



# ECOS comments on the preliminary Annual Union Work Programme for standardisation 2022

June 2021

ECOS welcomes the opportunity to comment on the preliminary draft Annual Union Work Programme (AUWP) for Standardisation for 2022.

This paper outlines ECOS' views on the proposed initiatives and perceived omissions.

We support the overall coverage of proposed activities in key environmental areas, namely natural refrigerants, air quality and industrial emissions, batteries, and Ecodesign of energy-related products. We also take the opportunity to highlight gaps and make recommendations to ensure that the European Commission's use of standards will effectively contribute to meeting EU policy and legislative requirements in areas of public interest, in particular the European Green Deal.

## Reinstate inclusiveness as a key feature of standardisation

The AUWPs put forward by the Commission setting its plans for new Standardisation Requests (SRs) used to stress the importance of inclusiveness in the standardisation system. The last one in 2021 however, failed to do so. ECOS requests the Commission to reinstate the specific clause on inclusiveness into the Communication for 2022. Only through a wide representation of actors – such as environmental NGOs and other civil society actors – can standards truly serve societal as well as market needs.

Moreover, given the growing relevance of international standardisation, the Commission should continue addressing inclusiveness and related challenges with the international standardisation organisations, namely ISO and IEC. The conditions governing international standardisation are different from the European, especially regarding inclusiveness. However, regardless of whether the standards are drafted at European or international level, it is crucial to have inclusive standardisation systems at all levels to provide for a European one that is well-functioning for all.

## Improving the proposed standardisation developments in key environmental areas

In this section, ECOS views are outlined on ways to improve or strengthen the Commission's 2022 [AUWP for Standardisation](#). While we support many of the proposed initiatives and look forward to future

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developments in other environmental areas, we regret that some key areas have not been included in the preliminary draft:

## Microplastics

ECOS wishes to highlight that specific standards are still required to support the European Commission's agenda on microplastics. The need for a coherent definition of microplastic through all work streams is urgent to support a harmonised assessment and behaviour of microplastic particles across the environment. Furthermore, the development of harmonised sampling methods, sample treatment protocols and characterisation methods (exposure and hazard), quantitative assessment, as well as the qualitative analysis of microplastics found in the environment are a necessary prerequisite to be able to make the results of the research more comparable and relevant for risk assessment and set adequate limits in policies and regulation.

In addition, standards can also help address microplastics linked to products such as tyres and synthetic clothing. ECOS calls on the European Commission to request the appropriate standardisation organisations to swiftly develop harmonised test methods for the **measurement of tyre abrasion** into its AUWP, in line with the adopted Regulation (EU) 2020/740 on the labelling of tyres, with a view to establishing a suitable test method as soon as possible and at the latest by 2023. This method is the necessary first step to enable the inclusion of abrasion and mileage as parameters into the tyre label – and ultimately help consumers choose tyres that shed less microplastics. It will then be important for the Commission to set a legal threshold for tyre wear so that the most wearing tyres are excluded from the EU market.

Similarly, a harmonised standard for the **measurement of fibre wear-off during a washing cycle** could help limit unintentionally released microplastics into the environment. Given the missed opportunity to include those aspects within the Standardisation Request to support the revised Ecodesign and Energy labelling regulations for household washing machines, ECOS calls on the European Commission for its inclusion in the AUWP 2022. It will be important to include some focus on their biodegradability and on ecotoxicity as well.

It is important to make sure that any proposed methodology to fight against microplastics will not overlook **pellet loss**. While a harmonised set of best practices to minimise pellet loss throughout the supply chain would be key to support any regulatory action to limit microplastics accidentally leaked into the environment, a growing body of evidence demonstrates that a mandatory supply-chain accreditation approach, incorporating certification and chain of custody to verify best practice handling and management, is the most efficient and cost-effective means to minimise this considerable source of microplastic pollution.

## Recycled content

A Standardisation Request to support the upcoming EC Implementing Act on the calculation methodology of recycled content for the implementation of the Single Use Plastic Directive should mandate the revision of EN 15343:2007 *Plastics - Recycled Plastics - Plastics recycling traceability and assessment of conformity and recycled content* in order to align the definitions, calculation methods and verification procedure with EU legislation.



## Packaging and packaging waste

To ensure the packaging standards are revised and support homogeneous packaging specifications, especially for plastic packaging, and apply the EU concepts of recyclability and reusability under the revised Packaging and packaging waste Directive 94/62/CE, a specific Standardisation Request should be foreseen in 2022.

## Textiles

ECOS calls for a Standardisation Request to support circularity in textiles. The Commission rightly believes there is a large potential for circular economy action in the textile sector and a sectoral plan for textiles in the Circular Economy Action Plan has been identified as a priority in the European Green Deal, which also sets out the Commission's zero pollution ambition for a toxic-free environment. Product design is of crucial importance as it determines the environmental performance and impacts of a product throughout its entire life cycle.

To facilitate such action, we need standards to assess and measure among others<sup>1</sup>, the following:

- assess durability, reusability, repairability and recyclability, determine the amount of recycled content, quantify the shedding of microplastics their biodegradability and ecotoxicity,
- assess and validate products and materials for reuse, assess and validate products and materials derived from waste and recycled sources; presence of chemicals.
- Standardisation of circular waste management practices, laying out processes that encourage textile reuse and high-quality textile-to-textile recycling.
- Development of new standards to assess and declare certain parameters relevant to material use such as reduced use of virgin material, increased material recovery and the share of recycled content, as well as relating to material quality to facilitate the use of low-carbon materials and to reduce the use of hazardous substances.
- Product standards to include and describe requirements regarding the reusability and longevity of products during their life cycle, to contain suitable technical specifications to be recyclable.

## Batteries

ECOS supports this SR whose objective is to optimise recycling markets and enhance closed material loops in order to mitigate the supply risk for raw materials. However, we urge the Commission to ensure that standardisation deliverables responding to this SR are adopted in a timely manner to avoid hindering the objectives of the Battery Regulation proposals and its targets for material recovery.

## Natural refrigerants

ECOS welcomes this item, especially the revision of EN 378 standard series. We believe that M/555, which will be completed in 2021, did not lead to a direct revision of standards, but only to the development of Technical Specifications and a Technical Report which cannot contradict European Standards by definition. These deliverables, albeit very useful for refrigerants' operators, are still insufficient for a substantial uptake of natural refrigerants whose charge limits are still challenged by EN 378.

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<sup>1</sup> Durable, repairable and mainstream. How ecodesign can make our textiles more circular. ECOS, 2021. Annex I  
[ECOS comments on preliminary AUWP for standardisation 2022](#)



We urge that this new SR attempt will not be as vague as M/555, and that it will target specific revisions of standards for a higher uptake of natural refrigerants only, and not of fluorinated refrigerants. The fact that the EN 378 series is not harmonised with EU F-Gas Regulation, but with other EU legislation, should not be a reason for lower ambition. Finally, we would like EN 378 to be aligned to the European Chemical Agency safety classifications, especially regarding chronic toxicity levels.

## Hydrogen

In its AUWP of 2017, the European Commission included an item on the standardisation of “renewable electrolytic hydrogen” and its injection into the European gas grid, but this SR has not materialised so far. The new item included in the AUWP 2022 draft only refers to “hydrogen” and its quality vis-à-vis fossil gas. We believe that this item should not be referenced under the Renewable Energy Directive, which does not deal with transport, storage and operational efficiency of “hydrogen”. The current item only refers to blending of hydrogen into the gas grid which we do not believe is a long-term solution for decarbonisation of our energy systems. The item should rather refer to dedicated hydrogen infrastructure and specify that the focus should be on “renewable electrolytic hydrogen”.

## Construction products

ECOS calls for the Commission to plan for an additional SR to support and accelerate the development of essential standards supporting circularity in the construction sector. Such standards should support on the provision of the following:

- Commonly agreed definition of key circular construction terminology,
- Development of harmonised circular environmental sustainability assessment method taking into account different material loops,
- Development of validation methods on inherent characteristics relating to circular construction products (e.g., durability, reusability, repairability),
- Development of key standards for closing the loop, both for reuse and recycling,
- Development of essential standards for data and information supporting a circular construction sector.

## Common charger

In order to ensure that the forthcoming common charger initiative consistently tackles charging performance across different cables and prevents proliferation of incompatible chargers, a Standardisation Request must be issued for a standardised fast charge protocol. While charger performance is partially covered through the planned Standardisation Request for external power supplies under Ecodesign, the focus at the moment is only on energy efficiency and should therefore be extended.

## Ecodesign & Energy labelling of Energy-related products

Ecodesign and Energy Labelling constitute an area which is supported by numerous standards and therefore Standardisation Requests, due to its coverage of a wide range of product categories. In order to serve the purpose of providing state-of-the-art methodologies and reflecting market and technological progress, new SRs need to be considered each time new regulatory proposals are being made either for



products newly regulated or for those that regulations are being revised. Such SRs must also be aligned with recent key regulatory provisions and, while respecting product specificities, still maintain a level of consistency amongst each other. Specifically, in order to implement provisions provided in the framework Energy Labelling Regulation 2017/1369 as well as in the Ecodesign regulations published in 2019, SRs must:

- request standards containing methodologies which represent as far as possible real-life conditions of product use and consumer behaviour,
- request standards that will consider ways to address circumvention,
- request product-specific standards to support regulatory provisions related to material efficiency, such as durability, reparability, recyclability and others,
- ensure that harmonised standards do not make any reference to regulations in their normative body, modify any legal definition, contain provisions concerning responsibilities for market surveillance authorities.

Additionally, comments on Ecodesign-related SRs for specific products are provided below:

- ECOS expects a swift adoption of the SR for **electronic displays**, which was already identified in the AUWP for 2021 but has faced significant delays. The SR should cover not only new and more consumer-relevant energy efficiency test methods for televisions, monitors and digital signage displays, but also standards related to material efficiency aspects covered by the new regulatory requirements (e.g. on reparability and software and firmware support), as well as methods that limit the use and facilitate the recycling of critical raw materials in view of the planned revision of the regulation.
- ECOS supports the long-awaited SR for **vacuum cleaners** in relation to the decision of annulment of the Energy Labelling Regulation, and to align with the “ongoing” revision of the Ecodesign Regulation. The SR should aim at developing a more representative measurement method for the performance involving a partly-loaded instead of an empty receptacle. Moreover, it shall also set the principles for the development of standards for the performance measurement of robot and cordless vacuum cleaners in order to facilitate their inclusion in the revised scope of the regulations.
- The foreseen SR for **air conditioners and heat pumps** should enable the development of a method to test heat pumps with the compensation/dynamic method and to account for thermal comfort.
- While we welcome the inclusion of the SR for **light sources**, additional objectives should be considered mandating methods in relation to durability and lifetime, as well as those that would facilitate future regulatory intervention on the removability and exchangeability of light sources and control gears.
- We welcome the planned SR for **space heating** appliances to fill in the gap left by the rejection of M/550. In particular, we believe that the recently circulated draft SR for space heating under the CPR Regulation risks creating confusion in the relationship between the Ecodesign and CPR legislative frameworks. Concerning solid fuel local space heaters specifically, the SR should be adopted in alignment with the regulatory discussions and enable several methods to measure the particulate matter emissions (not restricting it to the EN-PME method only) including a method to count the particles given that the most harmful ones are the smallest.
- ECOS supports the planned standardisation work on industrial products: **industrial fans, variable speed drivers and electric motors**. Although similar SRs were foreseen in previous AUWPs, these have not materialised so far. We particularly welcome the extension of the scope of the SRs compared to previous plans.



- We welcome the planned SRs for other appliances such as **space and water heaters, computers, external power supplies, household cooking appliances, refrigerating appliances, refrigerating appliances with a direct sales functions and standby**. These SRs should facilitate the setting and implementation of new regulatory requirements.
- New SR is needed for **mobile phones and tablets**, which regrettably does not feature in the AUWP at the moment. The SR should facilitate the setting and implementation of new regulatory requirements, notably in relation to material efficiency aspects but also for the purposes of energy labelling.
- In order to align with the review process of the Ecodesign and Energy Labelling regulations for **tumble driers**, a new SR might be needed for the existing standard measurement method to be in line with the latest policy developments which should include revised aspects on energy efficiency, material efficiency, circumvention and real-life user behavior.
- The need for a specific SR related to **photovoltaic modules**, systems and inverters should be considered on the basis of the outcome of the Consultation Forum for these products. Particular focus should be given to material efficiency, and in particular durability, as this aspect stands out from the Ecodesign preparatory study.
- The need for a specific SR related to **Building Automation and Controls** should be considered on the basis of the outcome of the Consultation Forum for these products.
- **Non-household washing machines and dishwashers**: the blockage on the regulatory developments for these products since 2014 is based mainly on the lack of common measurement methods. Also, the SR issued in 2015 was rejected by CENELEC. ECOS insists on the urgency for a SR to develop measurement methods for energy and water performance.
- **Professional cooking appliances**: similarly to the regulatory inaction on non-household washing machines and dishwashers, regulatory developments on commercial/professional cooking appliances are stalled. ECOS insists on the urgency for a SR to develop measurement methods for energy performance in order to allow the regulatory discussion move forward.
- Despite the regulatory requirements on **product-specific material efficiency** already in place for the latest Ecodesign regulations adopted in 2019, only the SRs adopted afterwards for servers has included those aspects. Whereas SRs for other products such as washing machines and dishwashers have omitted material efficiency aspects and focused merely on performance. ECOS urges the Commission to consider the systematic inclusion of those aspects into all Ecodesign regulations, and therefore expects relevant SRs to support such requirements with measurement methods without further delay.

## Waste and raw materials

- The Commission must foresee a SR to support the upcoming Implementing Act on **waste electrical and electronic equipment** (WEEE). The EN 50625 series and EN 50614 on preparation for re-use need to be revised in order to upgrade requirements in line with the legal act and the latest environmental legislation (e.g. on POP), and to remove the legal requirements from the standards.
- A SR is needed on quality standards for secondary **Critical Raw Materials** (CRM). To follow up on the ancillary action on material efficient recycling and preparation for re-use of CRM from different waste streams and set up quality standards.
- A SR to support the revised **end-of-life vehicle** Directive can already be anticipated as the introduction of new standards supporting the circular design of vehicles, especially of plastic parts will be soon needed.

