ECODESIGNED4LIFE

Report on synergies for horizontal policy developments

Brussels, January 2025

This document outlines key legislative frameworks, strategic discussions, and policy opportunities within the Ecodesigned4LIFE project. The goal is to identify synergies and strengthen consumer and environmental perspectives in Ecodesign and Energy Labelling (ED and EL) regulations. The report highlights the evolution of ecodesign policies, focusing on horizontal approaches and their potential to enhance sustainability. It also details key policy developments, strategic discussions, and collaborative efforts aimed at improving the regulatory landscape for sustainable products.

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PROJECT SUMMARY

Ecodesigned4LIFE aims at ensuring civil society representation in the preparatory process leading to implementing measures and their reviews under the ecodesign and energy labelling (ED and EL) legislation, tyre labelling, as well as in the other EU legislative developments impacting ED and EL policies.

The main activities to achieve these objectives include participating in the ED and EL relevant meetings, including but not limited to the Ecodesign and Energy Labelling Consultation Forum (EELCF). The Consortium will also provide technical input to the European Commission regarding the real-life usage of products and the environmental and consumer interests that should be considered when developing the legislation, notably through the EELCF, but also through the several stakeholder and public consultation processes. In addition, the Consortium will lead awareness-raising and capacity building of national consumer and environmental representatives for greater involvement of civil society in ED and EL developments.

The Consortium consists of three project partners – the **European Consumer Organisation (BEUC)**, the **Environmental Coalition on Standards (ECOS)** and the **European consumer voice in standardisation (ANEC)**. Each organisation is a recognised member of the EELCF, which assists the European Commission with the development and review of ED and EL regulations. The Partners have over 16 years of experience in influencing the ED and EL decision-making process and rely on a network of member organisations and experts that are based in all EU Member States and beyond, enabling a broad representation of consumer and environmental interests in the process.

Through regular consultation with their members and external experts as well as exchanges with the wider stakeholders within the ecodesign community, the Consortium will identify aspects of consumer and environmental relevance and translate these into adequate policy recommendations to the European Commission.

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THE CURRENT STATUS OF ECODESIGN AND ENERGY LABELLING REGULATIONS

Ecodesign and energy labelling (ED and EL) are some of the most successful and impactful environmental legislation ever produced by the European Union. They help to make products more energy-efficient and circular, notably through product-specific regulations covering household appliances (washing machines, fridges, vacuum cleaners, etc.), ICT products (computers, servers and data storage products, smartphones, etc.), industrial machinery (industrial fans, welding equipment, power transformers, etc.) and tyres. Thanks to ED and EL regulations, in 2020, the average EU27 household saved 1011 kWh/a of electricity (28% of the total annual electricity consumption of the average household in 2020).[1]

The original framework, the Ecodesign Directive[2], has been replaced by the Ecodesign for Sustainable Products Regulation (ESPR)[3], which is now just starting to be implemented. It establishes a framework for setting ecodesign requirements on specific product groups and widens the scope of the original Ecodesign Directive in two ways. First, it expands ED and EL requirements to cover nearly all products (with a few exemptions such as food, feed, and medicinal items), whereas the original directive applied solely to energy-related products and tyres. Second, the ESPR strengthens the variety of ecodesign criteria that can be applied to products, including requirements for durability, circularity, and reducing the overall environmental and climate impact of products, among other aspects.

Additionally, the ESPR encourages a horizontal, rather than product-specific approach: for groups of products that share enough common characteristics, the framework allows and encourages horizontal rules to be set. This is not entirely new as this was already practised in the context of an ecodesign regulation on standby, networked standby and off mode[4], but it is a strategic shift towards greater and wider impact for the benefit of both consumers and the environment.

Other horizontal ED and EL legislative tools exist, such as the overarching methodology for Ecodesign of Energy-related Products (MEErP) that determines the way the measures are drawn, the European Product Registry for Energy Labelling (EPREL) that brings the information behind the Energy Label closer to the market surveillance authorities and citizens, or the drafting of the ED and EL Working Plan that will identify the priority topics to be assessed for possible regulatory action.

[1] European Commission, *Ecodesign and Energy Label - The Legislative Framework* (available here - consulted on 13/01/2024)
[2] Directive 2009/125/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for the setting of ecodesign requirements for energy-related products (recast)
[3] Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC
[4] European Commission, *Product List - Standby, Networked Standby and Off Mode* (available here - consulted on 13/01/2024)

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THE ROLE OF THE ECODESIGNED4LIFE PROJECT

Since the beginning of 2024, the consumer organisations BEUC and ANEC, together with the environmental NGO ECOS, have partnered under the framework of the Ecodesigned4LIFE project. Co-funded by the EU's LIFE Programme, the project aims to strengthen consumer and environmental perspectives in ED and EL legislation. As part of this initiative, the consortium has monitored relevant horizontal developments expected to impact the implementing measures and their reviews under the current ED and EL legislation. The consortium has also considered significant political developments, particularly in light of the 2024 European Parliament elections and the emergence of new political priorities. Partners engaged in ad hoc strategic discussions on respective priorities and identified synergies that could result in the development of common positions throughout the project.

One joint webinar was organised on 3 December 2024 (*ESPR and beyond: what's next for sustainable products*) to allow ECOS, BEUC and ANEC members to exchange views among civil society organisations (be it environmental NGOs or consumers organisations) on the ESPR framework and to discuss opportunities and challenges to further advance on products sustainability.

The conclusions of these discussions will guide the Consortium's members in their work under the project and, wherever possible, to build common positions.

OPPORTUNITIES FOR HORIZONTAL POLICY DEVELOPMENTS

The consortium identified three upcoming policy developments (under the ESPR and beyond) that would enable a discussion on horizontal approaches: small electronics, sustainability labels and textiles. These topics were selected due to their timeliness, considering the upcoming ESPR Working Plan. Other topics such as the need for reinforced market surveillance authorities to enforce ED and EL regulations were also considered, but left aside to focus on topics that would better trigger the interest of our members. During the 3 December webinar, environmental and consumer representatives discussed them together and identified key opportunities and challenges for each of them.[5]

- **Horizontal resource efficiency requirements for small electronics**

Whilst light in weight, small electronics are substantial in number and environmental impact. The global E-waste Monitor 2024 pointed out that small equipment, such as video cameras, toys, microwave ovens and e-cigarettes (all currently out of the scope of ED and EL measures), "*constitutes the largest category of e-waste in terms of mass, accounting for 20 billion kg in 2022, or almost one-third of the world's total e-waste*".

Information and communication technology (ICT) and other electronics (of which a part would be in the scope of small electronics) feature on the list of priority products to be considered by the Commission in its first ESPR Working Plan for horizontal ecodesign measures. These ecodesign requirements could, for example, include longevity requirements for all the

[5] A summary of the discussions held with members on these three topics during the workshop on 3 December is available in Annex I below.

batteries contained in electronic products. In July 2024, the Commission's Joint Research Centre also presented a promising draft Reparability Scoring System scoping study to the Ecodesign and Energy Labelling Consultation Forum. The study suggested a methodology to score the reparability of approximately 50 products, proposing that the lowest scores for each parameter (such as availability and replaceability of spare parts and their delivery time) could be transposed into minimum repairability requirements.

To discuss all the options available to make all electronics longer lasting, and easier to maintain, repair, upgrade and recycle, the consortium decided to explore with members key horizontal principles to observe when developing such requirements. The collected information will guide the Consortium to develop recommendations to be shared (jointly or separately) with the European Commission on what horizontal resource efficiency requirements on ICT and other electronics should cover.

- **Horizontal principles for sustainability labels**

Consumers increasingly want to act to reduce their ecological footprint and look out for environmental information when purchasing.[6] According to figures from the Commission, 80% of consumers want more information on sustainability aspects, like durability, repairability, and circularity of products, but currently cannot easily find them.[7] What's more, unsubstantiated green claims flood the market, making it extra difficult for anyone to make an informed choice.[8]

Among other initiatives aimed at empowering consumers for the green transition and tackling this information gap, the ESPR also introduces the possibility of adopting labels on several sustainability aspects. Under the ESPR, the Commission is empowered to introduce new sustainability labels, based on the information requirements related to one or several Ecodesign aspects. These labels could be based on classes of performance on single parameters or on aggregated scores, and their main objective is to influence sustainable product choices for consumers. Member States are also encouraged to refer to new ESPR labels (especially those indicating classes of performance) and the EU Ecolabel, when setting up incentives for sustainable products.[9]

To ensure new sustainability labels have the desired effect of guiding consumers and manufacturers towards more sustainable options, the consortium[10] decided to explore with members key horizontal principles to observe when developing such labels.

- **Horizontal resource efficiency requirements for sustainable textile**

Over the past 15 years, clothing prices have dropped by more than 30% while production has doubled. Simultaneously, people are wearing their clothes 36% less often before discarding them. Textile waste is a growing challenge, but extending the lifespan of textile products offers a powerful solution. Achieving this requires rethinking how textiles are designed, used, and

[6] 2020, European Commission, *Attitudes of Europeans towards the Environment* (available here)
[7] 2022, European Commission, *Empowering Consumers for the Green Transition* (available here)
[8] 2023, BEUC, The Great Green Maze (available here)
[9] Article 64, ESPR
[10] BEUC and ANEC will cover horizontal principles for sustainability labels through Ecodesigned4LIFE. ECOS will work on this topic through other sources of funding.

valued. From physical durability to emotional attachment, and from repairability to reusability, there are numerous dimensions to consider.

A key novelty brought by the ESPR is the extended scope of the ecodesign framework, beyond energy-related products. Given its large ecological impact, one of the first sectors to be prioritised under the ESPR is textile.

As a new sector to be regulated under ecodesign, the consortium[11] decided to exchange with members on key challenges and opportunities ahead on ways to create clothes that last and inspire consumers to cherish and care for them. The collected information will guide the Consortium to develop recommendations to be shared (jointly or separately) with the European Commission on what horizontal resource efficiency requirements on textiles should cover.

[11] BEUC and ANEC will cover horizontal principles for sustainability labels through Ecodesigned4LIFE. ECOS will work on this topic through other sources of funding.

ANNEX I

54 people in total registered for the workshop — 11 as ANEC, 22 as BEUC, and 21 as ECOS.

RECAP

- **Where do we stand with ESPR?** Olivia Chassais (EU Commission, DG ENV) presented the current state and next steps of ESPR implementation, including a tentative date for the first Ecodesign Forum meeting: 19 February 2025.
- **Horizontal measures in ESPR.** Mathieu Rama (ECOS) and Silvia Barlassina (BEUC) discussed the importance of taking a horizontal approach to ecodesign and energy labelling, highlighting opportunities in future performance and information requirements (e.g. for durability and repairability).

Download presentations

BREAKOUT ROOM DISCUSSIONS

After the presentations, BEUC, ANEC and ECOS members contributed to discussions in breakout rooms:

- How to make all electronics more durable. Electronics and household appliances are regulated under ecodesign, but no horizontal measure has been adopted so far to improve their durability and repairability. Participants highlighted information on durability and the price of spare parts as areas that could be successfully addressed with a horizontal measure.
- How to empower consumers with sustainability labels. Participants discussed the potential of new ESPR sustainability labels to address consumer demand for clear environmental information. They emphasised using familiar formats like the EU Energy Label, ensuring simplicity, and testing labels with consumers. Key challenges identified include avoiding information overload, clarifying criteria to prevent mistrust, and defining the roles of ESPR labels alongside the EU Ecolabel.
- How to ensure textile products are used for longer. The trend of fast fashion, ease of buying new clothes (instead of repairing old ones), and changing consumer expectations towards short-lived products are all big challenges to overcome. Participants identified communication campaigns towards consumers as an important part of the solution. We also need innovative policies to help improve clothing durability, repairability, and usability.

The views expressed below are summaries of these sessions, but do not necessarily reflect the views of the Ecodesigned4LIFE Consortium as a whole.

1. Electronics

This breakout room focused on how to ensure electronic products are more durable, repairable and used for longer.

After a short round of introductions, the participants were asked to identify the main challenges and barriers to making electronics more durable and used for longer, whether financial, political or technical. Participants identified the following main challenges:

- High price and limited availability of spare parts
- Diversity of spare parts hindering interoperability
- Lack of reliable information on real durability for consumers to make informed decisions
- Business practices focusing on putting more products on the market rather than extending products' lifespans
- Premature obsolescence of software and/or hardware
- Anti-repair practices such as part pairing and serialisation
- Short duration of guarantees
- Mandatory certifications for repair and reuse operators posing barriers for social enterprises

Once the main challenges and barriers were identified, participants were prompted to provide examples of national/local best practices, existing or innovative policies and product design examples that could help in overcoming the identified barriers.

Best practices applied at national or local level included repair bonuses for consumers, fiscal reductions for repairs, repairability scores that include the price of spare parts, and voluntary durability labels.

Existing policies to be implemented or improved included the Common Rules promoting Repair, the Ecodesign for Sustainable Products Regulation, extended producer responsibility schemes, and green claims legislation. Digital product passports, the definition of reasonable price, and setting a minimum repairability score in ecodesign legislation were identified as potential new tools and measures.

Product design examples improving durability were, for instance, modular products and interoperable parts, open source softwares and upgradeability, and reduced number of different materials inside a product.

Finally, participants were asked to discuss all aspects and examples identified in terms of their low/high complexity and their low/high potential impact. The price of spare parts emerged as a barrier with significant impact, for example. Voluntary durability labels were seen as a relatively simple measure to tackle the lack of reliable information for consumers. Standardisation of parts and design for interoperability, including allowing third-party parts to be used, was also a measure with high potential impact and relatively low complexity.

2. Sustainability labels

In this breakout session, participants discussed what sustainability labelling opportunities the ESPR can bring forward. They identified key principles to observe when developing new sustainability labels, and potential challenges.

Participants identified key guiding principles for the development of new sustainability labels under the ESPR:

- Familiarity of format: The Commission should rely on consumers' familiarity with existing labels and icons. The EU Energy Label is a recognised and relied upon label by consumers. It should be taken as an important reference when developing new sustainability labels. The colour-coded energy efficiency scale is easily understandable and could be replicated for other sustainability aspects.
- Simplicity: The Commission should strive for simplicity and avoid overloading consumers with too much information. The Planet Score developed in France[12] for food products was identified as a good example, conveying clear information to consumers and focusing on key environmental aspects.
- Assess trade-offs: When developing labels based on classes of performance, potential trade-offs between various sustainability dimensions should be adequately assessed. Poor environmental performance on certain aspects cannot be offset by other positive impact and hinder overall product performance. This is important to avoid misleading consumers, as well as to ensure that Member States set up incentives schemes for the most sustainable options only.
- Consumer testing: New labels should be tested with consumers before being introduced on the market, assessing potential cultural or national differences across Member States.

[12] https://www.planet-score.org/en/

- Accessibility: New sustainability labels should always be accessible in paper format, to enable easy comparison at the point of sale. Additional information could be added online through a QR code or in the Digital Product Passport (DPP) once available.

Participants later identified the following key challenges:

- Unclear or hidden rating: Labels based on classes of performance can be easily misunderstood and mistrusted if the criteria behind the rating are not clearly explained to consumers. This explanation could be provided through digital means through a QR code, e.g. in the DPP or EPREL for household appliances.
- Information overload: It can be counterproductive. New ESPR labels should focus on the most important sustainability aspects for the specific product group, while minimum design requirements should ensure overall sustainable performance.
- Interaction of new labels & EU Ecolabel: It should be clarified what role each labelling approach has and how the two interact with each other, especially regarding potential incentives schemes developed by Member States.

3. Textiles

The breakout room focused on how to ensure that textile products are more durable and used for longer.

The participants were first asked to identify the main challenges and barriers to making textiles more durable and used for longer, whether financial, political or technical. Participants identified the following main challenges:

- The business model of fast fashion companies incentivizes people to consume more.
- Ease of buying cheap new clothes and the cost of repairing, which is expensive in comparison.
- Loss of skills and knowledge on how to repair clothing.
- Consumers notice their clothes have a shorter lifetime compared to the past.
- Changing consumers' attitudes, which should instead be focused on more durable clothing, is a challenge in itself.
- Lack of information on the durability of the clothing that can be purchased.
- Cost of durable materials.

Secondly, participants were asked to present good practices applied at the national or local level to ensure that textiles are used for longer. Ecolables were mentioned, as well as communication campaigns to avoid excessive laundering. The second-hand market plays also an important role, based on the opinion of the participants. Exchanges of clothing among consumers (swap parties) should be supported or organised by public institutions.

Thirdly, participants were asked to list examples of existing pieces of legislation that could be mobilised to ensure that textiles are used for longer. The EU Textile Labeling Regulation was mentioned. Besides that, the other examples focused on France, where environmental labelling will become mandatory and a repair bonus is implemented. Furthermore, a law to limit the marketing of fast fashion companies has been proposed.

Finally, participants were asked to share their ideas for new innovative policies that are not yet implemented and that could ensure textiles are used for longer. The following was proposed:

- Minimum criteria for durability and information for consumers on the expected lifetime of clothing.

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- Sew extra fabric or lining inside the garment and leave extra seam and hem allowance. This should allow to adjust the garment in an easier way to make it fit better.
- Facilitate repair and rental services. The latter are interested in having durable textiles due to their business model.
- Remove VAT for circular business models, to make them more profitable.
- Finance or support swap parties, to allow consumers to exchange clothes among themselves.
- More unisex clothes.

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