



# Ecodesign for Sustainable Products Regulation – ESPR

Vortrag von Prof. Ursula Tischner  
econcept, Agentur für nachhaltiges  
Design  
[u.tischner@econcept.org](mailto:u.tischner@econcept.org)



# Ecodesign for Sustainable Products Regulation in short

## **Goal: Making sustainable products the norm in EU**

The new law will allow **to progressively set performance and information requirements for key products** placed on the EU market.

The Commission will **adopt and regularly update a list of products identified on the basis of a thorough analysis and criteria notably related to the EU's climate, environment and energy efficiency objectives.**

Priority will be given to highly impactful products, including **textiles (especially garments and footwear), furniture (including mattresses), iron and steel, aluminium, tyres, paints, lubricants and chemicals, as well as energy related products, ICT products and other electronics.**

The new Regulation also contains novel measures to **end the wasteful and environmentally harmful practice of destroying unsold consumer products.** Companies will have to take measures to prevent this practice, and the co-legislators introduced a direct **ban on destruction of unsold textiles and footwear products.** Over time, other sectors could be covered by such bans, if needed.



Goals: To set  
Minimum  
Sustainability  
Requirements &  
to allow Free  
Movement of  
Goods in EU

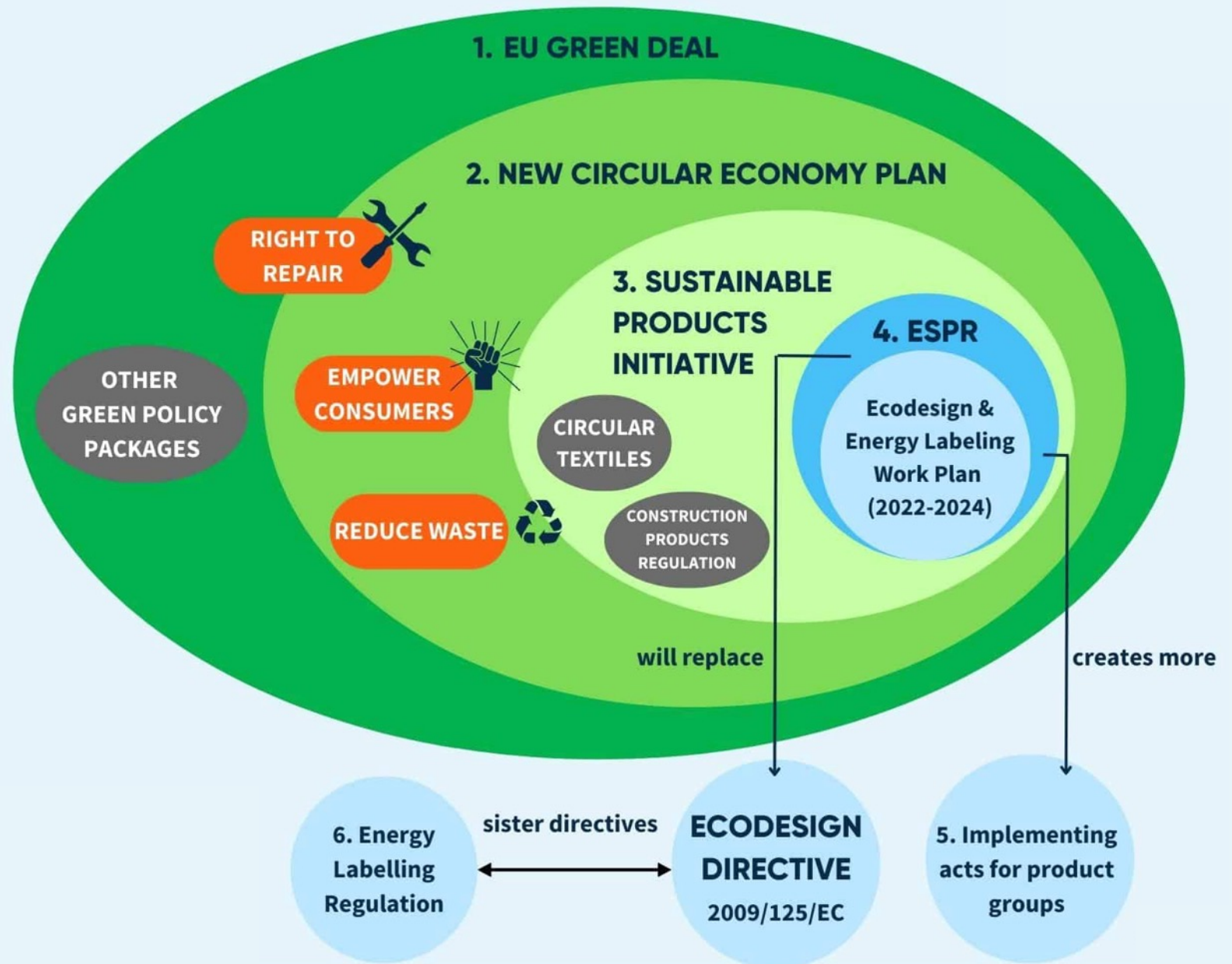
**Products shall only be placed on the EU market or put into service, if they comply with the **ecodesign requirements** set out in the delegated acts adopted pursuant to Article 4 applicable to those products.**

**A working plan will be developed to formulate these requirement similar to how the current Ecodesign Directive works involving stakeholders.**

# Time Line To Adoption of new ESPR



# ESPR embedded in other “green” EU policy



## Current Ecodesign Directive

The current **Ecodesign Directive 2009/125/EC** is delivering benefits to businesses, consumers and the environment since October 2009 . In 2021 alone, the impact of the current ecodesign measures, covering 31 product groups, saved EUR 120 billion in energy expenditure for EU consumers and led to a 10% lower annual energy consumption by the products in scope.

Energy-Using  
Products    ▷    Energy-Related  
Products

Focus more on energy  
efficiency / climate

## New Ecodesign for Sustainable Products Regulation / ESPR


The proposal for a new **Ecodesign for Sustainable Products Regulation (ESPR)**, published on 30 March 2022, is the cornerstone of the Commission’s approach to more environmentally sustainable and circular products. The proposal builds on the existing Ecodesign Directive, which currently only covers energy-related products.

**All Products** except:

- (a) food and (b) feed
- (c) medicinal products for human use
- (d) veterinary medicinal products
- (e) living plants, animals and micro-organisms;
- (f) products of human origin;
- (g) products of plants and animals relating directly to their future reproduction.

**Focus on many criteria**  
including climate, toxicity, circularity etc.:  
Two types of requirements: Performance and information requirements (Digital Product Passport).





# Products covered already by current Ecodesign Directive

## **Domestic and service industry lighting products:**

- Directional and non-directional lamps (including ultraviolet radiation)
- Fluorescent lamps (without integrated ballast)
- High-intensity discharge lamps
- Ballasts and luminaires able to operate such lamps

## **Electrical devices:**

- Computers and servers
- Game consoles
- Simple/complex set-top boxes
- Standby for networked equipment
- Televisions

## **Household appliances:**


- Cookers
- Dishwashers
- Freezers
- (Commercial) Refrigerators
- Tumble dryers
- Washing machines
- Vacuum cleaners

## **Heating and cooling devices:**

- Air conditioners
- Heaters
- Comfort fans
- Industrial fans
- Local space heaters
- Solid fuel local space heaters
- Solid fuel boilers
- Ventilation units
- Water heaters

## **Other products:**

- Circulators
- Electric motors
- Electric power consumption standby and off mode
- External power supplies
- Imaging equipment
- Power transformers
- Professional refrigeration
- Water pumps



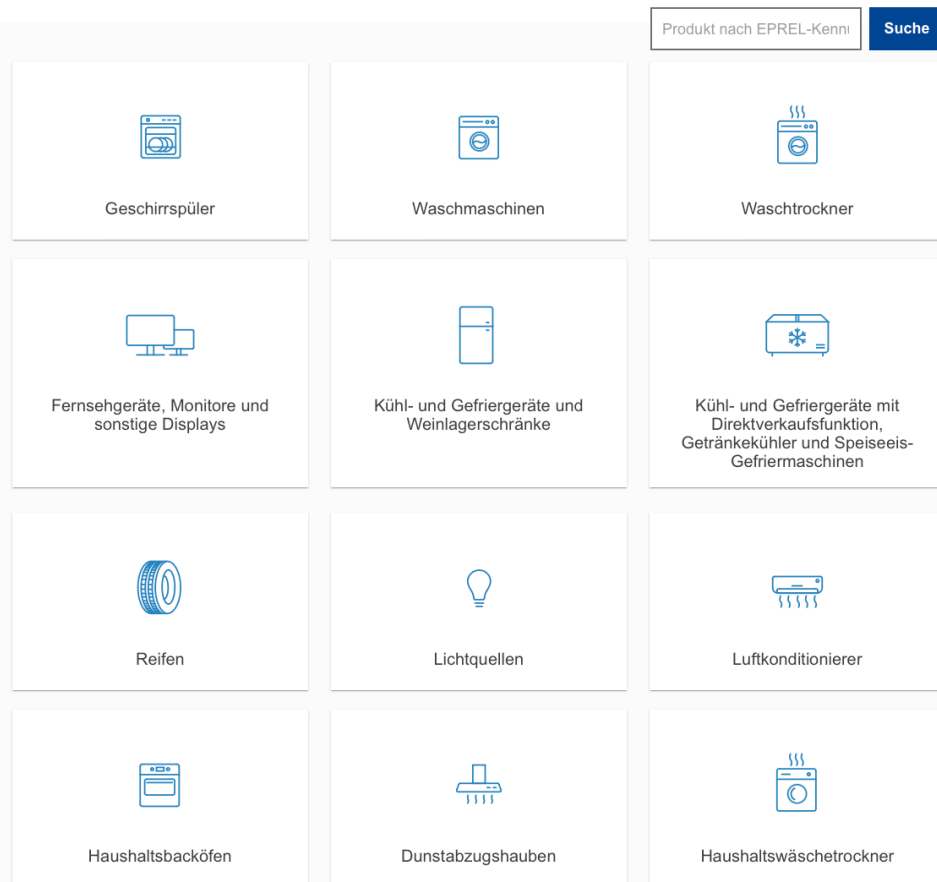
## Products upcoming under new working plans up to 2024

- Machine tools and welding equipment
- Professional washing machines, dryers and dishwashers
- Enterprise servers, data storage and ancillary equipment
- Water-related products
- Smart appliances
- Lighting controls/systems
- Industrial and laboratory furnaces and ovens
- Power Cables
- Steam boilers
- Compressors
- Windows
- Building Automation and Control Systems
- Electric kettles
- Hand dryers
- Lifts
- Solar panels and inverters
- Refrigerated containers
- High-pressure cleaners
- Gateways (home network equipment)
- Mobile/smart phones
- Base stations
- Tyres
- Low temperature emitters (radiators, convectors..)
- Professional laundry appliances
- Professional dishwashers
- Universal External Power Supplies (EPS)
- Electric vehicle chargers

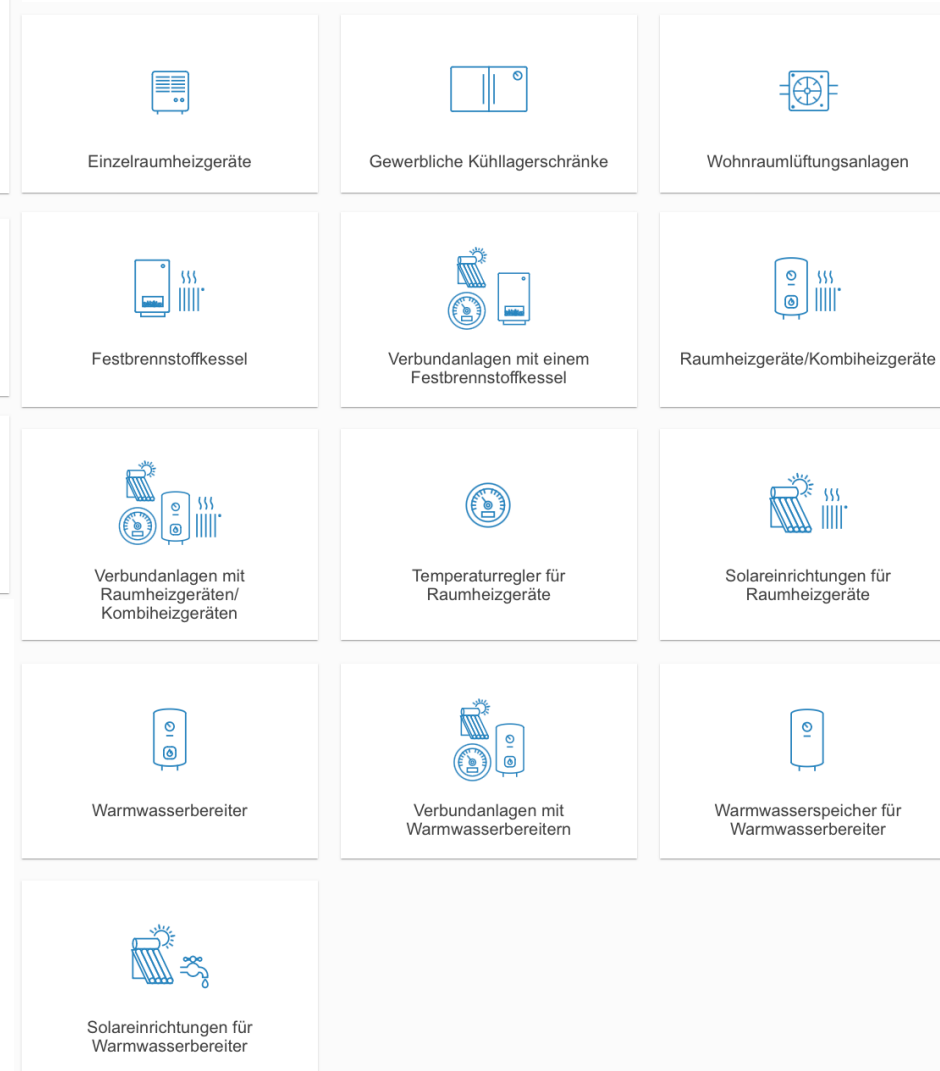


# Products covered by Energy Labelling

EPREL – Europäische Produktdatenbank für die Energieverbrauchskennzeichnung



## The European Product Registry for Energy Labelling (EPREL)



# Product Exceptions

This **Regulation shall apply to any physical good that is placed on the market or put into service, including components and intermediate products.**

However, it shall **not apply to:**

- a) food** as defined in Article 2 of Regulation (EC) No 178/2002;
- b) feed** as defined in Article 3(4) of Regulation (EC) No 178/2002;
- c) medicinal products for human use** as defined in Article 1(2) of Directive 2001/83/EC;
- d) veterinary medicinal products** as defined in Article 4(1) of Regulation (EU) 2019/6;
- e) living plants, animals and micro-organisms;**
- f) products of human origin;**
- g) products of plants and animals** relating directly to their future reproduction.

# Special Conditions for SMEs apply

The Commission shall, where appropriate, accompany those acts with **guidelines covering specificities of SMEs active in the product or product group sector affected for facilitating the application of this Regulation by SMEs.**

Member States shall take appropriate **measures to help SMEs apply ecodesign requirements** set out in delegated acts.

Those measures shall at least **include ensuring the availability of one-stop shops or similar mechanisms to raise awareness and create networking opportunities for SMEs** to adapt to requirements.

In addition, without prejudice to applicable State aid rules, such measures may include:

- financial support, including by giving fiscal advantages and providing physical and digital infrastructure investments;
- access to finance;
- specialised management and staff training;
- organisational and technical assistance.

## EU Definition SME

| Company category | Staff headcount | Turnover | or | Balance sheet total |
|------------------|-----------------|----------|----|---------------------|
| Medium-sized     | < 250           | ≤ € 50 m |    | ≤ € 43 m            |
| Small            | < 50            | ≤ € 10 m |    | ≤ € 10 m            |
| Micro            | < 10            | ≤ € 2 m  |    | ≤ € 2 m             |



# Typical Performance Requirements

## **What kind of product PERFORMANCE requirements to expect:**

- (a) minimum or maximum levels in relation to a specific product parameter or a combination thereof: e.g. substances of concern
- (b) non-quantitative requirements that aim to improve performance in relation to one or more product parameters: e.g. repairability
- (c) requirements related to the functional performance of a product: e.g. energy efficiency of a specific function

## **Requirements to be covered very likely:**

- product durability, reusability, upgradability and repairability
- presence of substances that inhibit circularity
- energy and resource efficiency
- recycled content
- remanufacturing and recycling
- carbon and environmental footprints



# Information Requirements / Digital Product Passport

**What kind of INFORMATION requirements to expect:**

## **General Requirements in Digital Product Passport**

- information on the **performance of the product** in relation to the product parameters defined
- information for **consumers and other end-users on how to install, use, maintain and repair the product** in order to minimise its impact on the environment and to ensure optimum durability, as well as on how to return or dispose of the product at end-of-life;
- information for **treatment facilities on disassembly, recycling, or disposal at end-of-life;**
- other **information that may influence the way the product is handled by parties other than the manufacturer** in order to improve performance in relation to product parameters defined.



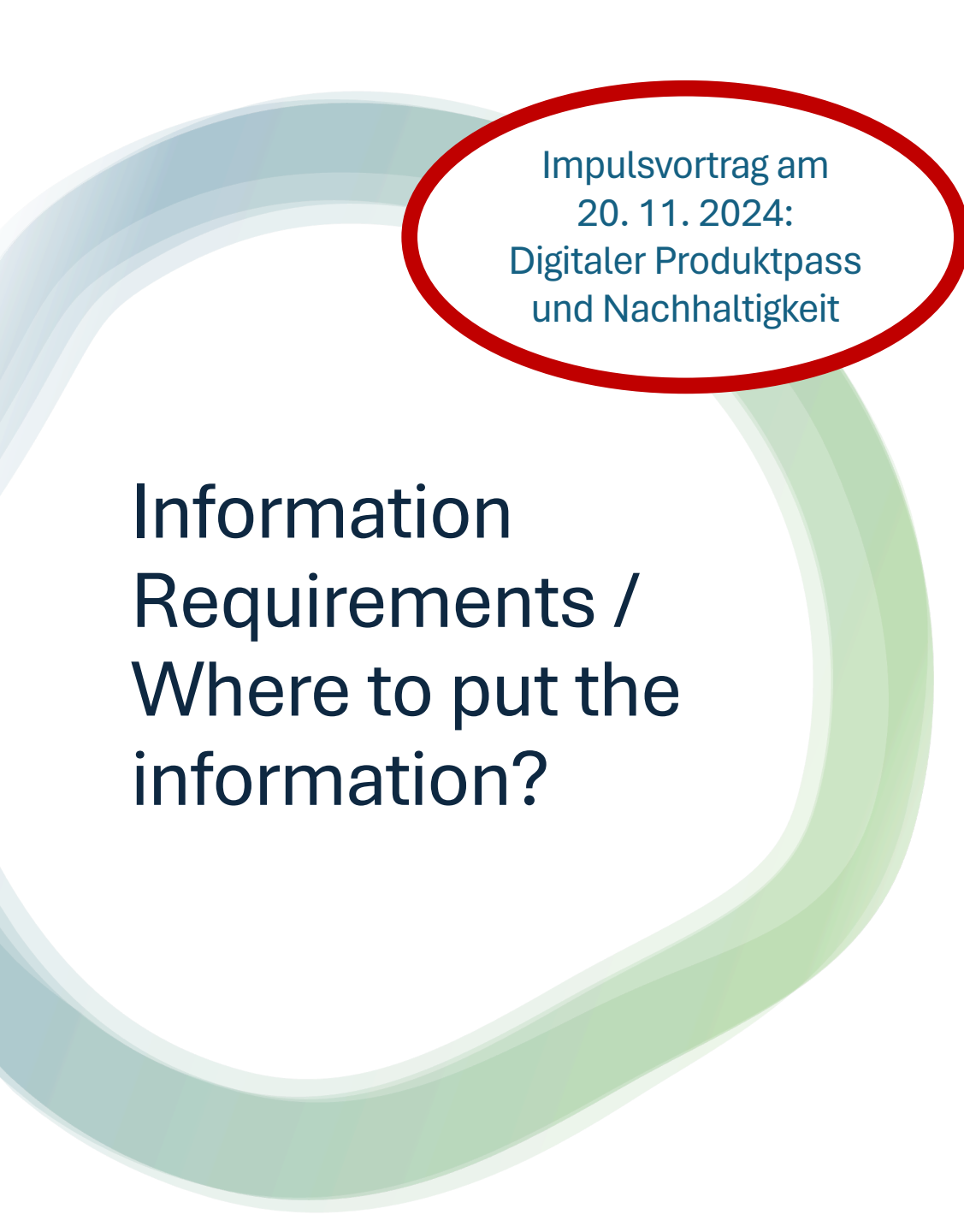
# Information Requirements / Digital Product Passport

## Information regarding “Substances of Concern”

The information requirements shall enable the tracking of all **substances of concern** throughout the **life cycle of products**, unless such tracking is already enabled by another delegated act adopted pursuant to Article 4 covering the products concerned, and shall include at least the following:

- the **name of the substances** of concern present in the product;
- the **location of the substances** of concern within the product;
- the **concentration, maximum concentration or concentration range of the substances** of concern, at the level of the product, its main components, or spare parts;
- relevant **instructions for the safe use of the product**;
- **information relevant for disassembly.**





Impulsvortrag am  
20. 11. 2024:  
Digitaler Produktpass  
und Nachhaltigkeit

# Information Requirements / Where to put the information?

The required information shall, as appropriate, be provided in at least one of the following manners:

- on the product itself;
- on the product's packaging;
- in the product passport;
- on a label;
- in a user manual;
- on a free access website or application.

Information ensuring the traceability of substances shall be given **either on the product or be accessible through a data carrier included on the product.**

The information requirements shall provide that products **can only be placed on the market or put into service if a product passport is available** in accordance with the applicable delegated act adopted.



## Recommendations for Companies

# Performance Criteria to be dealt with by proactive companies

## **Circular Economy related**

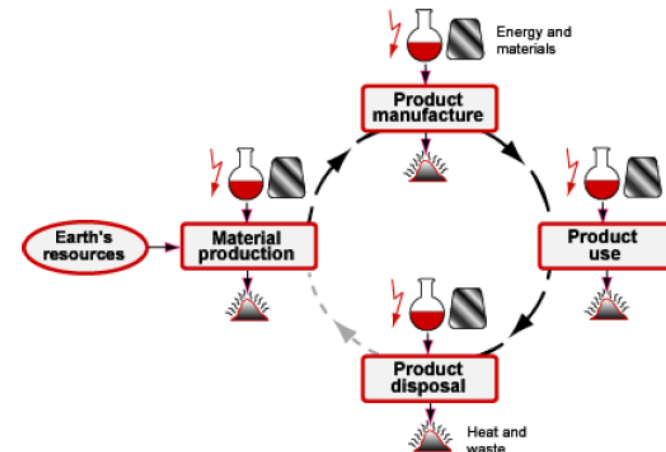
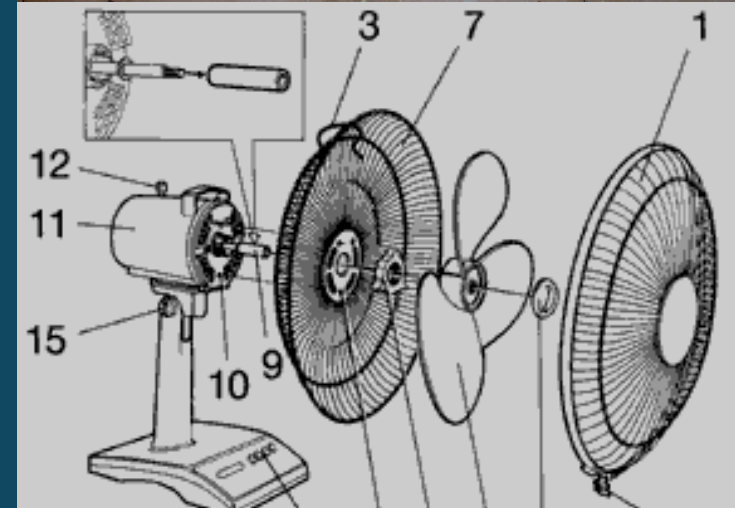
- durability;
- reliability;
- reusability;
- upgradability;
- reparability;
- possibility of maintenance and refurbishment;
- recycled content;
- possibility of remanufacturing and recycling;
- possibility of recovery of materials;

## **More general Environmental Impact related**

- presence of substances of concern;
- energy use or energy efficiency;
- resource use or resource efficiency;
- environmental impacts, including carbon and environmental footprint;
- expected generation of waste materials.

# How to anticipate requirements?

- Check typical **environmental and energy labelling criteria**, e.g. EU Ecolabel, Blauer Engel, Nordic Swan etc.: e.g. <https://www.ecolabelindex.com>
- Check **product category rules for EPDs** if any: e.g. <https://www.theepdregistry.com>
- Consult the **EC Ecodesign preparatory studies documents**: <https://www.ecodesignworkingplan20-24.eu>
- Conduct an **LCA and Circularity Assessment** for your most important and typical products to understand where the most relevant impacts are. Improve products accordingly.
- Set up integrated **Data Management System** to provide the relevant information for DPP.



# Conclusions: To do for companies

- Monitor the Ecodesign developments on EU and national level.  
[https://commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/sustainable-products/ecodesign-sustainable-products-regulation\\_en](https://commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/sustainable-products/ecodesign-sustainable-products-regulation_en)
- Get involved in stakeholder consultation processes to influence product requirements for “your” product groups.
- Prepare product design(ers) / developers / processes already for expected requirements = Practice Ecodesign
- Prepare for data delivery to DPP (LCA, PCF, Circularity etc. assessments) / Data Management.  
<https://www.wbcsd.org/Pathways/Products-and-Materials/Resources/The-EU-Digital-Product-Passport>
- Consider cooperation within your value chains and with competitors.



# Success !

[u.tischner@econcept.org](mailto:u.tischner@econcept.org)

