



Industry calls for a product group specific approach to the Ecodesign's first Working Plan

In view of the finalisation of the first Ecodesign Working Plan, industry associations ranging from branded goods to furnitures recommend that **the European Commission takes a vertical approach by focusing on rules set on a product group basis.**¹ This is in line with the previous Ecodesign Directive's framework. As sustainability impacts vary across product categories, ecodesign requirements should be tailored to the unique characteristics of each product group and value-chain.² This is in line with the Commission's impact assessment³ and Executive Vice-President Stéphane Séjourné's plan to base industrial policy on a sector-by-sector approach.

Potential horizontal requirements covering different product groups, as the ones the Joint Research Centre (JRC) considered on durability, recyclability and recycled content, carry risks, as also highlighted by the JRC and the Commission impact assessment on ESPR:

- **Inadequate requirements.** To properly consider product groups' different functions and composition, the Commission must apply product-specific ecodesign requirements and tailored transition timelines – of no less than 24 months – reflecting the unique features of each product group.
 - **Durability – reliability requirements (eg minimum lifetime):** As recognised by the JRC⁴ potential horizontal requirements for reliability would be challenging, time consuming and costly due to the complexity of the measurement methodology. The lifespan of products such as bed mattresses, textiles and appliances varies depending on their purpose and exposure to environmental conditions.

¹ The scope of the product group should be determined on a case-by-case basis.

² As per the recently circulated discussion document on the ESPR workplan 2025-2030, we understand that it the Commission's intention that products covered by a vertical regulation will incorporate durability and reparability requirements in the context of their respective revisions. When it comes to the application of existing reparability, recyclability and recycled content studies, we therefore urge the Commission to incorporate the suggested requirements in product-specific legislations.

³ European Commission Staff Working Document, ESPR Impact Assessment, 30 March 2022, part 1/4, p. 23.

⁴ Joint Research Centre (JRC) – The JRC study, 'Ecodesign for Sustainable Products Regulation: Study on new product priorities', November 2024, p. 39. JRC recognises, 'the potential for horizontal reliability requirements horizontally is expected to be challenging'.

- Durability – reparability, upgradability and reusability: a product’s potential for repair depends on its nature, ie how components are assembled to ensure a product can function safely. While some product components can be repaired by consumers, others require professional repairers to avoid risks to consumer health. For instance, when a repair involves electricity, gas or electrical appliances in contact with water or when parts of furniture (e.g. gas springs in office chairs) are to be replaced by experts or are destined for specific environments (e.g. schools).
 - Recycled content: Recycled content targets should be set at the level of a specific product group, based on a case-by-case assessment. This is the case since not all product groups and materials can incorporate the same percentage of recycled content, given their specific needs in terms of performance or safety (eg products in contact with food, drinking water or skin).
 - Recyclability: To perform its function, every product group requires a different design, and material mix depending on the product’s purpose. There are very different ways on how to collect and recycle different kind of products. e.g. textile recycling is not comparable with recycling of electrical and electronic equipment. Given this huge variability, recyclability requirements can only be set at the product group- specific level. This is, for example, in line with the Packaging and Packaging Waste Regulation’s approach to define Design- for-Recycling criteria for specific packaging categories.
- **Overly vague requirements.** To apply to several product groups, horizontal requirements must be broad and generic, leading to legal uncertainty for companies about compliance. As noted in the Commission impact assessment on ESPR,⁵ Competent Authorities could interpret vague requirements differently, potentially leading to market fragmentation.⁶
 - **Inadequate assessment of trade-offs between different product parameters.** There are trade-offs between different product group parameters. For instance, reparability may come at the expense of lifetime, and recycled content may come at the expense of product durability or safety.⁶ When setting ecodesign rules, the Commission must assess such trade-offs so ecodesign measures have an overall positive environmental impact. Horizontal measures do not allow for the assessment of trade-offs.
 - **Slowing down the process.** As the JRC mentioned,⁷ it would likely take the Commission much longer to adopt horizontal requirements than product group specific requirements because horizontal requirements would need broader stakeholder consultation and might in the end lead to product- group specific rules under the horizontal measures. This would be a time-consuming process, as already shown by the Ecodesign Regulation on standby and off mode, which took several years to be adopted; a product group -specific approach enables the Commission to be more agile. In the same vein, the significant delay of the work on ecodesign for textiles exemplifies the challenges of regulating highly heterogenous product groups.
 - **Risk of double regulation and regulatory overlap.** With horizontal measures, products such as textiles, toys or a great variety of packaged products may be covered by both product group-specific measures and horizontal measures, increasing the risk of conflicting or overlapping rules.

⁵ “General horizontal rules would be unlikely to solve the problems identified and are clearly inferior to product specific rules, which can be tailored to the characteristics of the products and the sustainability issues pertaining to them.”⁴ European Commission Staff Working Document, ESPR Impact Assessment, 30 March 2022, part 1/4, p. 23.

⁶ [Letta report](#).

⁷ See JRC study, p. 39. As the JRC study also highlights, horizontal measures – for instance, reliability – have ‘challenges and limitations, meaning that the policy making efficiency of developing a horizontal requirement on this aspect would depend on the ability to accommodate product-specific considerations under the same Act.

Based on the above, the European Commission must implement the ESRP through product group-specific measures that can be better tailored to the specificities of each product group and allow for precise rules that provide legal certainties to economic operators, while avoiding regulatory overlaps. This is coherent with the Commission's impact assessment and the new EU Commission's priorities on Competitiveness and the Clean Industrial Deal.

List of signatories



AIM, The European Branded Goods Association



AmCham EU, The American Chamber of Commerce to the European Union



Applia, Home Appliance Europe



AISE, International Association for Soaps, Detergents and Maintenance Products



Cefic, The European Chemicals Industry Council



CEPE, The European Council of the Paint, Printing Ink and Artist's Colours Industry



Cosmetics Europe, The Personal Care Association



DigitalEurope, The Association for Digitally Transforming Industries in Europe



EDANA, The Global Association and Voice of Nonwovens and Related Industries



EFIC, European Furniture Industries Confederation



EHI, European Heating Industry



Europen, The European Organisation for Packaging and the Environment



Federation of the European Sporting Goods Industry

FESI, Federation of the European Sporting Goods Industry



KEA, Korea Electronics Association



TIE, Toy Industries of Europe