

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

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

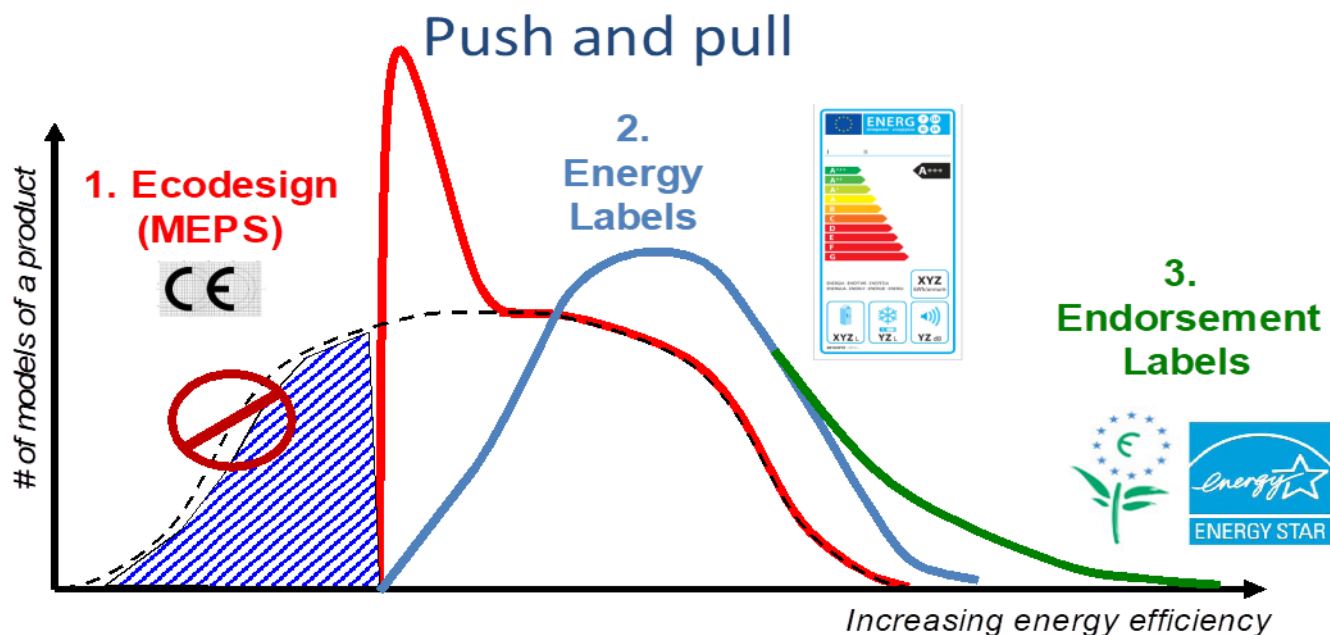
- Construction and buildings
- Mobility
- Food
- Electrical & electronic appliances
- ...



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?



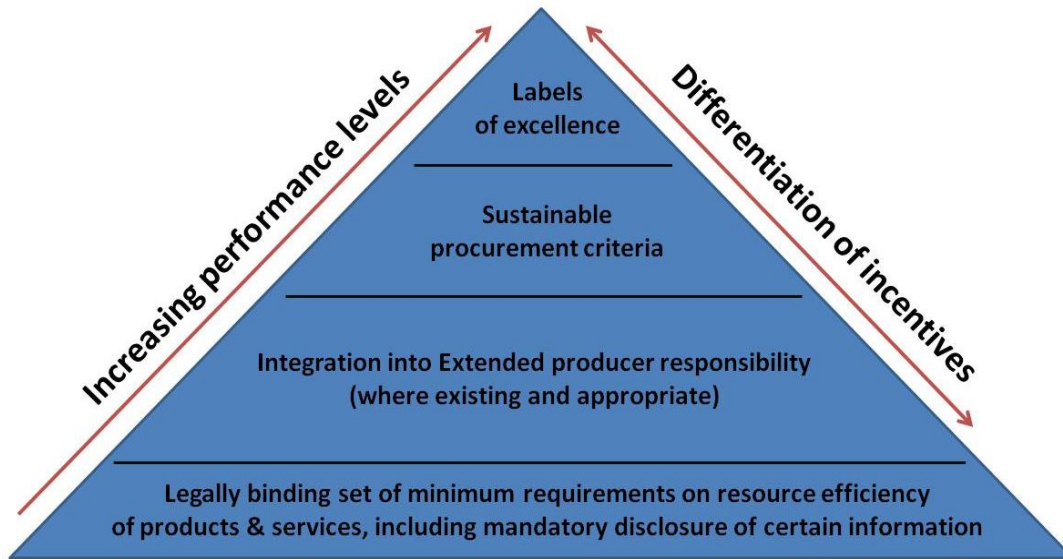
Ecodesign addresses the product supply side; pushes the market

Categorical energy labels address the demand side; pulls the market

Endorsement labels provide further pull; toward premium models

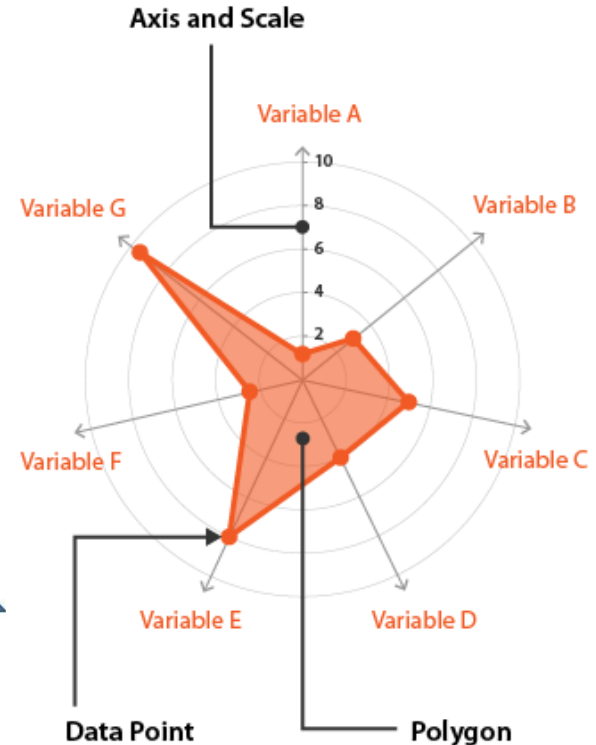
A MORE COHERENT PRODUCT POLICY

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

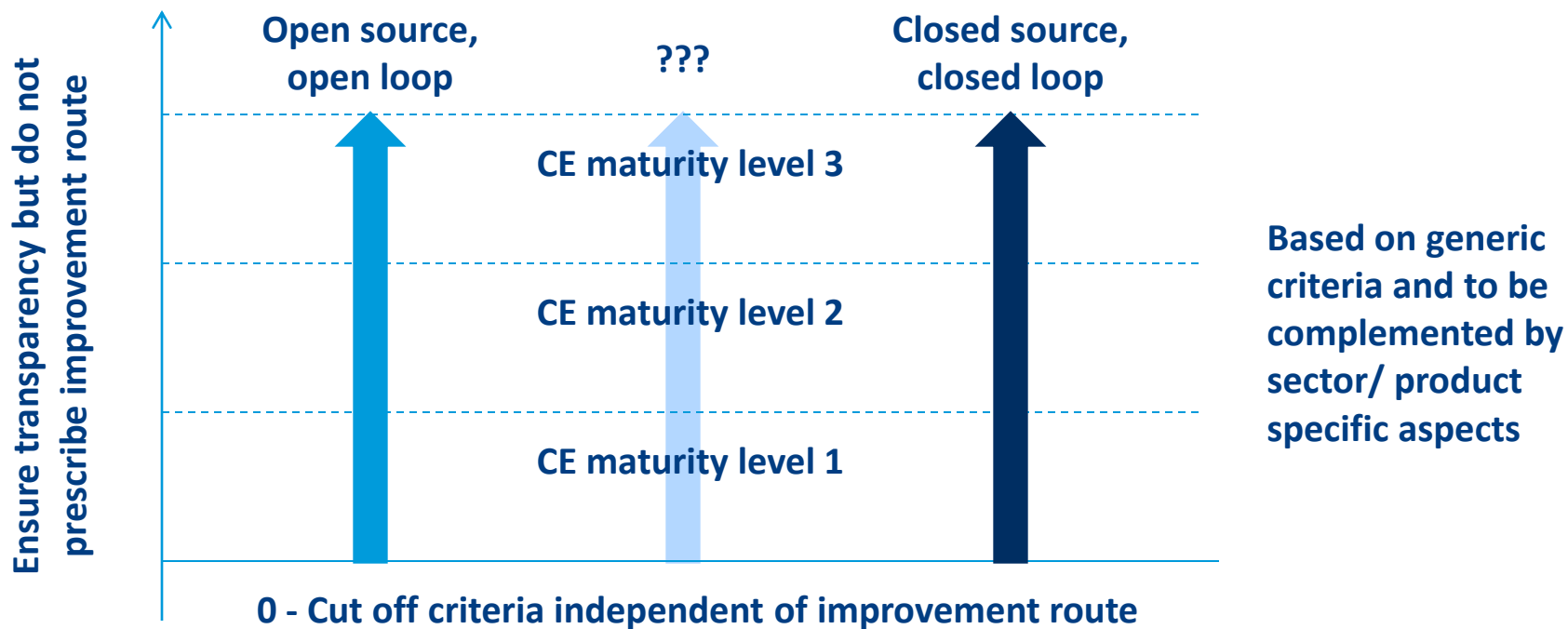
=> The analytical framework for EU product policy should cover the same building blocks from a circular economy perspective for different instruments, such as:

- **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)?

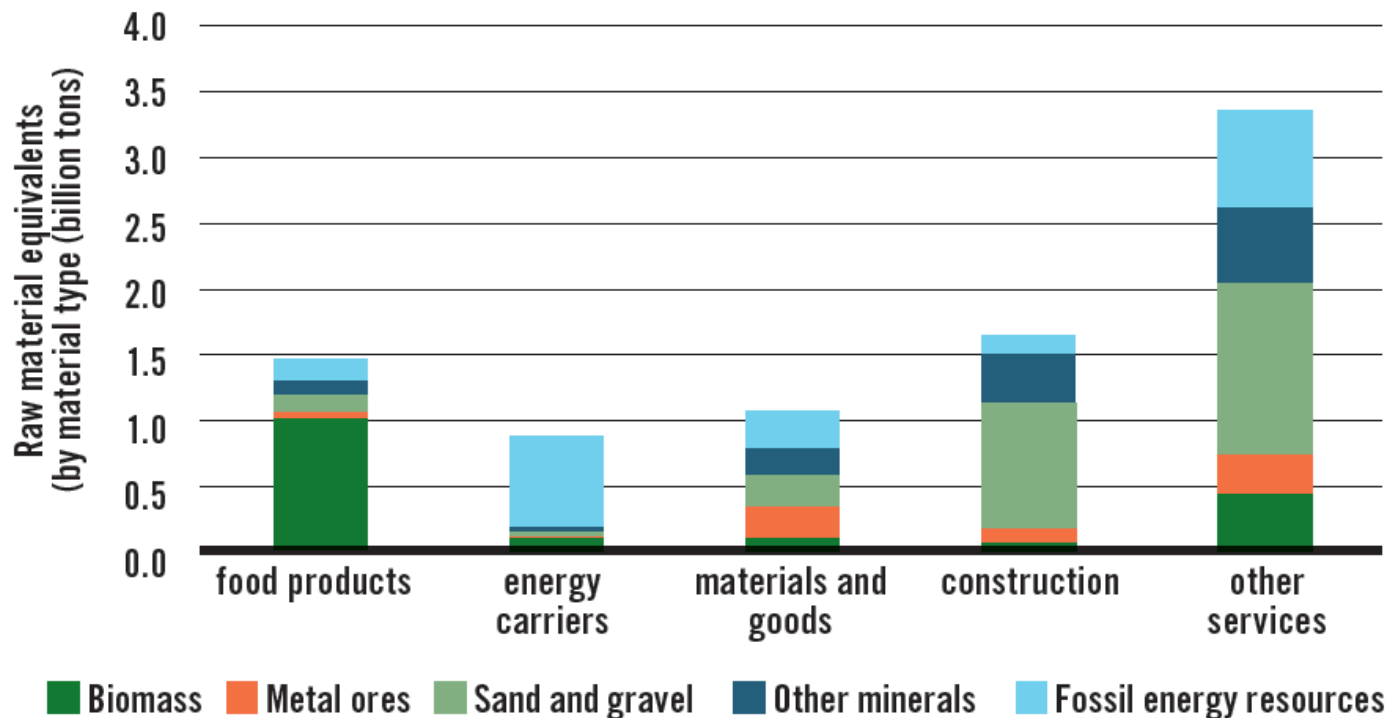


JOINT PREPARATORY STUDIES & VERIFICATION SYSTEMS FOR DIFFERENT POLICY INSTRUMENTS

- **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



Packaging



Substances



Weight



Recycling and disposal



Lifetime reliability

Why do we need to go beyond ratings or labels?

- **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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