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| THE SUSTAINABLE PRODUCT INITIATIVE |
| A product policy framework to make sustainable products by design the norm |

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Why it matters for consumers

Consumers play a key role in the circular economy and, if given the right tools, they can guide the transition to much more sustainable consumption and production. This is however not an easy task. Too many unsustainable options still exist on the EU market and consumers still struggle to understand which ones are better from a sustainable perspective. Systematic changes in the way we address sustainability at policy level are necessary to enable broader access to sustainable and higher quality products and services and to avoid that sustainable consumption remains a hassle or a privilege reserved to most affluent consumers. A comprehensive approach towards products sustainability is necessary to ensure that all products placed on the EU market are sustainable by design and that more sustainable business models are incentivised.

Contents

[Summary 3](#_Toc77089741)

[1. Introduction 4](#_Toc77089742)

[2. Consumers’ call for sustainable products by design 5](#_Toc77089743)

[3. Shortcomings of the current sustainable product policy 7](#_Toc77089744)

[4.A revised Ecodesign Directive is needed to bring more sustainable products on the market 8](#_Toc77089745)

[4.1 Prioritization of products for implementing Regulations 9](#_Toc77089746)

[4.2 Updated governance to ensure faster decision making 10](#_Toc77089747)

[4.3 Self-regulation no longer an option 11](#_Toc77089748)

[4.4 Closer alignment with EU Ecolabel 11](#_Toc77089749)

[4.5 Sector-specific instruments 12](#_Toc77089750)

[5. Sustainability principles and horizontal measures 13](#_Toc77089751)

[5.2 Durability principles and guarantees 14](#_Toc77089752)

[5.3 Repairability and upgradability principles and horizontal measures 16](#_Toc77089753)

[5.4 Software updates availability and security of connected products 18](#_Toc77089754)

[5.5 Addressing the presence of dangerous chemicals 18](#_Toc77089755)

[5.6 Resource Efficiency principles 19](#_Toc77089756)

[5.7 Recyclability principles 20](#_Toc77089757)

[4.7 Single use items 21](#_Toc77089758)

[4.8 Horizontal ban on the destruction of unsold goods 21](#_Toc77089759)

[5.9 Product information requirements 22](#_Toc77089760)

[6. Compliance with and enforcement of sustainability requirements for products 23](#_Toc77089761)

[7. Further measures needed to promote sustainable consumption 25](#_Toc77089762)

[6.1 Circular business models 25](#_Toc77089763)

[6.2 Mandatory Green Public Procurement Criteria 27](#_Toc77089764)

# Summary

Within the Circular Economy Action Plan (CEAP), the European Commission announced the development of a policy initiative aimed at making sustainable products the norm and addressing the challenges that consumers often face when trying to make sustainable choices.

ANEC and BEUC welcome this initiative and agree that to meet the CEAP’s ambitious objectives, systemic changes are needed in the way we address products’ sustainability at policy level. The focus should be on developing rules that make all products more sustainable by design, therefore products that are built to last, fir for purpose, easily repairable, energy and material efficient, free from dangerous chemicals and built respecting human rights and fair labour conditions.

To make this possible, ANEC and BEUC recommend developing an instrument that would comprehensively address the sustainable production and consumption of all products, as well as the way consumers are informed about sustainability aspects. The Ecodesign Directive is a well-suited instrument to bring more sustainable products on the EU market, but its scope should be extended to non-energy related products and its governance modernized, to enable swift decision making that keeps pace with technological improvement. It is essential that that the European Commission allocates sufficient resources to the development of these measures, to enable the adoption of meaningful Ecodesign regulations in the future, as well as the prompt revision of existing ones.

The role of the Ecodesign framework in reducing the environmental burden of products should be strengthened. Additional sustainability aspects should be addressed beyond products’ energy efficiency, including resource efficiency, chemical restrictions, and waste prevention, as well as usability and accessibility. To this end, sustainability principles and horizontal measures should be developed to be used as a checklist to assess what aspects are relevant for each product, to ensure that the appropriate sustainability parameters are considered when developing product/sector specific Regulations.

Efforts should also be increased to enable more effective compliance and enforcement of sustainability rules. In this context, it should be investigated with enforcement authorities if the deployment of digital tools (e.g., the product passport) can increase transparency in the entire life cycle of a product and facilitate the tracking of compliance in all relevant stages from production to disposal/recycling. Market surveillance activities must also be complemented by effective enforcement actions, such as fines and penalties. There should be transparent disclosure of the non-compliance findings to trigger name-and-shame mechanisms. Relevant product information is also to be made available in physical form at the point of sales to enable all consumers to make informed choices.

In addition to measures addressing products’ sustainable design,[[1]](#footnote-2) the European Commission should also consider ways to incentivise more sustainable business models (such as renting, reuse and second-hand markets) and strengthen consumer rights in these areas. More information and data should be collected on the financial and environmental benefits of other circular business models, such as the sharing economy and product-as-a-service systems.

# Introduction

Our society, environment and economy are intrinsically impacted by the way we design, manufacture, consume and discard products. The linear pattern of “take-make-use-dispose” that characterizes our current systems of production and consumption of goods and services is responsible for much of the social and environmental challenges that we experience globally. In response, the concept of circular economy aims at redirecting products’ design, production, and consumption towards more sustainable approaches. The idea is that by improving products’ circularity from their design to their discharge, we can contribute to strengthening sustainability in its broadest sense, benefiting people, the planet, and the economy.[[2]](#footnote-3) Here the role of consumers is pivotal as their choices can support or hamper the circular economy.[[3]](#footnote-4)

Last year, the European Union made a bold pledge for resource-friendly consumer goods by adopting the Circular Economy Action Plan (CEAP).[[4]](#footnote-5) The European Commission, Member States and the European Parliament all agree that the aim should be “to make sustainable products the norm”.[[5]](#footnote-6) To do so, the European Commission is currently working on the development of an ambitious sustainable product policy framework which will translate in several legislative initiatives due to be launched by the end of 2021.[[6]](#footnote-7) BEUC and ANEC agree with this vision that to shift up a gear, systemic changes are needed. The new EU sustainable product policy must ensure that, in the future, consumers have a broad access to more sustainable and higher quality products and that sustainable consumption is not any more a hassle or a privilege reserved to most affluent consumers.

In this paper we firstly highlight the challenges consumers face today when trying to engage in more sustainable consumption practices. We later identify the shortcomings of current initiatives and legislation that address products’ sustainability and propose possible ways forward to enable the systematic change needed to make more sustainable products the norm. Besides strengthening some of the existing product legislation, we argue that the European Union needs to develop a comprehensive set of rules that would not only ensure high environmental performance by design, but also more effectively address the social issues that result from non-sustainable consumption and production. The focus should be on ensuring that all products are more sustainable by design, meaning they must be of good quality, fit for purpose, long-lasting, easily repairable, resource efficient, free from hazardous chemicals and not in breach of the respect of human rights and fair labour conditions.

# 2. Consumers’ call for sustainable products by design

The way we consume products can determine the success of the circular economy and the transition to a more sustainable way of living. In 2018, households accounted to 19% of the EU greenhouse gas emissions, of which the largest majority (80%) came from the use of final products.[[7]](#footnote-8) Many of these products are used for a limited amount of time and are often discarded too soon. This practice is responsible for several environmental issues, such as excessive waste creation and loss of critical resources, and is also very burdensome for consumers, who must constantly replace inefficient products that fail prematurely. Besides, products' environmental and social costs are not factored in their final price but are ultimately borne by the most fragile members of our society, future generations, and the environment.

Recent behavioural studies show that European consumers are increasingly aware of the environmental and social impacts of their purchasing choices and are willing to actively engage in the circular economy, for example by favouring durable and repairable products, buying second-hand items and leasing products rather than buying new ones.[[8]](#footnote-9) With the Covid-19 pandemic, aspects such as health, sustainability and wellbeing have become even more important, and consumers are increasingly mindful about what they are buying.[[9]](#footnote-10) While there is a general expectation that sustainability principles should be prioritized and that companies should be leading this initiative, only one in five people can name a brand that meet their expectations.[[10]](#footnote-11)

Over the years, the Ecodesign and Energy Labelling instruments have successfully contributed to make certain consumer products more sustainable and efficient, while also stirring consumer’s purchase choices towards more sustainable ones. Nonetheless, many products continue to be inefficiently designed and tend to fail prematurely and are difficult/impossible to repair. As the largest environmental impact of products comes from their design phase,[[11]](#footnote-12) it is essential that more sustainability aspects are systematically addressed when designing products to be placed on the EU market. In this context, resource efficiency and reducing waste by improving the ability of products to last longer, be reused, and be repaired is key, along with usability and accessibility.

Alongside, companies must also be obliged to follow basic social standards through their value chain and ensure goods are produced in a socially fair manner. In this regard, BEUC very much supports the announced EU legislative initiative to introduce a regulatory instrument establishing mandatory due diligence criteria for companies operating in the EU, which should be considered when developing measures under the SPI.[[12]](#footnote-13) However, the focus of this paper focuses mainly on the potential of improving the environmental sustainability of products through a reformed sustainable product policy framework.

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| **What is a sustainable product?**  A product that is designed to be **sustainable throughout its full lifecycle**, from the extraction of raw materials, over its production, transportation, usage and the way it is discarded, so that all its component materials can be easily recuperated. The **cradle-to-cradle principles** should guide the way manufacturers conceive their products, with the objective of reducing the use of natural resources, eliminating waste and creating products with materials that are safe and easy to be reused again in new products. Consumers must be able to assume that minimum social and ecological criteria have been met by all companies during production.  The following recommended characteristics should be looked at when considering sustainability in individual product groups:   * They must **perform their expected primary function** **well, based on usability and accessibility criteria,** to avoid early discharge. * They must be **built to last**, of better quality and less prone to wear and tear of single components that artificially shorten their lifetime. * They must be **easily repairable**, **furnishable, and upgradable,** therefore easy to disassemble and where repair information and spare parts are available to consumers and independent repairers. * They must be **produced and used minimising the use of resources**, such as energy and water, and the emissions of waste and other pollutants. * They must be **safe to use** **and recycle** therefore not contain dangerous substances. * They must be **convenient and cost-efficient** for consumers to use, as to ensure they are satisfied with what the product delivers and thereby are less tempted to replace them prematurely. * They should **contain recycled material** provided that safeguards are put in place to ensure that, through recycling, toxic substances are not re-introduced in the production-cycles, causing harm to consumers and the environment. Nonetheless, recyclability is not an end in itself and the primary objective should always be to build products that last longer, to prevent waste and enable reuse. * They should **not be meant for single-use**, at least when suitable and less polluting alternatives exist. * **Software updates** must be guaranteed to make sure that digital products are compatible with other equipment and continuously offer key functionalities over time. * Digital and connected products must also be **secure to use** at all times, and **minimum performance must be guaranteed even when offline.** * They must be produced in **fair labour conditions** and in **respect of human rights.** |

# 3. Shortcomings of the current sustainable product policy

The current EU product policy framework is composed of a patchwork of different regulatory and voluntary instruments, which address sustainability aspects in a non-harmonized way and for a limited number of products/sectors.

The Ecodesign Directive sets minimum energy and material efficiency requirements for most energy-related products (including most household electrical appliances), but it does not apply to many other products such as clothes and furniture. While durability and repairability requirements have been recently introduced for five household appliances there is no consistent implementation across sectors and not all products benefit from the same level of sustainability requirements/framework. What is more, in some sectors, voluntary industry agreements are prioritized over regulation, with the idea that Ecodesign objectives can be achieved faster or in a less costly manner. Yet, the experience shows that voluntary agreements have often not lived up to consumer expectations in getting more sustainable products on the market.[[13]](#footnote-14)

As no common horizontal sustainability criteria exist, most sector/product specific legislation work in silos. This means that more time and resources are needed to develop each of these separate instruments, resulting in significant delays and inconsistencies across sectors. In addition, the lack of compliance and effective enforcement of existing rules hinders sustainability. In 2018, it was estimated that 10-to-25% of products on the market were not complying with relevant Ecodesign requirements.[[14]](#footnote-15) This causes problems not only for consumers, who are faced with underperforming and unsafe products, and manufacturers, who miss the motivation to innovate their products and make them more sustainable, but also for public institutions that may lose credibility in the eyes of the public.

As part of the announced Sustainable Product Initiative, the European Commission plans to tackle some of the current shortcomings and is set to develop new EU policy framework aimed at making products fit for a climate neutral, resource efficient and circular economy by design. ANEC and BEUC support this initiative and agree that systemic changes are needed to ensure that sustainable products become the norm in the EU.

# 4.A revised Ecodesign Directive is needed to bring more sustainable products on the market

This chapter provides ANEC and BEUC’s suggestions for the development of an ambitious product policy framework, aimed at bringing more sustainable products on the market and enabling consumers to make informed sustainable choices and effectively contribute to the circular economy. For this to happen, the EU must adopt an instrument that would comprehensively address the sustainable design of products, as well as the way consumers are informed about sustainability aspects. This should be done by introducing sustainability principles and, where technically possible, horizontal measures tackling sustainability dimensions common to all products (see Section 5).

Alongside, vertical implementing measures should continue to be developed, as they remain the most appropriate tool to regulate sector/product specific sustainability aspects and allow for the targeted identification of priority sustainability concerns.  To this end, sustainability principles and horizontal measures should be developed to be used as a checklist to assess what aspects are relevant for each product group, to ensure that appropriate sustainability parameters are considered when developing product/sector specific Regulations. This would allow for the appropriate differentiation across products (in terms of environmental impacts priorities), while also ensuring the necessary coherence when tackling products’ sustainability.

The Ecodesign framework is well suited for this task, as this instrument has so far brought better performing products to the market and financial benefits to consumers. Nonetheless, its focus largely remains on improving products' energy efficiency, while other equally important sustainability aspects are not sufficiently and systematically addressed across products. To ensure that the Ecodesign method can also be applied to more product groups, its scope must be extended to non-energy related products and its focus broadened beyond energy efficiency. In addition, new horizontal measures and sustainability principles should be introduced under the Ecodesign Directive to address sustainability concerns common to all products, such as usability, resource efficiency, durability and repairability. For this to happen, the Ecodesign Framework Directive needs to evolve into a much broader instrument and its governance be updated to guarantee a swift decision-making process.

## 4.1 Prioritization of products for implementing Regulations

The way products will be prioritized for specific implementing Regulations should no longer be based solely/largely on their energy efficiency potential, but rather considering a larger range of sustainability aspects, including a systematic assessment of their material efficiency potentials. This type of assessment should be made based on different data sources, including the findings of market surveillance inspections and information on the "costs" borne by consumers as regards to, for example, the extent to which products are repairable or the instances of product’s early failures. National consumer organisations also receive complaints about under-performing items and the European Commission should similarly collect and use this type of evidence in the Ecodesign preparatory process too.

Besides the products at the centre of the preparatory study for the next Ecodesign and Energy Labelling Work Plan, the following product groups should be prioritized, in particular:

* **Digital and connected products** (including electronics and ICT products) are reportedly among the most problematic for consumers, due to early failures to batteries, displays and operating systems.[[15]](#footnote-16) Small domestic appliances (such as electric kettles, toasters, coffee machines) are becoming more and more connected and are frequently replaced by consumers as it is hard or costly to repair them. They should be prioritized by the future Ecodesign.
* **E-products used for micro-mobility** (such as, e-bikes, e-scooters, etc.) are increasingly gaining popularity among consumers but their environmental and social impact is highly underestimated. The German consumer group vzbv found that it is often hard for consumers to access affordable repair services and spare parts for such products and there is no uniformity as concerns minimum lifespan / number of charging cycles.[[16]](#footnote-17)
* **Textile products** and **furniture** are also frontrunner candidates for future Ecodesign measures. The fashion industry is the second most polluting in the world and is heavily dependent on the use of hazardous chemicals substances.[[17]](#footnote-18) Reportedly 10 million tonnes of furniture are discarded every year in the EU and only a limited amount of those is reused or recycled.[[18]](#footnote-19) Ecodesign measures have the potential to counter this trend, by encouraging repair, reuse, and recycling.
* **Toys, sports,** and **leisure products,** which are often made of plastics and frequently risk ending up in the environment.

## 4.2 Updated governance to ensure faster decision making

The current Ecodesign decision making process is one we praise especially for how it results in benefits for consumers and how it allows for the effective engagement of all relevant stakeholders in the development of product measures, including as part of the Ecodesign and Energy Labelling Consultation Forum. Nonetheless, currently, it can take up to five years for an Ecodesign Implementing Regulation to be adopted. This extensive timeline is not satisfactory now and will be even less so when the scope of Ecodesign will be extended and cover many more products.

To meet the goal of having only sustainable products on the EU market, the future Ecodesign decision-making process must become faster and ensure that implementing measures keep pace with technological development. For this to happen, it is essential that the **European Commission allocates sufficient resources to the development of these measures**, to enable the development of meaningful Ecodesign regulations in the future, as well as the prompt revision of existing ones.

In this context and to accelerate the process, **Ecodesign Implementing Regulations should no longer be adopted by package** but individually once ready to be published. In addition, the European Commission could consider the simultaneous development of parallel work plans for each relevant sector to guarantee procedural efficiency and ensure a timelier adoption of product-specific implementing measures. The sustainability principles listed under Section 5 below should be comprehensively assessed and balanced from the very first stages of the preparatory work for future Ecodesign and Energy labelling Regulations, to ensure a uniform and consistent approach across the different product specific measures.

## 4.3 Self-regulation no longer an option

The Ecodesign Directive currently prioritizes voluntary industry agreements over regulatory measures when the Ecodesign objectives can be achieved faster or in a less costly manner. Nonetheless, existing voluntary agreements have often taken longer than expected to be adopted and their level of ambition is not high. We therefore reiterate our call to **put an end to self-regulation in favour of mandatory legislation**, especially in view of the extended scope of Ecodesign to critical sectors and product groups.

## 4.4 Closer alignment with EU Ecolabel

The Commission must ensure that the synergies of all product policies and instruments are optimised within a coherent framework. The Ecodesign should be implemented in **greater coordination with the Energy labelling, but also with the EU Ecolabel criteria**. These criteria are often developed for the same product groups, but their technical preparatory and legislative processes are not well aligned. When the European Commission addresses a product group, it should look at the possibility of developing criteria for both instruments at the same time, setting differentiated performance levels with minimum sustainability criteria for Ecodesign and higher ambition or complementary metrics for Ecolabel. There exist criteria under the EU Ecolabel which must already be considered when expanding Ecodesign to priority sectors such as textiles and furniture. This way the Ecolabel and Ecodesign criteria will be developed in a more efficient way.

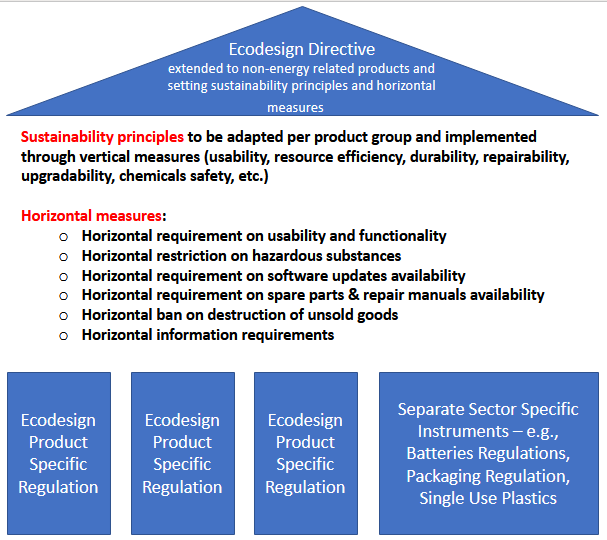
In the future, we would like to see the current EU Ecolabel as a benchmark and its criteria progressively become mandatory for the whole market in a staged approach (top runner approach). At the same time, the EU Ecolabel should continue to take a step forward and ensure its criteria are of environmental excellence. This way, the Ecodesign instruments would determine the “minimum” level of sustainability for products to be allowed on the EU market, while the EU Ecolabel should continue to indicate excellency for the most sustainable products.

## 4.5 Sector-specific instruments

In some cases, separate sector specific instruments already regulate sustainability aspects independently from Ecodesign (such as for batteries, packaging and single use plastics). Likewise, in the future, new separate sectorial legislation may appear. While these sectorial instruments would continue to be developed and work independently from the Ecodesign framework, the same logic/similar approach to sustainability would need to be applied in the development of these measures. Where sectorial legislation does not or only insufficiently address the common sustainability concerns identified under the Ecodesign Directive, the established horizontal principles/measures should apply also to such sectors.

This means that the separate sector specific processes should follow the same approach of a sound Ecodesign process as regards to tackling the full life cycle of products, using primarily mandatory criteria, prioritising product groups and actions based on the environmental impact and improvement potential. This should **guarantee a uniform approach to sustainability across sectors and products**. The objective is ensuring that the established key principles of sustainability (including sustainable design, design for circularity, responsible information, non-destruction of unsold goods, etc.) would apply to all products in the market through this horizontal instrument.

*Figure 1: revised architecture of the Ecodesign Framework*



# 5. Sustainability principles and horizontal measures

Under the revised Ecodesign Directive a comprehensive set of sustainability principles and horizontal measures should be established to guide the development of product specific implementing measures in a coherent and systematic approach.

From a governance perspective, identifying common sustainability principles/criteria at horizontal level would spare time and resources, compared to taking a product-by-product approach, especially when addressing certain cross-cutting sustainability aspects (e.g., usability, resource efficiency, durability, hazardous substances restrictions). It will also ensure consistency across instruments and avoid situations when certain sustainability criteria are adopted for some product groups but not others, despite being relevant. In turn, manufacturers would have a clear idea of what is expected from their products in terms of sustainability, creating a level playing field, thus fostering competition and innovation.

Depending on the specificities of each sector or product concerned, it will be for the product/sector specific preparatory studies to identify the relevant sustainability parameters of a specific product and its components (e.g., the motor lifetime of a device or the specific spare parts to be made available). These priority sustainability concerns would then direct the technical requirements in the sectorial measures, which should be verifiable, reproducible and reliable. This way, **product/sector specific sustainability requirements would be developed in a staged approach, based on the common sustainability principles established at horizontal level**.

Following the definition of “sustainable product” offered under Chapter 2, we have identified a series of sustainability principles and measures that the European Commission should consider at horizontal level:

**5.1 Usability/functionality principles**

Consumer products should be safe, easy to use, accessible, effective and efficient. They should be designed to perform their expected primary function well over time, to avoid that consumer discharge their products early due to unsatisfactory performance. These aspects are especially relevant as products are becoming increasingly connected and entirely new functionalities are emerging. Connected devices should be able to work stand-alone and continue to deliver their main functionality reliably. This means the product needs to deliver the service to consumers for which the product has been bought, such as washing clothes, cleaning the dishes, cooling food etc.

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| ANEC and BEUC key recommendations regarding good functionality:   * Consumer products should be **easy to use, accessible, and designed to perform their expected primary function well over time.** * **Connected devices should be able to reliably work stand-alone**, at least for basic functionalities. |

## 5.2 Durability principles and guarantees

The resource extraction required to manufacture consumer products has significant environmental impacts and major contributions to climate change. As a major focus of the CEAP, it is crucial that the design and production of goods ensures keeping resources in the EU economy for as long as possible.[[19]](#footnote-20) This entails that products are built to last over time so that they are less prone to wear and tear of single components that shorten their lifetime.

Based on analysis performed by the PROMPT project,[[20]](#footnote-21) durability extension must be a priority for all products, but also particularly those embedding electronics. From an environmental perspective, the manufacturing of consumer products such as smartphones or tablets is linked to high emissions which fuel climate change.[[21]](#footnote-22) What is more, with the ongoing design trends towards battery-powered and connected devices (where products traditionally offline are increasingly becoming internet-connected), there is a higher demand for mining electronics. This will further increase the environmental impact of all these products during the manufacturing phase.

Market research and product testing need to establish the expected lifespan of consumer products, to better assess their environmental impact and to incentivize design improvements, as well as to facilitate consumers’ choices when purchasing a new product. Such durability requirements should also in the future become the basis for establishing the legal guarantee periods for certain product categories.

Currently, the EU sales law provides for the same guarantee period for all goods. To achieve circular economy goals, the legal guarantee periods for durable goods (e.g., white goods) should last considerably longer than the current two years, foreseen as a minimum period in the Sales of Goods Directive[[22]](#footnote-23). However, due to different characteristics of specific product categories, the general provisions of the EU sales law, might not be appropriate to define their periods. For this purpose, specific measures should be taken by product specific legislation and a link between product law requirements and consumer contract law should be created. The Sustainable Product Initiative will be instrumental in achieving such goal and should go hand in hand with the announced revision of the Sales of Goods Directive. Introducing longer and product-specific, mandatory guarantee periods for durable goods, together with the possibility to hold producers directly liable for the goods non-conformity, will not only incentivise producers to invest in making their products last longer but would also allow consumers to expand their products’ service life.

For more information on BEUCs recommendations in this area, please see our[*Paper on durable and repairable products*](https://www.beuc.eu/publications/beuc-x-2021-061_durable_and_repairable_products_beuc_position_paper.pdf)*.*

Mandatory manufacturer’s durability guarantees could also be established under the respective Ecodesign implementing measures. BEUC and ANEC would be ready to contribute to the discussion of such a policy option that must provide an enforceable right for consumers.

The Revision of the Ecodesign Directive provides this opportunity. This could be achieved following some recommendations from the study led by Professors Tonner and Malcolm that was commissioned at the request of the JURI committee of the EU Parliament.[[23]](#footnote-24) ANEC and BEUC intend to investigate this option further.

Alongside, Ecodesign implementing measures should also establish technical durability requirements for key product components, whenever relevant and feasible. In the case of lighting and vacuum cleaners, minimum lifetime requirements have already been considered through the existing Ecodesign Directive.[[24]](#footnote-25) Similar requirements should be envisaged for other products systematically. In the case of ICT products that work with a battery, for example, this could mean setting a minimum number of cycles during which the battery must function properly.[[25]](#footnote-26)

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| ANEC and BEUC key recommendations regarding durability:   * **Durable design requirements:** products should be designed to last over time so that they are less prone to wear and tear of single components that shorten their lifetime. This includes, for example, the selection of high-quality materials that would ensure robustness and reliability of key components. * **Durability requirements** should be introduced systematically for all product groups, whenever feasible and relevant, and become the basis for establishing the legal guarantee periods for durable goods. |

## 5.3 Repairability and upgradability principles and horizontal measures

Repair and upgradability are critical for a resource-efficient circular economy, as they contribute to extend a product’s durability. This not only reduces the use of resources and the production of waste, but also benefits consumers who do not have to face the burden of replacing a product when a single component may fail.

In order to make products easily reparable, it should be easy to disassemble them, in a way that can simplify repair and maintenance, while ensuring safety in the process. Standards should be used to identify the necessary tools to open products to repair and upgrade them. Designing for disassembly could also facilitate end-of-life processes such as re-use and recycling. A modular design could also help users to easily replace product components to repair or even upgrade a product. Nonetheless, this should not result in products failing prematurely due to fragile components and design methods.

Beyond improving the physical design of products to facilitate repair, minimum repairability requirements should also ensure that consumers and independent repairers have access to spare parts and repair manuals. Spare parts needed for repair should be readily available to end-consumers and independent repairers for a period that reflects the expected lifetime of a product and continue after the last product is placed on the market. Ensuring that spare parts are made available to independent repairers increases the competition and should in turn lower the cost of this type of services. This is an important factor considering that one of the main reasons for consumers not to repair their faulty products is the high cost and lack of repair services.

Consumers should at least have access to those spare parts that are easily and safely replaceable without the assistance of a professional repairer. Testing and standardisation should help identify the priority parts crucial for each product and make the appropriate selection. For example, through its Barometer of Premature Obsolescence, the Spanish consumer organization OCU found that in most European countries, mobile phones appear in the top of the list of consumers complaints related to products’ premature obsolescence, especially in relation to failures to batteries, displays and operating systems.[[26]](#footnote-27)

These requirements should go hand in hand with the appropriate **pre-contractual information obligations** introduced to the consumer protection legislation.

During the period of ensured spare parts availability, delivery should be performed within a set maximum number of days (not exceeding 10 calendar days), to avoid that consumer would be drawn into buying new items due to long waiting times.

Within the EU Sales of Goods Directive an obligation to carry out a repair (as one of the possible remedies for product non-conformity) within a fixed time limit of 15 days should also be introduced. This would encourage consumers to choose this remedy more often when exercising their legal guarantee rights.

Currently, if reparability and availability of spare parts is not foreseen by the manufacturer, any attempt to repair the product or reproduce the spare parts by an independent service provider or the consumer could breach the proprietary rights of the manufacturer. This affects the ability of consumers to repair their faulty products, who do not have access to these services. Specific exceptions to the relevant intellectual property rights regimes could ensure that those seeking to repair products or to provide repair services can do so in compliance with the law.

Repair requirements should also be looked at in the context of its ambiguous relation with durability to avoid trade-offs and/or balance them to some extent.

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| ANEC and BEUC key recommendations regarding repairability and upgradability:   * **Circular design methods**, such as easy disassembly and modularity, should be **systematically considered for all products** to simplify repair, maintenance, and upgradability, while also ensuring safety in the process. * **A horizontal requirement to make spare parts and repair manuals** **available** to both consumers and independent repairers should be introduced. * Delivery of spare parts should **not exceed 10 calendar days**. * **Specific exceptions to the relevant intellectual property rights regimes should be considered**, to allowindependent service providers and consumers to repair their products. * Always assess the relation between durability and repairability requirements to be able to address possible risks of trade-offs. |

## 5.4 Software updates availability and security of connected products

Software updates are also paramount to ensure that consumers can use their devices in a secure and sustainable way. At present, it is not always clear to consumers whether the proposed updates are necessary to improve security, to resolve a software bug, or to install new functionalities or whether they serve other purposes. Software obsolescence can result in products not working properly or not working at all even when their hardware is operational. In addition, more products traditionally offline are becoming internet-connected, such as washing machines, TVs or fridges. As a result, the issue of software obsolescence becomes particularly pressing.

Security and functionalities updates should be provided by the manufacturers and service providers during a minimum period which corresponds to the expected lifespan of the product. Very importantly, security updates should be provided separately from functionality updates, as this will enable consumers to clearly distinguish between critically important updates (security updates) and others which can have a negative impact on their devices (functionality updates).

To enable repair and reuse of connected products, secure data deletion should also be enabled for all data storage devices of a product. Many consumers prefer to keep their unused or non-functioning devices at home instead of recycling/repairing them, due to privacy concerns.

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| ANEC and BEUC key recommendations regarding connected products:   * A **horizontal requirement to provide software updates for the entire lifespan of connected devices** should be introduced. Security updates should be provided separately from functionality updates. * Manufacturers of connected products should ensure **secure data deletion for all data storage devices**, to facilitate reuse and recycling. |

## 5.5 Addressing the presence of dangerous chemicals

Ensuring that the presence of dangerous chemicals in consumer products is minimized is an important aspect, not only to ensure consumers’ safety but also to reduce environmental pollution and facilitate products’ recyclability in a resource saving context. For this reason, we believe there should be a horizontal restriction to ensure that the presence in consumer products of substances of concern – as defined in the Chemicals Strategy - are minimised and substituted as far as possible. Such horizontal measures should be complemented by product specific restrictions under each separate Ecodesign Implementing Regulations, whenever necessary and appropriate. It is important that these restrictions are developed also in alignment with the measures taken under the [Chemicals Strategy for Sustainability](https://ec.europa.eu/environment/strategy/chemicals-strategy_fr).[[27]](#footnote-28) Requiring the substitution of hazardous substances by safer ones when alternatives are available could be done through horizontal criteria building on the experience of the EU Ecolabel. The scheme already has in place a very ambitious approach on dangerous chemicals, which shows that requiring improvements in the way product legislation tackles chemicals can be made.

Finally, the traceability of hazardous chemicals during a product’s lifecycle is essential to ensure transparency for users and safe handling and recycling. A successful circular economy can only be achieved if consumers are confident that secondary raw materials are safe. For this to happen, information on chemicals content of products must be made available at all stages of a products lifecycle in a transparent way. It should be investigated if information on chemicals content could be collected through a "product passport” to ensure transparency in the supply chain.

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| ANEC and BEUC key recommendations regarding dangerous substances:   * **Horizontal and product specific restrictions on the presence of hazardous chemicals in consumers products should be introduced in alignment with the Chemicals Strategy for Sustainability** and should consider the generic risk management approach as the default option for the most harmful chemicals. Such horizontal measures should be complemented by product specific restrictions. * Closer alignment with the EU Ecolabel criteria is necessary. In the future, the **EU Ecolabel should become a benchmark and its criteria mandatory**. * **Traceability of chemicals should be ensured during the entire lifecycle of a product**. This is especially important for some priority products, such as toys, materials in contact with food etc. |

## 5.6 Resource Efficiency principles

Resource efficiency and sustainable material use should be the primary objective of products’ design. For relevant products that have an impact on energy and/or water consumption during their use (e.g., ICT products, cooking appliances, etc.), energy and water efficiency requirements should be systematically introduced. It is estimated that the existing Ecodesign and Energy Labelling legislation, which are the EU’s flagship policies which address the energy use of appliances, have contributed to a 13% reduction in the EU total energy consumption.[[28]](#footnote-29) For consumers, these figures can be translated in energy savings of €332 each year compared with a non-Ecodesigned world.[[29]](#footnote-30) Likewise, improving the water efficiency of household appliances can decrease water usage and save consumers' money.

Finally, products that have an impact on noise emissions or any other form of pollution while being used should be addressed with appropriate efficiency measures to reduce their negative impact.

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| ANEC and BEUC key recommendations regarding efficiency criteria at use phase:   * **Energy and water efficiency requirements should continue to be systematically established for relevant products** that have an impact on energy and/or water consumption during their use, as it is currently the case under the Ecodesign framework. * Additional parameters such as **noise emissions and other form of pollution should also be factored in future product/sector specific measures**. |

## 5.7 Recyclability principles

Recyclability is not an end in itself and the primary objective should be to build products that last longer, to prevent waste and enable reuse. Recycling should only be considered where useful and not resulting in additional health and environmental burdens. In the context of transitioning to a more circular economy, the use of recycled material in consumer products will help reducing the environmental impacts of the exploration, extraction, production, and waste management of primary raw materials.

Nonetheless, the systematic introduction of minimum recycled content requirements through Ecodesign should be carefully assessed against health ans environmental impacts and alternatives.

Finally, it is important that these requirements are developed in alignment with the Chemicals Strategy for Sustainability, to ensure that, through recycling, toxic substances are not re-introduced in the production-cycles, causing harm to consumers and the environment.

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| ANEC and BEUC key recommendations regarding recyclability and re-manufacturing:   * **Recyclability is not an end in itself** and the primary objective should be to build products that last longer, to prevent waste and enable reuse. * If **minimum recycled content requirements** are introduced, they should be **developed in alignment with the Chemicals Strategy for Sustainability** and ensure that toxic substances are not reintroduced in the production cycles. * Any measure to increase recycling rates must be accompanied by an **assessment of health and environmental impacts**, as well as an assessment of alternatives. |

## 4.7 Single use items

Consumers are worried to live in a throw-away society in which many products and materials are only used once or for a very short time and contribute to excessive level of pollution and waste. Through the provisions of the Single Use Plastics Directive, several single use plastics items have been phased out and manufacturers have been asked to change their design to bring more sustainable options on the market. Nonetheless, several other plastics and non-plastics single use products continue to be sold in the EU, with an increasingly polluting effect on the environment. Following up on the good approach introduced with the Single Use Plastics Directive, the European Commission should investigate the possibility to phase out or restrict additional single use items, such as ink cartridges and cigarette filters containing plastics. A preparatory study on this aspect could be performed under the reformed Ecodesign framework or via a separate instrument, if deemed more appropriate. We encourage the European Commission to first identify unnecessary material streams (such as unnecessary overpackaging) and consider options to replace single use items/packaging by reusable options.

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| ANEC and BEUC key recommendations regarding single use items:   * The European Commission should **investigate the possibility to phase out or restrict additional single use items**, following the positive approach of the Single Use Plastics Directive**.** * **A preparatory study** on this aspect could be performed under the reformed Ecodesign framework or via separate instruments, if deemed more appropriate, to identify unnecessary and preventable material streams. |

## 4.8 Horizontal ban on the destruction of unsold goods

Companies often produce more than they can sell and tend to destroy products that were never sold or that were returned by costumers, even if still usable. It is estimated that €7 billion worth of goods are destroyed each year in Germany alone, resulting in major waste production.[[30]](#footnote-31) Nonetheless, there is currently little transparency on companies' handling of unsold products and consumers are left wondering about what happens when new items are returned.

To face these challenges, the European Commission should require companies to disclose this type of information and introduce a horizontal ban on the destruction of unsold goods.[[31]](#footnote-32) Any product that can continue to be used without posing any health or safety risk should not be destroyed or landfilled. This means that defective products should also be covered by this ban as they can be repaired and reused.

In addition to this horizontal ban, the European Commission should also consider additional measures aimed at fostering donation schemes of unsold products, along with reconditioning and remanufacturing schemes that can help foster second-hand markets and more sustainable consumption practices.

ANEC and BEUC key recommendations regarding unsold goods:

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| ANEC and BEUC key recommendations regarding the destruction of unsold goods:   * A **horizontal ban on the destruction of unsold goods should be introduced under the Ecodesign Directive**, which should apply to any unsold product that does not pose any health or safety risk to consumers. * Additional measures should be adopted to **increase transparency** by reducers and retailers regarding their product return rates and unsold goods policies. |

## 5.9 Product information requirements

While the focus should remain on introducing technical requirements that improve the design of products, information requirements also enable consumers to make informed sustainable choices. Under the revised Ecodesign Directive, products should be accompanied with clear information at the point of sale that specify:

* Durability information, including the duration of the guarantee of durability in line with our recommendations under Chapter 5. This should be in the form of a lifespan/durability label expressed in years.
* The product’s ability to be repaired. The experiences with repair scores at national level and the JRC study on a European repair score need to be assessed further to identify what are the limitations and benefits for consumers in displaying that information.
* The presence of chemicals in a product and a clear explanation of on the hazard properties of the chemical, e.g., if it is suspected to cause cancer, harm fertility or the environment. The collection of this type of information should start from priority products, such as materials in contact with food, toys, and other products used by vulnerable people.
* The amount of recycled material in the product and its components.
* Information on how the product should be used, recycled and/or handled at the end of life.

Digital information tools (e.g., electronic labels, information databases, product passports, etc.) can effectively contribute to inform consumers about critical sustainability aspects of products but can also be more burdensome for some of them or completely inaccessible for others. Therefore, digital tools should rather play a complementary role and not replace the established means of communicating product information to consumers, such as on-pack labels or paper leaflets. **Information that is essential to consumer health and rights must be clearly declared in physical form with the product and not be “hidden” in a digital tool**. The same should apply to any new information disclosure obligation that will be introduced with the SPI.

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| ANEC and BEUC key recommendations about point-of-sale information requirements:   * Alongside design-specific measures, the new **horizontal sustainability aspects should also address the type of point-of-sale sustainability information** available to consumers regarding, *inter alia*, products’ lifetime linked to the guarantee, repairability, presence of chemicals and their hazard properties (starting from priority products), and recyclability. * This type of products information **must be easily accessible to consumers with the product and should not be solely provided through digital tools** (e.g., the digital product passport). |

# 6. Compliance with and enforcement of sustainability requirements for products

Effective enforcement of products sustainability requirements is essential for the achievement of the CEAP’s goals and to ensure consumers' needs and expectations are met. It is an important achievement that the EU Ecodesign Directive has been added to the new market surveillance Regulation (2019/1020/EC)[[32]](#footnote-33) as this will give Member States important new tools such as better traceability along the supply chain, better cooperation with customs and new joint testing opportunities in EU-designated laboratories as well as better checks of online sales. However, **new measurement methods** will be needed to ensure that market surveillance authorities will be able to check conformity of durability requirements as they will be introduced more widely in the future.

The European Commission should work more closely with market surveillances authorities (MSAs) to facilitate their work and fund (or promote existing funding programmes for) cross-border cooperation projects. Furthermore, it is important that **MSAs use the new opportunities of the market surveillance regulation to cooperate among themselves** and exchange results when a product is found non-compliant. Cooperation on Ecodesign has in the past not been at a satisfactory level and it is crucial that Member States make active use of the opportunities of the new Regulation to step up their control efforts.

The European Commission should investigate with enforcement authorities if digital tools like a “Product passport” or information databases like EPREL (European Product Registry for Energy Labelling) and SCIP (Substances of Concern In Products) can help to improve market surveillance. Increased transparency in the entire life cycle of a product eases the tracking of compliance in all relevant stages from production to disposal/recycling. The European Commission has already set up a database to improve compliance in the context of the Energy labelling framework (EPREL). We think the possibility of extending this type of databases to ecodesigned products should also be assessed, to provide consumers with useful and comparable information about their products. Products that would particularly benefit from increased transparency in the supply chain (such as textile) should be prioritized for digital information tools.  Finally, a possible introduction of a digital product passport should not become cost-prohibitive for small manufacturers and in turn hinder innovation.

Strong enforcement actions, such as fines and penalties, should follow any non-compliance findings, including in the online market.  There should be more transparency regarding findings of non-compliance, which can also trigger name-and-shame mechanisms. Digital information tools can assist consumer organizations in successfully launching class actions against producers, for example when products do not reportedly last or are not as repairable as described. The reputational damage of enforcement actions should be considered as a possible reputational incentive for companies to comply with Ecodesign requirements. Establishing a link between products Ecodesign durability requirements and the legal guarantee periods for durable goods will also function in this case as an extra sanction for the non-compliance of these regulatory obligations.

Finally, the creation of a centralized repository of products’ sustainability information could also facilitate certain circular economy practices, such as recycling, reuse and remanufacturing, as the relevant market actors along the value chain would have easier access to information on products’ composition, repair and dismantling options and safe end of life handling. It could also be used as a database where businesses would need to submit the evidence substantiating the environmental claims used in their marketing strategies, before they enter the market.

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| ANEC and BEUC key recommendations regarding stronger enforcement:   * **Close collaboration between the European Commission and national market surveillance authorities** must be ensured, especially when a product is found non-compliant. * **New testing and measurement methods** must be developed to check compliance with durability requirements. * **The European Commission should investigate with enforcement authorities if digital tools** like the Product Passport **should have the function of assisting them** when checking compliance with sustainability rules. They can also serve as enablers of the circular economy, as products’ sustainability information is made easily available to all market actors along the value chain (e.g., repairers, remanufacturers, etc.). * Market surveillance activities must also be complemented by **effective enforcement actions**, such as fines and penalties. There should also be more transparent disclosure of non-compliance findings. **Digital information tools can assist consumer organizations in successfully launching class actions against producers**, for example in cases of premature obsolescence. |

# 7. Further measures needed to promote sustainable consumption

## 6.1 Circular business models

A comprehensive sustainable product policy should not only look at products’ design but also address the potentials of more sustainable business practices. Renting, second-hand markets and collaborative or sharing economies, for example, can have a positive effect on the uptake of sustainable consumption practices, based on reuse and repurposing of products, as well as a lower environmental impact, as fewer products are needed on the market to accommodate more people.

Resale models can also contribute to extending the useful life of products and can give access to cheaper high-quality items to less affluent consumers. Along with the introduction of a ban on the destruction of unsold products, the European Commission should consider introducing measures that incentivise the return of products that are no longer used, to facilitate recycling and refurbishment practices, reduce waste, and provide a stimulus for second-hand markets. This could, for example, be implemented through mandatory supplier take-back schemes for unused products. These schemes should however not have the effect of hindering existing charity donation systems.

Similarly, “product-as-a-service” systems can reinforce the responsibility of manufacturers to provide products that last longer and are easily repairable, as producers maintain the ownership of the final product while offering performance services to different consumers over time. However, it is essential that products that are offered as a service continue to apply the established key principles of sustainability, including sustainable design, design for circularity, responsible information, and non-destruction of unsold goods.

Consumers can have a crucial role for the successful implementation of circular business models and their perspective should be carefully taken into consideration when developing relevant measures. The sustainable option should always be the more attractive and efficient one for consumers, not only financially but also in terms of accessibility, protection of consumers rights and availability of effective remedies. According to a 2020 survey by the German consumer group vzbv, the hurdle for sharing offers in the mobility sector is still far too high and more should be done to make it easier for consumers to access digital mobility platforms.[[33]](#footnote-34) In addition, there is a lack of reliable data on how much cheaper circular business models are compared to more conventional offers, as well in relation to their ecological advantage. The European Commission should consider founding dedicated research projects investigating consumer acceptance of such new business models as well as the resulting benefits and challenges. Increased circularity in the way we consume and produce products should not result in additional burdens for low-income consumers.

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| ANEC and BEUC key recommendations regarding Circular Business Models:   * The European Commission should introduce measures that tackle sustainable consumption beyond products’ design and towards more circular business models. For example, measures should be introduced to **incentivise second-hand markets and the take back of unused products**. * **More information and data should be collected on the financial and environmental benefits of circular business models**, such as the sharing economy and product-as-a-service models. * The consumers’ perspective should not be overlooked and increase circularity should not result in more financial and procedural burdens for the less affluent consumers. The European Commission should consider **founding dedicated research projects investigating consumer acceptance of circular business models**. |

## 6.2 Mandatory Green Public Procurement Criteria

To further incentivize sustainable consumption practices among consumers, EU governments should act as good role-models and show their active involvement in the green transition. Public authorities should be obliged to purchase only the most sustainable goods and services, which are those with the highest material and energy efficiency performance and that are built in respect of human rights and fair labour conditions. Through large scale public buying, the price of sustainable products should gradually reduce making it also more accessible to consumers. For this to happen, the European Commission should develop mandatory Green Public Procurement (GPP) criteria and targets, based on the already existing EU Ecolabel and voluntary GPP schemes.

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| ANEC and BEUC key recommendations regarding public procurement:   * To further incentivize sustainable consumption practices and make them more accessible to consumers, the European Commission should develop **mandatory Green Public Procurement (GPP) criteria and targets** and force public governments to lead by example in the green transition. |

7. Conclusions

To meet the ambitions of the Green Deal and the CEAP, systematic changes in the way we address sustainable consumption and production are needed. The European Commission must step it up and adopt an instrument that comprehensively addresses the sustainable design of products, and the way consumers are informed about sustainability aspects. Alongside, more sustainable business models (such as renting, reuse, second-hand markets) should be incentivised to the benefits of consumers and the environment.

1. Sustainable design refers here to the efforts made to redirect products’ design, as well as production and consumption patterns, towards more sustainable approaches to the benefits of the environment and society. [↑](#footnote-ref-2)
2. https://ec.europa.eu/environment/circular-economy/pdf/sustainable\_products\_circular\_economy.pdf [↑](#footnote-ref-3)
3. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52015DC0614 [↑](#footnote-ref-4)
4. https://ec.europa.eu/environment/circular-economy/pdf/new\_circular\_economy\_action\_plan.pdf [↑](#footnote-ref-5)
5. <https://www.europarl.europa.eu/doceo/document/A-9-2021-0008_EN.html> ; <https://ec.europa.eu/environment/circular-economy/pdf/new_circular_economy_action_plan.pdf> ; <https://data.consilium.europa.eu/doc/document/ST-6364-2021-INIT/en/pdf> [↑](#footnote-ref-6)
6. The Sustainable Product Policy Initiative was launched in September 2020 and aims at making products placed on the EU market more sustainable. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12567-Sustainable-products-initiative [↑](#footnote-ref-7)
7. European Parliament, Sustainable consumption - Helping consumers make eco-friendly choices, <https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/659295/EPRS_BRI(2020)659295_EN.pdf> [↑](#footnote-ref-8)
8. EU Commission, Behavioural Study on Consumers’ Engagement in the Circular Economy, 2018 - <https://ec.europa.eu/info/sites/info/files/ec_circular_economy_final_report_0.pdf> [↑](#footnote-ref-9)
9. Accenture, COVID-19: How consumer behaviour will be changed. https://www.accenture.com/us-en/insights/consumer-goods-services/coronavirus-consumer-behavior-research [↑](#footnote-ref-10)
10. https://kantar.turtl.co/story/whocares-who-does-2020-p/page/6/2 [↑](#footnote-ref-11)
11. The European Commission estimates that 80% of products’ environmental impact is determined at their design phase. <https://ec.europa.eu/environment/circular-economy/pdf/new_circular_economy_action_plan.pdf> [↑](#footnote-ref-12)
12. https://www.beuc.eu/publications/beuc-x-2021-024\_the\_consumer\_checklist\_eu\_due\_diligence.pdf [↑](#footnote-ref-13)
13. The case of printers is emblematic: the work on a voluntary agreement by the industry has already taken over 2 years and has not been concluded yet and the measures foreseen are far from being ambitious enough. <https://www.beuc.eu/publications/greener-better-faster-stronger-ecodesign> [↑](#footnote-ref-14)
14. CEPS,<https://www.ceps.eu/wp-content/uploads/2018/03/RRNo2018_02_EcoDesignDirective.pdf> [↑](#footnote-ref-15)
15. OCU Barometer of Premature Obsolescence, <https://www.ocu.org/barometro-de-obsolescencia-prematura> [↑](#footnote-ref-16)
16. https://www.vzbv.de/pressemitteilung/e-bikes-teuer-und-kurzlebig [↑](#footnote-ref-17)
17. Altroconsumo, https://www.altroconsumo.it/organizzazione/media-e-press/comunicati/2016/cambiamo-abito-per-una-moda-consapevole-dirittiallamoda [↑](#footnote-ref-18)
18. EEB, Circular Economy Opportunities in the furniture sector, <https://circulareconomy.europa.eu/platform/sites/default/files/eeb_-_ce_in_the_furniture_sector_final_high_res.pdf> [↑](#footnote-ref-19)
19. <https://ec.europa.eu/environment/circular-economy/pdf/new_circular_economy_action_plan.pdf> [↑](#footnote-ref-20)
20. <https://prompt-project.eu/wp-content/uploads/2020/07/PROMPT_20200429_Environmental-Evaluation-of-Current-and-Future-Design-Rules.pdf> [↑](#footnote-ref-21)
21. Table 15, https://prompt-project.eu/wp-content/uploads/2020/07/PROMPT\_20200429\_Environmental-Evaluation-of-Current-and-Future-Design-Rules.pdf [↑](#footnote-ref-22)
22. Directive (EU) 2019/771 of the European Parliament and of the Council of 20 May 2019 on certain aspects concerning contracts for the sale of goods [↑](#footnote-ref-23)
23. K. Tonner and R. Malcolm (2017): How an EU Lifespan Guarantee Model Could Be Implemented Across the European Union [↑](#footnote-ref-24)
24. See on vacuum cleaners, ANEC-BEUC's position on the European Commission draft proposal: <https://www.beuc.eu/publications/beuc-x-2019-100_ecodesign_vacuum_cleaners.pdf>. See on lamps, the Ecodesign regulation 2019/2020 [↑](#footnote-ref-25)
25. https://www.halteobsolescence.org/wp-content/uploads/2020/11/Livre-Blanc-europeen.pdf [↑](#footnote-ref-26)
26. https://www.ocu.org/barometro-de-obsolescencia-prematura [↑](#footnote-ref-27)
27. By substances of concern, we understand those identified in the Chemicals Strategy, i.e., substances having a chronic effect for human health or the environment (Candidate list in REACH and Annex VI to the CLP Regulation) but also those which hamper recycling for safe and high quality secondary raw materials. [↑](#footnote-ref-28)
28. <https://www.beuc.eu/publications/beuc-x-2016-108-benefits_of_ecodesign_for_eu_households.pdf> [↑](#footnote-ref-29)
29. <https://www.beuc.eu/publications/beuc-x-2016-062_how_much_can_consumers_save_thanks_to_ecodesign.pdf> [↑](#footnote-ref-30)
30. https://www.dw.com/en/destroy-packages-online-shopping/a-52281567 [↑](#footnote-ref-31)
31. This ban on the destruction of unsold goods should be introduced under the new Ecodesign Directive through this revision under the Sustainable Product Initiative. In alternative, the European Commission should consider introducing such ban through the European waste legislation. [↑](#footnote-ref-32)
32. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32019R1020 [↑](#footnote-ref-33)
33. https://www.vzbv.de/pressemitteilungen/sharing-angebote-grosse-bekanntheit-geringe-nutzung [↑](#footnote-ref-34)