



Brussels, 1 June 2018

ECOS response to the European Commission's Roadmap "Towards an EU Product Policy Framework contributing to the Circular Economy"

ECOS welcomes the European Commission's ongoing efforts to develop an EU circular economy. We strongly encourage the EU to ensure that the circular economy respects planetary boundaries and fair share of use and access to resources, and avoids and minimises negative impacts of resource use including biodiversity loss, climate change, pollution, and reduced/impaired human health.

ECOS views the European Commission's current work on EU product policy contributing to the circular economy as a continuum that began with its work on Integrated Product Policy (IPP) in the late 1990s. This work was then taken up again under the heading of Sustainable Consumption and Production and Sustainable Industrial Policy adopted in the mid-2000s. Despite this long-standing analysis and reflection on EU product policy, we regret that there has been little development on a more horizontal tool or approach to integrated, sustainable or even circular products. We therefore urge the European Commission to perform a gap analysis and to develop policy and legislative proposals to fill any gaps identified.

While the focus on circularity is welcome, several other important aspects need to be addressed on the road to circularity, such as the environmental (and social) aspects of different materials including their production, sourcing, labelling, and ease of recycling, and listing of all chemicals in final products. Lifecycle thinking is a well-established and understood approach which also needs deeper integration into policy approaches.

A circular economy also requires a horizontal sustainability approach to production and consumption, even if focused attention on a narrow range of products like energy-related products remains essential. Such a horizontal sustainability approach could be integrated into existing policy tools such as the General Product Safety Directive, which could be extended to address sustainability. The General Product Safety (and Sustainability) Directive could then be supported by vertical sectoral targeted actions addressing key product groups identified as having significant environmental impacts.

Understanding the difficulty of introducing horizontal sustainability criteria across a large range of products, the extended GPSD could start by requiring information provision on sustainability-specific aspects of products (bill of materials, chemicals present in the final product, etc.). An EU product information tool could be created, which would gather data from tools such as the future Energy Labelling Regulation product database, and the Waste Framework Directive's SVHC list. The extended GPSD's sustainability information element would fit well within this information tool.

In the context of the European Commission's work on IPP, extensive studies were undertaken to identify products with significant environmental impacts. The EIPRO project resulted in 22 product groups being highlighted¹, and three functional areas of consumption identified as having most

¹ The EIPRO project's 22 product groups are: car repairs and servicing; cheese; clothing; domestic heating equipment, including use but excluding electric heating; drugs; electric light bulbs and tubes, including use; household laundry equipment, including use; household refrigerators and freezers, including use; household use of pesticides and agricultural chemicals; meat; milk; motor vehicles, including use; new buildings and conversions; new one-family houses; other edible fats and oils; other household appliances, including use; other leisure and recreation services; poultry; sausages and other prepared meat products; services of beauty

significant impacts. Food and drink, passenger transport, and housing² were shown to represent 70-80% of environmental impacts of consumption and account for 60% of consumption expenditure. In other areas of private consumption, clothing was also highlighted as ranking highest amongst a wide range of products. The Commission's roadmap document has also identified food and drinks, textiles, construction products/buildings, furniture, cosmetics as having high circularity potential.

ECOS calls on the Commission to:

- put into practice the many studies that have pointed to significant environmental impacts and potential for improvements
- to build on experience from existing EU product policy tools to streamline criteria development processes
- to integrate into future EU product policy tools and measures the experience from independent sustainability initiatives on products (from FSC and MSC to bio-based products sustainability tools and beyond).

Through this last suggestion on independent sustainability initiatives, ECOS does not intend to communicate its support for all such initiatives, rather that there is potential to build upon the knowledge gathered through these exercises to integrate elements into a more comprehensive and transparent EU approach.

and hairdressing salons; services of restaurants and bars; and telephone, telex and communications services.
ec.europa.eu/environment/ipp/pdf/eipro_report.pdf.

² Housing included buildings, furniture, domestic appliances, and energy for purposes such as room and water heating.