Public Consultation on the Sustainable Products Initiative

Fields marked with * are mandatory.

Introduction

Developing a Sustainable Products Policy Initiative as a key part of the Circular Economy Action Plan for a cleaner and more competitive Europe (CEAP)[1] is one of the main flagships of the European Green Deal[2] and a pillar of the New Industrial Strategy for Europe[3]. This legislative initiative will aim to make products fit for a climate neutral, resource efficient and circular economy, reduce waste and ensure that the performance of frontrunners in sustainability progressively becomes the norm.

As announced in the new CEAP, the core of the Sustainable Product legislative Initiative will widen the scope of the Ecodesign Directive[4] beyond energy-related products so as to make it applicable to the broadest possible range of products (including services where appropriate) and make it deliver on circularity.

The Commission committed to consider such amendments to the Ecodesign Directive, and, where appropriate, complementary legislative proposals, to regulate the following sustainability aspects: product durability, reusability, upgradability and reparability; the presence of hazardous chemicals in products; energy and resource efficiency; recycled content in products; remanufacturing and high-quality recycling; carbon and environmental footprints; restrictions to single-use and premature obsolescence; a ban on the destruction of unsold durable goods; circular business models; digitalisation of product information and ways to reward the most sustainable products.

It will also strengthen information requirements and establish a digital product passport that gathers data on a product along its value chain, among other things on environmental characteristics, repair and upgrade instructions, presence of hazardous chemicals, reusability, recycled material content, recycling, and correct disposal and waste stream information, so as to enable consumers and businesses to understand the composition and properties of products, and enable compliance authorities to better fulfil their duties.

Priority products under the Sustainable Product Policy legislative initiative identified in the CEAP are electronics, ICT, textiles, furniture and high-impact intermediary products such as steel, cement and chemicals. (The initiative will not cover food and feed products.) Further product groups are to be identified based on their environmental impact and circularity potential. The Commission will also seek to increase the effectiveness of the current Ecodesign framework for energy-related products, including through the Ecodesign and Energy Labelling Working Plan 2020-2024.

The Sustainable Product legislative Initiative aims primarily at advancing sustainability at the design phase. As laid down in the Circular Economy Action Plan, it is part of a broader framework, which includes initiatives on

empowering consumers and public buyers and promoting circularity in production processes.

Further background can be found in the [Inception Impact Assessment on the Sustainable Products Initiative](#), which was published by the Commission in 2020[5].

The aim of this public consultation is to gather opinions and evidence from the public and relevant stakeholders on the main policy options for the legislative initiative.

The questionnaire is divided into four sections:

First section: Introduction

Second section: "About you" questions

Third section: Main consultation questions:

- Challenges to making products sustainable
- Measures to make sustainable products the norm
    - *Design for sustainability - sustainability requirements for products*
    - *Responsibility for information, including Digital Product Passport(s)*
    - *Avoidance of destruction of goods*
    - *Circular business models*
    - *Incentives for circularity*
- Compliance with and enforcement of sustainability requirements for products

Fourth section: Optional additional comments

[1] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2020:98:FIN

[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1588580774040&uri=CELEX:52019DC0640

[3] https://ec.europa.eu/commission/presscorner/detail/en/ip_20_416

[4] https://ec.europa.eu/growth/industry/sustainability/product-policy-and-ecodesign

[5] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12567-Sustainable-Products-Initiative

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 organisation
- ⊙ Consumer organisation
- ⊙ EU citizen
- ⊙ Environmental organisation
- ⊙ Non-EU citizen
- ⊙ Non-governmental organisation (NGO)
- ⊙ Public authority
- ⊙ Trade union
- ⊙ Other

Please specify your sector:
- ☐ Agriculture, forestry and fishing
- ☐ Apparel and footwear
- ☐ Chemicals and chemical products
- ☐ Construction
- ☑ Electrical equipment
- ☑ Computers, electronic and optical products

☐ Food and beverages

☐ Materials (e.g. metals, plastics, paper)

☐ Retail & wholesale trade

☐ Banking

☐ Insurance, reinsurance and pension funding

☐ Accommodation and food service activities

☐ Other

Please specify the type of product your organisation produces or represents:

☐ Intermediate product (e.g. ingredient or component for a final product)

☐ Final product (used as it is)

☑ Both intermediate and final products

☑ Other (e.g. services):

Please indicate the level of market(s) you are active on:

☐ Local market

☐ Regional market

☑ EU market

☐ Non-EU market

☑ Worldwide market

☐ Not applicable

*First name

Secretary

*Surname

General

*Email (this won't be published)

sg@aioti.eu

*Organisation name

255 character(s) maximum

Alliance for Internet of Things Innovation (AIOTI) IWZV

*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.

380738729287-22

*Country of origin

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

○ Afghanistan	○ Djibouti	○ Libya	○ Saint Martin
○ Åland Islands	○ Dominica	○ Liechtenstein	○ Saint Pierre and Miquelon
○ Albania	○ Dominican Republic	○ Lithuania	○ Saint Vincent and the Grenadines
○ Algeria	○ Ecuador	○ Luxembourg	○ Samoa
○ American Samoa	○ Egypt	○ Macau	○ San Marino
○ Andorra	○ El Salvador	○ Madagascar	○ São Tomé and Príncipe
○ Angola	○ Equatorial Guinea	○ Malawi	○ Saudi Arabia
○ Anguilla	○ Eritrea	○ Malaysia	○ Senegal
○ Antarctica	○ Estonia	○ Maldives	○ Serbia
○ Antigua and Barbuda	○ Eswatini	○ Mali	○ Seychelles
○ Argentina	○ Ethiopia	○ Malta	○ Sierra Leone
○ Armenia	○ Falkland Islands	○ Marshall Islands	○ Singapore
○ Aruba	○ Faroe Islands	○ Martinique	○ Sint Maarten
○ Australia	○ Fiji	○ Mauritania	○ Slovakia
○ Austria	○ Finland	○ Mauritius	○ Slovenia

○ Azerbaijan	○ France	○ Mayotte	○ Solomon Islands
○ Bahamas	○ French Guiana	○ Mexico	○ Somalia
○ Bahrain	○ French Polynesia	○ Micronesia	○ South Africa
○ Bangladesh	○ French Southern and Antarctic Lands	○ Moldova	○ South Georgia and the South Sandwich Islands
○ Barbados	○ Gabon	○ Monaco	○ South Korea
○ Belarus	○ Georgia	○ Mongolia	○ South Sudan
● Belgium	○ Germany	○ Montenegro	○ Spain
○ Belize	○ Ghana	○ Montserrat	○ Sri Lanka
○ Benin	○ Gibraltar	○ Morocco	○ Sudan
○ Bermuda	○ Greece	○ Mozambique	○ Suriname
○ Bhutan	○ Greenland	○ Myanmar /Burma	○ Svalbard and Jan Mayen
○ Bolivia	○ Grenada	○ Namibia	○ Sweden
○ Bonaire Saint Eustatius and Saba	○ Guadeloupe	○ Nauru	○ Switzerland
○ Bosnia and Herzegovina	○ Guam	○ Nepal	○ Syria
○ Botswana	○ Guatemala	○ Netherlands	○ Taiwan
○ Bouvet Island	○ Guernsey	○ New Caledonia	○ Tajikistan
○ Brazil	○ Guinea	○ New Zealand	○ Tanzania
○ British Indian Ocean Territory	○ Guinea-Bissau	○ Nicaragua	○ Thailand
○ British Virgin Islands	○ Guyana	○ Niger	○ The Gambia
○ Brunei	○ Haiti	○ Nigeria	○ Timor-Leste
○ Bulgaria	○ Heard Island and McDonald Islands	○ Niue	○ Togo
○ Burkina Faso	○ Honduras	○ Norfolk Island	○ Tokelau

○ Burundi	○ Hong Kong	○ Northern Mariana Islands	○ Tonga
○ Cambodia	○ Hungary	○ North Korea	○ Trinidad and Tobago
○ Cameroon	○ Iceland	○ North Macedonia	○ Tunisia
○ Canada	○ India	○ Norway	○ Turkey
○ Cape Verde	○ Indonesia	○ Oman	○ Turkmenistan
○ Cayman Islands	○ Iran	○ Pakistan	○ Turks and Caicos Islands
○ Central African Republic	○ Iraq	○ Palau	○ Tuvalu
○ Chad	○ Ireland	○ Palestine	○ Uganda
○ Chile	○ Isle of Man	○ Panama	○ Ukraine
○ China	○ Israel	○ Papua New Guinea	○ United Arab Emirates
○ Christmas Island	○ Italy	○ Paraguay	○ United Kingdom
○ Clipperton	○ Jamaica	○ Peru	○ United States
○ Cocos (Keeling) Islands	○ Japan	○ Philippines	○ United States Minor Outlying Islands
○ Colombia	○ Jersey	○ Pitcairn Islands	○ Uruguay
○ Comoros	○ Jordan	○ Poland	○ US Virgin Islands
○ Congo	○ Kazakhstan	○ Portugal	○ Uzbekistan
○ Cook Islands	○ Kenya	○ Puerto Rico	○ Vanuatu
○ Costa Rica	○ Kiribati	○ Qatar	○ Vatican City
○ Côte d'Ivoire	○ Kosovo	○ Réunion	○ Venezuela
○ Croatia	○ Kuwait	○ Romania	○ Vietnam
○ Cuba	○ Kyrgyzstan	○ Russia	○ Wallis and Futuna
○ Curaçao	○ Laos	○ Rwanda	○ Western Sahara

○ Cyprus	○ Latvia	○ Saint Barthélemy	○ Yemen
○ Czechia	○ Lebanon	○ Saint Helena Ascension and Tristan da Cunha	○ Zambia
○ Democratic Republic of the Congo	○ Lesotho	○ Saint Kitts and Nevis	○ Zimbabwe
○ Denmark	○ Liberia	○ 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. **Fo r 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](#)

Main questions

1. Challenges to making products sustainable

1.A To what extent do you agree that the following **market-related** statements explain why products sold in the EU are not more sustainable?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / no opinion
a. Economic actors do not have adequate and reliable information on the sustainability of products	○	◉	○	○	○	○
b. Products such as electronics become obsolete quickly because of technological innovations	○	◉	○	○	○	○
c. Some products are designed for shorter term use due to changing fashion trends	○	○	○	○	○	◉
d. Many products are not designed to be easily repaired or upgraded	○	◉	○	○	○	○
e. Some products are designed to break down after a certain amount of time (planned obsolescence)	○	○	○	○	○	◉
f. Materials used in products are more and more complex and difficult to recycle	○	◉	○	○	○	○
g. Products do not sufficiently cover the costs of the harm that their production and use cause to the environment	○	○	○	○	○	◉
h. More sustainable products are often too expensive for households with lower incomes	○	◉	○	○	○	○
i. The cost of repairing a product is too high, in comparison with buying a brand new product	○	◉	○	○	○	○

j. For electronics, as well as for fashion products, there are not enough places where products can be repaired	○	○	○	○	○	◉
k. The quality of second hand goods cannot be guaranteed or is difficult to assess	○	○	○	○	○	◉

1.B To what extent do you agree that the following **policy-related** statements explain why products sold in the EU are not more sustainable?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / no opinion
a. There is no harmonized set of requirements to foster the sustainable design of products placed on the EU market	○	○	○	○	○	◉
b. There is no harmonized set of requirements to foster the sustainability of services provided in the EU	○	○	○	○	○	◉
c. Voluntary approaches, such as labelling, do not provide sufficient incentives for businesses to offer more sustainable products	○	◉	○	○	○	○
d. Diverging national rules and lack of a harmonized set of EU rules discourage large businesses, which operate across various EU Member States, from offering more sustainable products	○	◉	○	○	○	○
e. There are insufficient incentives to reward products based on their different sustainability performances	○	◉	○	○	○	○

1.C Other relevant market or policy-related challenges to making products more sustainable in the EU (please specify) and/or other comments you may have:

500 character(s) maximum

> OEMs needs to see there is a strong customer-facing value proposition & competitive edge for sustainability. Could be a mix of consumer education (and thus demand), legislation and perhaps incentives. However, this changes electronics business model, since annual sales / margins will be affected. On the other hand, as we move to more of service economy (PAAS), revenue emphasis is more on service subscription basis rather than hardware, so this assists the move to more sustainable hardware.

2. Measures to make sustainable products the norm

2.A *Design for sustainability - sustainability requirements for products*

As set out in the CEAP, the Commission intends to set product design rules and general product requirements to foster the overall sustainability of products in the EU. Among other aspects, these rules should cover:

- improving product durability, reusability, upgradability and reparability, addressing the presence of hazardous chemicals in products, and increasing their energy and resource efficiency;
- increasing recycled content in products, while ensuring their performance and safety;
- enabling remanufacturing and high-quality recycling;
- reducing carbon and environmental footprints;
- restricting single-use and countering premature obsolescence.

In your view, how effective would the following measures be in achieving these objectives? Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 high preference.

	1	2	3	4	5	I do not know/ no opinion
a. Set binding rules detailing, at product group level, what actions producers are obliged to take to improve their products' durability, reusability, upgradability and reparability (for example, for electronic/ICT products, setting a minimum number of cycles during which the battery must function properly)	○	○	●	○	○	○

Statement	1	2	3	4	5	6
b. Require producers/importers to prove that the design of their products respects the following prioritization: (**first preference**) that the product is capable of being reused/repaired/shared; (**second preference**) that the product is capable of being remanufactured/refurbished/upgraded; (**third preference**) that the product is capable of being recycled	○	○	○	●	○	○
c. Require producers/importers to prove that they have assessed possible causes of failures and addressed them, with a view to optimising product durability	○	○	○	○	●	○
d. Require producers/importers to prioritise modular design of their products, so as to facilitate repair, remanufacture, upgrade and disassembly (for example, for ICT products, batteries, screens and back covers should be removable in less than a defined number of steps).	○	○	○	●	○	○
e. Require producers/importers to ensure information on repairability is provided on or with a product	○	○	○	●	○	○
f. Require producers/importers to ensure information on access to repair services is provided on or with a product	○	○	●	○	○	○
g. Require producers/importers to offer product guarantees, which could include "commitment to free repair as first remedy" in case of failures and a "commitment to upgrade the product periodically"	○	○	○	●	○	○
h. Require producers/importers to display a repairability score on their products, in line with harmonized requirements at EU level, to facilitate comparison of product repairability	○	○	○	○	○	●
i. Require producers/importers to establish a repair network for their products	○	●	○	○	○	○
j. Require producers/importers to ensure information on a product's average expected lifespan is provided on or with a product	○	○	●	○	○	○
k. Require producers/importers to ensure information on the chemical content of a product is provided on or with a product	●	○	○	○	○	○
l. Ban the use of a substance or substances in a given product, should such substances be found to inhibit product recyclability	○	○	●	○	○	○
m. Require producers/importers to publish information on how they have prioritised materials that are safe and sustainable-by-design, and have substituted chemicals of concern with safer ones whenever possible	○	●	○	○	○	○

n. Require additional information to be made available on material sources, e.g. content in the product of critical raw materials and minerals from conflict-affected and high-risk areas	○	◉	○	○	○	○

2.B _Responsibility for information, including Digital Product Passport_

One of the options considered for a new Sustainable Products legislative Initiative is the development of digital 'product passport(s)', which would provide producers and other key supply chain actors, consumers and market surveillance authorities with information relevant for ensuring the sustainable management of a product (maintenance, repair, re-manufacturing, recycling, control of compliance, etc.).

2.B.1 In your opinion, what **information** should be collected as part of such a digital 'product passport'?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / no opinion
a. Economic actors at the origin of information (Manufacturer/Service provider/Retailer /Distributor/Recycler/ Providers of Repairability services)	○	●	○	○	○	○
b. List of materials and substances present in the product	○	●	○	○	○	○
c. Quantities of materials and substances present in the product	○	●	○	○	○	○
d. Recycled content of each material present in the product	○	●	○	○	○	○
e. Presence in the product of hazardous chemicals, and if so, their location	○	●	○	○	○	○
f. List of legislation and standards that the product complies with, or the technical specifications that it fulfils	○	●	○	○	○	○
g. Results of compliance tests against legislations, standards or technical specifications	○	●	○	○	○	○
h. Expected lifespan of the product	●	○	○	○	○	○

i. Information relevant for testing, dis-assembly, maintenance, repair or re-assembly (e.g. test protocol, disassembly process and instructions, etc.)	●	○	○	○	○	○
j. Information on safe use and instructions, where applicable	○	○	●	○	○	○
k. Information relevant to re-manufacture and spare parts (e.g. CAD technical drawings, 3D-printing files)	●	○	○	○	○	○
l. Information on Product Environmental and/or carbon footprint, or other relevant sustainability characteristics	○	●	○	○	○	○
m. Social conditions along the value chain (e.g. working and pay conditions; respect of human rights)	○	●	○	○	○	○
n. Information on the origin of product components	○	●	○	○	○	○
o. Information on material sources (e.g. conflict-free materials, responsible mining etc.)	○	●	○	○	○	○
p. Any possession of sustainability labels, such as the EU Ecolabel	○	●	○	○	○	○
q. Information on how the product should be recycled and/or handled at the end of life	●	○	○	○	○	○

2.B.2 In your view, what are the biggest **challenges** to ensuring a successful establishment and implementation of digital product passport(s)? Please select your top preferences from the list below.

at most 3 choice(s)

☐ a. Managing confidential data (for example making sure that information is only available to those entitled to access it)

☑ b. Minimising administrative burden by re-using data already uploaded on existing databases and ensuring their interoperability

☑ c. Managing the complexity of products and value chains and the quantity of data that is required to make such a passport effective

☐ d. Minimising the costs and environmental impacts involved in setting up a digital 'product passport'

☑ e. Ensuring the relevance and reliability of the information included in the passport

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2.C *Avoidance of destruction of unsold durable goods*

The Commission intends to ban the destruction of unsold durable goods (e.g. home appliances, textiles, electronic equipment etc.)

2.C.1 In your view, are there categories of products that should be excluded from this ban?

☐ a. Defective goods

☑ b. Goods not complying with relevant legislation

☐ c. Highly inefficient products

☐ d. Defunct accessories/spare parts of products no longer on the market

☑ e. Counterfeit products

☑ f. Products that pose a health or safety risk

☑ g. Products that are not usable after a certain date

2.C.2 What additional measures should be taken to decrease the amount of unsold goods in the EU, thereby complementing this ban?

at most 4 choice(s)

☑ a. Selling damaged products at a discounted price

☑ b. Fostering donation schemes

☑ c. Fostering reconditioning and remanufacturing schemes

☐ d. Fostering a producer 'duty of care', whereby producers take measures to ensure that products are not damaged during distribution, transport or storage

☐ e. Fostering greater transparency by producers regarding their product return rates and unsold goods policies

☑ f. Boosting more sustainable business models such as on-demand production

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2.D *Circular business models*

2.D.1 *Circular business model types*

2.D.1.a The ways in which businesses operate strongly influence how products are produced and consumed. The table below presents several (non-exhaustive) categories of circular business models, together with a brief description of them. How effective do you think these models can be in terms of encouraging more sustainable production and consumption patterns? Please rate from 1 to 5, with 1 denoting low impact and 5 high impact.

	1	2	3	4	5	I do not know / no opinion
a. Product-service systems (i.e. users do not buy the product from manufacturers/owners but rather the service associated with the product, e.g. car leasing. This means that the manufacturer/owner is responsible for repairing and maintaining the product, thus incentivizing better reparability and potentially longer lifespan of the product)	○	○	○	○	◉	○
b. Collaborative and sharing economy (i.e. where sharing of products replaces purchasing, e.g. for power tools or other products that consumers use only occasionally. As a result, less resources are used to satisfy the same needs)	○	○	○	◉	○	○
c. Reverse logistics (i.e. where the reverse transport of products, from consumer to producer, is arranged in view of repair or reuse. e.g. beer bottles or old phones)	○	○	○	◉	○	○
d. On-demand production (i.e. where the production of goods occurs only for those customers expressly requesting them, thus preventing overproduction and waste)	○	○	◉	○	○	○

2.D.1.b Other relevant circular business models not included in the list above (please specify):

500 character(s) maximum

2.D.2 *Challenges*

What in your view are the main **barriers** to successful deployment of more circular business models in the EU? Please rate from 1 to 5, with 1 denoting low importance and 5 high importance?

	1	2	3	4	5	I do not know / no opinion
a. The profitability of these business models is not viewed as sufficient, or is viewed as too high-risk	○	○	○	○	●	○
b. The initial investment costs and financial capital required to establish such business models are too high	○	○	○	●	○	○
c. Banks and investors are often unwilling to provide the credit and funding necessary to initially establish these business models	○	○	○	●	○	○
d. There is a lack of demonstrable success stories or large-scale projects demonstrating the business case for such business models	○	○	○	●	○	○
e. There is a lack of tools and methods to measure (long-term) benefits of circularity for businesses, including the financial benefits	○	○	●	○	○	○
f. There is insufficient proof of adequate consumer demand for these business models	○	●	○	○	○	○
g. Consumer awareness of and responsiveness to these business models are insufficient	○	○	●	○	○	○
h. There is a lack of training for entrepreneurs/potential entrepreneurs in how circular business models operate	●	○	○	○	○	○
i. There is a lack of the technical skills necessary to perform the functions required by these business models (repair; maintenance etc.)	○	●	○	○	○	○
j. These business models are more difficult for SMEs to adopt, e.g. given the initial investment costs	○	○	●	○	○	○

k. A clear regulatory framework to support such business models is missing	○	○	⦿	○	○	○

2.D.3 *Enabling circular business models*

Taking as examples the models mentioned above, how in your view can the EU best **enable or regulate circular business models**?

Please select the business model(s) for which you wish to provide a response, then indicate your preferences from the list(s) of options that appear:

- ☑ 1. Product-service systems
- ☐ 2. Collaborative and sharing economy
- ☐ 3. Reverse logistics
- ☐ 4. On-demand production

2.D.3.a Product-service systems: please select your top preferences (max 5) from the list below

at most 5 choice(s)

- ☐ a. Provide guidelines on the various EU funding instruments, opportunities and support mechanisms available to foster the creation of circular business models
- ☑ b. Strengthen maintenance and repair obligations for producers (such as on the ease of separating product parts; the availability of spare parts etc.) to encourage the adoption of these business models
- ☐ c. Foster increased collaboration amongst the circular business community and facilitate exchange of best practice/'lessons learnt'
- ☐ d. Develop tools and methods to better measure the (long-term) benefits and financial viability of circular business models
- ☐ e. Investigate the feasibility of harmonization at EU level of the certification of competence for professional repairers and other professionals involved in circular businesses
- ☐ f. Require large producers, who offer repair and other services 'in-house', to provide repair training programmes to independents, as well as training certification
- ☐ g. Set EU level targets related to adoption rates for circular business model
- ☑ h. Disseminate information on cost effectiveness of such models
- ☐ i. Introduce obligatory take-back schemes, to ensure products at end of life are less likely to become waste and can e.g. be reused or remanufactured

☑ j. Facilitate market access for circular innovations by decreasing administrative burden for new circular business models, e.g. by speeding up approval procedures for novel products and application to existing funding schemes, where appropriate

☑ k. Prioritize circularity as a criteria or as part of a reward system in use of public finances, e.g. by giving priority to circular business models in financing schemes and in formulation of public tenders

☐ l. Introduce a circularity certification/label/scoring system to promote circular business models

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2.E *Incentives for circularity*

Regulatory, market and reputational incentives are necessary to encourage more sustainable production and consumption patterns. The Commission is examining what the most effective measures in this respect are, and how products can be rewarded based on their sustainability performance.

In your view, how important are the following measures? Please rate the choices below from 1 to 5, with 1 denoting low preference and 5 high preference.

	1	2	3	4	5	I do not know / no opinion
a. Modulation of fees on the sustainability of products under Extended Producer Responsibility schemes (e.g. producers who place products that are more easily recyclable on the EU market pay reduced fees)	○	●	○	○	○	○
b. Recognizing voluntary commitments by producers to increase the sustainability of their products	○	○	○	○	●	○
c. Making better use of standardisation to promote sustainability	○	○	○	○	●	○
d. Increasing transparency on the performance of products as regards sustainability, for instance by identifying different levels of sustainability performance at EU level	○	○	●	○	○	○
e. Better use and promotion of voluntary sustainability labels, such as the EU Ecolabel	○	○	○	●	○	○
f. Improving access to finance for the production and consumption of more sustainable products	○	○	○	●	○	○

	1	2	3	4	5	I do not know / no opinion
g. Developing and implementing mandatory Green Public Procurement criteria and targets	○	●	○	○	○	○

2.F *Measures to make sustainable products the norm: other comments*

Other comments you may have relating to any of the sections covered in 'Question 2 – Measures to make sustainable products the norm':

500 character(s) maximum

> regulation and dissemination by EU to push manufacturers and consumers but ultimately (longer term) the manufactures and consumers must want to do this; so the longer term answer is in profitable business models, but that of course takes much more time and may not even happen without the short term 'push'. So the balance here between short and long term measures is key. Overall, there are many good ideas presented in this section.

3. Compliance with and enforcement of sustainability requirements for products

3.A Compliance with requirements and enforcement of sustainable product policy are crucial for achieving results. Enforcement can be carried out via market surveillance within the EU Single Market and via customs checks at its borders. Market surveillance is the responsibility of the Member States and was the object of the recently revised Regulation (EU) 2019/1020 of 20 June 2019 on market surveillance and compliance of products. How do you think the European Commission could contribute further to this dimension? Please rate from 1 to 5 each action presented in the table, with 1 denoting low importance and 5 high importance.

	1	2	3	4	5	I do not know / no opinion
a. Set verification targets for the products deemed most likely to be non-compliant (e.g. electronic gadgets)	○	○	○	●	○	○
b. Support Member States in the distribution of surveillance tasks per product category (e.g. Member State A responsible for construction materials; Member State B for heating & cooling equipment etc.)	○	○	○	○	○	●
c. Require third-party certification or inspection to simplify the work of Member State enforcement authorities	○	○	●	○	○	○

d. Accompanying measures from the European Commission to Member States (e.g. guidance, support etc.)	○	○	○	○	●	○
e. Create a central reporting point/website to enable consumers to provide feedback on products that do not meet their sustainability requirements	○	○	○	○	●	○

3.B According to your experience with the Ecodesign Directive (if any), are there any market surveillance issues related to the current Directive that you think need to be considered in a future Ecodesign legislation?

500 character(s) maximum

Optional additional comments

If you wish to add further information, comments or suggestions (relevant to the scope of this Public Consultation), please do so here:

2000 character(s) maximum

International open standards for product identification are really relevant to allow companies collecting and sharing product data. The sustainable product initiative should take them into account so to allow companies to structure product data in a meaningful way at both European and global levels.

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

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

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