



EPEA Position Paper

on the report of the Deutsche Umwelthilfe e.V.

“Unter den Teppich gekehrt - Das große Entsorgungsproblem der Teppichbodenindustrie in Deutschland”



EPEA
The Cradle of
Cradle to Cradle



Introduction

The Deutsche Umwelthilfe (DUH) developed in cooperation with other NGOs a series of reports on the carpet recycling (<https://changingmarkets.org/portfolio/carpet-recycling/>). These reports are similar in their construction and approach but adapted to the situations of the English and French speaking commercialization areas for carpets in Europe and the United States.

These reports criticize the current situation where almost all the carpets leaving the use phase aren't recycled but disposed of or incinerated depending on the local frame conditions. EPEA and Cradle to Cradle are also mentioned in these reports. Indeed, EPEA applies the Cradle to Cradle design principles for coaching a transition of companies for enhanced safety and fitness of products as productive resources after a first use for e.g. carpet and flooring products.

EPEA is itself rooted in the environmental movement. EPEA - founded in 1987 as a spinoff of Greenpeace - recognizes of course the importance of NGOs challenging companies not to meet only a functional demand at the cheapest price with their products. This comment is a call to NGOs to consider more efforts of companies who work intensively on developing and implementing an integrated understanding of quality that includes already in the design phase positively defined environmental properties and targets for their products. This comment is based on EPEA's reading of the German version of the report authored by the Deutsche Umwelthilfe. This comment is also developed because these reports are taken over by other organizations, the criticisms are amplified and end up in unfortunately wrong statements.



About critics of the recycling performance of carpet producing companies

Producers are presented as responsible for the environmental performance of their products - which is true. External conditions are however also drivers for the situation as it is:

- Lack of financial incentives for customers / carpet users to call the producer for taking back and recycling the products after use. I.e. the cost of landfill remains too cheap and the density of incinerators, especially in Germany, is currently too high to support high investments in competitive recycling.
- Political strategies are lacking for industrial products having from a scientific point of view beneficial environmental potentials in the open environment after use.
- Immature market demand patterns for products with positively defined environmental properties, also in public procurement.
- Lacking contributions with potential for change by suppliers who need to understand the demand first before they can implement with innovations that take time at their level.

Information available and mentioned in the reports appears not to have been combined to draw proper conclusions: DUH and the other NGOs identify the fact that the "product life duration" of carpets is 7 to 20 years (p 13 in the DUH report). They also acknowledge that one company for example, has been engaged in the redesign of their products since 2008 (therefore 9 years ago, p 35 in the DUH report). Therefore, this company necessarily launched first redesigned and industrially developed products only after 2008 which means that their first redesigned carpet tiles are almost completely still in the use phase and cannot have contributed to a significant recycling figure, yet. Their claim of only 3% of recycling is the logical consequence in 2016, when the research for the reports was done. The alternative consequence would be NGOs asking for the recycling of products that weren't designed for recycling and therefore asking for generation of environmental problems!

Pioneers (and EPEA as well) may have underestimated the effort for a transition to safe and resource reproductive product designs and commercialization forms. The NGOs authoring the reports however appear to underestimate this effort as well. All carpet producing companies must however not be seen for having failed just because their recycling performance is modest today. NGOs simply come too early with such critics.



Cradle to Cradle presentation in the Infobox (p. 39)

The Cradle to Cradle Certification contains different levels between Basic and Platinum to reflect the fact that Cradle to Cradle principles isn't a base line – as in almost all certification schemes – but is based on striving to reach positively defined environmental quality targets. These can of course be reached only after a **transition** that may have to go over many steps and address many partly interdependent topics dealing with safety (material health), reuse of already used resources (that need to be available, defined and safe, first) and reusability of the product, water and energy management, and finally social conditions of production, purchased productions, and after-use management. If it wasn't so complex and if environmental and social product quality was easy and a spontaneous given, there would be no crisis to solve.

There is a logical mistake in the statement about the Gold certification standard suggesting that a system for collection and reprocessing after-use is required without quantified targets. Since C2C certificates are accompanying the commercialization of products, therefore **before** the use phase, only **recyclability** potentials can be certified indeed, not effective recycling rates **after** a use phase that creates a latency of 7 to 20 years in the case of carpets.



Conclusion

In our perception, the impatience to see effective environmental issues getting solved leads to NGOs however underestimating two **latencies**:

- The latency between the decision of a company to adopt a positive environmental quality agenda and first implementation results in form of innovations reaching the commercialization phase.
- The latency between market introduction of products with environmental benefit potentials and earning the environmental benefits after the use phase.

Especially companies pioneering with changes in products with a long use period undergo the risk not to be perceived differently than their most conservative competitors. For this reason, we invite NGOs to consider not only materialistic facts at a point in time but to give much more weight in their analysis on:

- which intentions producers set for their products entering the commercialization phase,
- which orientation their environmental quality claims have (reaching beneficial impacts or products "free of..." a certain list of problems that may be more or less relevant in the context),
- which orientation their intended investments have that will be made possible with the demand for their products as they are at the point in time for the analysis,
- what they say about impacts of their business environment on their possibilities to change.

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