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Output document for the
#EU Circular Talk on:

EPR as a signal for circular design

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Key takeaways

Overall conclusion:

EPR has proven to be a useful tool for mobilising resources to manage waste when the legislation provides the right guidance, but its potential remains largely untapped.

Limitations of EPR schemes

- The deployment of EPR across Europe over the last few decades **has not prevented an increase in waste generation, nor has it supported eco-design for reuse**.

- In France, 15 schemes apply bonuses or penalties. Most criteria concern the manufacturing stages (i.e recycled content), with **end-of-life criteria being less important** and taking the form of penalties.

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Call for action

- EPR will only be able to cover the costs of waste management and create incentives for eco-design if it is **incorporated into a wider policy ecosystem and combined it with other tools**.

- More should be done to **promote dialogue between PRO/producers and refurbishment operators in EPR systems**. The lack of communication:
  - undermines eco-design, as refurbishment providers could provide valuable insights into design for repair and durability,
  - makes it harder for refurbishment providers to obtain technical specifications on the items they refurbish.

- Key eco-design criteria for laptops should **include software life cycle characteristics as well as hardware aspects** (i.e soldered or removable Ram modules, batteries and disks).

- EPR fees are mostly directed towards communication, collection and recycling of household electronics. **Further attention should be given to professional computers**, which often have better technical features than standard consumer devices and when refurbished, can last an additional 5 to 10 years.

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Call for action

- A **balanced, open and transparent Digital Product Passport** will be a key driver for ecomodulation, fostering better design and environmental priorities and providing additional data to all stakeholders.

- Effective, acceptable EPR criteria have a direct, traceable link to waste treatment costs and the daily operations of the PRO. However, to incentivize more eco-design, modulation criteria are moving towards external scores and evidence, weakening or completely eliminating the link to treatment costs. It is therefore crucial to **strike a balance between end-of-life criteria and criteria encompassing the whole lifecycle**, prioritising those with a clear link to EPR-managed costs (hazardous substances, recyclability, carbon class, DPP).

- EPR **fees should be based on the cost of compliance and the cost of ecodesign**.

- With a view to gathering reliable data to evaluate the system, **PROs should invest in impact assessment** with the help of environmental agencies and the participation of a range of stakeholders.