementing the Regulation of the European Parliament and of the Council (EC) No. 66/2010 of 25 November 2009 on EU Eco-label. The European Eco-label has been obtained for the following categories of labelled products/services: in-door paint, out-door paint, enamel, primer, lubricants, bed mattresses, printable paper, absorbent paper, textiles, detergents, soaps, shower gel, computers, laptops, and tourist accommodation services. Within 2008-2017, there were granted 41 licenses, of which 38 licenses were granted for products, and 3 licenses - for tourist accommodation. A total of 246 products/services have been eco-labelled.

When analyzing the Romanian legislation with regard to the fee charged by the competent authority for the award of the EU Eco-label to a product, we can see that, pursuant to Resolution No. 661/2011 on Establishing Measures for Ensuring the Application at a National Level of the Provisions of Regulation (EC) No. 66/2010 of the European Parliament and of the Council of 25 November 2009 on EU Eco-label, Article 4, paragraph (2) „*the fee collected by the competent authority for each application for the award of the EU Eco-label is 200 EUR, the equivalent in lei, at Leu/Euro exchange rate of the National Bank of Romania on the date of payment.*”¹⁹ In addition to the above, it is indicated that the annual fee is not charged.

¹⁸ <https://www.edu.ro/sites/default/files/Strategia-nationala-pentru-dezvoltarea-durabila-a-Rom%C3%A2niei-2030.pdf>

¹⁹ <https://lege5.ro/Gratuit/gi2tqnbxga/hotararea-nr-661-2011-privind-stabilirea-unor-masuri-pentru-asigurarea-aplicarii-la-nivel-national-a-prevederilor-regulamentului-ce-nr-66-2010-al-parlamentului-european-si-al-consiliului-din-25-noiemb>

3. NATIONAL ECO-LABELLING SYSTEM

3.1 *Legislative Aspects on Eco-labelling in the Republic of Moldova*

The regulatory framework of the Republic of Moldova currently does not transpose the provisions of Regulation (EC) No. 66/2010 of the European Parliament and of the Council (EEC) of 25 November 2009 on EU Eco-label. However, it should be noted that the national legislative basis includes a number of laws and policy documents that indirectly regulate the aspects of eco-labelling.

a) Policy Documents

On September 25, 2015, at the Summit on Sustainable Development, the Republic of Moldova, together with 192 other UN member states, adopted the 2030 Agenda for Sustainable Development („Transforming the World We Live In”), which comprises 17 Sustainable Development Goals (SDGs) and 169 targets framed in five (5) key-pillars: People, Planet, Prosperity, Peace, and Partnership.²⁰ Thus, the Republic of Moldova committed to implementing the 2030 Sustainable Development Agenda by the end of 2030. In this context, we would like to draw the attention to the fact that the official ecolabels especially contribute to accomplishing the **Goal No. 12 Responsible Consumption and Production**. Thus, the ecolabel scheme is part of the sustainable consumption and production policy of the Community, which aims at reducing the negative impact of consumption and production on the environment, health, climate and natural resources. The scheme is intended to promote those products which have a high level of environmental performance through the use of the ecolabel.

In addition to the commitment assumed by adopting the 2030 Agenda 2030, according to the Action Plan for the implementation of the Republic of Moldova – European Union Association Agreement, ratified by the Law No. 112 of 02.07.2014 on Ratification of the Association Agreement between the Republic of Moldova, on the one side, and the European Union and European Atomic Energy Community, on the other side²¹, under **Title V, Chapter 13 – Trade and Sustainable Development** promoting sustainable development, and in the Article 367, item (d) the Parties ... agree to promote trade in goods which contribute to the creation of better social conditions and environmentally friendly practices, including goods subject to voluntary schemes to ensure the sustainability of trade, such as fair and ethical trade, eco-labels and certification schemes for products derived from natural resources;

Furthermore, The Action Plan for the implementation of **Environmental Strategy for 2014–2023** provides for 115 actions, indicating the implementation period, responsible institutions, indicators, costs and financial sources (local and foreign) which will contribute to the accomplishment of the Strategy objectives. With regard to the introduction of eco-labelling scheme, this action is included under specific objective 2- *Integrating the environment protection, sustainable development and*

²⁰ <https://cancelaria.gov.md/ro/apc/agenda-de-dezvoltare-durabila-2030>

²¹ https://www.legis.md/cautare/getResults?doc_id=83489&lang=ro

green economy development, and adaptation to climate change principles in all sectors of the national economy, planned for 2018.

b) Regulatory Acts

- **Law No. 44 of 27-03-2014 on Labelling of Energy-Related Products** - transposes Directive 2010/30/EU of the European Parliament and of the Council of 19 May 2010 on Indication, by Labelling and Standard Product Related Information, of the Energy and Other Resource Consumption of Energy-Related Products²². This Law sets the regulatory framework for national measures to ensure the labelling and standard information about energy-related products intended for final users, particularly about energy consumption, and, as the case may be, about other resources essential for use, as well as additional information about energy-related products.
- **Government Resolution on Approving the Regulation on Labelling of Tires No. 685 of 11.07.2018 (enacted on 10.02.2019)** – transposes Regulation 1222/2009/EC of the European Parliament and of the Council of 25 November 2009 on Labelling of Tires with regard to efficient consumption of fuel and other essential parameters; the consolidated version which inserts the amendments introduced by Regulation (EU) No. 1235/2011 of the Commission of 29 November 2011²³ and transposes *Article* 8 and part C, Annex II to Regulation 661/2009/EC of the European Parliament and of the Council of 13 July 2009 on Type-Approval Requirements for the General Safety of Motor Vehicles, Their Trailers, and the Systems, Components, and Separate Technical Units Intended for Them.²⁴
- **Law No. 151 of 17-07-2014 on Eco-design Requirements for Energy-Related Products** – transposes Directive 2009/125/EC of the European Parliament and of the Council of 21 October 2009 on Establishing the Framework for Setting the Eco-design Requirements for Energy-Related Products.²⁵ This Law sets the legislative framework on eco-design requirements applicable to energy-related products for the purpose of insuring free movement of such products on the domestic market. The Law sets requirements for the energy-related products introduced on the market and/or put into operation, thus contributing to sustainable development, increasing energy efficiency and the level of environment protection, as well as increasing the security of energy supply.
- **Government Resolution No. 750 of 13.06.2016 on Approving the Regulations on Eco-design of Energy-Related Products:** Regulation on Eco-design Requirements for Non-Directional Household Lamps, according to Annex No 1; Regulation on Eco-design Requirements for Fluorescent Lamps without Built-in Ballast, High Intensity Discharge Lamps, as well as Ballasts and Luminaries Compatible With Such Lamps, according to Annex No.2; Regulation on Eco-design Requirements for Directional Lamps, Light-Emitting Diode Lamps, and Related Equipment, according to Annex No.3; Regulation on Eco-design Requirements Applicable for Electric Motors, according to Annex No.4; Regulation on Eco-design Requirements for Water Pumps, according to Annex No.5;

²² Published in the Official Journal of the European Union, L 153 of 18 June 2010

²³ Published in the Official Journal of the European Union, L 342 of 22 December 2009

²⁴ Consolidated version which inserts the amendments introduced by Regulation (EU) 2016/1004 of the Commission of 22 June 2016, published in the Official Journal of the European Union, L 200 of 31 July 2009.

²⁵ Published in the Official Journal of the European Union, L 285 of 31 October 2009.

Regulation on Eco-design Requirements for Household Dishwashers, according to Annex No.6; Regulation on Eco-design Requirements for Washing Machines (Laundry) for Household Use, according to Annex No.7; Regulation on Eco-design Requirements for Household Tumble Dryers, according to Annex No. 8; Regulation on Eco-design Requirements for Vacuum Cleaners, according to Annex No. 9; Regulation on Eco-design Regulation on Eco-design Requirements for Comfort Air-Conditioners and Fans, according to Annex No.10; Regulation on Eco-design Requirements for Motor Driven Fans with Input Power Between 125 W and 500 kW, according to Annex No. 11.

- **Law No. 115 of 9 June 2005 on Organic Agri-Food Production** – regulates social relations related to obtaining organic agri-food products without using synthetic chemicals, and marketing of organic products of vegetable and animal origin, and namely of: a) unprocessed primary products; b) processed products intended for human consumption, prepared from one or more ingredients of vegetable or animal origin; c) fodder and raw materials that are not included under item a).
- **Government Resolution No. 1078 of 22.09.2008 on Approving the Technical Regulation “Organic Agri-Food Production and Labelling of Organic Agri-Food Products”**– partially transposes Regulation (EC) No. 834/2007 of the Council of 28 June 2007 on Organic Production and Labelling of Organic Products, and Abrogation of Regulation (EEC) No. 2092/91.²⁶ This Technical Regulation sets the requirements applicable to organic agri-food products: a) at all stages of production, processing, and marketing of organic products, and their control; b) upon the use in labelling and advertising of indications applicable to organic products.
- **Law No. 420 of 22 December 2006 on Technical Regulation Activity**. This law is aimed at consolidating the domestic market operation by eliminating technical barriers to trade, and by implementing the obligations assumed by the Republic of Moldova, including those before the World Trade Organization and the European Union, as well as insuring conditions for placing on the market safe products that favor a competitive market. To ensure the accomplishment of the above-mentioned goals, the Law sets general requirements for the content and the procedure for drafting, approval and enforcement of technical regulations in the field of product marketing, as well as the duties of regulatory authorities related to insuring transparency in the regulation process with the view to protect public interest on the domestic market.
- **Law No. 235/2011 on Accreditation and Conformity Assessment Activities** – sets the legal framework for the accreditation activity of conformity assessment institutions, performed mandatorily or voluntarily, as well as for making the products available on the market, and for conformity assessment activity, whether or not such assessment is mandatory for the products put on the market and/or used in the Republic of Moldova.
- **Law No. 7/2016 on Market Surveillance Concerning the Marketing of Non-Food Products** – adopted for the purpose of establishing the necessary legal framework for the application of the provisions of Chapters I and III of Regulation (EC) No.765/2008 of the European Parliament and of the Council of 9 June 2008 on Setting Accreditation and Market Surveillance Requirements Related to Marketing of Products, and abrogating Regulation (EEC) No. 339/93. This law establishes the legal framework for ensuring

²⁶ Published in OJ L 189, 20.07.2007, page 123.

market surveillance with regard to non-food products to ensure that respective products meet the essential requirements that provide a high level of protection of the public interest, health, and safety, in general, of health and safety at work, consumer protection, environment protection, and security.

3.2 Designation of the competent Body for Eco-labelling in the Republic of Moldova

In order to identify the competent authority for issuing the ecolabel, it is necessary to study the international experience in this regard. So, each state from the European Economic Area designates a competent authority/body, an independent and impartial organization that applies the EU eco-labelling system at a national level. Competent bodies play a central role in the activity of the EU eco-labelling system and represent the first contact point for applicants. Specifically, they assess the applications and award the EU eco-label to products that meet the criteria set thereof. In fact, they are responsible for making sure that the verifications are performed in a consistent, neutral, and reliable manner by a party that is independent from the operator subject to verification, based on international, European or national standards and procedures for bodies operating product certification systems.²⁷

Table No. 1 provides some examples of competent bodies in several EU countries:

No.	Member States of the European Economic Space (EUS)	Competent body in the field of EU eco-labelling
1.	Germany	In Germany, the certification system is managed by Umweltbundesamt (UBA; Federal Environmental Agency) and RAL gGmbH as competent authority. This independent authority verifies if the products and services marked with the EU eco-label meet the criteria strictly related to the environment and their use. To do so, all the stages of the product lifecycle are taken into consideration, from production to use, and up to elimination. ²⁸
2.	Italy	In Italy, the competent body for applying Regulation (EC) No. 66/2010 on Eco-Labelling is the Italian Eco-Labelling Department of the Eco-Labelling and Eco-Audit Committee under the Ministry of Environment. ²⁹ This department is comprised of a chairperson and six members, designated by Order of the Minister of Environment, Territorial Protection, and the Seas for a period of three years. The chairperson can be appointed by the Minister of Environment or Minister of Economic Development, while two members are appointed by the Minister of Environment, two members – by the Minister of Economic Development,

²⁷ <https://ec.europa.eu/environment/ecolabel/faq.html>

²⁸ www.eu-ecolabel.de

²⁹ <https://www.minambiente.it/pagina/ecolabel-ue>

		one member – by the Minister of Finance, and one member – by the Minister of Health.
3.	Poland	In Poland, the competent body in the field of EU eco-labelling is the Polish Center for Testing and Certification with a statute of notified institution under number 1434, recognized by the European Commission in the field of Directives on Medical Devices and Regulation No. 305/2011 of the European Parliament and of the Council. ³⁰
4.	Denmark	In Denmark, the competent authority is the Non-Government Organization “Echo-Labeling Denmark” ³¹ . This organization provides certification services for the use of the EU eco-label. According to its charter, the revenues collected are used for processing the applications and managing the certifications – and for increasing the supply of and the demand for eco-labelled products and services, thus reducing the negative impact on environment, to the benefit of humans, environment, and Earth’s resources.
5.	Romania	<p>The competent authority in the field of awarding the EU Eco-label in Romania is the Ministry of Environment.</p> <p>The Commission for EU Eco-Labeling operates under the Ministry of Environment as a consultative body with a role in assessing the files required for awarding the eco-label.³²</p> <p>The structure of the Commission for EU Eco-Labeling includes:</p> <ul style="list-style-type: none"> • three representatives of the Ministry of Environment and Forests, • one representative of the Ministry of Economy, Trade, and Business Environment, • one representative of the Ministry of Regional Development and Tourism, • one representative of the National Agency for Environment Protection, • one representative of the National Consumer Protection Authority, • one representative of the National Environmental Guard, • three representatives from research institutions in the field of environment protection, • two representatives from employer organizations, and two – from environmental NGOs

From the experience of the European Economic Area countries, we can state that the competent authorities for applying the EU eco-labelling system at a national level come both from public and private sectors.

³⁰ <https://www.pcbc.gov.pl/>

³¹ <https://www.ecolabel.dk/en/become-certified/what-does-it-cost/eu-ecolabel>

³² <http://www.mmediu.ro/>

With regard to identification of the potential competent authority in the field of eco-labelling on the territory of the Republic of Moldova, there would be analyzed the following alternatives:

- *The alternative No.1 – competent body from private sector*

One of the alternatives would be for products and services to be eco-labelled by an inspection and certification body accredited by the National Accreditation center of the Republic Of Moldova, taking into account SM SR EN ISO / CEI 17065: 2013, a standard setting requirements for certification bodies.

The National Accreditation Center, with abbreviated name “MOLDAC”, ensures an independent, objective, and impartial decision-making process, being responsible for its decisions on granting, rejecting, maintaining, extending, suspending and withdrawing the accreditation. MOLDAC performs its activity in compliance with the provisions of the Constitution of the Republic of Moldova, legislative acts, decrees of the President of the Republic of Moldova, ordinances, Governmental regulatory acts and provisions, international treaties the Republic of Moldova is party to, as well as with the provisions of the *Regulation on the Organization and Operation of the Public Institution “National Accreditation Center of the Republic of Moldova” (MOLDAC)*, approved by Government Resolution No. 77 of 25 January 2013.³³

MOLDAC organizes its activity and operates to observe Law No.235 of 1 December 2011 on Accreditation and Conformity Assessment Activities, reference standard SM SR EN ISO/CEI 17011 “Conformity Assessment. General Requirements for the Accreditation Body Ensuring the Accreditation of Conformity Assessment Institutions”, documents of European and international accreditation organizations (EA, ILAC, IAF), underlying the agreements for mutual recognition of accreditations and conformity assessment results at the European and international level.

On 30.10.2018, the National Accreditation Center MOLDAC approved the specific requirements for the accreditation of ecologic products certification institutions.³⁴ According to these requirements:

- Pursuant to Law No. 235 on Accreditation and Conformity Assessment Activities of 01.12.2011,³⁵ the National Accreditation Center shall ensure the accreditation of conformity assessment institutions based on reference standards and shall issue accreditation certificates regardless of the fact whether the conformity assessment is mandatory or voluntary. In addition, MOLDAC shall constantly comply with the reference standard, European and international documents on the operation of accreditation institutions.
- During its activity, the National Accreditation Center shall ensure the use and implementation of documents of specialized European and international organizations which set the general criteria and rules in the field of accreditation and conformity assessment. Thus, for instance, the certification institutions for labelling organic agri-food

³³ <http://lex.justice.md/index.php?action=view&view=doc&lang=1&id=346574>

³⁴ <https://acreditare.md/public/files/instructiuni/CS-OCprec-01-ed-2-site.pdf>

³⁵ https://www.legis.md/cautare/getResults?doc_id=91981&lang=ro

products shall be accredited by taking into account the SM SR EN ISO / CEI 17065: 2013 – requirements for institutions certifying products, processes, and services.

- The evaluation of the competence of a conformity assessment institution involves competence assessment of all activities carried out by the respective institution, including the competence of the staff, validity of the methodology for conformity assessment and validity of the conformity assessment results, in accordance with reference standards and requirements laid down in the documents of specialized European and other international organizations.
- The decision on accreditation shall be adopted in cases when the applicant conformity assessment institution complies with the accreditation criteria. Based on the accreditation decision, the applicant is issued an accreditation certificate for a term provided for in the reference standard, by registering the latter in the Register of Accredited Conformity Assessment Institutions. The area of accreditation approved by the National Accreditation Center shall be an integral part of the accreditation certificate.
- The National Accreditation Center³⁶ shall supervise the conformity assessment institutions for which it has issued an accreditation certificate. Such surveillance shall be carried out by monitoring the ongoing fulfillment of accreditation conditions by the accredited conformity assessment institutions. The accreditation validity confirmation shall be approved by a decision on maintaining the accreditation, issued by the National Accreditation Center, taking into consideration the positive results of surveillance assessments.
- Where it is found that a conformity assessment body that received an accreditation certificate is no longer competent to carry out a specific conformity assessment activity and does not comply with the accreditation criteria set in the applicable reference standard, the National Accreditation Center shall take all appropriate actions for restricting, suspending or withdrawing the accreditation certificate of the latter.

By carrying out a comparative analysis of the conformity requirements for the competent EU certification body, stipulated in Annex V of Regulation (EC) No. 66/2010³⁷ and the general requirements that should be met by the Moldavian certification institutions for certifying products, processes, and services to issue the certificates specified in SM SR EN ISO/ CEI 17065:2013³⁸, we can identify several similarities of the latter:

No.	Criteria	EU organization	Moldovan organization
1.	Independence and impartiality of the competent body	The competent body is independent from the organization or from the product it assesses.	The competent body shall describe in detail all the activities it carries and, if relevant, those that the parent organization carries out and are likely to be incompatible with the certification activity. Incompatible activities are those activities considered to affect or create the prerequisites to affect the

³⁶ Government Resolution No. 77 of 25.01.2013 on Reorganization of State Enterprise „Accreditation Center in the Field of Product Conformity Assessment”

³⁷ <https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32010R0066&from=NL>

³⁸ http://www.acreditare.md/public/files/docemente_de_referinta/4-DR-OCpr-04-17065-ed-2.pdf

			independence and/or impartiality of the body in the certification process.
2.	Related bodies, branch offices, subcontractors.	Competent bodies make sure that the activities of branch offices or of subcontractors do not affect the confidentiality, objectivity or impartiality of their conformity assessment activities.	Competent bodies must analyze and demonstrate to MOLDAC how they carry out the certification activity and any other activities deriving from the relation with the associated bodies, in order to establish the possibilities of conflict of interests. Competent bodies must identify activities that could (if not properly controlled) affect confidentiality, objectivity or impartiality, they must eliminate the conflict of interests, thus excluding or minimizing such risks. Competent bodies must allow MOLDAC to assess the associated bodies to ensure there is no risk to impartiality. If a risk to impartiality is identified, the competent authorities must be able to demonstrate how to eliminate or minimize such a risk. The identified risks to impartiality must be documented.
3.	Confidentiality	The competent body that has granted the EU Eco-label to the product shall not disclose, or use for any purpose unconnected with the award for use of the Eco-label, the information to which it has gained access in the course of assessing the compliance by a user of the EU Eco-label with the rules on use of the EU Eco-label.	The competent body must submit evidence to MOLDAC that they have made sure all their personnel, the committees, and the subcontracted conformity assessment body involved in respective assessment observe the confidentiality requirements.
4.	Personnel of the competent body	Competent bodies and their personnel shall carry out the conformity assessment activities with the highest degree of professional integrity and the requisite technical competence in the specific field	The competent bodies must have all the relevant evidence and records (files) to prove the competence of each employee (operational or managerial staff) in relation to the certification activity they carry out, and namely up-to-date record keeping of the identity, professionalism, qualification, performance monitoring, authority within the competent body, etc.
5.	Surveillance	The competent body shall, in respect of products to which it has awarded the EU Eco-label, verify that the product complies with the EU Eco-label criteria.	The competent body shall carry out the assessment for surveillance purpose in cases where it is provided by the scheme. The competent body shall prepare an annual surveillance program the implementation of which is under its responsibility. Surveillance must be

			established and shall include regular surveillance activities to ensure the continued validity of the demonstration of compliance with the product, process or service-related requirements, regular surveillance of labelled products.

In the light of those described above, we would like to highlight that hypothetical, MOLDAC could accredit one or more independent bodies (outside of the government ministries), responsible for carrying out the tasks provided for in the Regulation (EC) 66/2010.

- *The alternative No. 2- competent body within government ministries*

By analyzing the existing public institutions in the Republic Of Moldova, in the field of authorization of activities with impact on environmental quality, we identify the Environmental Agency. The Environmental Agency, an administrative authority subordinated to the Ministry of Agriculture, Regional Development, and Environment, is responsible for the implementation of the state policy on environment, established by Government Resolution No. 549 of 13.06.2018 on the Establishment, Organization, and Operation of Environmental Agency.

Currently, the Environmental Agency is responsible also for the regulation and authorization of activities with impact on the environment, issuing permissive documents to physical and legal entities for performing entrepreneurial activities with impact on the environment (licenses, environmental agreements, permits, certificates, notifications, opinions, and coordination papers), provided for in the List of Permissive Documents approved by Law No. 160/2011 on Regulation by Licensing of Entrepreneurial Activity.

At the same time, the goal of eco-labelling perfectly fits in the mission of the Environmental Agency, which is taking actions to ensure a healthier, better, and more sustainable environment for the population of the Republic of Moldova.

4. NATIONAL TRADEMARK “ORGANIC AGRICULTURE – REPUBLIC OF MOLDOVA”

Pursuant to provisions stipulated in the *Law No. 115 on Organic Agri-Food Production of 9 June 2005*³⁹, agri-food products that have been subject to inspection and certification procedures throughout their production cycle by inspection and certification organizations authorized by the competent body based on the accreditation provided by the national accreditation body, shall be applied the national trademark “Organic Agriculture – Republic of Moldova”. Pursuant to the Regulation on the Use of the National Trademark “Organic Agriculture – Republic of Moldova”, approved by *Government Resolution No. 884 of 22-10-2014*, the national trademark is an official sign that confirms the fact that the production process is checked by inspection and certification institutions, and guarantees that the product has been obtained in accordance with the requirements and principles of organic agriculture.

The right to use the national trademark “Organic Agriculture – Republic of Moldova” shall be granted free of charge to economic entities producing, processing, exporting, and/or marketing organic agri-food products, which are registered by the competent body, with the view to guarantee the consumers that the product bearing the national trademark has been obtained in compliance with the provisions stipulated in the *Law No. 115 of 9 June 2005 on Organic Agri-Food Production*, and the provisions of the Technical Regulation on “Organic Agri-Food Production and Labelling of Organic Agri-Food Products”, approved by *Government Resolution No. 1078 of 22 September 2008*.

Pursuant to the provisions of *Law No. 115 of 9 June 2005 on Organic Agri-Food Production* the use of the national trademark “Organic Agriculture – Republic of Moldova” shall be prohibited:

- 1) during the period of conversion to organic agri-food production;
- 2) on products containing genetically modified organisms and their derivatives;
- 3) until obtaining the conformity certificate of the organic product.

Organic agri-food products shall be certified by an inspection and certification institution accredited by the National Accreditation Center of the Republic of Moldova, taking into account the SM SR EN ISO / CEI 17065: 2013, a standard that sets the requirements for certification institutions.

However, the conformity certificates issued by the national inspection and certification institutions for organic agri-food products are not recognized in the European Union.⁴⁰ Thus, due to existing divergences between the national legislation and the EU legislation, the Republic of Moldova is not recognized by the European Union as a third party country with appropriate legislation, as provided in Article 33 of Regulation (EC) No. 834/2007⁴¹ on Organic Production and Labelling of Organic Products: “*Organic products imported into the European Community should be*

³⁹ https://www.legis.md/cautare/getResults?doc_id=115169&lang=ro

⁴⁰ Regulatory impact assessment (RIA) carried out on the draft Law on Organic Agri-Food Production and Labelling of Agri-Food Products https://particip.gov.md/public/documente/151/ro_7095_AIR-20.02.2020.docx

⁴¹ <https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32007R0834&from=EN>

allowed to be placed on the Community market as organic, where they have been produced in accordance with production rules and subject to control arrangements that are in compliance with or equivalent to those laid down in the Community legislation. In addition, the products imported under an equivalent system should be covered by a certificate issued by the competent authority or recognized control authority or body of the third country concerned.”

In this context, a good part of local economic entities, particularly those interested in exporting “organic” agri-food products, certify the organic agri-food products, contracting international inspection organizations, in line with the European standards.⁴² The negative aspect is that such certification is not recognized on the territory of the Republic of Moldova and the economic entities cannot benefit from state subsidies. On the other hand, economic entities whose agrifood products are certified by national control bodies do not meet the EU standards and have no right to export products with the mention “organic” to the EU market.

With the view to ensure the recognition at European level of conformity certificates issued by the national inspection and certification institutions for organic agri-food products, for a start, it is important to ensure a production system in line with the European standards, as well as an efficient control system to ensure the conformity of “organic” products. The recognition process starts concurrently with the submission of the application by national authorities to the EU Commission as provided in Article 33 of *Regulation (EC) No. 834/2007 on Organic Production and Labelling of Organic Products*. In this case, the conformity certificates issued by national inspection and certification bodies for the use of eco-labels will be recognized by the European Union.

Pursuant to Article 33, paragraph (1) of Regulation (EC) No. 834/2007 : “a product imported from a third country can be introduced on the Community market under the following conditions:

- a) the product has been produced in compliance with the regulations applicable to products that are similar to those mentioned under the Titles III and IV of Regulation (EC) No. 834/2007;
- b) the operators have been subject to control measures equivalent in efficiency to those referred to in the Title V, and these control measures are implemented continuously and efficiently;
- c) the operators at all stages of production, preparation, and distribution in the third country submitted their activities to a control system recognized in accordance with paragraph (2) or to a control authority or control body recognized in accordance with paragraph (3);
- d) the product is covered by a certificate of inspection issued by the competent authorities, control authorities or control bodies from the third country recognized in accordance with paragraph (2) or by a control authority or control body recognized in accordance with paragraph (3), which confirms that the product satisfies the conditions set out in this paragraph.

In accordance with the procedure referred to in the Articles 5 and 7 of Decision 1999/468/EC⁴³, the Commission shall recognize third countries whose production system complies with the

⁴² Regulatory Impact Assessment (RIA) carried out for the draft Law on Organic Agri-Food Production and Labelling of Organic Products https://particip.gov.md/public/documente/151/ro_7095_AIR-20.02.2020.docx

⁴³ <https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:31999D0468&from=RO>

principles and rules equivalent to those laid down in the Titles II, III and IV and whose control measures are of equivalent effectiveness to those laid down in the Title V, and establish a list of these countries. When examining requests for recognition, the Commission shall invite the third country to provide all the necessary information. The Commission may entrust experts with the task of examining on-the-spot the rules of production and the control measures of the third country concerned. By 31 March of each year, the recognized third countries shall send a concise annual report to the Commission on the implementation and the enforcement of the control measures established in the third countries. Based on the information included in these annual reports, the Commission, assisted by the member states, shall ensure appropriate supervision of the recognized third countries by regularly reviewing their recognition. The nature of the supervision shall be determined on the basis of an assessment of the risk of occurrence of irregularities or infringements of the provisions set out in this Regulation.

A first step made at the national level towards aligning the national legislation with the *acquis communautaire* is the development of a draft Law on Organic Agri-Food Production and Labelling of Organic Products⁴⁴. This draft Law transposes the provisions of *Regulation (EU) 2018/848 of the Parliament and of the Council of 30 May 2018 on Organic Production and Labelling of Organic Products*⁴⁵, which will further allow initiating the recognition process for the Republic of Moldova as a third party country with appropriate legislation. Also, once the national legislation is harmonized with the EU legislation, the certification institutions recognized by the European Commission to operate in third countries will be able to request the recognition by the Ministry of Agriculture, Regional Development, and Environment. Thus, the economic entities accredited by international certification organizations will be able to access national subsidies.

⁴⁴ https://cancelaria.gov.md/sites/default/files/document/attachments/proiectul_470.pdf

⁴⁵ <https://eur-lex.europa.eu/legal-content/RO/TXT/PDF/?uri=CELEX:32018R0848&from=RO>

5. RECOGNITION OF NATIONAL ECO-LABELLED PRODUCTS IN THE EUROPEAN ECONOMIC AREA

At the moment, any product or service that is supplied for distribution, consumption or use in the European Economic Area market can be awarded the Ecolabel, regardless of the origin of the product. The Regulation on the EU Ecolabel allows manufacturers, producers and retailers coming from non-European countries to apply for their products to be awarded the EU Ecolabel on the condition that they meet the criteria for their respective product group. The application can be made to the Competent Body of the country where the products are produced (if inside the EEA) or will be sold (if outside the EEA).⁴⁶

By analyzing the aspect related to the recognition of national products eco-labelled in the European Economic Area, we identify several options:

A first option would be that the economic operators of the Republic of Moldova would apply to control authorities and control bodies recognized by the EU Commission, which are competent to carry out controls and issue certificates in third countries. In practice, however, this option has proved not to be advantageous for the Republic of Moldova. A confirmation of this can be found in the Regulatory Impact Assessment (RIA) carried out on the draft Law on Organic Agri-Food Production and Labelling of Organic Products, pursuant to which economic entities currently certify organic agri-food products in compliance with a standard equivalent to the EU standard, the control bodies also being equivalent. However, due to the lack of national legislation harmonized with that of the EU, these certificates are not recognized on the territory of the Republic Of Moldova. Along with this, it has been demonstrated that the control bodies recognized as equivalent do not report to the competent authority on their activities. This also had an important impact on the evolution of submitted data, causing damage to the image of the entire organic farming sector by the fact that the Ministry of Agriculture, Regional Development, and Environment does not have up-to-date information about the quantities of certified products, the number of certified operators, and non-conformities identified at the level of the European Commission.

A second option in the context of promoting consumer information and consolidation of eco-labels as a tool for promoting sustainable consumption would be for the applicants to request and receive both labels in situations when the national eco-label and the EU eco-label have criteria for a certain group of products. It should be mentioned that, according to Article 11 of the EU Ecolabel Regulation 66/2010, the national ecolabel scheme should provide evidence that the existing national criteria are as stringent as the EU Ecolabel criteria or alternatively revise or amend them in order to align their criteria with the ones of the EU Ecolabel decision to ensure that they are at least as strict as the ones adopted by the EU Ecolabel. This alternative would mean that at the national level, the producer would benefit from local popularity of the national label and from the dimension of the EU label, while when selling their products in other member states (where their

⁴⁶ <https://ec.europa.eu/environment/ecolabel/faq.html>

national label is less known) they would benefit from the EU label. Both labels appearing side by side would increase consumer awareness of both logos and both systems would be strengthened.

To encourage the use of both labels, tax structures should be adapted so that the applicants wishing to obtain both labels benefit from an appropriate discount. For instance, they would be allowed to deduct from their fees for one label the price paid for the other label. The financial consequences (both positive and negative ones, and short-term and long-term ones) of such a thing should be considered carefully, as well as a number of procedures for settling eventual complications.

In the light of the above stated, we conclude that the most advantageous option would be the recognition the Republic of Moldova as a third country with appropriate legislation. Recital 15 of Regulation 66/2010 highlights the benefits of a harmonised approach to grant an environmental label to products traded in the EU. It sets out that in order to facilitate the marketing of products bearing environmental labels at national and Community levels, to limit additional work for companies, in particular SMEs, and to avoid confusing consumers, it is also necessary to enhance the coherence and promote harmonisation between the EU Ecolabel scheme and national eco-labelling schemes in the Community.

6. CONCLUSIONS AND RECOMMENDATIONS

As a result of the multi-sector analysis of the Eco-labelling system at the national and international levels, we consider that the benefits of Eco-labelling are indispensable in the context of sustainable development. Currently, the legislation of the Republic of Moldova does not transpose the provisions of the Regulation of the European Parliament and of the Council (EC) on EU Eco-labelling, No. 66/2010 of 25 November 2009. The disadvantages of the lack of a legal Eco-labelling mechanism at the national level are:

- a) this creates an impediment upon promotion of products with a smaller impact on the environment;
- b) the impossibility to correctly inform the consumers in the Republic of Moldova regarding the ecological characteristics of products which are sold on the market;
- c) the impossibility to certify that a given product or service complies with environmental standards;
- d) the impossibility to enhance the competitiveness of products (the Eco-label provides a competitive advantage to products on the market and allows the development of the trade market for these products);
- e) the impossibility to participate in the national programs for supporting and developing green businesses;
- f) the impossibility to indirectly monitor the observance of environmental regulations and requirements underlying the use of the Eco-labelling scheme;
- g) the impossibility to ensure the recognition of organic products at the international level, which diminishes the enterprise competitiveness;
- h) the lack of a competent body capable to perform the tasks for assessing the conformity of eco-labelled products/services, etc.

We would like to reiterate the fact that the need for instituting and regulating an Eco-labelling system at a national level derives from the obligation to both harmonize the national legislation with the EU legislation, and to accomplish the goal of integrating the environment protection, sustainable development, and green economy development principles in all sectors of the national economy.

Based on the carried-out research and formulated conclusions, and in order to develop the legislative framework in the field of eco-labelling, we consider the following recommendations welcome:

- to elaborate a draft government decision for the approval of the regulation on the ecolabel system, which would stipulate clearly and concisely the eco-labelling procedure on the territory of the Republic of Moldova, taking into account the legislation of the European Union. So, the legislative regulation at the national level of the ecolabel system will be carried out by transposing the provisions of Regulation (EC) no. 66/2010. The technical regulation establishes requirements for the award and application of voluntary environmental labelling in Moldova and regulates the procedure for the development and revision of environmental criteria.

- to carry out a market study to identify the list of priority products and services for which will be necessary to transpose the technical regulations in accordance with the criteria for assessment and award of green certificates.
- to develop a guideline on the criteria applicable to the national ecolabel. This guide will reflect the following aspects: 1) environmental requirements that a product must fulfil in order to bear the Ecolabel; 2) validity of ecological criteria; 3) the limits of the permitted changes in the production and composition of the products, which are allowed for the duration of the validity of the ecolabel criteria; etc.
- to raise public awareness about the Eco-label benefits: conducting relevant courses, trainings, seminars, in order to inform the public with the eco-labelling process and ensure the participation of national experts in those trainings.
- to train public authorities and economic operator on eco-labelling procedure; development of a training and capacity building plan, which will include training/assistance activities of representatives of local/central public authorities on the ecolabel.;
- In order to apply the regulatory framework, it is necessary to create an effective implementation mechanism. The creation of the institutional framework is a crucial step in the successful implementation of the eco-labelling process. The designation of the competent body in this sense should be carried on the basis of the analysis of the alternatives identified in p. 3. 2 Chapter III. To elaborate a study on the National normative framework from the perspective of the sanctions applicable to the Environmental Protection chapter (the code on Contraventions and the Criminal Code of Moldova) and the need to include applicable sanctions in situations of violation of eco-labelling legislation. Based on this study,
- to develop legal provisions on contraventional and criminal sanctions for the infringement of the legislation on eco-labelling.

Annex 1

Product Groups

Product Profile	Status	Links
Commercial refrigeration equipment	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/423/documents
Computers	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/416/documents
Recyclable and printable paper	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/410/documents
Cooking appliances	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/424/documents
Data centers	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/458/documents
Eco-design of energy-related products	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/426/documents
Resistant/hard coatings	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/413/documents
Imaging equipment	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/460/documents
Common store(s) frame	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/412/documents
Stationary items	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/441/documents
Retail financial products	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/432/documents
Cosmetics for rinsing	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/444/documents
Road transport	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/508/documents
Reparability scoring system	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/447/documents
Solar photovoltaic installations	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/462/documents

Product Profile	Status	Links
Taps and showers	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/464/documents
TV sets	In process of evaluation	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/466/documents
Absorbent hygiene products	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/415/documents
Bed mattresses	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/440/documents
Cleaning services	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/409/documents
Detergents	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/411/documents
Dish cleaning solutions	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/425/documents
Food and catering services	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/433/documents
Footwear	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/434/documents
Furniture	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/435/documents
Heating systems	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/437/documents
High-pressure cleaners	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/438/documents
Lubricants	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/439/documents
Office buildings	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/408/documents
Paints and varnishes	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/461/documents
Public space maintenance	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/443/documents
Street lighting and traffic signs	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/414/documents
Roads	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/445/documents
Sanitary taps	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/431/documents
Soil improvers and culture substrates	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/450/documents
Textile products	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/467/documents
Touristic accommodation and camping services	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/451/documents
Transport	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/452/documents

Product Profile	Status	Links
Washing machines and laundry driers	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/454/documents
Windows and doors	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/455/documents
Wood flooring	Completed	https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/456/documents

Source: <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups>

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