

The Consumer Voice in Europe

BEUC RECOMMENDATIONS FOR TRILOGUES NEGOTIATIONS

Ecodesign for Sustainable Products Regulation



Contact: Silvia Barlassina – sustainability@beuc.eu

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • www.beuc.eu

EC register for interest representatives: identification number 9505781573-45



Co-funded by the European Union

Ref: BEUC-X-2023-115 - 22/09/2023

For the past few decades, the Ecodesign rules and Energy labelling have contributed to reducing the energy consumption and increasing the overall sustainability of household appliances. Such rule has not only improved their energy- and resource- efficiency, but also helped consumers to save money and make more sustainable choices. A [recent study we commissioned](#) shows that in 2022, during the height of the energy prices, European households could save close to €900 only by using appliances complying with minimum Ecodesign energy efficiency standards.

The European Commission rightly identified the Ecodesign framework as a cornerstone of its Circular Economy Action Plan and came forward with a proposal for a new Ecodesign for Sustainable Products Regulation, with the objective of making sustainable products the norm in the EU market.

As the proposed Regulation moves into the trilogues phase, BEUC wishes to make its recommendations to the negotiations, highlighting the important points for consumers:

Commission proposal	BEUC recommendation
Responsibilities for online marketplaces Article 29	While BEUC advocated for stronger rules to address the problem of non-compliance online, we strongly call on the negotiators to maintain the initial proposal by the European Commission, which makes sure online marketplaces provide easily accessible information to consumers and remove non-compliant products from their platforms.
Market surveillance Articles 59, 60, 61, 62	Strong market surveillance measures are essential to ensure consumers can benefit from more sustainable products and non-sustainable ones do not enter the EU market. BEUC recommends maintaining the proposal of the European Commission and making sure that physical and laboratory checks are mandated for high-risk products, as proposed by the European Parliament.
Remedies for lack of compliance and representative actions Article 69a, 69b	BEUC supports the proposals made by the European Parliament, which introduce stronger protection and remedies for consumers in case of non-conformity with Ecodesign requirements. The new article would also strengthen the enforcement of Ecodesign requirements through representative actions.
Destruction of unsold goods Article 20a	BEUC welcomes the strong political signal sent by both the European Parliament and the Council to put an end to this practice. However, we recommend adopting the more ambitious proposal of the European Parliament, which introduces a direct ban on destruction of textile, footwear, and electrical and electronic equipment.
Premature obsolescence Article 5a	BEUC strongly supports the proposal made by the European Parliament to ensure that manufacturers do not limit the durability and reparability of a product making it prematurely obsolete.
Substances of concern Article 6(3)	BEUC supports the proposal made by the European Parliament which provides for the possible restrictions of substances in products if there is an unacceptable risk to human health or the environment.