



ecos

Implementing the EU Ecodesign for Sustainable Products Regulation ESPR

ECOS

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23 April 2024

ESPR quick links – ECOS resources

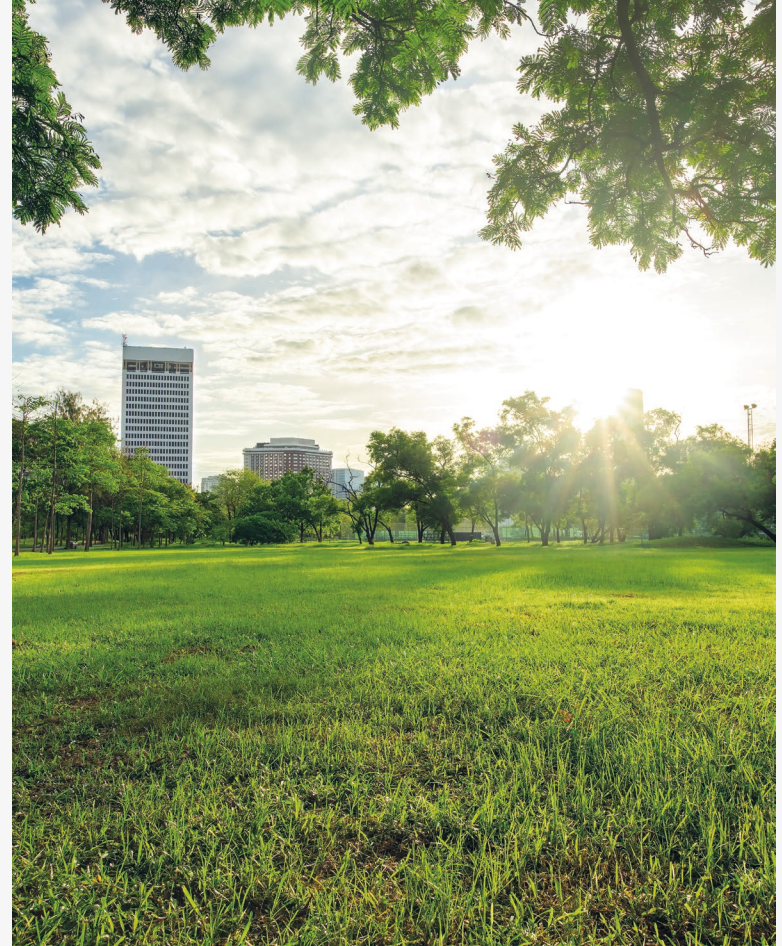
- Ecodesign for Sustainable Products Regulation - [analysis of final text](#).
- [Recommendations for the Ecodesign Forum](#)
- Complete [our product interest survey](#) – or scan the QR code!



Agenda

- 10:05 Welcome and introduction
- 10:15 Overview of ecodesign and framework
 - How it works now (Ecodesign Directive)
 - How it will work in the future (ESPR)
- 10:30 Products and timeline of working plan
- 10:45 Deep-dive in the Ecodesign Forum
 - How the current Consultation Forum works
 - ECOS recommendations for the Ecodesign Forum
- 11:00 What's next and how to get involved
 - The textile example
- 11:10 Open discussion
- 11:25 Concluding remarks and closure

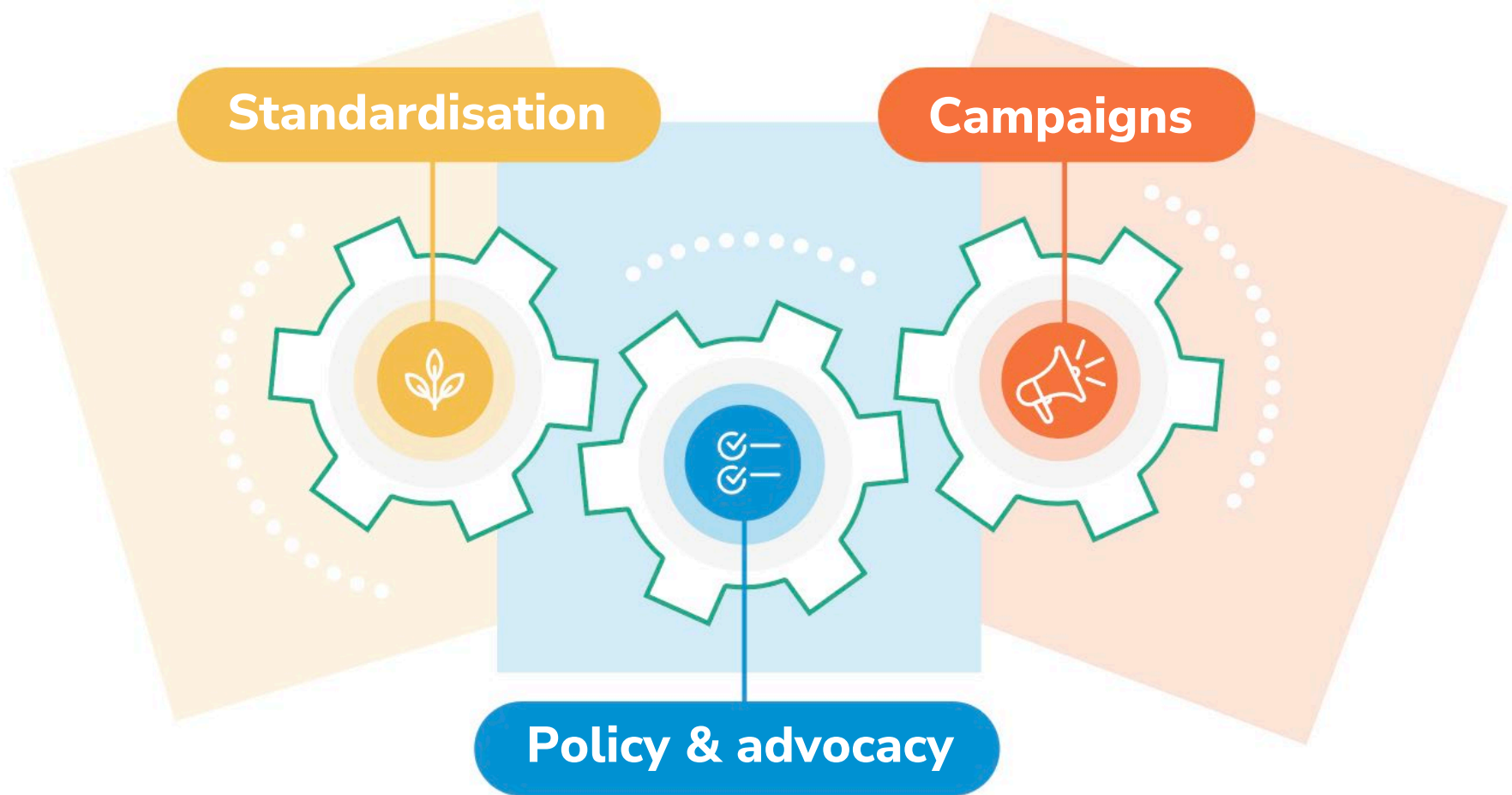
About ECOS



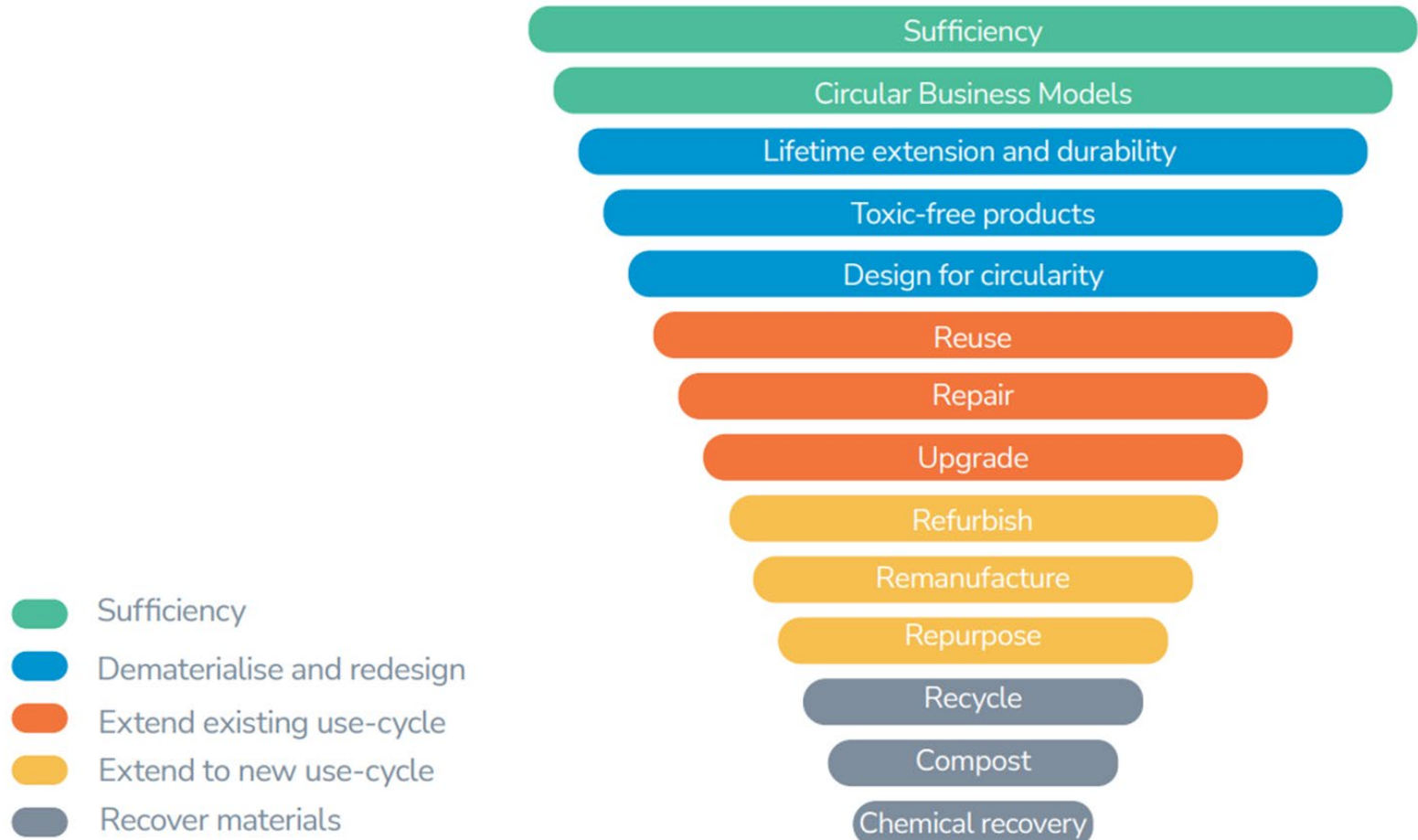
In a nutshell



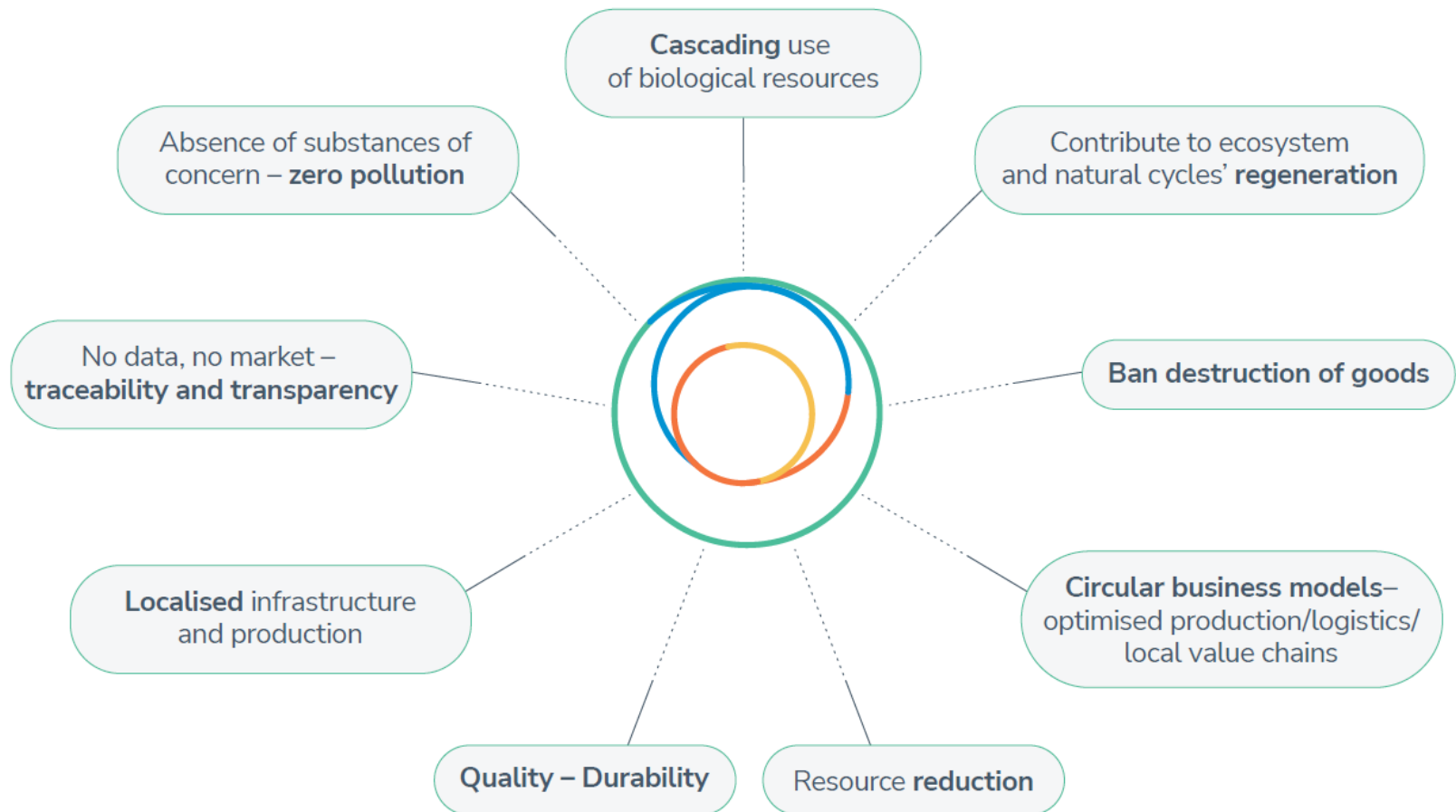
The ECOS method – **how do we work?**



ECOS hierarchy for product policies



ECOS vision for Circular Economy & Product Policies



Who works on ESPR at ECOS?

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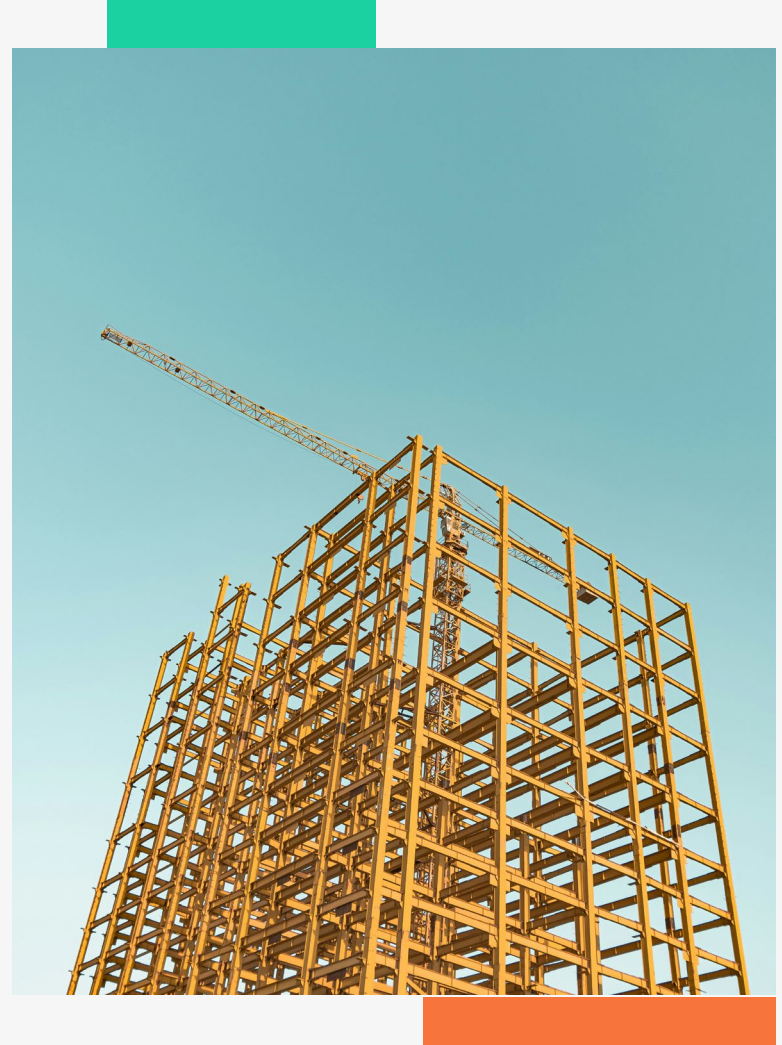
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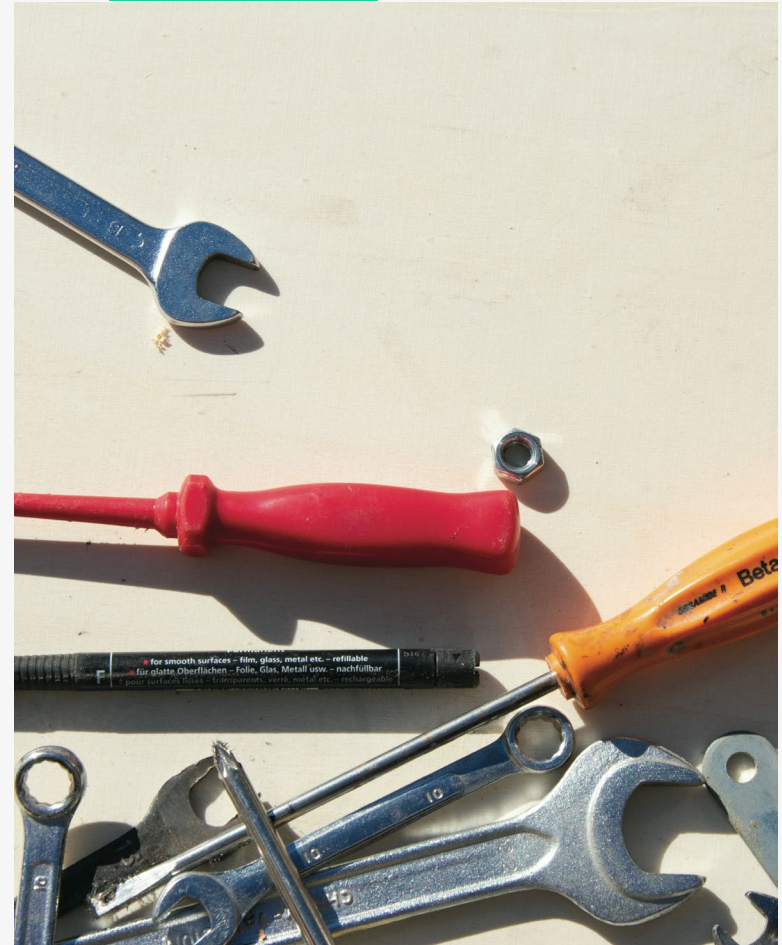
- Communication



Overview of ESPR legislation and framework



How ecodesign works now



Push and pulls

2009

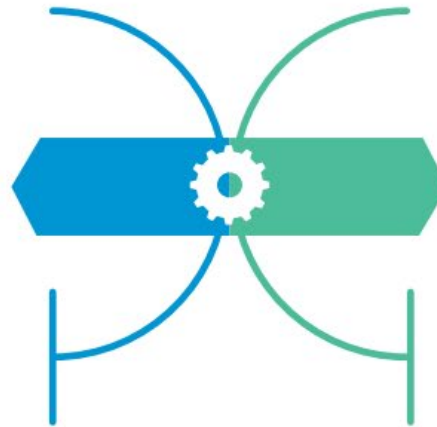
Ecodesign Directive

Pushes worst products off the market

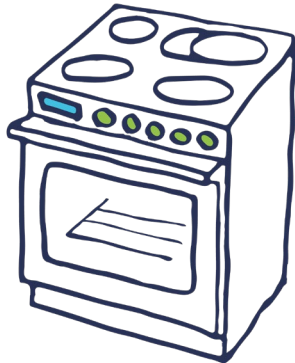
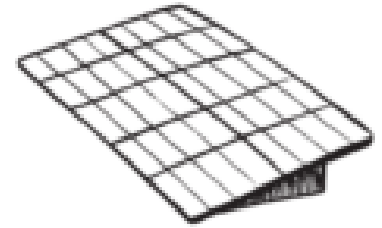
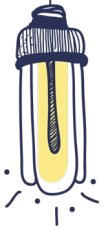
2017

Labelling Regulation

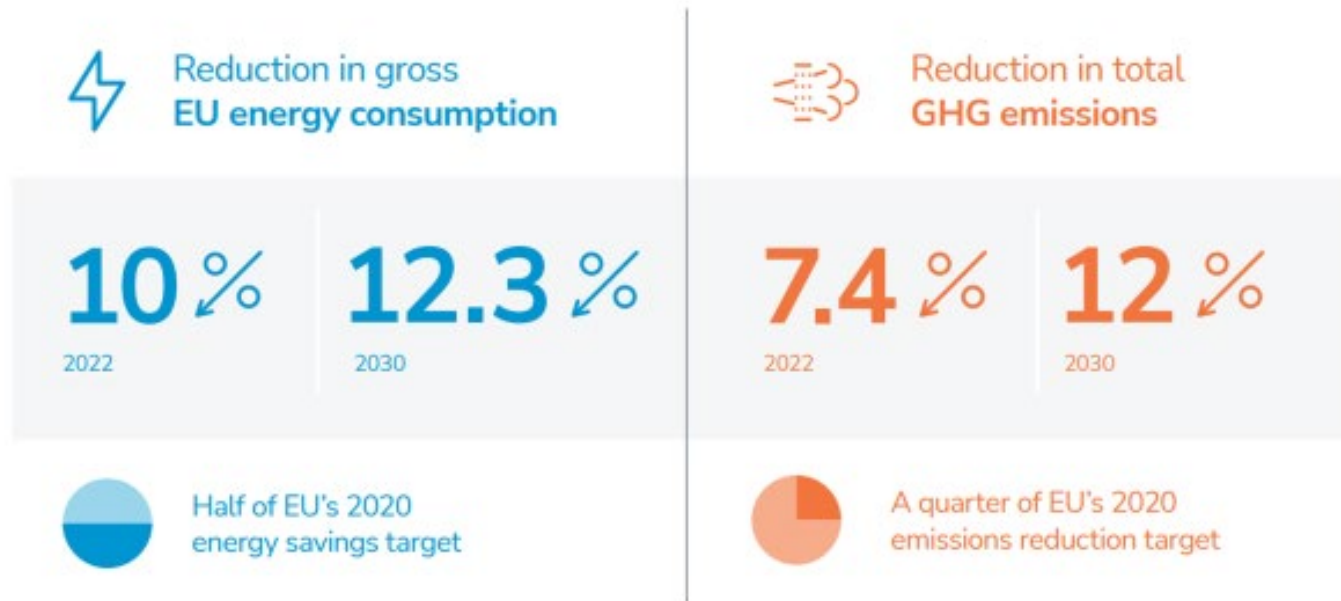
Pulls consumers towards better products



Energy-related products



Ecodesign: A success story



And this is only with 28 product groups covered (with more to come)

... and energy bills savings up to €285 per year per avg. household

How it will work in the future



Why is the ESPR important?

ESPR focuses on enhancing product sustainability across the EU. It requires producers to integrate ecological considerations from design to disposal and mandatory product disclosures.

- Opportunity to reform value chains – essential rules for a circular economy
- Setting a path and a direction
- Implementations will take years, with opportunities for continuous improvement

[Learn more in our analysis:](#)



ESPR Main Features



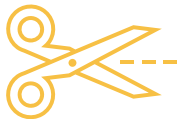
- Applicable across **all product groups** except food, feed, military products, medicinal products, vehicles



- **Ecodesign requirements** for more sustainable products: durability, repairability, reusability, upgradeability, absence of substances of concern.



- **Digital product passport** to share important information across the value chain - inform sustainability-relevant decision-making.



- Reporting and ban on the **destruction of unsold goods** - starting with textiles.



- Ensure consistency with other policies: **GPP** and more **resources** in the Commission for product policies

Ultimately, the success of the ESPR depends on its implementation, including upcoming activities, secondary legislation, and the role of standardisation.

Wins and lost battles

- Link objectives to key environmental parameters (carbon and material footprints).
 - Key product groups & sectors identified, e.g. ICT, textiles, steel, cement.
 - Ban the destruction of unsold goods – starting with textiles
 - Transparency overall and transparency on substances + possibility to restrict on impacts on human health and environment.
 - Social & due diligence: a pathway for inclusion in the review
 - Performance requirements & product parameters: horizontal requirements encouraged and material footprint as an indicator.
- Creation of appropriate governance.
 - Increase resources for policy makers, market surveillance and NGOs for the development of secondary legislation.
- Need for strong sanctions in cases of non-compliance.
 - Ensure appropriate liability and enforcement for online sales.
 - Removal of the possibility to create voluntary agreements.

Product – ecodesign requirements

Ecodesign requirements include performance & information requirements.

Where 2+ product groups show similarities: possibility of horizontal ecodesign requirements

- Durability
- Reliability
- Reusability
- Upgradability
- Reparability
- Possibility of maintenance & refurbishment
- Presence of substances of concern
- Energy use and energy efficiency
- Water use and water efficiency
- Resource use and resource efficiency
- Recycled content
- Possibility of remanufacturing
- Possibility of recycling
- Possibility of recovery of materials
- Environmental impacts, including carbon and environmental footprint
- Expected generation of waste

Product parameters

- Product requirements based on parameters (Annex I)- the specific features to be measured -while requirements are the performance targets those features must meet.
- Civil Society's wins:
 - impact of **substances on human health and environment**,
 - the use or consumption of energy and water, emissions to air, water and soil,
 - the release of micro and nanoplastics,
 - **material footprint** of products.

Substances of concern in ESPR – our impacts

- Performance requirements should reduce “significant risks to human health or the environment”
- Substances hindering circularity under “standard technologies”
- Tracking of SoC throughout the life cycle of products
- Expanded definition to include substances identified as PoPs
- Product policy & restrictions: PPWR – PFAS restriction / halogenated flame retardants in displays

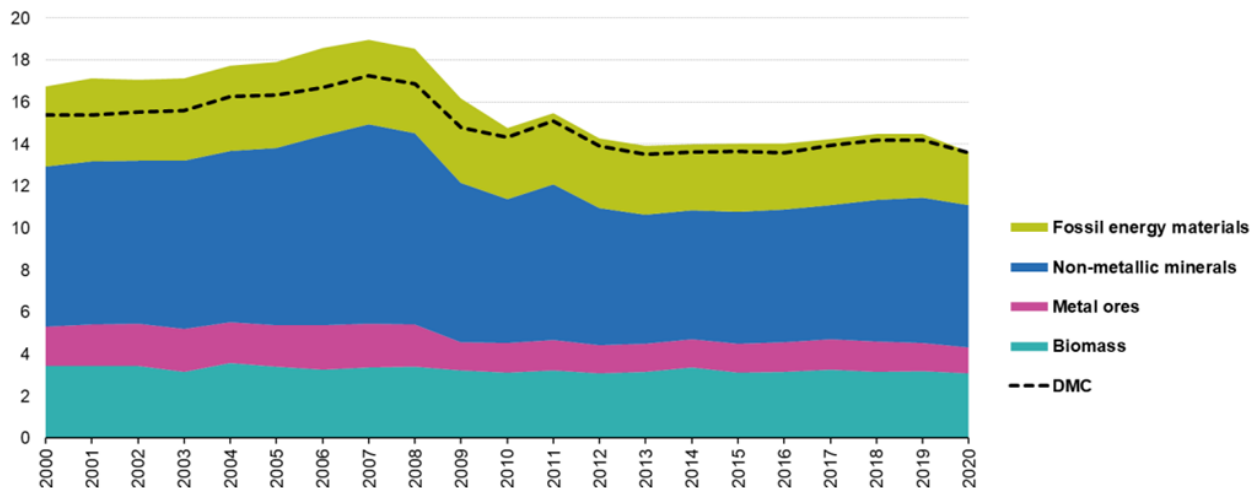
Key Opportunity for Chemicals in Products

- Elections + New Commission
- Shift in priorities and framing – circular economy
- REACH reform: pending...
- Key areas to improve:
 - Traceability and transparency
 - Address EDCs, SVHCs, and others not adequately addressed by REACH
 - Textiles, paints, detergents, tyres



Ensure the ESPR leads to material footprint reductions

Raw material consumption (RMC) by main material categories, EU, 2000-2020
(tonnes per capita)



The EU, which represents 6% of the world's population, consumed 17% of all the raw materials that were extracted in 2019

Source: Eurostat (online data codes: env_ac_mfa, env_ac_rme)

eurostat 

The ESPR and Material Footprint

The main objectives of the Regulation:

- To improve the environmental sustainability of products
- To improve the functioning of the internal market

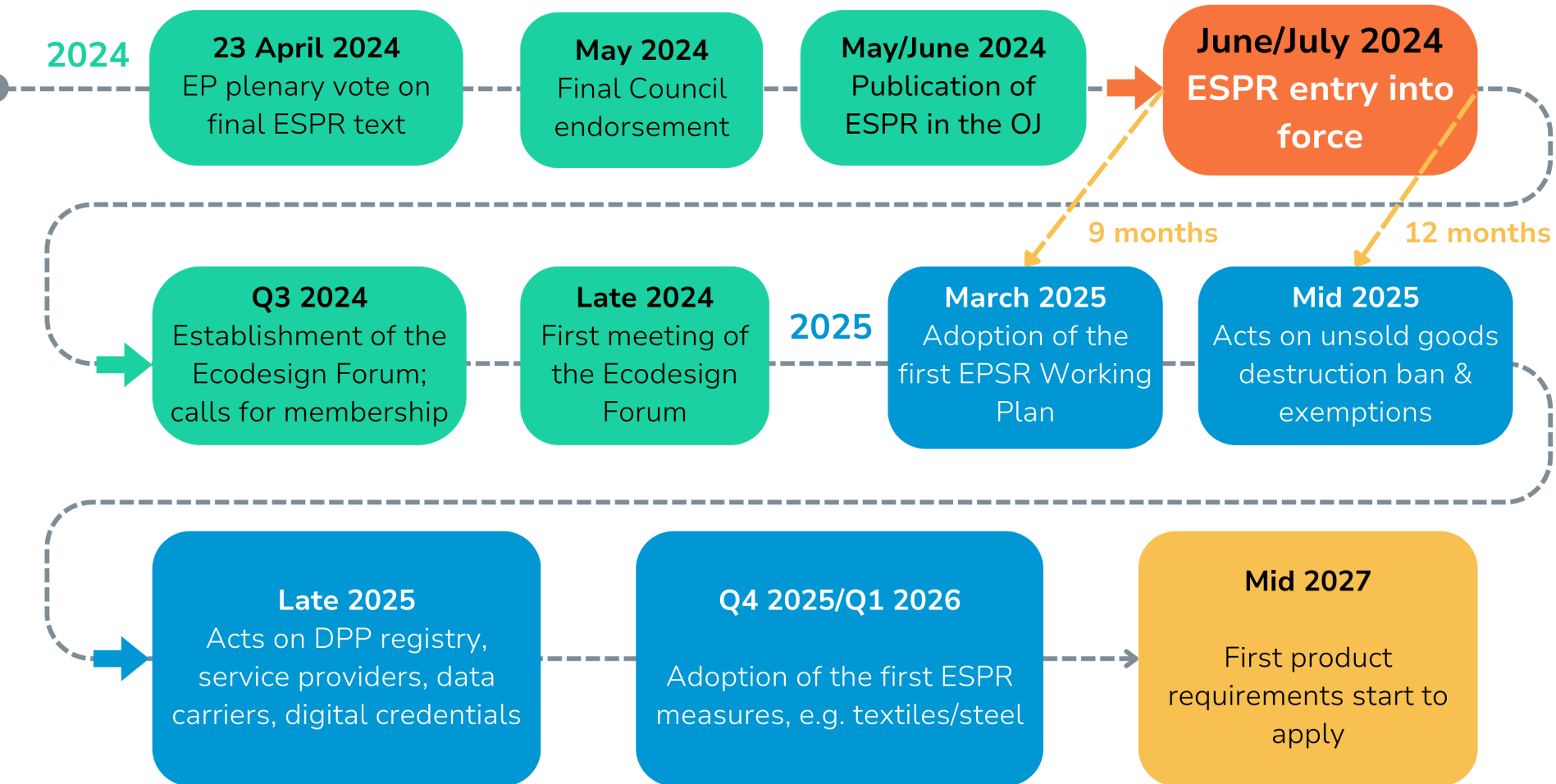
ESPR should also contribute to achieving:

European Climate Law	8th Environmental Action Programme
<p>A binding commitment of:</p> <ul style="list-style-type: none">• At least 55% of GHG emissions reduced by 2030• Economy-wide climate neutrality by 2050	<ul style="list-style-type: none">• By 2050 at the latest, Europeans live well, within planetary boundaries, in a well-being economy where nothing is wasted

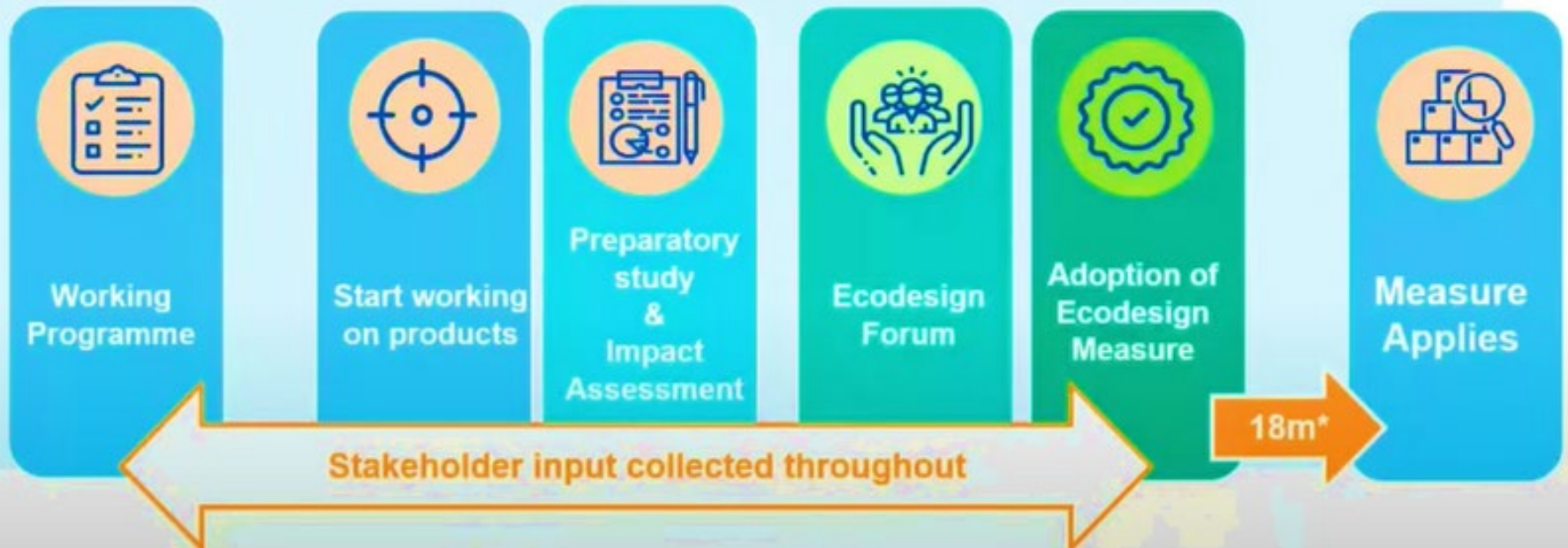
Products and timeline of working plan



ESPR: Tentative timeline



Process for adoption of Ecodesign measures



European Commission presentation March 2024

First working plan

- The European Commission will first focus on setting sustainability requirements for categories with the biggest environmental impact:
 - **Intermediate products:** e.g. iron, steel and aluminium, lubricants, and chemicals
 - **Products:** e.g. textiles (notably garments and footwear), furniture (including mattresses), tyres, detergents, paints, energy-related products, and ICT products/other electronics.
- The Commission must provide a justification if the WP list is changed (omission or addition).
- To be adopted no later than 9 months after the entry into force

Methodology behind 1stWP priorities

Figure III. The 12 shortlisted end-use products.



Start with the base: preparatory study

Purpose: to establish whether the product represents:

1. A significant volume of trade.
2. Significant environmental impact over its life-cycle.
3. Significant improvement potential without excessive costs, e.g. wide disparity in environmental performance between products of equivalent functionality.

Structure & methodology defined

What about standards?

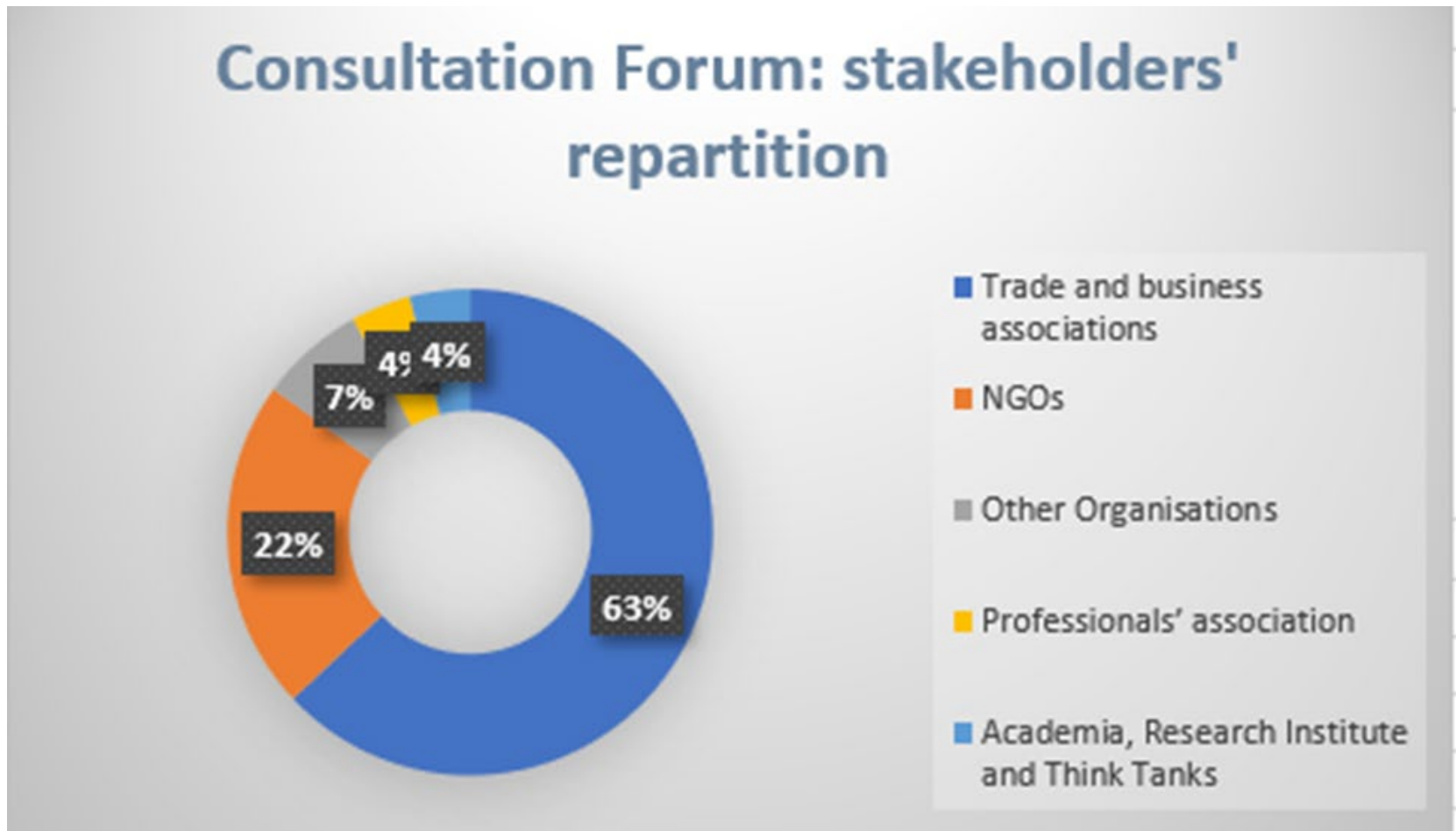
They can play a significant role in its implementation. Industry can use standards to ensure their products meet the ESPR's goals and standardisers have all started preempting this work – crucial for us to be there.

- Standards provide a common technical language, can simplify compliance with ESPR and can promote consistency across the European market.
- Direct complementary role of European standards, which help ascertain conformity with requirements:
- Allow manufacturers to prove conformity with requirements & affix the CE marking onto products which is necessary to sell in the EU;
- Help market surveillance authorities to verify that requirements are met.

Deep-dive in Ecodesign Forum



Involvement of CSOs in Consultation Forum



Our experience:

ECOS has 17 years' experience in the ED&EL CF



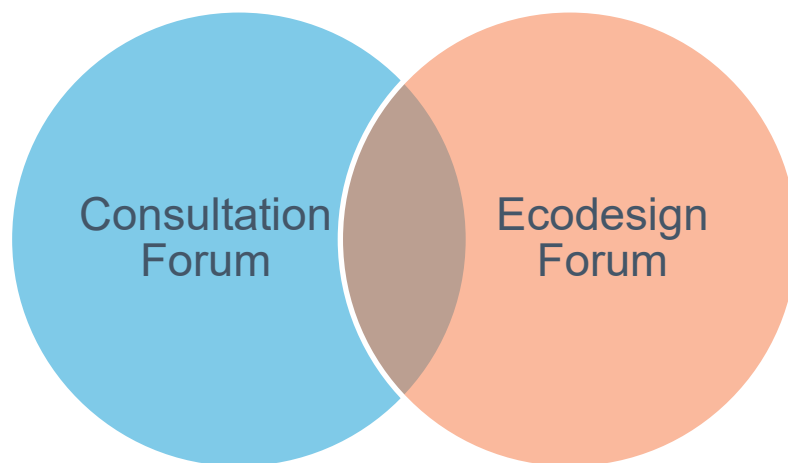
- Environmental stakeholders and consumers represented
- Focused discussions



- Chronic delays and multiplication of studies
- Limitation of 5 representatives per organisation
- Transparency
- Some stakeholders are not represented (e.g. Repairers)

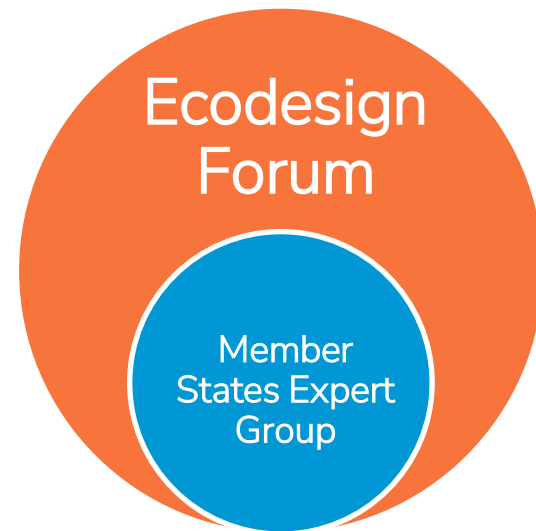
Until 2030: CF & EDF

- Until 2030, Consultation Forum and Ecodesign Forum will co-exist in parallel, with limited role for CF from 2027 onwards.
- EDF responsible for work on products/ horizontal requirements in ESPR WP including new products and certain energy-related products for which measures are not yet in the pipeline.



Ecodesign Forum (EDF)- Role

- Prepares ecodesign requirements
- Prepares working plans
- Examines the effectiveness of MS mechanism
- Assesses self-regulation
- Assesses prohibition of destruction of unsold goods



Ecodesign Forum

ECOS Recommendations



Process and transparency

Ecodesign Forum and a Member State Expert group: no duplication & no delays

Expert Group - national experts without conflict of interest

Forum to be efficient & stay on schedule, more transparency along the way



Inclusiveness

Thorough & inclusive stakeholder involvement & consultation

Different products = different expert needs: product-specific sub-groups

Inclusion of repairers, circular operators, social enterprises, trade unions, importers, environmental & consumer organisations – positive signals in the final ESPR text



Resources

Ensure that relevant offices are fully staffed to manage the workload

Commission to secure sufficient resources and ensure that funding is in place for **substantial, long-term and stable support for the effective involvement of civil society in the Ecodesign forum.**

Ecodesign Forum (EDF) – Next steps



EC decision to establish EDF including rules – Q3 2024



Call for membership application - Q3 2024

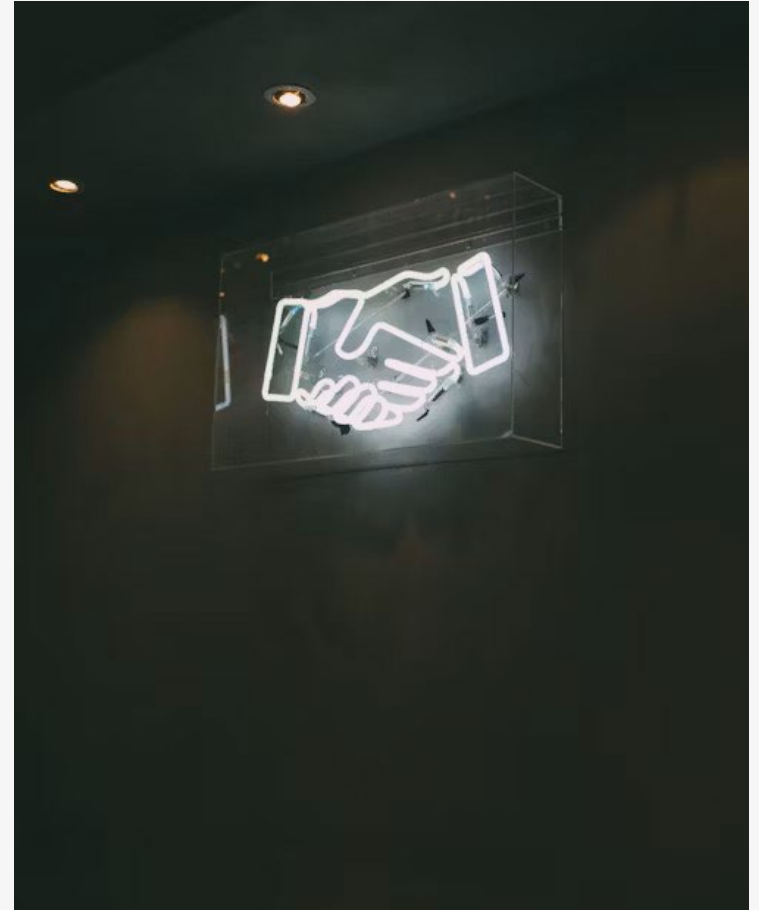


Rules of procedure adopted at the 1st meeting



First meeting of Ecodesign Forum – before end of 2024

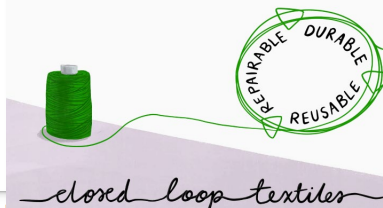
**What's next...
and how to get
involved**



ECOS work on textiles

Durable, repairable and mainstream

How ecodesign can make our textiles circular



Working paper

Exploring sufficiency approaches to textiles policy

Dr. Katia Dayan Vladimirova, University of Geneva
Luca Boniolo and Valeria Botta, ECOS

This report was developed as part of the 'closed loop textiles' project, which aims to explore how the environment in Europe's circular economy of the 2022 ETC/CE work programme. Lars Fogh Mortensen (EEA) and Saskia Mans (ETC/CE) were project supervisors and contributors, Jana Deckers was the lead author. Francesca (CSCP) provided graphical support. Bart Ullstein (BEC) carefully edited the report.

The authors are grateful to the following experts and organisations for their comments that substantially improved the quality of the report:

EEA experts:

- Almut Reichel

ETC experts:

- Tom Duhoux, VITO

External experts:

- Dalena White, Wool Textile Organisation
- Tone Skårdal Tobiasson, Union of Concerned Researchers in Fashion
- Tanja Gotthardsen, Continual CSR
- Valeria Botta, ECOS
- Else Skjold, Royal Danish Academy
- Jesper Richardy, Royal Danish Academy
- Candide Duflocq, CIRFS
- Francesco Mirizzi, European Indu



FAIR & SUSTAINABLE TEXTILES

EUROPEAN CIVIL SOCIETY STRATEGY

Dear Executive Vice-President Timmermans,
Dear Commissioner Sinkvilius,

We, the undersigned organisations, welcome the EU Strategy for Sustainable and Circular Textiles and its clear commitments to driving sustainability in the textiles sector.

However, we would like to outline our concerns regarding the development of the Product Environmental Footprint Category Rules (PEF-CR) for apparel and footwear which the Commission has stated will be taken into account in the context of developing criteria to substantiate and communicate environmental claims.

We believe there is a risk that the PEF-CR for apparel and footwear will give a limited and unholistic picture of product impact. As such, it is our view that the PEF-CR for apparel and footwear should not be used as a standalone method for underpinning labelling, green claims made in marketing, or any other EU policy measures announced as part of the EU Strategy for Sustainable and Circular Textiles.

We would welcome a discussion with you on our concerns:

• Governance

The development of the PEF-CR for apparel and footwear is mainly driven by representatives from industry groups. Civil society organisations are involved in a limited capacity as observers without voting rights, MEPs and Member State authorities are underrepresented in the process, and actors from the whole global value chain are not fairly represented (for example, small, local, craft-based industry, suppliers, manufacturers, and consumers).

• Poor data quality

The PEF-CR are being developed by building on the comparison of data from different available life cycle assessments (LCA). However, comparing LCA data can be problematic if the same boundaries and methods of allocation have not been used. Equally, it can be problematic if sample sizes are too small and unrepresentative and/or based on outdated or self-reported data. In addition, the PEF method is to a large extent based on the use of global average secondary data which fails to capture local variations in environmental impacts.

• Full product lifecycle not covered

LCA studies also do not fully capture the environmental impact of the product's whole life cycle. Highly toxic chemicals, such as PFAS, continue to play a major role in the production of textiles. Yet, the PEF method does not fully capture toxicity related to direct human exposure through the whole life cycle of the garment, including worker's exposure through manufacturing, use and waste treatment. The PEF-CR for apparel and footwear contains no measurement of microplastic shedding. The impact of the textile sector on biodiversity as well as animal welfare are also not taken into account in the method.

• Social impacts not included

LCA studies tell us nothing about the social conditions that a specific product was produced in (for example, whether workers received a living wage). There is also no consideration given to the socio-economic, cultural, and health impacts of recommending one fibre over another. Such a narrow view of product sustainability is not coherent with the EU's own commitments to the Sustainable Development Goals (SDGs).

• Method overly rewards fibres made from recycled PET bottles

There is a risk that the method would give a bonus for recycling PET packaging into polyester fibres. However, the EU Textile Strategy identified that using recycled plastic polymers from sorted PET bottles poses a risk of misleading

24 October 2022



Deep dive: Standards to measure textile durability

Technical paper

Authors: Valeria Botta, ECOS; Ebba Magnusson, technical expert



1 June 2023

society joint reaction to the European Parliament report on an EU Strategy for Sustainable and Circular Textiles

The European Parliament has sent an unequivocal signal, with 600 positive votes, that the industry needs to transform its practices towards true respect of social and environmental

With this report, the European Parliament has improved the Commission's original proposal by recognising that social and environmental aspects are two sides of the same coin.

Moreover, the European Parliament acknowledges the global dimension of the industry, as well as its specific challenges related to social issues, the gender-dimension, and overproduction.

that are
voted
clear c



... of 600 Members of the European Parliament
... icymakers at the EU and national levels to listen
... ambition into concrete legislative initiatives.

What's next: Ecodesign for textiles

EU Textile Strategy sets the vision for 2030:

- “binding product-specific ecodesign requirements to *increase textiles’ performance* in terms of *durability, reusability, reparability, fibre-to-fibre recyclability* and *mandatory recycled fibre content*, to minimise and track the presence of *substances of concern* and to *reduce the adverse impacts on climate and the environment*”
- Revision of the **EU Ecolabel** criteria for textiles
- Introduction of mandatory criteria for **green public procurement**



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JRC preparatory study - timeline

Milestone	Topics addressed	Timeline
Initial questionnaire	Definitions, scope, market analysis, user behaviour, ecodesign aspects, EU Ecolabel, EU Green Public Procurement	30 March 2023 – 8 May 2023
1st milestone	Scope, market, user behaviour, current EU Ecolabel criteria, current EU Green Public Procurement criteria	23 February to 22 April 2024
2nd milestone	Technologies, and analysis of base cases from environmental and economic perspectives	Before the summer break 2024
3rd milestone	Analysis of ecodesign aspects, design options, policy scenarios, and information requirements, including elements to be included in the Digital Product Passport	Before the end of 2024

JRC preparatory study - scope

Included: apparel; sportswear and workwear → horizontal requirements

Excluded:

- Intermediate products → ECOS to advocate inclusion in the preliminary study for apparel
- Home textiles → new preliminary study to be launched
- Footwear → possible preliminary study if included in first workplan
- PPE, medical textiles, smart and electronic textiles
- Non-textile materials: leather, fur, down, feathers → ECOS to advocate inclusion in the preliminary study for apparel

Function: criterion for differentiating requirements within apparel subgroup

JRC preparatory study – key learnings

1. Numbers of preliminary studies are limited (resources)
2. Definitions are key to determine the scope of the requirements
→ **avoid loopholes**
3. Strong focus on the functionality of products to determine the scope → **horizontal requirements**
4. Industry uses complexity of supply chain and enforceability to avoid requirements on production
5. Strong focus on products and their physical characteristics → **difficult to address overproduction**

What's next: Ecodesign for steel

- 22 Oct. 2023 (done): deadline for preparatory study survey feedback.
- June 2024 approx. First consultation forum: presentation of progress on analysis under preparatory study.
- Jan./Feb. 2025 approx. Second consultation forum: presentation of progress on analysis under preparatory study.
- July 2025 (confirmed) target completion of preparatory study and beginning of consultation on proposed policy options (3-month duration, similar to an Inception Impact Assessment).
- End of 2025/early 2026 approx. publication of policy proposal and final approval via Delegated Act procedure.



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How to get involved

- Complete [our product interest survey](#) – scan the QR code
- [Contact us](#) – become an ECOS member!
- [Register as a stakeholder](#) – each product group requires its own registration



Thank you



Environmental Coalition on Standards

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ECOS-NGO



ECOS is co-funded by the European Commission & EFTA