



Raising standards for consumers



The Consumer Voice in Europe

BEUC AND ANEC RECOMMENDATIONS ON THE 1ST ESPR WORKING PLAN & PROPOSED MEASURES ON THE DESTRUCTION OF UNSOLD GOODS

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Summary

- BEUC and ANEC welcome the first ESPR Working Plan, recognising that strong Ecodesign rules bring substantial benefits for consumers, both from an economic and convenience perspective.
- We support the Commission's ambition to make the EU the world leader on circular economy by 2030 through the Clean Industrial Deal, which includes the full roll-out of Ecodesign requirements for critical product groups.
- This political ambition must be matched with adequate resources (staff and budget) on the Commission's side and for market surveillance authorities.
- We strongly welcome that textiles feature in the first Working Plan and call on the Commission to also include footwear. Consumers want shoes that last longer and are sustainable.
- We recommend including mattresses in the work related to furniture. Tests by consumer organisations show significant improvement potentials in terms of repairability, carbon footprint and durability.
- We strongly support the decision to prioritise horizontal Ecodesign measures for repairability, recyclability and recycled content.
- We support the prohibition to destroy unsold textile and footwear and regret that a prohibition was not introduced for electronics too. In the context of setting derogations, we urge the Commission to carefully consider any risk of creating loopholes.

General comments

We welcome the Commission's proposal for the first Working Plan of the Ecodesign for Sustainable products Regulation (ESPR). The Working Plan officially kickstarts the implementation of the ESPR, with the commendable aim of making sustainable products by design the norm in the EU market.

Strong Ecodesign rules bring substantial benefits for consumers, both from an economic and convenience perspective. The existing Ecodesign and energy labelling Regulations [annually save several hundreds of Euro in consumers energy bills](#), thanks to appliances that became more energy efficient. New rules addressing products' durability and repairability also make it easier for consumers to hold on to their products longer, instead of discarding them prematurely.

As highlighted in a recent [EEA Report](#), the EU is likely not on track to meet its targets of significantly decreasing its material footprint and generated waste by 2030. Additional efforts are necessary to reduce the negative impacts of EU consumption and to move further towards a circular economy. New Ecodesign rules under the ESPR can play an important role in ensuring progress, making the EU economy more circular and increasing competition for more sustainable products and materials in the market. This is also recognised by the Commission in the recent communication on the Clean Industrial Deal, which has the ambition to make the EU the world leader on circular economy by 2030.¹ This includes the full roll-out of Ecodesign requirements on important product groups through the ESPR.

We are aware that the development of Ecodesign measures is a resource- and time-intensive process which requires the necessary expertise from the Commission and all stakeholders involved. Therefore, it is essential the political ambition as stated in the Clean Industrial Deal is matched with adequate resources (staff and budget) on the Commission's side and for market surveillance authorities to enable them to promptly implement the ESPR and ensure effective compliance and enforcement. The Commission estimates that non-compliant products with efficiency requirements cause a 10% loss in savings every year (over €10bn).²

The first ESPR Working Plan should be promptly adopted and implemented without delays, focusing on the more problematic sectors, such as textile, ICT and electrical and electronic equipment.

OUR KEY RECOMMENDATIONS

- We strongly support the Commission's ambition as stated in the Clean Industrial Deal to make the EU the world leader on circular economy by 2030, which includes the **full roll-out of Ecodesign requirements for critical product groups**.

¹ [European Commission, The Clean Industrial Deal: A joint roadmap for competitiveness and decarbonisation, 2025](#)

² [European Commission, Action Plan for Affordable Energy, 2025](#)

- We urge the Commission to match this political ambition with **adequate resources to the Commission and market surveillance authorities** to properly implement the ESPR.

Priority measures

Textiles & Footwear

We strongly welcome that textiles feature in the first Working Plan and that the Commission recognises the improvement potentials that Ecodesign can bring to this sector. The fashion industry accounts for 10% of greenhouse gas emissions, with textiles at top in the list of sectors responsible for climate change just after food, housing and transport.³ The pressure on the environment has increased exponentially in the last decades, as a direct result of corporate strategies aiming at overconsumption and fast fashion.

Research from consumer organisations from the BEUC network, including [OCU](#) in Spain, [vzbv](#) in Germany and [Arbeiterkammer](#) in Austria, confirms that consumers are increasingly aware of the problem and trying to adapt their behaviours.

Future Ecodesign rules should focus on reducing the environmental impact of textiles, prolonging their lifetime and enabling their circularity potential by design, while also putting a break to the negative impact of fast fashion and overproduction.

We regret that footwear has not been selected as priority product in the first Working Plan. We are not satisfied by the Commission's justification for this exclusion, which lacks a targeted analysis of the impacts and improvement potentials of the sector. In its report, the JRC analysed footwear together with textiles and concluded that they ranked first in the list of priority products. Specific figures on the environmental impact and improvement potential of footwear alone compared to other sectors cannot therefore be derived from their analysis.

As [highlighted by the EEA](#), the textile sector has a significant environmental impact, due to large amounts of raw materials, water and land use and GHG emissions associated to production and consumption of textile products. Footwear is a key contributor to all these impacts, along with home textile too. Excluding them from the Ecodesign work risks diluting the improvement potential that these measures could bring.

The Commission correctly highlighted that the improvement potential of ESPR measures for footwear is primarily associated with increasing the product lifespan by improving product durability and reparability. Such measures would be aligned with consumers' expectations. A [survey by vzbv](#) (2022) found that consumers want shoes that last longer and are sustainable. More than nine in ten consumers consider durability as an important aspect when purchasing shoes. However, while a large majority considers repair of shoes as desirable, price of repair and

³ EEA 2022, <https://www.eea.europa.eu/publications/textiles-and-the-environment-the/textiles-and-the-environment-the>

access to repair services were seen as important barriers. Moreover, there is also potential for improving recycling through the materials used and design approach, with already some successful examples on the market⁴.

Given that footwear is included in the measure prohibiting the destruction of unsold goods, is an additional argument in favour of prioritising this product group.

We therefore ask the Commission to include footwear in the list of products to prioritise for work under the first ESPR Working Plan.

OUR KEY RECOMMENDATIONS

- We **strongly welcome that textiles feature in the first Working Plan** and that the Commission recognises the improvement potentials that Ecodesign can bring to this sector.
- We **urge the Commission to include footwear in the list of products to prioritise**. Consumers want durable and repairable shoes.

Horizontal requirements

We strongly support the decision to prioritise horizontal Ecodesign measures for repairability, recyclability and recycled content. Horizontal requirements ensure consistency across the board and predictability for manufacturers regarding what is expected from their products in terms of sustainability, creating a level playing field, thus fostering competition and innovation.

We support the decision to prioritise horizontal measures on repairability for energy-related products, electronics and light means of transportation. Spare parts and repair instructions unavailability remain a barrier to repair for consumers and Ecodesign can make it easier for them to hold on to their products for longer. E-products used for micro-mobility (such as e-bikes, e-scooters, etc.) are gaining popularity among consumers but their environmental and social impact is highly underestimated. The German consumer group, vzbv, [found](#) that it is often hard for consumers to get affordable repair services or spare parts for such products, and there is no uniformity of minimum lifespan/number of charging cycles.

Existing requirements on spare parts and repair instructions availability improved the repairability potential of certain household appliances. Nonetheless, as [found by consumer organisations in Germany](#) and the Netherlands, major differences still exist in the way manufacturers display repair information and spare parts on their website, sometimes making it difficult to access the correct information/spare part or compare across different sellers. The high price of spare parts and repair services also continue to make repairing products unattractive for consumers. We urge the Commission to consider these aspects when setting out new horizontal measures on repair and the repair score.

⁴ <https://www.fastfeetgrinded.eu/lets-team-up/>

To ensure consistency with the new Right to Repair Directive, once adopted, the new horizontal Ecodesign measures on reparability should be listed in Annex II. This way, consumers will be better protected when they chose to repair their goods, rather than discarding them.

OUR KEY RECOMMENDATIONS

- We strongly support the decision to prioritise horizontal Ecodesign measures for reparability, recyclability and recycled content. We also agree with the identified scope of horizontal reparability requirements, which should **include energy-related products, electronics and light means of transportation**.
- When setting requirements on reparability, we urge the Commission to consider that the **high price of spare parts and repair services continue to make repairing products unattractive for consumers**.

Others

We recommend the inclusion of mattresses in the work related to furniture. Tests by consumer organisations found substantial differences related to the environmental impact of mattresses, especially on criteria such as carbon footprint and ease of separation of the layers and, to a lesser extent, durability. The ease of separation of the layers is particularly relevant, as it greatly influences waste management, which is recognised by the Commission as one of the major challenges associated with mattresses. In the EU, 30 to 40 million mattresses are discarded every year, and many end up in landfills or incineration due to difficulties in recycling. It is important to include mattresses in the scope of future Ecodesign requirements, with the objective of encouraging the use of sustainable materials, extend product lifespan and improve recyclability.

We regret that the Commission opted to exclude from the Working Plan other priority products listed in article 18 of the ESPR, such as detergents and paints. These product groups are already covered by the voluntary EU Ecolabel and other national Ecolabelling schemes. The Commission should take inspiration from their scope and criteria to develop mandatory Ecodesign requirements soon.

OUR KEY RECOMMENDATIONS

- We **recommend including mattresses in the work related to furniture**. Tests by consumer organisations show significant improvement potentials in terms of reparability, carbon footprint and durability.
- We **regret that the Commission opted to exclude from the Working Plan other priority products listed in article 18** of the ESPR, such as detergents and paints.

Timeline

We understand that the higher comprehensiveness of the ESPR compared to the previous Ecodesign Directive justifies a longer timeline for the Working Plan (five years instead of three years). We see this as an opportunity to develop ambitious requirements without delays.

As a limited number of measures have been initially selected, we ask the Commission to consider the possibility of adding new product groups in a mid-term review of the Working Plan, e.g. after three years. Such mid-term revision is already envisaged under the Energy Labelling Regulation. The Commission should take this opportunity to evaluate progress in Ecodesign too and identify additional priorities, also based on the products listed in article 18 of the ESPR.

In addition, we call on the Commission to give stakeholders guidance on upcoming Standardisation requests to support the implementation of the Working Plan.

OUR KEY RECOMMENDATIONS

- We recommend that the Commission performs a mid-term review of the Working Plan (e.g. after three years) to assess the possibility of adding other product groups in the Working Plan, also based on the products listed in article 18 of the ESPR.

Destruction of unsold goods

The destruction of unsold goods is a major environmental issue. It is estimated that €7bn worth of goods are destroyed each year in Germany alone, resulting in major waste production.⁵ [Research](#) commissioned by the Danish Consumer Council found that 677 tonnes of new clothes are destroyed every year in Denmark, equating to about three million t-shirts a year.

We support the prohibition to destroy unsold textile and footwear and regret that a prohibition was not introduced for electronics too. Preventing destruction will lower the environmental impact of products, reducing generation of waste and disincentivising overproduction. In turn, this contributes to tackle the issue of overconsumption in the EU, which is directly related to overproduction trends.

When setting derogations to the prohibition, we urge the Commission to reduce any risk of creating loopholes for companies. Any product that can continue to be used without posing any health or safety risk (as established in applicable legislation) should not be destroyed or landfilled. This includes defective products, as they can be repaired, refurbished and reused. Trademark rules should not be used as a justification for enabling the destruction of unsold products that cannot be prepared for reuse or remanufacturing because it is technically difficult to remove labels, logos, and design features needed to comply with intellectual property rights or social norms. The Commission should consider introducing mandatory Ecodesign requirements to make these elements easily removable.

⁵ Ajit Niranjana, 'Online retailers are destroying goods but won't say how much ends up as trash', Deutsche Welle, 7 February 2020.

More transparency on the practice of destruction of unsold goods is also essential to enable policymakers to tackle the issue more extensively across different sectors. Reporting rules should be clear and easy for companies to follow, while also enabling the Commission to have a complete overview of the practice and its environmental impact. We support the proposal to disclose information based on the first four digits of CN codes, as well as the independent verification of reported information.

OUR KEY RECOMMENDATIONS

- We support the prohibition to destroy unsold textile and footwear and **regret that a prohibition was not introduced for electronics** too.
- We urge the Commission to reduce any risk of creating loopholes for companies, when setting derogations. Any product that can continue to be used without posing any health or safety risk (as established in applicable legislation) should not be destroyed or landfilled.
- **Defective products should not be destroyed**, as they can be repaired, refurbished and reused. **Trademark rules should not be used as a justification** for enabling the destruction of unsold products.
- We support the proposal to disclose information on the destruction of unsold goods based on the **first four digits of CN codes**, as well as the **independent verification** of reported information

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