

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

Fields marked with * are mandatory.

Introduction

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

* 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

Free Text Question

Text of 1 to 50 characters will be accepted

Waste Management & resources

(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

FEAD

* Surname

Secretariat

* Email (this won't be published)

info@fead.be

* Organisation name

255 character(s) maximum

FEAD - European Waste Management Association

* 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.

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* 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.

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| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
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| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
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| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
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| <input type="radio"/> Bonaire Saint Eustatius and Saba | <input type="radio"/> Guadeloupe | <input type="radio"/> Nauru | <input type="radio"/> Switzerland |
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| <input type="radio"/> Brazil | <input type="radio"/> Guinea | <input type="radio"/> New Zealand | <input type="radio"/> Tanzania |
| <input type="radio"/> British Indian Ocean Territory | <input type="radio"/> Guinea-Bissau | <input type="radio"/> Nicaragua | <input type="radio"/> Thailand |
| <input type="radio"/> British Virgin Islands | <input type="radio"/> Guyana | <input type="radio"/> Niger | <input type="radio"/> The Gambia |
| <input type="radio"/> Brunei | <input type="radio"/> Haiti | <input type="radio"/> Nigeria | <input type="radio"/> Timor-Leste |
| <input type="radio"/> Bulgaria | <input type="radio"/> Heard Island and McDonald Islands | <input type="radio"/> Niue | <input type="radio"/> Togo |
| <input type="radio"/> Burkina Faso | <input type="radio"/> Honduras | <input type="radio"/> Norfolk Island | <input type="radio"/> Tokelau |
| <input type="radio"/> Burundi | <input type="radio"/> Hong Kong | <input type="radio"/> Northern Mariana Islands | <input type="radio"/> Tonga |
| <input type="radio"/> Cambodia | <input type="radio"/> Hungary | <input type="radio"/> North Korea | <input type="radio"/> Trinidad and Tobago |
| <input type="radio"/> Cameroon | <input type="radio"/> Iceland | <input type="radio"/> North Macedonia | <input type="radio"/> Tunisia |
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| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
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| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
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| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
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| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

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

‘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

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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Bed Mattresses	<input checked="" type="radio"/>	<input type="radio"/>	<input 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

Electric and Electronic Equipment, batteries, packaging, vehicles and construction products.

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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Bed Mattresses	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lubricants	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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

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

TEXTILES AND FOOTWEAR

Product scope: Apparel and home/interior textiles (e.g. bedlinen, towels, tablecloths, curtains etc.) consumed by households, and similar products consumed by government and business (e.g. uniforms and workwear used by all public and private sectors, bedlinen and towels etc. consumed by hotels, restaurants, healthcare services etc.) and technical textiles usually or also meant for consumers (such as truck covers, cleaning products) or specifically meant for industry (automotive, construction, medical, agriculture, etc.) + footwear

Excluded from the scope in preliminary analysis: Products for which textile components constitute less than 80% by weight of the product (e.g. furniture, carpets mainly made of plastics, duvets, pillows) and leather, unless incorporated in footwear

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. Within the product group of textiles and footwear, should some product sub-groups be considered as higher priority for regulation than others?

- ☒ Apparel
- ☒ Footwear
- ☐ Home/interior textiles (e.g. bed linen, towels, curtains)
- ☒ Technical textiles not included in the above-mentioned scope (e.g. textiles for automotive applications; agrotextiles)
- ☐ Other

3. Textiles and footwear 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 textiles and footwear should be laid down?

at most 1 choice(s)

- ☐ Across all textile products (i.e. applicable to all products containing at least 80% by weight of textile fibres)
- ☐ At the level of specific sub-groups within this product group (for example, 'apparel', or 'household textiles')
- ☒ At the level of individual articles (i.e. at 't-shirt' level, or at 'jeans' level)
- ☐ Based on the material used (i.e. for 'cotton textiles')
- ☐ Based on product purpose/functionality (i.e. for 'outdoor wear'; 'everyday wear', etc.)
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

5. For textiles, 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

6. Do you wish to add comments on textiles and footwear?

500 character(s) maximum

FURNITURE

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

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

The most important factors to be considered at ecodesign stage should be: minimum recycled content, substances of concern, recyclability and dismantlability.

CERAMIC PRODUCTS

Product scope: The scope considered is the same as that of the BREF (see [here](#)) with the exception of the uses related to construction. See explanation of interplay between the ESPR and EU level rules for construction products in the section on intermediate products. Thus, ceramic products include the following sectors: **Vitrified clay pipes** and fittings are used for drains and sewers, but also tanks for acids and products for stables. **Refractory products** are usually applied in industries like the metals, cement, petrochemical and glass industries to increase the energy efficiency of their processes. **Expanded clay aggregates** are porous ceramic products used as loose material in garden and landscape design (e.g. embankment fillings in road construction, substrates for green roofs, filter and drainage fillings). **Household ceramics** covers tableware, artificial and fancy goods made of porcelain, earthenware and fine stoneware. **Sanitaryware** covers lavatory bowls, bidets, wash basins, cisterns and drinking fountains. **Technical ceramics** supply aerospace and automotive industries (engine parts, catalyst carriers), electronics (capacitors, piezo-electrics), biomedical products (bone replacement), environment protection (filters), inorganic bonded abrasive and many others.

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. Ceramic 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 ceramic products should be laid down?

at most 1 choice(s)

- ☒ Across all ceramic materials (i.e. applicable at general level to all products falling within this product group)
- ☐ At the level of individual articles (i.e. at 'sanitaryware' level)
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For ceramic products, 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 ceramic products?

500 character(s) maximum

TYRES

Product scope: Products included are car (C1) tyres, van (C2) tyres and heavy-duty vehicle (C3) tyres.

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

Please specify the elements to be **added**:

Text of 1 to 100 characters will be accepted

Bicycle and light vehicles (motor cycle, scooters) tyres

2. Tyres 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 tyres should be laid down?

at most 1 choice(s)

- ☐ Across all tyres (i.e. applicable i at general level to all products falling within this product group)
- ☒ At the level of individual articles (e.g. requirements specifically for heavy-duty vehicle tyres)
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For tyres, 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 tyres?

500 character(s) maximum

Recycled content should be mandatory for tyres in order to foster circular economy, recycling and resources efficiency.

DETERGENTS

Product scope: Laundry detergents, dishwasher detergents, hard surface cleaning products (i.e. all purpose cleaners, kitchen cleaners, window cleaners, sanitary cleaners), hand dishwashing detergents).

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. Detergents 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 detergents should be laid down?

at most 1 choice(s)

- ☒ Across all detergents (i.e. applicable at general level to all products falling within this product group)
- ☐ At the level of individual articles (i.e. requirements specifically for 'dishwasher detergents')
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For detergents, 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 detergents?

500 character(s) maximum

BED MATTRESSES

Product scope: Products consisting of a cloth cover that is filled with materials and that can be placed on an existing supporting bed structure or designed for free standing in order to provide a surface to sleep or rest upon for indoor use.

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

- ☒ Yes
- ☐ No
- ☐ No opinion

3. For bed mattresses, 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

4. Do you wish to add comments on bed mattresses?

500 character(s) maximum

Recycled content should be mandatory for mattresses in order to foster circular economy, recycling and resources efficiency.

LUBRICANTS

Product scope: Product capable of reducing friction, adhesion, heat, wear or corrosion when applied to a surface or introduced between two surfaces in relative motion, or is capable of transmitting mechanical power. Composed of base fluids (80-75%) and additives (25-20%). Base fluids can be fossil base fluids (mineral oils, synthetic oils, re-refined mineral oils) which account for >95% of the market or vegetable base oils (in EU mostly rapeseed and sunflower) which account for <5% of the market (2015 data) and also mixtures of them, mostly mineral-synthetic and vegetable-synthetic.

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. Lubricants 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 lubricants should be laid down?

at most 1 choice(s)

- ☒ Across all lubricants (i.e. applicable to all products falling within this product group)
- ☐ At the level of individual articles (e.g. requirements specifically for 'industrial lubricants')
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For lubricants, 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 lubricants?

500 character(s) maximum

Not all the lubricants can be recycled. Then, the most important thing at the ecodesign stage should be to produce long-lasting lubricants and to restrict as much as possible the substances of concern they contain.

PAINTS AND VARNISHES

Product scope: Products falling under the scope of the Directive 2004/42/EC ('the Paints Directive') for paints and varnishes. Paints and varnishes means coatings applied to buildings, their trim and fittings, and associated structures for decorative, functional and protective purpose. Note that vehicle refinishes also fall under the scope of the Paints Directive. Vehicle refinishes are used for the coating of road vehicles as defined in Directive 70/156/EEC, or part of them, carried out as part of vehicle repair, conservation or decoration outside of manufacturing installations.

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. Paints and varnishes 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 paints and varnishes should be laid down?

at most 1 choice(s)

- ☐ Across all paints and varnishes (i.e. applicable at general level to all products falling within this product group)
- ☒ At the level of individual articles (e.g. requirements specifically for 'decorative paint')
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For paints and varnishes, 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 paints and varnishes?

500 character(s) maximum

Paints and varnish are not recyclable as soon as they have been applied on products. Most of them contain hazardous substances. The priority should be to phase out as much as possible these substances.

COSMETIC PRODUCTS

Product scope: Any substance or mixture falling under the scope of [Regulation \(EC\) No 1223/2009](#), intended to be placed in contact with the external parts of the human body, or with the teeth and the mucous membranes of the oral cavity, with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours. Products included are e.g. toilet soaps, shower preparations, shampoos, hair conditioning products, shaving products, deodorants, toothpaste, skin-care products, sunscreens, decorative cosmetics (this list is not exhaustive).

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. Cosmetic 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 cosmetic products should be laid down?

at most 1 choice(s)

- ☐ Across all cosmetic 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 (i.e. requirements specifically for 'shampoo')
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For cosmetic products, 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 cosmetic products?

500 character(s) maximum

As stated in the proposal for a Directive concerning urban wastewater treatment, pharmaceuticals and cosmetic residues currently represent the main sources of micro-pollutants found in urban wastewater. It is therefore important the design of cosmetic products to minimize at source the production of such pollutants.

TOYS

Product scope: Toys that consist of plastic, foam, silicone, rubber, textile, fur, leather, metal, paper, cardboard, wood, bamboo, or wood-based boards.

Excluded from the scope in preliminary analysis: Electronic toys (because these fall under the current Ecodesign Directive).

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

Please specify the elements to be **added**:

Text of 1 to 100 characters will be accepted

Electronic toys because current Ecodesign Directive will be repealed by the the ESPR

2. Toys 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 toys should be laid down?

at most 1 choice(s)

- ☐ Across all toys (i.e. applicable at general level to all products falling within this product group)
- ☒ Based on the material used (e.g. requirements specifically for 'plastic toys')
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For toys, 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 toys?

500 character(s) maximum

Recycled content should be mandatory for toys in order to foster circular economy, recycling and resource efficiency. Dismantlability is also essential, for example, the batteries must be removable without exception. We see more and more toys using batteries, these have to be easily removable. From a resource-efficiency but also from a security point of view, this is crucial.

FISHING NETS AND GEARS

Product scope: Any item or piece of equipment that is used in fishing or aquaculture to target, capture or rear marine biological resources or that is floating on the sea surface, and is deployed with the objective of attracting and capturing or of rearing such marine biological resources.

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. Fishing nets and gears 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 fishing nets and gears should be laid down?

at most 1 choice(s)

- ☒ Across all fishing nets and gears (i.e. applicable at general level to all products falling within this product group)
- ☐ At the level of specific sub-groups that could be identified within this product group (e.g. applicable to all 'trawling gear')
- ☐ At the level of individual articles (i.e. requirements specifically for 'nets')
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For fishing nets and gears, 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 fishing nets and gears?

500 character(s) maximum

ABSORBENT HYGIENE PRODUCTS

Product scope: Any article whose function is to absorb and retain human fluids such as urine, faeces, sweat, menstrual fluid or milk, excluding textile products. Products included are: baby diapers, panty-liners, menstrual pads, breast pads, tampons, incontinence products.

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. Absorbent hygiene 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 absorbent hygiene products should be laid down?

at most 1 choice(s)

- ☐ Across all absorbent hygiene products (i.e. applicable at general level to all products falling within this product group)
- ☒ At the level of individual articles (i.e. requirements specifically for ‘diapers’)
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For absorbent hygiene products, 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 absorbent hygiene products?

500 character(s) maximum

B. INTERMEDIATE PRODUCTS

‘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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-Ferrous Metals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Aluminium	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Chemicals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plastic and Polymers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pulp Paper and Boards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Glass	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>
Chemicals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Plastic and Polymers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Pulp Paper and Boards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Glass	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

II. QUESTIONS ON INDIVIDUAL INTERMEDIATE PRODUCT GROUPS

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

Iron and Steel

Product scope: Iron and steel. Steel is an alloy of iron and carbon, where the carbon content can range up to 2% (when the carbon content is over 2%, the material is defined as cast iron).

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. How do you believe iron and steel could best be regulated under the ESPR?

at most 1 choice(s)

- ☐ As an intermediate product
- ☐ By regulating their use in end-use products/applications
- ☒ Both ways
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For iron and steel, 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 iron and steel?

500 character(s) maximum

Iron and steel are long lasting and recyclable. However, if they are incorporated into products designed to have a short life span and cannot be easily dismantled, the ecodesign properties of the intermediate products alone will not keep the materials in the loop. Industry needs to transform into a circular business model. This takes time and resources whereas now, prize is king/queen. This can change if sustainability requirements are transparent enough to ensure fair competition globally.

NON-FERROUS METALS

Product scope: This includes seven primary and secondary non-ferrous metals: copper, lead and/or tin, zinc and/or cadmium, precious metals, ferro-alloys, nickel and/or cobalt, carbon and graphite electrodes.

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. How do you believe non-ferrous metals could best be regulated under the ESPR?

at most 1 choice(s)

- ☐ As an intermediate product
- ☐

By regulating their use in end-use products/applications

- ☒ Both ways
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For non-ferrous metals, 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 non-ferrous metals?

500 character(s) maximum

Metals are long lasting and recyclable. However, if they are incorporated into final products that are designed to have a short life span, or even into single use products, that in addition, cannot be (easily) dismantled, the ecodesign properties of the intermediate products alone will not be sufficient to keep the materials in the loop.

ALUMINIUM

Product scope: Aluminium and its alloys.

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. How do you believe aluminium could best be regulated under the ESPR?

at most 1 choice(s)

- ☐ As an intermediate product
- ☐ By regulating their use in end-use products/applications
- ☒ Both ways
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For aluminium, 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 aluminium?

500 character(s) maximum

Voluntary certifications are currently shaping the market. As the demand for primary aluminium is expected to increase 50% by 2050, recycled aluminium is key to resource-efficiency. Technologies such as LIBS are showing good results, but a definitive scale-up requires enough demand for the alloying elements to cover the costs of thorough recycling. Today, downcycling seems still more profitable. Nevertheless, over-regulation and higher costs also risks shifting demand toward other materials.

CHEMICALS

Product scope: ammonia, nitric acid, sulphuric acid, phosphoric acid and hydrofluoric acid. Basic inorganic chemicals: caustic soda and soda ash (called sodium carbonate, including sodium bicarbonate), titanium dioxide (from the chloride and sulphate process routes), synthetic amorphous silica (pyrogenic silica, precipitated silica, and silica gel). Large volume organic chemicals: lower olefins by the cracking process, aromatics such as benzene/toluene/xylene (BTX), oxygenated compounds such as ethylene oxide, ethylene glycols and formaldehyde, nitrogenated compounds such as acrylonitrile and toluene diisocyanate, halogenated compounds such as ethylene dichloride (EDC) and vinyl chloride monomer (VCM), sulphur and phosphorus compounds and organo-metallic compounds.

Excluded from the scope in preliminary analysis: speciality inorganic pigments (such as silicone, phosphorus compounds, inorganic explosives, cyanides, soluble inorganic salts of nickel) and organic fine chemicals (dyes and pigments, plant health products and biocides, pharmaceutical products, organic explosives, organic intermediates, specialised surfactants, flavours and fragrances, pheromones, plasticisers, vitamins, optical brighteners and flame-retardants).

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. How do you believe chemicals could best be regulated under the ESPR?

at most 1 choice(s)

- ☐ As an intermediate product
- ☐ By regulating their use in end-use products/applications (e.g. paints, detergents, etc.)
- ☒ Both ways
- ☐ Other

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

- ☒ Yes
- ☐ No

☐ No opinion

4. For chemicals, 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 chemicals?

500 character(s) maximum

PLASTIC AND POLYMERS

Product scope: Plastic is a polymeric material that has the capability of being moulded or shaped, usually by the application of heat and pressure. It usually contains polymers and additives that give additional properties to the mixture. The scope is plastic basic materials, synthetic rubbers and hydrocarbons containing oxygen.

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. How do you believe plastic and polymers could best be regulated under the ESPR?

at most 1 choice(s)

- ☐ As an intermediate product
- ☐

As an intermediate product for specific types of plastics and polymers (e.g. polyethylene)

- ☐ By regulating its use in end-use products/applications
- ☒ Other

Please specify

Text of 1 to 100 characters will be accepted

Both ways. As intermediate product and by regulating their use in end-use products/applications.

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For plastic and polymers, 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 plastic and polymers?

500 character(s) maximum

It is essential to adopt clear and objective quantification systems in order to evaluate the eco-design and sustainability of products (lifecycle environmental impact).

In addition to the 3 points above, also the presence of substances of concern is very important in terms of ecodesign.

PAPER, PULP PAPER AND BOARDS

Product scope: Pulp, paper and board (chemical, kraft, sulphite, mechanical and chemi-mechanical pulping, recovered paper processing and papermaking).

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. How do you believe paper, pulp paper and boards could best be regulated under the ESPR?

at most 1 choice(s)

- ☒ As an intermediate product
- ☐ By regulating their use in in end-use products/applications
- ☐ Both ways
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For paper pulp paper and boards, 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 paper, pulp paper and boards?

500 character(s) maximum

Attention should be paid to multilayer/composite materials (e.g., tetra pack) in terms of their (lack of) recyclability.

GLASS

Product scope: Container glass, flat glass, continuous filament glass fibre, domestic glass, special glass, mineral wool, high temperature insulation wools and frits.

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. How do you believe glass could best be regulated under the ESPR?

at most 1 choice(s)

- ☐ As an intermediate product
- ☐ By regulating their use in in end-use products/applications
- ☒ Both ways
- ☐ Other

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

- ☒ Yes
- ☐ No
- ☐ No opinion

4. For glass, 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 glass?

500 character(s) maximum

Glass as such is a permanent material, infinitely recyclable without loss of quality and quantity. Glass devices can be less perfect. In the packaging sector, all what is rendering glass opaque should be avoided (strong coating, very dark mass pigmentation). Heat resistant glass is also problematic as it is often collected together with packaging glass. Flat technical glass can include disturbing elements in the glass recycling chain (metallic elements, films, coatings, ...)

C. HORIZONTAL MEASURES

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

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

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

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

- ☒ Yes
☐ No

Please specify

100 character(s) maximum

Substances of concern, LCA

II. QUESTIONS ON INDIVIDUAL HORIZONTAL MEASURES

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

Durability

For the purposes of this consultation, 'durability' covers the aspects of '*reliability*', '*reparability*', '*reusability*' and '*upgradability*'

1. Do you believe there are products with characteristics that are similar enough to enable horizontal durability measures to be developed for them?

- ☐ Yes
- ☒ No

2. If yes, please indicate one set of products with characteristics that are similar enough to enable horizontal durability measures to be developed for them:

- ☐ Absorbent Hygiene Products
- ☐ Bed Mattresses
- ☐ Ceramic products
- ☐ Cosmetic Products
- ☐ Detergents
- ☐ Fishing Nets and Gears
- ☐ Furniture
- ☐ Lubricants
- ☐ Paints and Varnishes
- ☐ Textiles
- ☐ Toys
- ☐ Tyres
- ☐ Aluminium
- ☐ Chemicals
- ☐ Glass
- ☐ Iron and Steel
- ☐ Paper, Pulp Paper and Boards
- ☐ Plastic and Polymers
- ☐ Non-ferrous metals
- ☐ Transport equipment
- ☐ Energy-related products including ICT and electronics
- ☐ Other (*please specify product*)
- ☐ Animal care products
- ☐ Products containing Critical Raw Materials
- ☐ **ADD ANOTHER SET OF PRODUCTS**

3. Do you disagree with any of the potential horizontal provisions that could be developed in the area of durability?

	Disagree

Minimum lifetime and labelling	<input type="radio"/>
Resistance to stresses or ageing mechanisms (<i>e.g. resistance to drop/shock /abrasion; ingress protection</i>)	<input type="radio"/>
Minimum durability of function (<i>e.g. water repellence, colour fastness, dimensional stability</i>)	<input type="radio"/>
Introduction of a reparability scoring index/label	<input type="radio"/>
Availability of repair (+upgrade) information and maintenance instructions to independent operators and/or end users	<input type="radio"/>
Spare part (and software upgrade) availability and delivery time	<input type="radio"/>
Disassembly generally or related to Tools, Fasteners, Working Environment and Skill Level	<input type="radio"/>
Use of component and material coding standards for the identification of components and materials	<input type="radio"/>
Use of standard components / Compatibility with commonly available spare parts	<input type="radio"/>
Number of materials and components used	<input type="radio"/>
Modularity/Transformability; detachable/adjustable elements	<input type="radio"/>

4. Do you wish to add comments on durability?

500 character(s) maximum

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

1. Do you believe there are products with characteristics that are similar enough to enable horizontal recyclability measures to be developed for them?

- ☐ Yes
☒ No

2. If yes, please indicate products with characteristics that are similar enough to enable horizontal recyclability measures to be developed for them:

- ☐ Absorbent Hygiene Products
☐ Bed Mattresses
☐ Ceramic products
☐ Cosmetic Products
☐ Detergents

- ☐ Fishing Nets and Gears
- ☐ Furniture
- ☐ Lubricants
- ☐ Paints and Varnishes
- ☐ Textiles
- ☐ Toys
- ☐ Tyres
- ☐ Aluminium
- ☐ Chemicals
- ☐ Glass
- ☐ Iron and Steel
- ☐ Paper, Pulp Paper and Boards
- ☐ Plastic and Polymers
- ☐ Non-ferrous metals
- ☐ Transport equipment
- ☐ Energy-related products including ICT and electronics
- ☐ Other (*please specify product*)
- ☐ Animal care products
- ☐ Products containing Critical Raw Materials
- ☐ **ADD ANOTHER SET OF PRODUCTS**

3. Do you disagree with any of the potential horizontal provisions that could be developed in the area of recyclability?

	Disagree
Ability to easily separate the product into different materials	<input type="radio"/>
Choice of materials and restrictions on substances (<i>e.g. choice and combination of polymers; homogeneous fibres</i>)	<input type="radio"/>
Access to product data relevant for recycling, including dismantling information (<i>e.g. marking of parts and materials, use of component and material coding standards, indicative weight range of different materials including CRMs and environmentally relevant materials, hardware and software needed for the recycling process changes</i>)	<input type="radio"/>
Introduction of a recyclability scoring index/label	<input type="radio"/>

4. Do you wish to add comments on recyclability?

500 character(s) maximum

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

1. Do you believe there are products with characteristics that are similar enough to enable horizontal post-consumer recycled content measures to be developed for them?

- ☐ Yes
- ☒ No

2. If yes, please indicate products with characteristics that are similar enough to enable horizontal post-consumer recycled content measures to be developed for them:

- ☐ Absorbent Hygiene Products
- ☐ Bed Mattresses
- ☐ Ceramic products
- ☐ Cosmetic Products
- ☐ Detergents
- ☐ Fishing Nets and Gears
- ☐ Furniture
- ☐ Lubricants
- ☐ Paints and Varnishes
- ☐ Textiles
- ☐ Toys
- ☐ Tyres
- ☐ Aluminium
- ☐ Chemicals
- ☐ Glass
- ☐ Iron and Steel
- ☐ Paper, Pulp Paper and Boards
- ☐ Plastic and Polymers
- ☐ Non-ferrous metals
- ☐ Transport equipment
- ☐ Energy-related products including ICT and electronics
- ☐ Other (*please specify product*)

- ☐ Animal care products
- ☐ Products containing Critical Raw Materials
- ☐ **ADD ANOTHER SET OF PRODUCTS**

3. Do you disagree with any of the potential horizontal provisions that could be developed in the area of post-consumer recycled content?

	Disagree
Provisions on minimum content of post-consumer recycled material expressed either as a fraction of the total material input (in %) or in absolute numbers (<i>kg per unit; million tonnes Mt in aggregates</i>)	<input type="radio"/>

4. Do you wish to add comments on post-consumer recycled content?

500 character(s) maximum

D. FINAL REMARKS

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

1000 character(s) maximum

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

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