

## It's crunch time for Parliament to set a framework to make sustainable products the norm

**Brussels, 14 June 2023** - With the European Parliament's environment committee (ENVI) set to cast its vote tomorrow, we are at a critical stage of the EU's proposed Ecodesign for Sustainable Products Regulation (ESPR) aimed at establishing a legal framework to make sustainable products the norm. To reap the full potential of the progress made in energy efficiency over the past decades, maintaining the well-established process and approach used by the current Ecodesign Directive remains key.

As part of the European Union's ambitions for an environmentally sustainable and circular economy, the Commission has introduced a proposal for the Ecodesign for Sustainable Products Regulation (ESPR). The purpose is to set legal requirements to increase the sustainability of products. In addition to focusing on product's durability, reusability, and repairability, ESPR also establishes requirements on transparency as a key element enabling circularity.

### Adopting a product-by-product approach to unleash the full sustainability potential of each and every appliance.

"Even within individual categories of equipment in our sector, the products and their environmental impacts differ significantly," said APPLiA Environment Policy Director Korrina Hegarty. Product sustainability requirements must be individually evaluated to ensure they will ultimately lead to more sustainable products. The methodology must take into consideration "the trade-offs between different political objectives on how to address circularity and sustainability in products, resulting in different design choices and environmental impacts," explained Hegarty. Multiple ways are possible when it comes to increasing circularity and sustainability of products, which makes the assessment and quantification for methodologies a complex issue.

Requirements set horizontally, or at component level pose the risk of setting double regulation at product level. The Standby Regulation, adopted under current Ecodesign Directive, is a clear example of ineffective horizontal legislation presenting a real challenge for manufacturers, due to doubling of requirements and overlapping timelines making it very difficult to comply with, inevitably adding complexity, uncertainty and delays. The proposed new measures in the ESPR should build on the lessons learned and consider that current vertical Ecodesign requirements have resulted in higher energy savings for many products.



**In 2021, current Ecodesign measures saved EUR 120 billion in energy expenditure for EU consumers and led to a 10% lower annual energy consumption by the products in scope.** This is a clear indication of the good work the industry has been doing in the past 25 years and paves the way for the implementation of a future policy landscape for sustainable products that continues to drive circular appliances. Ecodesign is by no doubt a “success story we must capitalise on to reap the full potential of the great progress made in energy efficiency over the past decades,” said APPLiA Director General Paolo Falcioni. The experience of the Directive provides a good precedent towards a new product framework that takes into account individual aspects across the product’s lifecycle

## Products should not be included in the legal text without a proper impact assessment.

As currently drafted, the ESPR enlarges the scope of Ecodesign to any physical good that is placed on the market or put into service with only a few exemptions. With an eye to prioritising the products to be first regulated under the upcoming delegated acts, the European Commission set out clear provisions on how to implement a Working Plan which would help identify the most environmental and energy intensive products that should be subject to eco-design requirements in ESPR (Article 16).

However, before including a list of products in the legal framework, APPLiA Energy and Environment Policy Manager Giulia Zilla pointed out the critical role of the European Commission to carry out a proper assessment supported by evidence on the rationale behind the prioritisation. This would ensure focus on the most important products requiring Ecodesign rules. The Joint Research Centre (JRC) already started a study to help the Commission’s efforts to prioritise a list of relevant products under the ESPR with an eye to set priorities in a transparent and inclusive manner.

## The professional repairer concept should be reflected in the new proposal as in line with the current Ecodesign Directive.

Today’s Ecodesign Directive already addresses the professional repairer concept to ensure consumer safety. This should be continued in new requirements to come.

In many cases, repairing home appliances not only requires professional skills and even specific mandatory certifications, but also related liability insurance to make sure the consumer is not deprived of its right in case the repair service goes wrong. A sector’s priority is that repairs are carried out by professional repairers in order to ensure the integrity of the goods and protect consumers from any damage. Consumers not only have a right to repair, but most importantly “a right to have their products repaired right,” said APPLiA Corporate Policy Senior Manager Candice Richaud. The proposal should integrate this





dimension and refer to the definition of professional repairer and its related obligations under Ecodesign product Regulation.

With repair requests growing and likely to grow further, our industry has thus supported the development of [educational programmes and manuals](#) addressed to professional repairers and future technicians willing to professionalise in-home appliance repair. On top of revamping a disappearing profession, the programme aims to generate new skilled professionals into the market.

### Reference contact

Federica Lavoro *Communications Manager*

[federica.lavoro@applia-europe.eu](mailto:federica.lavoro@applia-europe.eu)

