

Stakeholders' Consultation on Ecodesign for Sustainable Products Regulation (ESPR)



TEXTILES COMMITTEE

MINISTRY OF TEXTILES

MUMBAI

What is it?

- ESPR establishes a framework legislation
 - It does not set specific measures. Rather, it enables their later adoption
- This regulation aligns with the **European Green Deal** and the **Circular Economy Action Plan** to
 - reduce environmental impacts,
 - enhance product durability,
 - repairability and recyclability, and
 - promote sustainable consumption and
 - production patterns.



Scope - Products Covered & applicability

- The regulation applies to all physical goods placed on the market or put into service within the EU, including components and intermediate products.
- Exemptions: Specific exemptions are provided for certain products where ecodesign requirements are deemed unnecessary. These include:
- **Food and Feed:** As defined by Regulation (EC) No 178/2002, including the general principles of food law.
- **Medicinal Products:** As defined by Directive 2001/83/EC and Regulation (EU) 2019/6, covering both human and veterinary medicines.
- **Vehicles:** Specific vehicles subject to other comprehensive regulations are excluded, although e-bikes and e-scooters are not exempt.



Eco design Requirements

Enhancing Product Sustainability: The regulation mandates requirements to improve various aspects of product sustainability, including:

- **Durability:** Ensuring products are long-lasting and robust.
- **Repairability:** Making products easier to repair, with the availability of spare parts and repair information.
- **Recyclability:** Enhancing the ability to recycle products at the end of their life cycle.

Resource Efficiency: To address resource efficiency, the regulation focuses on:

- **Energy Efficiency:** Reducing the energy consumption of products during their use phase.
- **Material Efficiency:** Promoting the use of recycled materials and minimizing the use of hazardous substances.
- **Waste Reduction:** Encouraging designs that reduce waste generation and facilitate the recovery of valuable materials.

Combating Premature Obsolescence

- The regulation includes measures to counteract premature obsolescence, ensuring that products are designed for longevity and reducing the environmental impact of frequent product replacement.



Eco design Requirements



Requirements... contd..

Information and Labelling: Digital Product Passport

- A central feature of the regulation is the digital product passport, which is designed to provide comprehensive information about a product throughout its lifecycle. This passport will include details on the product's sustainability, repairability, and recyclability, making it easier for consumers and businesses to make informed choices.

Clear Labelling

- Labels must provide clear and easily understandable information to consumers, allowing for effective product comparison. This includes physical labels at points of sale and online information, which should be easy to access and interpret.

Tracking and Communication

- The regulation mandates the tracking and communication of information on substances of concern within products. This ensures transparency and supports better recycling and reuse practices by providing necessary information to consumers, recyclers, and other stakeholders.



Implementation & Enforcement

Delegated Acts

- The European Commission is empowered to set specific ecodesign requirements for different product groups through delegated acts. These acts ensure that the regulation can be adapted to new products and technologies, maintaining its relevance and effectiveness.

Digital Product Passport Registry

- A central registry will store data related to digital product passports, facilitating compliance verification by customs and market surveillance authorities. This registry ensures that all relevant product information is readily accessible for enforcement and monitoring purposes.

Enhanced Enforcement

- Customs authorities will have a crucial role in verifying compliance at the border, ensuring that only compliant products enter the EU market. Enhanced market surveillance will also ensure that products already on the market continue to meet the required standards.



Implementation - Prioritisation & Planning

Working Plan

- The Commission will adopt a working plan covering at least three years, listing product groups for which it intends to set ecodesign requirements. This plan will be based on criteria such as potential environmental impact, feasibility, and alignment with EU sustainability goals.

Criteria for Prioritization

- Products will be prioritized based on their potential contribution to the EU's climate, environmental, and energy objectives. In the first working plan, which shall be adopted by **19 April 2025**, the Commission shall prioritise the following product groups:
 - **Iron, Steel, and Aluminium:** Key materials with significant environmental footprints.
 - **Textiles:** Particularly garments and footwear, which have substantial sustainability challenges.
 - **Furniture:** Including mattresses, focusing on durability and recyclability.
 - **Tyres:** Addressing waste and recyclability issues.
 - **Detergents, Paints, and Lubricants:** Reducing hazardous substances and improving sustainability.
 - **Chemicals:** Ensuring safer and more sustainable use.
 - **ICT Products and Electronics:** Enhancing energy efficiency and recyclability.
 - **Energy-Related Products:** Extending existing measures to new product groups.



Timelines for implementation of ESPR

Milestones	Completed	Timelines
EP Plenary vote on final ESPR text	✓	
Final Council endorsement	✓	
Publication in the OJEU	✓	
ESPR entry into force. Establishment of Ecodesign Forum	✓	
First meeting of the EDF		Late 2024
Adoption of the 1 ESPR Working Plan (9m after entry into force)		March 2025
Acts on unsold goods destruction disclosure (IA) & prohibition derogations (DA) (12m after entry into force)		Mid 2025
Acts on Digital Pass Port registry, service providers, identifiers & data carriers, digital credentials		Late 2025
Adoption of the first measures (eg. textiles/steel)		04/25-01/26
First product requirements start to apply		Mid-2027



The Text in the document

- Product Parameters: EU member states are bound by the product parameters under the ecodesign framework for marketing of the products (Article 3).
- Conformity Assessment Procedures: The regulation stipulates commission shall specify the applicable conformity assessment procedure to be followed (Article 4)
- Performance Parameters: The regulation indicates to define the minimum or maximum level in relation to specific product parameters or non-quantitative requirements aim to improve performance (Article 6).
- Information Requirement: Product parameters including reparability score, durability score, carbon footprint or environmental footprint are to be accompanied by the products.
- Product Standards: Article 8 advocates to specify the definition of product group, ecodesign requirements, the test, measurement or calculation standards or methods to be used, requirements for the use of digital tools, etc which is missing in the regulation.
- Digital Product Passport: As per the framework, the required information shall come in a DPP, which is mandatory for marketing of the products. The DPP to be connected through a data carrier to a persistent unique product identifier, data carrier shall be physically present on the product (Article 9). It should be given by economic operator as the mechanism to be developed by the Commission (Article 11) by adopting/implementing act.



The Text ... contd..

- Labelling requirements: The framework also stipulates labeling requirement for identified and notified product groups. On adoption of the ecodesign requirements, the regulation shall specify the contents, layout and presentation of label (Article 16 labels). No Misleading or mimicking labels to mislead or confuse the consumers shall not be placed in the market (Article 17 Mimicking labels).
- SME: The regulation stipulates the member states to take appropriate measures such as awareness creation, financial support, access to finance, training of staff and organizational & technical assistance to help SMEs in particular micro enterprises to comply with the ecodesign requirements (Article 22).
- Unsold Consumer Goods: Economic operators shall disclose the information on unsold consumer products discarded during the preceding financial year on an annual basis (Article 24). Micro and small enterprises are **exempted** and will be effective from **19 July 2030** to medium sized enterprises.
- Tests, measurements, etc: For the purposes of compliance and verification of compliance with ecodesign requirements, tests, measurements and calculations shall be carried out using harmonised standards or other reliable, accurate and reproducible methods that take into account the generally recognised state-of-the art methods (Article 39 & 41).



Thank
You

