

Public consultation on new product priorities under the Ecodesign for Sustainable Products Regulation (ESPR)

Fields marked with * are mandatory.

Introduction

1.1 Background to this consultation

A proposal for a Regulation on [Ecodesign for Sustainable Products](#) (ESPR) was adopted by the Commission in March 2022. The ESPR is a framework for setting ecodesign requirements on products to improve their circularity, energy performance and other environmental sustainability aspects. While the ESPR proposal provides a general framework for setting rules, the actual product requirements will be adopted only in a second stage. The Commission should therefore adopt and regularly update a working plan, setting out product priorities for which ecodesign requirements should be laid down.

The purpose of this questionnaire is to gather your views on what the new product priorities under the ESPR should be.

The questions build on preliminary assessments (see [here](#)) carried out by the Commission's [Joint Research Centre](#) (JRC), which has identified several product groups and horizontal measures that *may* be suitable candidates for prioritisation under the ESPR, once it enters into force. The responses of the public to this questionnaire will help the Commission to further refine this analysis, close information gaps and build consensus on future action under the ESPR.

A key methodological starting point for the JRC's preliminary assessments was **Article 16** of the [ESPR proposal](#), which requires the Commission to prioritise products and horizontal measures based on a set of criteria pertaining in particular to the *potential contribution that could be made to the EU's climate, environmental and energy objectives*, as well as the *potential for improving the product aspects identified by the proposal from an environmental point of view, products' market share and the distribution of product impacts across the value chain*. Factors such as products' environmental, sustainability and circularity impacts, improvement potential from an environmental sustainability point of view, and as well as existing policy gaps and proportionality of costs related to the improvement potential were therefore amongst the considerations taken into account.

The ESPR proposal builds on the existing [Ecodesign Directive 2009/125/EC](#), which currently covers energy-related products only. It should be clarified that this consultation focuses on identifying 'new products' that are *not* currently within the scope of Ecodesign Directive 2009/125/EC. The future ESPR working plan will nevertheless cover both new and energy-related products. (Please note: the Commission will carry out a

separate initiative to prioritise requirements for energy-related products, for which it will be necessary to take the progress in implementing the [Ecodesign and Energy Labelling Working Plan 2022-2024](#) into account.)

Given the wide scope of the ESPR, some products identified in this questionnaire will also be subject to separate product-specific or horizontal legislation at EU level. For these products, as a general principle the ESPR will only intervene when the environmental sustainability dimensions of those products cannot be fully and appropriately addressed by other instruments. For example for **chemicals**, ESPR could only take action where needed on aspects *not* dealt with under existing chemicals regulation (e.g. [Regulation \(EC\) No 1907/2006](#)); for **packaging**, it could only act where needed on *targeted aspects* specifically related to a packaged product covered by its measures, leaving [revised Packaging and Packaging Waste rules](#) to cover stand-alone packaging; for **construction products**, it could take action if the environmental sustainability dimensions of these products could not be fully and appropriately addressed by the [revised Construction Products Regulation](#) (with the exception of energy-related construction products, for which the ESPR will be the main regulatory instrument). As the ecodesign requirements that ESPR will set will help strengthen the EU's general circularity framework, including by improving product recyclability (including of the critical raw materials contained in products), it will also synergise with key pillars of [upcoming EU initiatives in the area of Critical Raw Materials](#) (CRMs).

The [JRC report](#) underpinning this consultation includes a preliminary assessment of product-specific legislation in this respect. However, a more precise assessment of the ecodesign requirements to be potentially laid down under ESPR, and their added-value in comparison with product-specific legislation, will be undertaken in a second stage, following adoption of the ESPR working plan, in the context of the preparatory studies foreseen. Questions on potential measures identified at this stage are therefore preliminary. Before adopting all rules under ESPR, the Commission will undertake thorough impact assessments and further consultations will also be held.

While the ESPR proposal is yet to be adopted by the co-legislators, and is therefore subject to further change, it is hoped that the results of this consultation will be able to feed into preparation of the new product priorities under the ESPR.

1.2 Structure of this questionnaire

You are invited to respond to the questionnaire regardless of your level of expertise. You can save your answers as draft and finish the survey later if necessary. The questionnaire is available in all languages. The questionnaire comprises the following sections:

- **'About you'**: general information about you, the respondent, to better understand your perspective
- **End-use products**: including general questions and questions per product group
- **Intermediate products**: including general questions and questions per product group
- **Horizontal measures**: including general questions and questions per horizontal measure
- **Final remarks**: allows you to provide final remarks and/or upload a document that you think is relevant to your views

Please note that **all sections (with the exception of the 'About you' section) are optional**: you can

choose which you wish to complete, depending on your main area(s) of interest.

If you have any questions, please contact **ENV-PRODUCT-POLICY@ec.europa.eu**

Your opinion matters and we are grateful to you for taking the time to complete this consultation. The results of the consultation will be published on Have your say.

For further information, please see the following background information:

- [Consultation webpage](#)
- JRC background [work](#) and [analysis](#)
- [ESPR proposal](#)
- [ESPR impact assessment](#)

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian

- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

Please specify your sector

- Agriculture,
- Ceramic products
- Chemicals and chemical products
- Computers, electronic and optical products
- Construction
- Cosmetics
- Electrical equipment
- Energy-related products, including ICT and electronics
- Fixtures (e.g. toilets and urinals)
- Food, feed and drink
- Forestry and fishing
- Furniture
- Hygiene products
- Materials (e.g. metals, plastics, paper)
- Office equipment
- Other [please specify]
- Packaging
- Retail & wholesale trade

- Textiles and footwear
- Transport equipment

Free Text Question

Text of 1 to 50 characters will be accepted

Space products, e.g. launchers and satellites

(For industry stakeholders) Please indicate the type of **product** your organisation produces or represents:

- Absorbent Hygiene Products
- Agricultural products
- Aluminium
- Bed Mattresses
- Ceramic products (including toilets and urinals)
- Chemicals
- Construction products
- Cosmetic Products
- Detergents
- Energy-related products, including ICT and electronics
- Fishing Nets and Gears
- Food, feed and drink
- Furniture
- Glass
- Iron and Steel
- Lubricants
- Non-ferrous metals
- Office equipment
- Other (please specify)
- Packaging
- Paints and Varnishes
- Paper, Pulp Paper and Boards
- Plastic and Polymers
- Textiles and Footwear
- Toys
- Transport equipment

Tyres

Free Text Question

Text of 1 to 50 characters will be accepted

Space products, e.g. launchers and satellites

(For industry stakeholders) Please indicate the level of the market(s) you are active on:

- Local market
- Regional market
- EU market
- Non-EU market
- Worldwide market
- Not applicable

* First name

Tim

* Surname

BECKER

* Email (this won't be published)

tim.becker@reachlaw.fi

* Organisation name

255 character(s) maximum

ASD-Eurospace

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

873508417106-05

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
|---|---|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input checked="" type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |

- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan

- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria

- Burkina Faso
- Burundi

- Cambodia

- Cameroon
- Canada
- Cape Verde
- Cayman Islands

- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland

- Grenada
- Guadeloupe

- Guam

- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau

- Guyana

- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong

- Hungary

- Iceland
- India
- Indonesia
- Iran

- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma

- Namibia
- Nauru

- Nepal

- Netherlands
- New Caledonia
- New Zealand
- Nicaragua

- Niger

- Nigeria
- Niue

- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan

- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Syria

- Taiwan
- Tajikistan
- Tanzania
- Thailand

- The Gambia

- Timor-Leste
- Togo

- Tokelau
- Tonga

- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands

- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States
Minor Outlying
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

A. END-USE PRODUCTS

'End-use products' are products sold directly to consumers and that are ready for their intended use upon sale (i.e. they do not require further [professional] manufacturing and/or assembly processes before being ready for use).

Based on the approach outlined in the main introduction to this questionnaire, the following end-use products have been identified as potentially suitable for first action under the ESPR:

- Textiles and Footwear
- Furniture
- Ceramic products
- Tyres
- Detergents
- Bed Mattresses
- Lubricants
- Paints and Varnishes
- Cosmetic products
- Toys
- Fishing Nets and Gears
- Absorbent Hygiene Products

For each end-use product listed above, the **product scope** taken into account in the preliminary analysis outlined in the main introduction to this questionnaire is set out in the dedicated sections underneath. These scopes remain subject to further change, including based on the results of this consultation.

I. GENERAL QUESTIONS ON END-USE PRODUCTS

1. Do you agree with the identification of the following end-use products for potential first action under the ESPR?

	Agree	Disagree	No opinion
Textiles and Footwear	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Furniture	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ceramic products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Tyres	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Detergents	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Bed Mattresses	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lubricants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Paints and Varnishes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cosmetic products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Toys	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Fishing Nets and Gears	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Absorbent Hygiene Products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

2. Are there any other end-use products you believe should be added to this list?

100 character(s) maximum

No.

3. The implementation of the ESPR and setting of ecodesign requirements will happen over time. Even among the products finally selected, an order of priority will need to be decided.

Please rate the priority of the below products from 1 to 3, with 1 denoting the lowest importance and 3 the highest:

	1 (low importance)	2 (medium importance)	3 (high importance)

Textiles and Footwear	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Furniture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ceramic products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tyres	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Detergents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bed Mattresses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lubricants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Paints and Varnishes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cosmetic products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Toys	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fishing Nets and Gears	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Absorbent Hygiene Products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

II. QUESTIONS ON INDIVIDUAL END-USE PRODUCT GROUPS

Please select the end-use product group(s) on which you would like to provide input:

- All 12 end-use product groups identified
- Textiles and Footwear
- Furniture
- Ceramic products
- Tyres
- Detergents
- Bed Mattresses
- Lubricants
- Paints and Varnishes
- Cosmetic products
- Toys
- Fishing Nets and Gears
- Absorbent Hygiene Products

CERAMIC PRODUCTS

Product scope: The scope considered is the same as that of the BREF (see [here](#)) with the exception of the uses related to construction. See explanation of interplay between the ESPR and EU level rules for

construction products in the section on intermediate products. Thus, ceramic products include the following sectors: **Vitrified clay pipes** and fittings are used for drains and sewers, but also tanks for acids and products for stables. **Refractory products** are usually applied in industries like the metals, cement, petrochemical and glass industries to increase the energy efficiency of their processes. **Expanded clay aggregates** are porous ceramic products used as loose material in garden and landscape design (e.g. embankment fillings in road construction, substrates for green roofs, filter and drainage fillings). **Household ceramics** covers tableware, artificial and fancy goods made of porcelain, earthenware and fine stoneware. **Sanitaryware** covers lavatory bowls, bidets, wash basins, cisterns and drinking fountains. **Technical ceramics** supply aerospace and automotive industries (engine parts, catalyst carriers), electronics (capacitors, piezo-electrics), biomedical products (bone replacement), environment protection (filters), inorganic bonded abrasive and many others.

1. Should certain elements be added to or removed from the above scope description?

- I agree with the product scope description as set out above
- Elements should be added
- Elements should be removed

Please specify which elements should be **removed**:

Text of 1 to 100 characters will be accepted

Non-consumer ceramics such as technical ceramics for aerospace industries

2. Ceramic products can be very different from one another. In order to be able to set effective requirements under the ESPR, the appropriate level at which to do so needs to be chosen.

At what level do you believe ecodesign requirements for ceramic products should be laid down?

at most 1 choice(s)

- Across all ceramic materials (i.e. applicable at general level to all products falling within this product group)
- At the level of individual articles (i.e. at 'sanitaryware' level)
- Other

3. Do you believe that action under the ESPR would contribute to better addressing the environmental sustainability aspects of ceramic products, compared to existing EU level legislation/initiatives?

- Yes
- No
-

No opinion

4. For ceramic products, which of the following products aspects do you believe will be the most important to regulate under ESPR?

at most 3 choice(s)

- Improving durability and reliability
- Ease of repair and maintenance
- Ease of recycling of materials
- Ease of refurbishment, remanufacturing and upgradability
- Resource use or resource efficiency
- Use or content of recycled materials
- Presence of substances of concern
- Energy use or energy efficiency
- The lifecycle environmental impact, including carbon footprint
- Expected generation of waste, such as release of microplastics
- Other

5. Do you wish to add comments on ceramic products?

500 character(s) maximum

We call for an explicit prioritisation of B2C products in the 1st ESPR working plan, with a clear legal definition of "consumer", excluding professionals/industrial (B2B, B2G). For different types of ceramics the regulatory priority under ESPR should be adjusted; e.g. product aspects for sanitaryware might focus on recyclability / presence of SoCs, whereas for technical ceramics (in a future ESPR working plan) the focus would be on durability and reliability (no one-size-fits-all-approach!).

LUBRICANTS

Product scope: Product capable of reducing friction, adhesion, heat, wear or corrosion when applied to a surface or introduced between two surfaces in relative motion, or is capable of transmitting mechanical power. Composed of base fluids (80-75%) and additives (25-20%). Base fluids can be fossil base fluids (mineral oils, synthetic oils, re-refined mineral oils) which account for >95% of the market or vegetable base oils (in EU mostly rapeseed and sunflower) which account for <5% of the market (2015 data) and also mixtures of them, mostly mineral-synthetic and vegetable-synthetic.

1. Should certain elements be added to or removed from the above scope description?

- I agree with the product scope description as set out above
- Elements should be added
- Elements should be removed

Please specify the elements to **removed**:

Text of 1 to 100 characters will be accepted

Non-consumer lubricants

2. Lubricants can be very different from one another. In order to be able to set effective requirements under the ESPR, the appropriate level at which to do so needs to be chosen.

At what level do you believe ecodesign requirements for lubricants should be laid down?

at most 1 choice(s)

- Across all lubricants (i.e. applicable to all products falling within this product group)
- At the level of individual articles (e.g. requirements specifically for 'industrial lubricants')
- Other

3. Do you believe that action under the ESPR would contribute to better addressing the environmental sustainability aspects of lubricants, compared to existing EU level legislation/initiatives?

- Yes
- No
- No opinion

4. For lubricants, which of the following products aspects do you believe will be the most important to regulate under ESPR?

at most 3 choice(s)

- Improving durability and reliability
- Ease of repair and maintenance
- Ease of recycling of materials
- Ease of refurbishment, remanufacturing and upgradability
- Resource use or resource efficiency
- Use or content of recycled materials
- Presence of substances of concern
- Energy use or energy efficiency
- The lifecycle environmental impact, including carbon footprint

- Expected generation of waste, such as release of microplastics
- Other

5. Do you wish to add comments on lubricants?

500 character(s) maximum

We call for an explicit prioritisation of B2C products in the 1st ESPR working plan, with a clear legal definition of "consumer", excluding professionals/industrial (B2B, B2G). For different types of lubricants the regulatory priority under ESPR should be adjusted; e.g. product aspects for consumers might focus on recyclability / presence of SoCs, whereas for industrial lubricants (in a future ESPR working plan) the focus would be on durability and reliability (no one-size-fits-all-approach!).

B. INTERMEDIATE PRODUCTS

'Intermediate products' are products placed on the market as final products, but which require further (professional) manufacturing and/or assembly processes before being ready for their end-use.

Based on the approach outlined in the main introduction to this questionnaire, the following intermediate products have been identified as potentially suitable for first action under the ESPR:

- Iron and Steel
- Non-Ferrous Metals
- Aluminium
- Chemicals
- Plastic and Polymers
- Paper, Pulp Paper and Boards
- Glass

For each intermediate product listed above, the **product scope** taken into account in the preliminary analysis outlined in the main introduction to this questionnaire is set out in the dedicated sections underneath. These scopes remain subject to further change, including based on the results of this consultation.

I. GENERAL QUESTIONS ON INTERMEDIATE PRODUCTS

1. Do you agree with the identification of the following intermediate products for potential first action under the ESPR?

	Agree	Disagree	No opinion
Iron and Steel	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Non-Ferrous Metals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Aluminium	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Plastic and Polymers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Pulp Paper and Boards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Glass	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

2. Are there any other intermediate products you believe should be added to this list?

100 character(s) maximum

No.

3. The implementation of the ESPR and setting of ecodesign requirements will happen over time. Even among the products finally selected, an order of priority will need to be decided.

Please rate the priority of the below products from 1 to 3, with 1 denoting the lowest importance and 3 the highest:

	1 (low importance)	2 (medium importance)	3 (high importance)
Iron and Steel	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-Ferrous Metals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Aluminium	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Chemicals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plastic and Polymers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pulp Paper and Boards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Glass	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

II. QUESTIONS ON INDIVIDUAL INTERMEDIATE PRODUCT GROUPS

Please select the intermediate product group(s) on which you would like to provide input:

- All 7 intermediate product groups identified
- Iron and Steel
- Non-Ferrous Metals
- Aluminium
- Chemicals
- Plastic and Polymers

- Paper, Pulp Paper and Boards
- Glass

CHEMICALS

Product scope: ammonia, nitric acid, sulphuric acid, phosphoric acid and hydrofluoric acid. Basic inorganic chemicals: caustic soda and soda ash (called sodium carbonate, including sodium bicarbonate), titanium dioxide (from the chloride and sulphate process routes), synthetic amorphous silica (pyrogenic silica, precipitated silica, and silica gel). Large volume organic chemicals: lower olefins by the cracking process, aromatics such as benzene/toluene/xylene (BTX), oxygenated compounds such as ethylene oxide, ethylene glycols and formaldehyde, nitrogenated compounds such as acrylonitrile and toluene diisocyanate, halogenated compounds such as ethylene dichloride (EDC) and vinyl chloride monomer (VCM), sulphur and phosphorus compounds and organo-metallic compounds.

Excluded from the scope in preliminary analysis: speciality inorganic pigments (such as silicone, phosphorus compounds, inorganic explosives, cyanides, soluble inorganic salts of nickel) and organic fine chemicals (dyes and pigments, plant health products and biocides, pharmaceutical products, organic explosives, organic intermediates, specialised surfactants, flavours and fragrances, pheromones, plasticisers, vitamins, optical brighteners and flame-retardants).

1. Should certain elements be added to or removed from the above scope description?

- I agree with the product scope description as set out above
- Elements should be added
- Elements should be removed

Please specify elements to be **removed**:

Text of 1 to 100 characters will be accepted

Remove 'chemicals' from the 1st ESPR working plan

2. How do you believe chemicals could best be regulated under the ESPR?

at most 1 choice(s)

- As an intermediate product
- By regulating their use in end-use products/applications (e.g. paints, detergents, etc.)
- Both ways
- Other

3. Do you believe that action under the ESPR would contribute to better addressing the environmental sustainability aspects of chemicals, compared to existing EU level legislation/initiatives?

- Yes
- No
- No opinion

4. For chemicals, which of the following products aspects do you believe will be the most important to regulate under ESPR?

at most 3 choice(s)

- Improving durability and reliability
- Ease of repair and maintenance
- Ease of recycling of materials
- Ease of refurbishment, remanufacturing and upgradability
- Resource use or resource efficiency
- Use or content of recycled materials
- Presence of substances of concern
- Energy use or energy efficiency
- The lifecycle environmental impact, including carbon footprint
- Expected generation of waste, such as release of microplastics
- Other

5. Do you wish to add comments on chemicals?

500 character(s) maximum

We support the initial focus in the 1st ESPR working plan on simpler products, excluding complex objects such as electronics. We are concerned about the high number of products considered as a first priority, regardless of the limited product group scope (exclusion of some chemical groups). Even this scope includes chemicals that are used in the European Space Sector today. Chemicals are already extensively regulated (e.g. CLP, REACH, WFD/SCIP, RoHS) and should not be in the 1st scope.

C. HORIZONTAL MEASURES

The ESPR proposal includes the possibility, when needed, of setting horizontal measures – in other words, cross-cutting measures applicable to two or more product groups sharing common characteristics.

Based on the preliminary analysis described in the main introduction to this questionnaire, five areas for horizontal measures which may be suitable candidates for prioritisation under the ESPR have been identified: Durability, Recyclability, Post-Consumer Recycled Content, Lightweight Design, and Sustainable Sourcing. After assessment, three of these aspects were retained for consultation:

- **Durability:** for the purposes of this consultation, 'durability' covers the aspects of 'reliability', 'reparability', 'reusability' and 'upgradability'.

- **Recyclability:** for the purposes of this consultation, 'recycling' means recovery operations of any kind via which waste materials are reprocessed into products, materials or substances, whether for the original or other purposes, excluding energy recovery.
- **Post-Consumer Recycled Content:** for the purposes of this consultation, 'post-consumer recycled content' refers to the amount of post-consumer recycled material that goes into the manufacturing of a new product.

The remaining two (Lightweight Design and Sustainable Sourcing) require further elaboration before drafting of the ESPR working plan, and are therefore not covered by this questionnaire.

The three horizontal measures retained for consideration are accompanied by sets of suggested provisions via which they could be concretely implemented. While this approach would entail alignment of certain definitions, principles, regulatory formulations and verification procedures, the exact content of the provisions could differ and be adapted, depending on the characteristics of the product categories to which they would apply.

I. GENERAL QUESTIONS ON HORIZONTAL MEASURES

1. Do you agree with the horizontal measures identified for potential first action under the ESPR?

	Agree	Disagree	No opinion
Durability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recyclability	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Post-Consumer Recycled Content	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

2. Are there any other horizontal measures you believe should be added to this list?

- Yes
 No

II. QUESTIONS ON INDIVIDUAL HORIZONTAL MEASURES

Please select the horizontal measure(s) on which you would like to provide input:

- All 3 horizontal measures identified
 Durability
 Recyclability
 Post-Consumer Recycled Content

Durability

For the purposes of this consultation, 'durability' covers the aspects of 'reliability', 'reparability', 'reusability' and 'upgradability'

1. Do you believe there are products with characteristics that are similar enough to enable horizontal durability measures to be developed for them?

- Yes
- No

2. If yes, please indicate one set of products with characteristics that are similar enough to enable horizontal durability measures to be developed for them:

- Absorbent Hygiene Products
- Bed Mattresses
- Ceramic products
- Cosmetic Products
- Detergents
- Fishing Nets and Gears
- Furniture
- Lubricants
- Paints and Varnishes
- Textiles
- Toys
- Tyres
- Aluminium
- Chemicals
- Glass
- Iron and Steel
- Paper, Pulp Paper and Boards
- Plastic and Polymers
- Non-ferrous metals
- Transport equipment
- Energy-related products including ICT and electronics
- Other (*please specify product*)
- Animal care products
- Products containing Critical Raw Materials
- ADD ANOTHER SET OF PRODUCTS**

3. Do you disagree with any of the potential horizontal provisions that could be developed in the area of durability?

	Disagree
Minimum lifetime and labelling	<input type="radio"/>
Resistance to stresses or ageing mechanisms (<i>e.g. resistance to drop/shock /abrasion; ingress protection</i>)	<input type="radio"/>
Minimum durability of function (<i>e.g. water repellence, colour fastness, dimensional stability</i>)	<input type="radio"/>
Introduction of a reparability scoring index/label	<input type="radio"/>
Availability of repair (+upgrade) information and maintenance instructions to independent operators and/or end users	<input type="radio"/>
Spare part (and software upgrade) availability and delivery time	<input type="radio"/>
Disassembly generally or related to Tools, Fasteners, Working Environment and Skill Level	<input type="radio"/>
Use of component and material coding standards for the identification of components and materials	<input type="radio"/>
Use of standard components / Compatibility with commonly available spare parts	<input type="radio"/>
Number of materials and components used	<input type="radio"/>
Modularity/Transformability; detachable/adjustable elements	<input type="radio"/>

4. Do you wish to add comments on durability?

500 character(s) maximum

See attachment

D. FINAL REMARKS

If you wish to add further information or elaborate on your views, please do so here:

1000 character(s) maximum

Even though the products manufactured in the European space industry (such as launchers, satellites and probes) are not amongst the new product priorities according to the present Call for Evidence, we are concerned about a possible upstream impact due to the high number of products considered as a first priority. Nevertheless, we welcome the initial focus on simpler products, excluding very complex objects such as electronics. For products designed to be sent into space, we believe furthermore that the horizontal measures currently envisaged (Durability, Recyclability, Post-Consumer Recycled Content) are not relevant nor appropriate to set. Therefore, as a sector with recognised specificities according to recital (16) of the Commission’s ESPR Proposal of 30 March 2022, we have provided the present contribution. Please find further details in the attached paper ref. MPTB-ES-PO-0121.

If you wish to upload a supporting document, please do so here:

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

6179ef9c-e860-4d02-8442-4140feecf7b/MPTB-ES-PO-

0121_Eurospace_SFG_Position_on_COM_ESPR_New_Product_Priorities_11052023.pdf

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