



*Raising standards for consumers*

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## Ecodesign in the spotlight for more sustainable products

Crucial now for the tool to maintain its success



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**The Commission today unveiled the Sustainable Products Initiative as part of its new Circular Economy Package.**

**ANEC Secretary-General, Stephen Russell, commented:**

**“We welcome the proposal for a Regulation on Ecodesign for sustainable products, as this recognises the leading role of ecodesign in excluding the least sustainable products from the market and aiding consumer choice. Nevertheless, some aspects on voluntary agreements and information provision leave too much leeway, and detract from what is an otherwise ambitious measure.”**

Although we applaud recognition of ecodesign as a tool that can go beyond energy efficiency and improve the environmental sustainability of certain products, a few improvements to the proposal are required. We believe the value of Voluntary Agreements to be exaggerated, that the chemical safety of products is not fully addressed, and that too much weight is given to information requirements over environmental performance requirements.

The proposed Regulation extends the **scope** of ecodesign to almost all products (except food, feed and medicinal products). Nevertheless, it acknowledges the need to prioritise products to be considered for delegated acts, avoiding overlaps with existing legislation, and stresses the importance of consulting stakeholders through the Ecodesign Forum. This extension of scope has to be accompanied by sufficient resources and effective **governance** in order to maintain the reputation ecodesign has earned, and see the development of product-specific delegated acts in a timely, precise and valuable manner.



## **Raising standards for consumers**

As we recommended last autumn<sup>1</sup>, this replacement of the Ecodesign Directive provides an opportunity to put an end to **self-regulation**, given the under-achievement of the Voluntary Agreements concluded with industry. We regret the new proposal still allows development of self-regulation measures that can be considered a “valid alternative to a delegated act”.

The proposal also envisages **information requirements and classes of performance**. While information plays an important role, these requirements should not come at the expense of environmental performance requirements. A matter of concern is that information requirements relating to selected parameters, “*such as the product’s environmental footprint*” should “*be set either in addition to, or in place of, performance requirements on the same parameters*”. We especially oppose that additional consumer information is provided based on the Product Environmental Footprint method, as it lacks precision, offers limited comparability, does not aid identification of products that are superior, and omits certain environmental aspects.

At least the explanation of the proposal also notes that “*if the product is already covered by a label as provided for in the Energy Labelling Regulation (EU) 2017/1369, it must not also bear a label on classes of performance provided for under this Regulation, to avoid causing confusion*”, provided this does not mean any new information with classes of performance would need to be included in the energy label. It must be ensured that any information added to the label is reliable, relevant and needed for the consumer to make an informed decision.

More broadly, we believe the focus of this proposal and its delegated acts needs to remain on requirements to **improve the environmental performance of products** in the design phase, rather than risking to jeopardise the value of this and other successful green policies – such as the Energy label or the EU Ecolabel - with additional overwhelming information.

Although the proposal requires delegated acts to include information requirements that aid tracking of **substances of concern**, it misses the opportunity to restrict substances based on chemical safety.

The proposal adds that, when deciding how to assess the setting of ecodesign requirements, **European standards** should also be taken into account (such as those on material efficiency of energy-related products). Further to the development of the horizontal standards of past years, there is now need to see those translated into specific application at product level and fine-tune the contribution standards can give in support of the legal Ecodesign requirements.

ENDS.

<sup>1</sup> ANEC-BEUC Position Paper: “MAKING MORE SUSTAINABLE PRODUCTS THE NEW NORMAL, Consumer recommendations for a meaningful EU Sustainable Product Initiative”. <https://tinyurl.com/ANEC-BEUConSPI>



ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

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