

# ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION

## A.I.S.E. Position Paper

December 2022

A.I.S.E. welcomes the objectives of the European Commission proposal for a new Regulation on Ecodesign for Sustainable Products (ESPR), which will enable a comprehensive and harmonised set of requirements for the sustainability of products placed on EU market.

The European detergents and maintenance products industry has been committed to sustainability via the Charter for Sustainable Cleaning since 2006. The Charter supports the whole industry to undertake continual sustainability improvements and encourages consumers to adopt more sustainable ways of doing their washing, cleaning, and household maintenance. The Charter has a proven track record of delivering tangible improvements in environmental performance including significant improvements in CO<sub>2</sub> emissions and energy use per tonne of production.

Ahead of the ordinary legislative procedure, A.I.S.E. wishes to highlight some key aspects aimed at further strengthening the ESPR Proposal. In particular, we call for:

- ***Use of other verifiable LCAs methods for quantification of environmental impacts in addition to PEF methodology;***
- ***Shared responsibility along the supply chain for information disclosure.***
- ***Focusing on key Substances of Concern and implementing a threshold –based approach, specifically defined for each product group***
- ***Harmonisation of ecodesign and information requirements at EU level;***
- ***Keeping self-regulation possibility as an option to meet ESPR policy objectives;***
- ***Ensuring necessary definitions for the relevant products aspects such as definition of recycled content are in place;***
- ***Limiting fossil based resource use and supporting use of sustainably sourced low carbon renewable and circular resources.***

### **Scientific methodology used for environmental assessment**

Using harmonised methodologies to assess environmental impact is necessary to achieve sustainability of products. The current proposal identifies Products Environmental Footprint (PEF) as the only methodology for quantification of environmental impacts. There are certain limitations with the current PEF rules, PEF databases which are outdated and PEF Category Rules (PEFCRs) that need further development. Therefore, to complement PEF, other scientifically robust and validated Life Cycle Assessment (LCA) methodologies and standards to assess the environmental footprint of products must be considered.

### **Information requirements and Digital Product Passport (DPP)**

Data and information shall originate from suppliers, while the obligation to provide such information will rest on manufacturers placing the final products on the EU market. The Digital Product Passport will be an important tool for sharing the necessary information along the value chain and enhance traceability. However, final product manufacturers do not possess most of the

information requirements such as recycled content, GHG, Carbon footprint and presence of substances of concern. Therefore, suppliers of product components or substances should bear the information reporting responsibilities as they are best placed to provide necessary information to final manufacturers. Moreover, confidential, sensitive data and trade secrets must be protected, and digital information provided to stakeholders and consumers should be relevant and tailored to the specific needs.

### **Substances of Concern (SoC)**

A threshold-based approach of key identified Substances of Concern for each specific product and existence of analytical methods to detect these substances of concern should be considered. Information on substances of concern should be provided via digital product passport and not on the labels.

### **Harmonisation across EU**

The fundamental principle to establish an overarching framework and harmonisation of all sustainability related requirements across EU, must enable a true single functioning market.

### **Self-Regulation**

Industry self-regulation voluntary schemes can represent a valid option to be considered when they can meet ESPR policy objectives more quickly and effective than legislation. Therefore, self-regulation measures, as laid down in Article 18 and Annex VII, should be maintained.

### **Definition of recycled content**

Recycled content definition is currently not covered in ESPR proposal and other legislation. This definition is critical to ensure a clear understanding for all the different stakeholders, to set the right thresholds and also due to the fact that the term can be relevant for chemicals in addition to materials.

### **Limitation of fossil-based resource use**

In ESPR proposal, there is no reference to the need to minimise the use of carbon intensive virgin and fossil-based resources. Use of sustainably sourced low carbon renewable and circular materials in design of products is one of the means to support the objectives of enabling a circular economy. Adding this feature amongst ecodesign aspects for specific categories is in line with EU Green Deal and climate objectives.

A.I.S.E. is committed to working together with the EU co-legislators and the EC to achieve sustainability, industry competitiveness and consumers' empowerment.

*A.I.S.E. is the International Association for Soaps, Detergents and Maintenance Products. Based in Brussels, A.I.S.E. has been the voice of the industry to EU regulators for nearly 70 years. Membership consists of 29 national associations across Europe, 17 corporate members and 14 value chain partners. Through this extensive network, A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe.*

*The industry is a substantial contributor to the European economy with an annual market value of €41.2 billion, directly employing 95 000 and 360 000 throughout the value chain. A.I.S.E. has a long history in leading voluntary industry initiatives that focus on sustainable design, manufacturing and consumption, product safety and safe use of products by consumers and professional customers.*