

The Consumer Voice in Europe

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Brussels, 17 May 2023

Subject: BEUC's recommendations on the Ecodesign for sustainable products regulation

Dear Deputy Permanent Representative,

BEUC released [a new study](#) demonstrating that the European Commission's ambitious policy in Ecodesign delivers to the environment and to the people. As the Ecodesign framework now stands at a crossroads, we hope these findings can help support the ambition of the proposed Ecodesign for Sustainable Products Regulation (ESPR).

Our research demonstrates that European households make very significant savings every year on their energy costs thanks to Ecodesign measures. This was especially striking in 2022, at the peak of energy prices, where consumers savings achieved thanks to Ecodesign increased exponentially, ranging between €850 and €2,450. Ecodesign is thus a central piece of the consumer protection puzzle also in times of crisis. Beyond its great benefits for consumers purchasing power, Ecodesign also clearly contributes to the EU energy efficiency objectives, to the fight against the climate crisis and to making Europe more resilient against external energy shocks.

This is the reason why Ecodesign has been a priority work area for BEUC and its members for over 15 years. We are convinced it is now time to bring this policy tool to the next level and achieve even bigger savings for consumers. This is why we strongly support the proposed ESPR and its objective to make sustainable products the norm on the EU market.

As the Council is currently discussing the Commission's proposal, we wish to draw Member States attention to recall our key recommendations to further improve the future Ecodesign framework:

- We strongly support the proposal to extend the scope of the Ecodesign to more products and sustainability criteria, including durability, reparability, and hazardous substances. If swiftly implemented, this Regulation will bring more sustainable products by design to consumers.
- Measures on market surveillance and custom controls must be strengthened. This includes setting mandatory percentage of testing to check compliance with new requirements, closer cooperation across market surveillance authorities, and a coordinated system to flag non-compliant products (such as through the EU Safety Gate). The proposal should specify dissuasive sanctions to ensure businesses comply with sustainability rules.
- To ensure a functioning framework and that consumers benefit from more sustainable options on the market, it is especially crucial to strengthen rules on the responsibilities of online marketplaces for non-compliant products sold online. Otherwise, non-compliant products will continue to flood the EU market, hindering the EU circular economy objectives.

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- The proposed measures on the issue related to the destruction on unsold goods should be strengthened. We support the introduction of a ban on the destruction of unsold goods (including returned and repairable ones), especially for sectors where this practice is commonplace and has major negative environmental and social consequences (e.g., textiles and electronics). Our [Danish member estimates](#) that in Denmark alone 677 tons of new clothes are destroyed every year instead of giving them a new life (this equates about 3 million t-shirts a year).
- Finally, voluntary agreements should no longer be an option to implement the Ecodesign framework in place of mandatory Regulations, as they have proven to be ineffective and have often taken longer to adopt.

Ecodesign is a time and resource-intensive policy, but as our research clearly show, the financial, environmental and energy consumption benefits achieved through Ecodesign largely outweighs the costs. As the development of new rules under the ESPR will become more complex and time-consuming, we believe a substantial increase in human and financial resources is needed for the Commission's to deliver on its ambition to make sustainable products the norm. We call upon Member States to consider this in future EU budgetary discussions.

We thank you for your consideration and remain available to further discuss this matter with you, at your best convenience.

Yours faithfully,

Monique Goyens,
Director General