

# Public consultation on new product priorities under the Ecodesign for Sustainable Products Regulation (ESPR)

Fields marked with \* are mandatory.

## Introduction

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### 1.1 Background to this consultation

A proposal for a Regulation on [Ecodesign for Sustainable Products](#) (ESPR) was adopted by the Commission in March 2022. The ESPR is a framework for setting ecodesign requirements on products to improve their circularity, energy performance and other environmental sustainability aspects. While the ESPR proposal provides a general framework for setting rules, the actual product requirements will be adopted only in a second stage. The Commission should therefore adopt and regularly update a working plan, setting out product priorities for which ecodesign requirements should be laid down.

The purpose of this questionnaire is to gather your views on what the new product priorities under the ESPR should be.

The questions build on preliminary assessments (see [here](#)) carried out by the Commission's [Joint Research Centre](#) (JRC), which has identified several product groups and horizontal measures that *may* be suitable candidates for prioritisation under the ESPR, once it enters into force. The responses of the public to this questionnaire will help the Commission to further refine this analysis, close information gaps and build consensus on future action under the ESPR.

A key methodological starting point for the JRC's preliminary assessments was **Article 16** of the [ESPR proposal](#), which requires the Commission to prioritise products and horizontal measures based on a set of criteria pertaining in particular to the *potential contribution that could be made to the EU's climate, environmental and energy objectives*, as well as the *potential for improving the product aspects identified by the proposal from an environmental point of view, products' market share and the distribution of product impacts across the value chain*. Factors such as products' environmental, sustainability and circularity impacts, improvement potential from an environmental sustainability point of view, and as well as existing policy gaps and proportionality of costs related to the improvement potential were therefore amongst the considerations taken into account.

The ESPR proposal builds on the existing [Ecodesign Directive 2009/125/EC](#), which currently covers energy-related products only. It should be clarified that this consultation focuses on identifying 'new products' that are *not* currently within the scope of Ecodesign Directive 2009/125/EC. The future ESPR working plan will nevertheless cover both new and energy-related products. (Please note: the Commission will carry out a

separate initiative to prioritise requirements for energy-related products, for which it will be necessary to take the progress in implementing the [Ecodesign and Energy Labelling Working Plan 2022-2024](#) into account.)

Given the wide scope of the ESPR, some products identified in this questionnaire will also be subject to separate product-specific or horizontal legislation at EU level. For these products, as a general principle the ESPR will only intervene when the environmental sustainability dimensions of those products cannot be fully and appropriately addressed by other instruments. For example for **chemicals**, ESPR could only take action where needed on aspects *not* dealt with under existing chemicals regulation (e.g. [Regulation \(EC\) No 1907/2006](#)); for **packaging**, it could only act where needed on *targeted aspects* specifically related to a packaged product covered by its measures, leaving [revised Packaging and Packaging Waste rules](#) to cover stand-alone packaging; for **construction products**, it could take action if the environmental sustainability dimensions of these products could not be fully and appropriately addressed by the [revised Construction Products Regulation](#) (with the exception of energy-related construction products, for which the ESPR will be the main regulatory instrument). As the ecodesign requirements that ESPR will set will help strengthen the EU's general circularity framework, including by improving product recyclability (including of the critical raw materials contained in products), it will also synergise with key pillars of [upcoming EU initiatives in the area of Critical Raw Materials](#) (CRMs).

The [JRC report](#) underpinning this consultation includes a preliminary assessment of product-specific legislation in this respect. However, a more precise assessment of the ecodesign requirements to be potentially laid down under ESPR, and their added-value in comparison with product-specific legislation, will be undertaken in a second stage, following adoption of the ESPR working plan, in the context of the preparatory studies foreseen. Questions on potential measures identified at this stage are therefore preliminary. Before adopting all rules under ESPR, the Commission will undertake thorough impact assessments and further consultations will also be held.

While the ESPR proposal is yet to be adopted by the co-legislators, and is therefore subject to further change, it is hoped that the results of this consultation will be able to feed into preparation of the new product priorities under the ESPR.

## 1.2 Structure of this questionnaire

You are invited to respond to the questionnaire regardless of your level of expertise. You can save your answers as draft and finish the survey later if necessary. The questionnaire is available in all languages. The questionnaire comprises the following sections:

- **'About you'**: general information about you, the respondent, to better understand your perspective
- **End-use products**: including general questions and questions per product group
- **Intermediate products**: including general questions and questions per product group
- **Horizontal measures**: including general questions and questions per horizontal measure
- **Final remarks**: allows you to provide final remarks and/or upload a document that you think is relevant to your views

Please note that **all sections (with the exception of the 'About you' section) are optional**: you can

choose which you wish to complete, depending on your main area(s) of interest.

If you have any questions, please contact **ENV-PRODUCT-POLICY@ec.europa.eu**

Your opinion matters and we are grateful to you for taking the time to complete this consultation. The results of the consultation will be published on Have your say.

For further information, please see the following background information:

- [Consultation webpage](#)
- JRC background [work](#) and [analysis](#)
- [ESPR proposal](#)
- [ESPR impact assessment](#)

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian

- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

Please specify your sector

- Agriculture,
- Ceramic products
- Chemicals and chemical products
- Computers, electronic and optical products
- Construction
- Cosmetics
- Electrical equipment
- Energy-related products, including ICT and electronics
- Fixtures (e.g. toilets and urinals)
- Food, feed and drink
- Forestry and fishing
- Furniture
- Hygiene products
- Materials (e.g. metals, plastics, paper)
- Office equipment
- Other [please specify]
- Packaging
- Retail & wholesale trade

- Textiles and footwear
- Transport equipment

**(For industry stakeholders)** Please indicate the type of **product** your organisation produces or represents:

- Absorbent Hygiene Products
- Agricultural products
- Aluminium
- Bed Mattresses
- Ceramic products (including toilets and urinals)
- Chemicals
- Construction products
- Cosmetic Products
- Detergents
- Energy-related products, including ICT and electronics
- Fishing Nets and Gears
- Food, feed and drink
- Furniture
- Glass
- Iron and Steel
- Lubricants
- Non-ferrous metals
- Office equipment
- Other (please specify)
- Packaging
- Paints and Varnishes
- Paper, Pulp Paper and Boards
- Plastic and Polymers
- Textiles and Footwear
- Toys
- Transport equipment
- Tyres

**(For industry stakeholders)** Please indicate the level of the market(s) you are active on:

- Local market
- Regional market
- EU market
- Non-EU market
- Worldwide market
- Not applicable

**\* First name**

Alexis

**\* Surname**

Kuhl

**\* Email (this won't be published)**

alexis.kuhl@europanel.org

**\* Organisation name**

*255 character(s) maximum*

European Panel Federation

**\* Organisation size**

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

**Transparency register number**

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

572064811767-22

**\* Country of origin**

Please add your country of origin, or that of your organisation.

*This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.*

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen

- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States



- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena  
Ascension and  
Tristan da Cunha
- Saint Kitts and  
Nevis
- Saint Lucia
- United States  
Minor Outlying  
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and  
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

### \* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

## A. END-USE PRODUCTS

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'End-use products' are products sold directly to consumers and that are ready for their intended use upon sale (i.e. they do not require further [professional] manufacturing and/or assembly processes before being ready for use).

Based on the approach outlined in the main introduction to this questionnaire, the following end-use products have been identified as potentially suitable for first action under the ESPR:

- Textiles and Footwear
- Furniture
- Ceramic products
- Tyres
- Detergents
- Bed Mattresses
- Lubricants
- Paints and Varnishes
- Cosmetic products
- Toys
- Fishing Nets and Gears
- Absorbent Hygiene Products

For each end-use product listed above, the **product scope** taken into account in the preliminary analysis outlined in the main introduction to this questionnaire is set out in the dedicated sections underneath. These scopes remain subject to further change, including based on the results of this consultation.

## I. GENERAL QUESTIONS ON END-USE PRODUCTS

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1. Do you agree with the identification of the following end-use products for potential first action under the ESPR?

	Agree	Disagree	No opinion
Textiles and Footwear	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Furniture	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ceramic products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Tyres	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Detergents	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bed Mattresses	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lubricants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Paints and Varnishes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cosmetic products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Toys	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fishing Nets and Gears	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Absorbent Hygiene Products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Are there any other end-use products you believe should be added to this list?

*100 character(s) maximum*

3. The implementation of the ESPR and setting of ecodesign requirements will happen over time. Even among the products finally selected, an order of priority will need to be decided.

Please rate the priority of the below products from 1 to 3, with 1 denoting the lowest importance and 3 the highest:

	1 (low importance)	2 (medium importance)	3 (high importance)
Textiles and Footwear	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Furniture	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ceramic products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Tyres	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Detergents	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Bed Mattresses	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lubricants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Paints and Varnishes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cosmetic products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Toys	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fishing Nets and Gears	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Absorbent Hygiene Products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

## II. QUESTIONS ON INDIVIDUAL END-USE PRODUCT GROUPS

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Please select the end-use product group(s) on which you would like to provide input:

- All 12 end-use product groups identified
- Textiles and Footwear
- Furniture
- Ceramic products
- Tyres
- Detergents
- Bed Mattresses
- Lubricants
- Paints and Varnishes
- Cosmetic products
- Toys
- Fishing Nets and Gears
- Absorbent Hygiene Products

### FURNITURE

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**Product scope:** Free-standing or built-in units whose primary function is to be used for the storage, placement or hanging of items and/or to provide surfaces where users can rest, sit, eat, study or work, whether for indoor or outdoor use. The scope extends to domestic furniture and contract furniture items for use in domestic or non-domestic environments. Bed frames, legs, bases and headboards are included in the scope.

**Excluded from the scope in preliminary analysis:** bed mattresses, streetlights, railings and fences, ladders, clocks, playground equipment, stand-alone or wall-hung mirrors, electrical conduits, road bollards and building products such as steps, doors, windows, floor coverings and cladding

**1. Should certain elements be added to or removed from the above scope description?**

- I agree with the product scope description as set out above
- Elements should be added
- Elements should be removed

**2. Furniture products can be very different from one another. In order to be able to set effective requirements under the ESPR, the appropriate level at which to do so needs to be chosen.**

**At what level do you believe ecodesign requirements for furniture should be laid down?**

*at most 1 choice(s)*

- Across all furniture products (i.e. applicable at general level to all products falling within this product group)
- At the level of specific sub-groups within this product group (for example, 'free-standing' furniture)
- Based on the materials used (e.g. 'wooden furniture')
- At the level of components (e.g. 'upholstery')
- At the level of individual articles (e.g. requirements specifically for 'bed frames')
- Based on product purpose/functionality (i.e. for 'office furniture')
- Other

Please specify

*Text of 1 to 100 characters will be accepted*

The delegated act must allow for a diversity of relevant requirements.

**3. Do you believe that action under the ESPR would contribute to better addressing the environmental sustainability aspects of furniture products, compared to existing EU level legislation/initiatives?**

- Yes
- No
- No opinion

#### 4. For furniture, which of the following products aspects do you believe will be the most important to regulate under ESPR?

*at most 3 choice(s)*

- Improving durability and reliability
- Ease of repair and maintenance
- Ease of recycling of materials
- Ease of refurbishment, remanufacturing and upgradability
- Resource use or resource efficiency
- Use or content of recycled materials
- Presence of substances of concern
- Energy use or energy efficiency
- The lifecycle environmental impact, including carbon footprint
- Expected generation of waste, such as release of microplastics
- Other

#### 5. Do you wish to add comments on furniture?

*500 character(s) maximum*

EPF beives that renewable content / biodegradable materials should be considered as a criterion. The use of renewable materials is an important aspect of the circular economy. Wood and wood-based products represent a large share of the materials used in the furniture industry, wood being a renewable raw material with carbon storage effects.

## B. INTERMEDIATE PRODUCTS

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'Intermediate products' are products placed on the market as final products, but which require further (professional) manufacturing and/or assembly processes before being ready for their end-use.

Based on the approach outlined in the main introduction to this questionnaire, the following intermediate products have been identified as potentially suitable for first action under the ESPR:

- Iron and Steel
- Non-Ferrous Metals
- Aluminium
- Chemicals
- Plastic and Polymers
- Paper, Pulp Paper and Boards
- Glass

For each intermediate product listed above, the **product scope** taken into account in the preliminary

analysis outlined in the main introduction to this questionnaire is set out in the dedicated sections underneath. These scopes remain subject to further change, including based on the results of this consultation.

## I. GENERAL QUESTIONS ON INTERMEDIATE PRODUCTS

### 1. Do you agree with the identification of the following intermediate products for potential first action under the ESPR?

	Agree	Disagree	No opinion
Iron and Steel	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Non-Ferrous Metals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Aluminium	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Plastic and Polymers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Pulp Paper and Boards	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Glass	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

### 2. Are there any other intermediate products you believe should be added to this list?

*100 character(s) maximum*

### 3. The implementation of the ESPR and setting of ecodesign requirements will happen over time. Even among the products finally selected, an order of priority will need to be decided.

Please rate the priority of the below products from 1 to 3, with 1 denoting the lowest importance and 3 the highest:

	1 (low importance)	2 (medium importance)	3 (high importance)
Iron and Steel	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-Ferrous Metals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Aluminium	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Chemicals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Plastic and Polymers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Pulp Paper and Boards	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## II. QUESTIONS ON INDIVIDUAL INTERMEDIATE PRODUCT GROUPS

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Please select the intermediate product group(s) on which you would like to provide input:

- All 7 intermediate product groups identified
- Iron and Steel
- Non-Ferrous Metals
- Aluminium
- Chemicals
- Plastic and Polymers
- Paper, Pulp Paper and Boards
- Glass

## C. HORIZONTAL MEASURES

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The ESPR proposal includes the possibility, when needed, of setting horizontal measures – in other words, cross-cutting measures applicable to two or more product groups sharing common characteristics.

Based on the preliminary analysis described in the main introduction to this questionnaire, five areas for horizontal measures which may be suitable candidates for prioritisation under the ESPR have been identified: Durability, Recyclability, Post-Consumer Recycled Content, Lightweight Design, and Sustainable Sourcing. After assessment, three of these aspects were retained for consultation:

- **Durability:** for the purposes of this consultation, 'durability' covers the aspects of 'reliability', 'reparability', 'reusability' and 'upgradability'.
- **Recyclability:** for the purposes of this consultation, 'recycling' means recovery operations of any kind via which waste materials are reprocessed into products, materials or substances, whether for the original or other purposes, excluding energy recovery.
- **Post-Consumer Recycled Content:** for the purposes of this consultation, 'post-consumer recycled content' refers to the amount of post-consumer recycled material that goes into the manufacturing of a new product.

The remaining two (Lightweight Design and Sustainable Sourcing) require further elaboration before drafting of the ESPR working plan, and are therefore not covered by this questionnaire.

The three horizontal measures retained for consideration are accompanied by sets of suggested provisions via which they could be concretely implemented. While this approach would entail alignment of certain



definitions, principles, regulatory formulations and verification procedures, the exact content of the provisions could differ and be adapted, depending on the characteristics of the product categories to which they would apply.

## I. GENERAL QUESTIONS ON HORIZONTAL MEASURES

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### 1. Do you agree with the horizontal measures identified for potential first action under the ESPR?

	Agree	Disagree	No opinion
Durability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Recyclability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Post-Consumer Recycled Content	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

### 2. Are there any other horizontal measures you believe should be added to this list?

- Yes
- No

## II. QUESTIONS ON INDIVIDUAL HORIZONTAL MEASURES

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Please select the horizontal measure(s) on which you would like to provide input:

- All 3 horizontal measures identified
- Durability
- Recyclability
- Post-Consumer Recycled Content

## D. FINAL REMARKS

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If you wish to add further information or elaborate on your views, please do so here:

*1000 character(s) maximum*

There are many challenges connected to introducing a horizontal measure on post-consumer recycled content. Several aspects should be considered. It cannot be applicable to all materials in the same way and implications should be assessed on a material basis. It should not have a negative effect on other important ecodesign criteria (e.g. durability, quality, performance or functionality). We need to carefully consider the technical possibility of replacing virgin with recycled material, as well as the concrete availability, quality and safety of recycled materials and maturity and size of the market.

If you wish to upload a supporting document, please do so here:

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

## **Contact**

ENV-PRODUCT-POLICY@ec.europa.eu