

# TOWARDS AN EU PRODUCT POLICY FRAMEWORK CONTRIBUTING TO THE CIRCULAR ECONOMY

EEB proposals for discussion  
at the EU Circular Economy  
Stakeholder Conference 2018



**EEB**

European  
Environmental  
Bureau



## WHO WE ARE

The European Environmental Bureau – [www.EEB.org](http://www.EEB.org)

Europe's largest network of environmental citizens' organisations

- around **140 civil society organisations...**  
including a growing number of other **European networks**
- ...from more than **30 European countries**

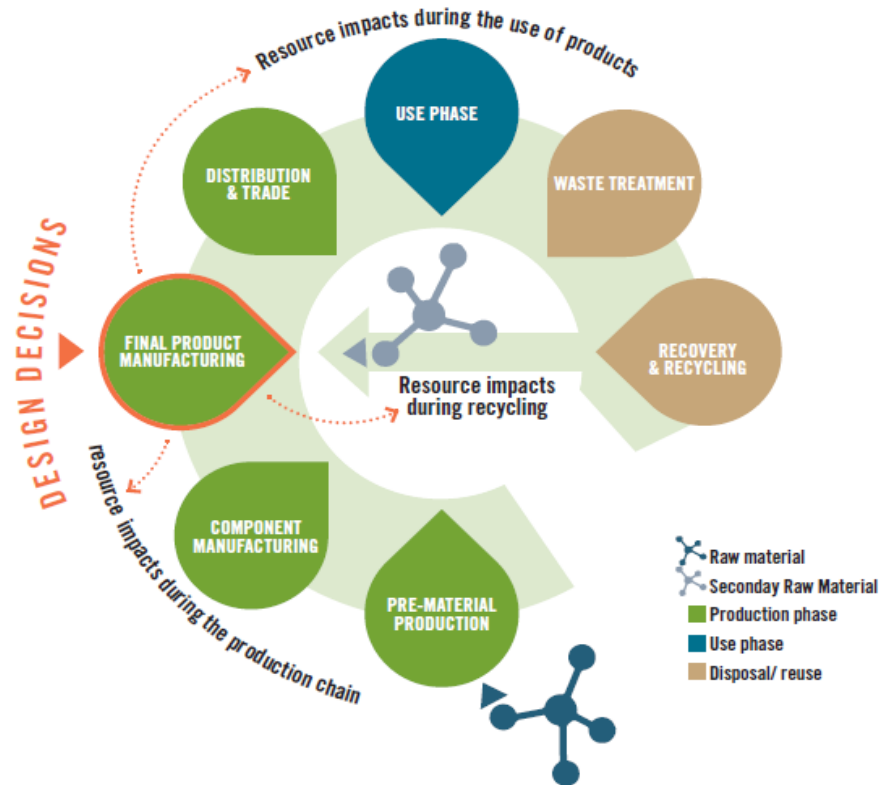
Over 40 years of EU environmental policy expertise

# EU PRODUCT POLICY: WHERE DO WE STAND? HOW TO IMPROVE IT? WHAT IS MISSING?

- AN INTEGRATED APPROACH TOWARDS PERFORMANCE OF PRODUCTS AND SERVICES IN A CIRCULAR ECONOMY
- JOINT PREPARATORY STUDIES AND VERIFICATION SYSTEMS FOR DIFFERENT POLICY INSTRUMENTS ON THE SAME PRODUCT CATEGORIES
- ECODESIGN APPROACHES FOR NON-ENERGY RELATED PRODUCTS/ SERVICES
- AN EU HARMONISED AND DIGITAL PRODUCT INFORMATION SYSTEM
- LINKING SUPPLY AND DEMAND LEVERS MORE EFFECTIVELY

# EU PRODUCT POLICY: WHERE DO WE STAND?


Life-Cycle Thinking accepted as guiding principle



# POLICY FRAMEWORKS NEED TO OVERLAP

## Horizontal approaches


- EU Chemicals legislation
- EU Product legislation
- EU Consumer legislation
- EU Waste legislation



How to address several interfaces in order to cover multiple life-cycles in a circular economy?

## To be complemented by sector approaches as appropriate

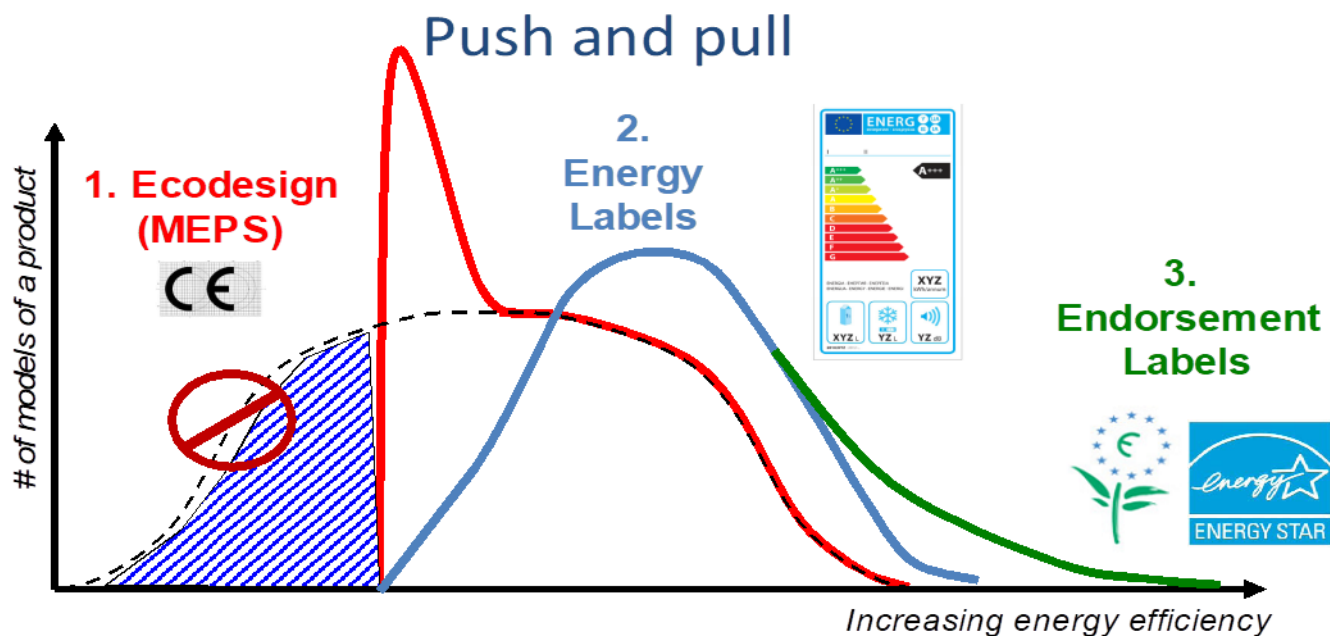
- Construction and buildings
- Mobility
- Food
- Electrical & electronic appliances
- ...



How to balance prescriptive regulations with incentives for companies to go beyond the legal minimum requirements/business as usual?

# A SUCCESSFUL PUSH & PULL MECHANISM FOR IMPROVING ENERGY EFFICIENCY OF APPLIANCES

How can we make it work for Circular Economy?



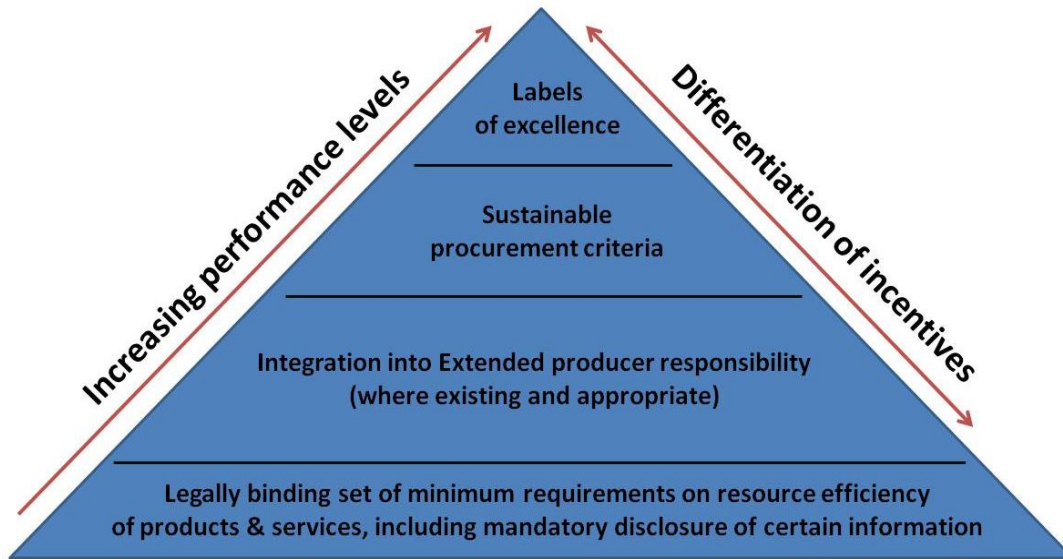
Ecodesign addresses the product supply side; pushes the market

Categorical energy labels address the demand side; pulls the market

Endorsement labels provide further pull; toward premium models

# A MORE COHERENT PRODUCT POLICY

## Challenges of a multi-criteria approach

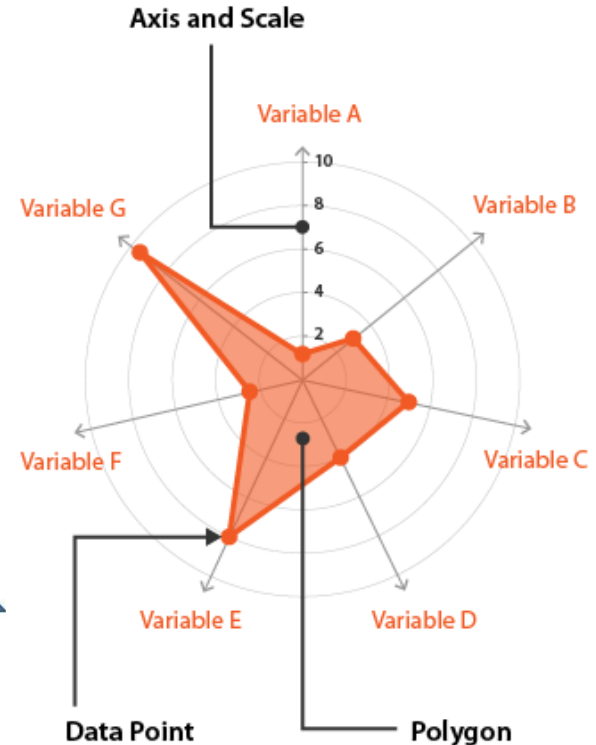


Based on a common set of metrics for a circular economy

**BETTER REPAIRABILITY AND DURABILITY** of products

**HIGHER RECYCLABILITY** of materials

**REMOVAL OF HAZARDOUS SUBSTANCES**



## EU PRODUCT POLICY: HOW TO IMPROVE IT?

An integrated approach for circularity of products and services

=> The analytical framework for EU product policy should cover the same building blocks from a circular economy perspective for different instruments, such as:

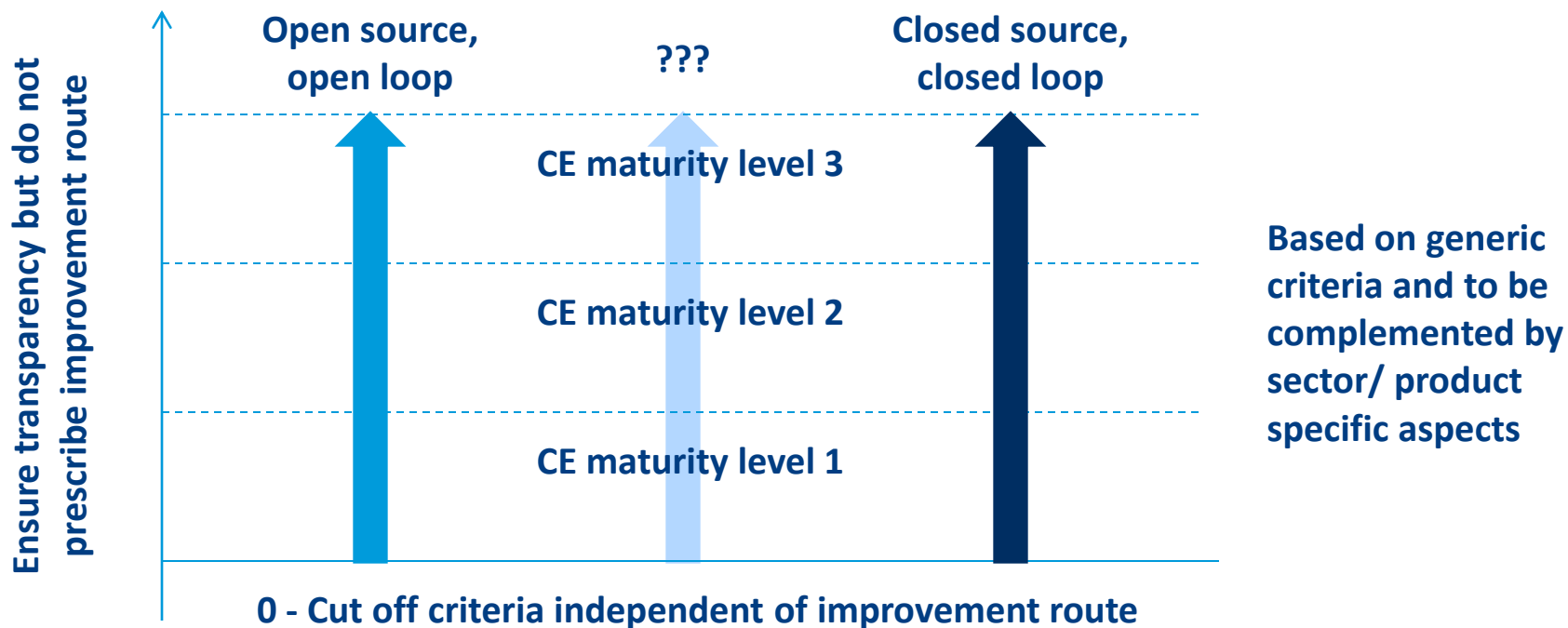
- **Better material utilisation** (e.g. non-toxic, reused & recycled content)
- **Extended product lifetime** (e.g. maintenance, repair, upgrades)
- **Shared use / rental or lease** (e.g. increasing usage intensity)
- **Value recovery** (e.g. take back, reuse, refurbish, remanufacture)
- **Sustainability check** (e.g. carbon balance, health and safety aspects)

=> Aiming at an overall reduction of the environmental footprint of our production & consumption model while avoiding or mitigating trade-offs.



# THE VISION: A CIRCULARITY RATING SYSTEM

How to ensure a level playing field in a Circular Economy (CE)?

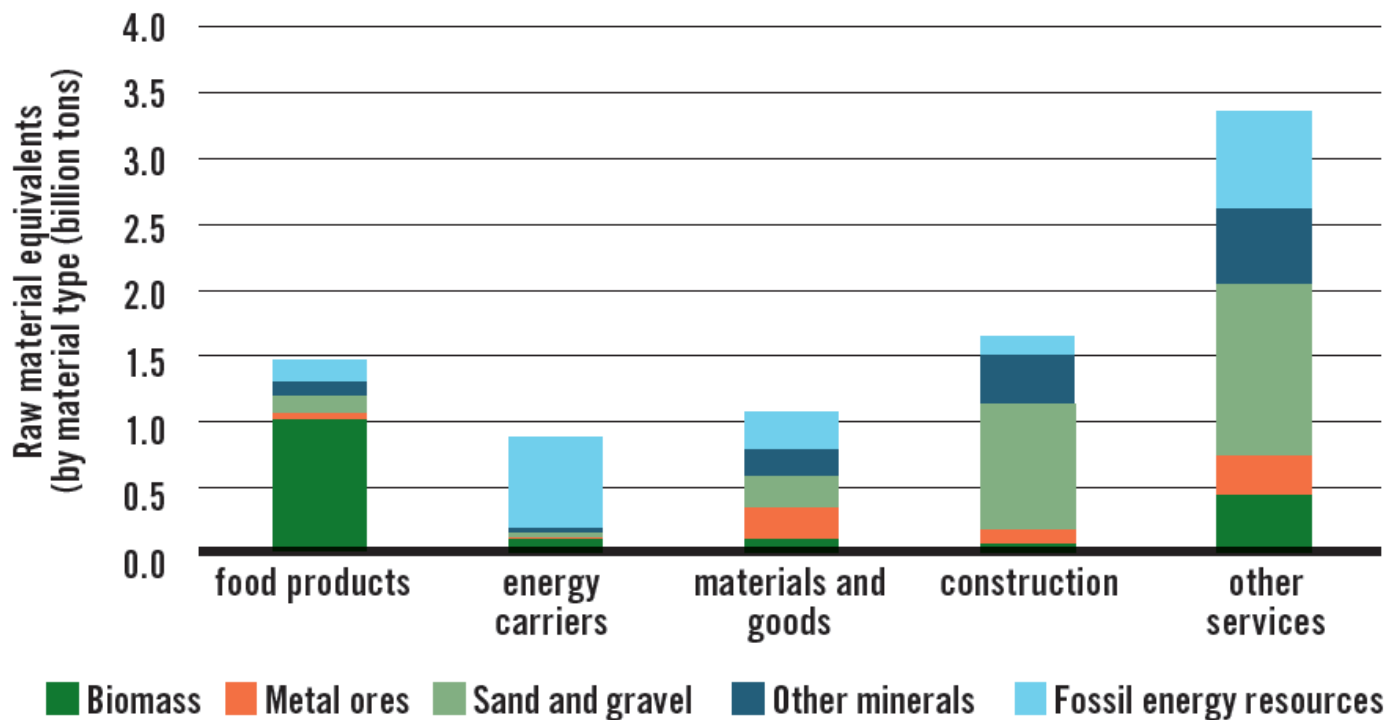


# JOINT PREPARATORY STUDIES & VERIFICATION SYSTEMS FOR DIFFERENT POLICY INSTRUMENTS

- **Align the different EC work plans** established under different EU legislation, giving the full overview of all preparatory and revision studies coming up for the respective instruments and product categories (Ecodesign, EPR, GPP, Labelling)
- **Harmonise the analysis** of market data, environmental hotspots (PEF plus complementary tools), improvement potential, and life-cycle costs
- **Use the same metrics for different policy instruments** but define adequate type of criteria or levels of performances that match with the policy objectives and ambition level required for the respective instrument
- **Propose a joint set of measures across the different instruments** that would then be subject to stakeholder consultation, impact assessment and inter-service consultation as well as adoption or scrutiny by Member States and the European Parliament as required

## EU PRODUCT POLICY: WHAT IS MISSING?

What are priority sectors beyond energy-related products?



Schoer, Weinzettel, Kovanda, Giegrich, Lauwigi for EU27 (2012)

## ECODESIGN APPROACHES FOR NON-ENERGY RELATED PRODUCTS AND SERVICES

- **Commission an impact assessment study** which sectors out of scope of the EU Ecodesign Directive would benefit most from minimum requirements on circular economy as requested both by the Environmental Council and the European Parliament
- Evaluate possibilities and experiences to **streamline application of horizontal circular economy standards & requirements** to priority sectors as identified in the above mentioned impact assessment study
- Provide funding to **priority sectors to develop their own circularity rating system** that could be referenced at a later stage in different policy instruments or sector specific legislation
- Kick-start discussions e.g. in the furniture and textiles industries **by setting up piloting schemes with clear governance structures** and investigate how to best link them with information and economic instruments at EU or national level

# AN EU HARMONISED AND DIGITAL PRODUCT INFORMATION SYSTEM

Why do we need to go beyond ratings or labels?



Packaging



Substances



Weight



Recycling and disposal



Lifetime reliability

- **Increase transparency on environmental performance and circularity potential of products** available on the EU single market
- Trigger a sound competition on best solutions through **direct access to circular economy related information**
- Support and/ or complement existing labelling schemes and legal requirements for information disclosure with digital tools for **enhancing green purchasing and procurement power**
- **Centralise access to environmental product specifications and design interfaces for different target groups** without necessarily having to transfer all the data in a static way to one digital place
- **Ensure relevance, timeliness, compatibility, and verification** of the information provided to the digital system and improve market surveillance for checking compliance where relevant



# LINKING SUPPLY AND DEMAND LEVERS

## By mainstreaming circular economy criteria

- While supply levers usually need to be defined at EU level as part of single market policies, **demand side measures such as labelling or economic incentives often fall into national competencies.**
- If a circular economy rating system is streamlined through relevant sectors and product categories, EU Member States will be able e.g. to apply **a reduced tax rate or lower fees for extended producer responsibility schemes** to reward frontrunners in a circular economy.
- Existing **eco-labelling schemes or green public procurement criteria at national level** could easily incorporate the respective circular economy criteria.
- For **products covered by an EU Energy Label or an Ecodesign implementing measure**, a circularity rating could eventually be integrated directly for the whole EU market.

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<http://eeb.org/work-areas/resource-efficiency/product-policy/>

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