

Orgalim **Policy Exchange**

# Sustainable Products and Digital Product Passports

1 June 2022 | 10.30 – 12.00 | Virtual event

# Orgalim Policy Exchange: *Sustainable Products and Digital Product Passports*

1 June 2022 | Partner Event of the EU Green Week

## Welcome

Stéphanie Mittelham  
Manager Energy and Environment,  
Orgalim – Europe’s Technology Industries



## Before we start...

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- The event is recorded and will be shared afterwards
- All attendees are muted
- It is not possible to ask questions in the chat but there will be polls to know more on the audience background knowledge and opinion
- You will find in the Handouts section a copy of the agenda, speakers' bios and the latest new Orgalim Position Paper about the proposed Ecodesign for Sustainable Products Regulation

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# Orgalim at a glance

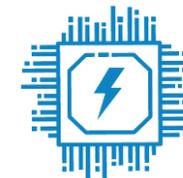
## Who we are



Mechanical  
Engineering



Metal  
Technology



Electrical Engineering,  
Electronics, ICT

## Our purpose

We are shaping a future that's good

## What we do

Orgalim is the foremost voice of Europe's technology industries at the EU level, working with policymakers to strengthen their sectors' growth and global leadership, maximise their contribution to Europe's economy and society and foster a new relationship of trust between businesses and citizens

## What we represent

Annual turnover  
**2,480**  
billion EUR

Direct employment  
**10.97**  
million people

Annual exports  
**664**  
billion EUR

Our industries comprise of  
**770,000**  
companies  
the vast majority of which are  
SMEs and microbusinesses

# Orgalim membership

48 Member Associations, 8 Corporate Members, 22 Countries



## National Associations

**Austria**  
FMTI 

**Belgium**  
AGORIA 

**Croatia**  
Croatian Chamber of Economy  
HUP 

**Denmark**  
DI 

**Finland**  
Technology Industries of Finland 

**France**  
FIEEC    
FIM

**Germany**  
VDMA    
WSM  
ZVEI 

**Great Britain**  
BEAMA   
GAMBICA 

**Hungary**  
MAGEOSZ 

**Ireland**  
Ibec 

**Italy**  
ANIE   
ANIMA 

**Latvia**  
MASOC 

**Lithuania**  
LINPRA 

**Luxembourg**  
FEDIL Metal 

**The Netherlands**  
FME    
METAALUNIE

**Norway**  
Norsk Industri 

**Portugal**  
AIMMAP 

**Slovenia**  
GZS-CCIS 

**Spain**  
SERCUBE 

**Switzerland**  
SWISSMEM 

**Sweden**  
TEKNIKFÖRETAGEN 

## Associate members

**Turkey**  
MAKFED 

## Sector Associations

AFECOR    
AQUA  
CECAPI    
CECE  
CEIR   
CEMA   
CEMEP    
CEO   
C.E.F.A.C.D.   
EFCEM   
EGMF  
EUNITED    
EURALARM  
EUROPACABLE    
EUROPUMP  
FARECOGAZ    
FEM  
PNEUROP    
T&D Europe

## New – Orgalim for Corporates

AMAZON   
EATON   
FASTEMS   
PEPPERL+FUCHS   
PHOENIX CONTACT   
SCHNEIDER ELECTRIC   
SIEMENS   
TEXAS INSTRUMENTS 

# 6 Orgalim is very active on Circular Economy & sustainable products

2-Jun-22

**orgalim** HOME ABOUT ORGALIM OUR INDUSTRIES POLICY SERVICES TO CLIENTS NEWS & EVENTS RESOURCE CENTRE

**Orgalim Policy Exchange**

**The Sustainable Products Initiative and EU Digital Product Passport**

29 June 2021 | 10.00 – 11.30 | Virtual event

**orgalim** EUROPE'S TECHNOLOGY INDUSTRIES

19 **Orgalim webinar on Circular Economy, 15<sup>th</sup> October 2020** 8-Nov-21

**European Industrial Strategy In Focus**

A series of interactive expert debates to discuss the questions of EU industrial strategy

**A Circular Economy supporting Europe's Green Deal climate ambition**

15 October 2020

**Orgalim Policy Exchange**

**The Sustainable Products Initiative and EU Digital Products Passport**

<b>Dr. Benedikt Branken</b> Director R-Cycle Initiative	<b>Louise Bünemann</b> Vice-Chair Orgalim Environmental Sustainability Working Group; Senior Advisor at Danish Industries	<b>Michele Galatola</b> Policy Officer, DG GROW, European Commission	<b>Jesper Jerlang</b> Standardisation Manager, Danfoss Drives A/S	<b>Kati Palomaa</b> Manager Sustainability and Analytics, Konecranes Global Corporation	<b>Prof. Dr. Dieter Wegener</b> Chairman of ZVEI Industrie 4.0 Management Circle	<b>Paola Zanetti</b> Senior Expert – Legal Officer, DG GROW, European Commission
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**Product Cycle**  
Rethink, Redesign, Upgrade, Maintain, Repair, Refurbish, Remanufacture, Repurpose, Reduce

**Material Cycle**  
Recovery (Reuse/ Materials), Reuse and Reversed Logistics, Collection, Recycling

**The New Circular Economy Action Plan - paving the way to a more Sustainable Europe**

Brussels, 15 October 2020

European Commission President Ursula von der Leyen has made it a core mission of her mandate for the "EU to lead the transition to a healthy planet". The new **Circular Economy Action Plan**, adopted by the Commission on 11 March 2020, marks a major step towards that goal. Indeed, the new Circular Economy Action Plan – one of the main blocks of the European Green Deal – will play a crucial role in achieving the Green Deal's overarching aim of making Europe climate-neutral by 2050 and can help to drive an industrial renaissance for a clean planet for all (see Orgalim's Green Deal position [2020](#)).

Representing Europe's technology industries, providing innovative solutions which can unlock a greener, healthier and more prosperous future for the EU and its citizens, Orgalim welcomes the new Circular Economy Action Plan for a cleaner and more competitive Europe. Optimising the circular use of resources throughout the economy is a key vector for minimising the environmental impacts of the EU economy. It makes environmental and economic sense and contributes to climate mitigation and renewing EU industrial global leadership. The co-benefits of achieving carbon neutrality in a wider resource efficiency agenda should contribute to meeting this goal in a faster and cost-efficient manner. Coupled with the possibilities of digitalisation and data analysis, a circular economy creates space for new business models and enables the optimisation of energy and resource use throughout the life cycle.

In this strategic paper Orgalim provides a summary of the key areas for consideration for Europe's technology industries and Orgalim's main recommendations on the new Circular Economy Action Plan. Further information can be found in Orgalim's detailed **Position Paper**, which provides our detailed views and recommendations on the various initiatives announced in the new Circular Economy Action Plan along the entire life cycle of products, targeting, for example, their design, promoting circular economy processes, fostering sustainable consumption, and aiming to ensure that the resources used are kept in the EU economy for as long as possible.

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# EU Green Week 2022

**EU Green Week 2022 will take place from 30 May to 5 June 2022.**

EU Green Week is an annual opportunity to debate European environmental policy with policymakers, leading environmentalists and stakeholders from Europe and beyond. This year's edition focuses on the European Green Deal - the EU's sustainable and transformative growth strategy for a resource-efficient and climate-neutral Europe by 2050.



Environment

Home > EU Green Week 2022



**EU Green Week 2022**

EU Green Deal - Make it Real

# Agenda for today's Policy Exchange

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10:30 - 10:35

Welcome, introduction, and opening remarks by the moderator **Stéphanie Mittelham**, Manager Energy and Environment, Orgalim, Europe's Technology Industries.

10:35 - 10:40

Online polls

10:40 - 11:00

**Keynote from Michele Galatola**, Policy Officer, DG GROW, European Commission

11:00 - 11:05

Online polls

11:05 - 11:25

**Statements & questions from Orgalim and ECOS**, and response from the Commission

- **Louise Bünemann**, Chair of Orgalim Environmental Sustainability Working Group and Head of EU Environmental Policy at the Confederation of Danish Industries
- **Margaux Le Gallou**, Programme Manager, ECOS, the Environmental Coalition on Standards

11:25 - 11:35

**Presentation of Finnish Pilot Project on DPP by Jussi Mäkinen**, Director EU Regulation, Technology Industries of Finland and reaction from the Commission

11:35 - 11:57

**Q&A session** between panellists

11:57 - 12:00

**Closing remarks**

# Orgalim Policy Exchange: *Sustainable Products and Digital Product Passports*

1 June 2022 | Partner Event of the EU Green Week

## Time for polls





## Orgalim Policy Exchange: *Sustainable Products and Digital Product Passports*

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# Keynote speech

Michele Galatola, Policy Officer  
European Commission, DG GROW



# Ecodesign for Sustainable Products Regulation (ESPR) and Digital Product Passport (DPP)

*Michele GALATOLA  
DG GROW – I3 Circular and Green  
Economy Unit*



# Sustainable products package

## Complementary sectoral rules

on construction and other product categories  
(e.g. batteries, chemicals, packaging)

## Ecodesign Working Plan 2022-2024

- Higher energy efficiency and circularity for energy-related products
- New rules for consumer electronics (smartphones, tablets, solar panels)

## Strategy for Sustainable and Circular Textiles

- Binding eco-design requirements, incl. durability, reparability, and recycled fibre content
- Stop microplastics pollution
- Tackle fast fashion, textile waste, and the destruction of unsold products
- Accurate green claims
- Sustainable global value chains

## Ecodesign for Sustainable Products Regulation

- Performance and information requirements for greener products
- Tackle the destruction of unsold goods
- Waste prevention and reduction
- Mandatory criteria for green public procurement
- Digital Product Passport and new labelling rules
- Stronger market surveillance

## Support for circular business models

- European circular business hub
- Guidance to businesses

## New rules to empower consumers for the green transition

- Protection against greenwashing and the deliberate planning or design of products with limited lifespans
- Information on product durability and reparability

## Global action

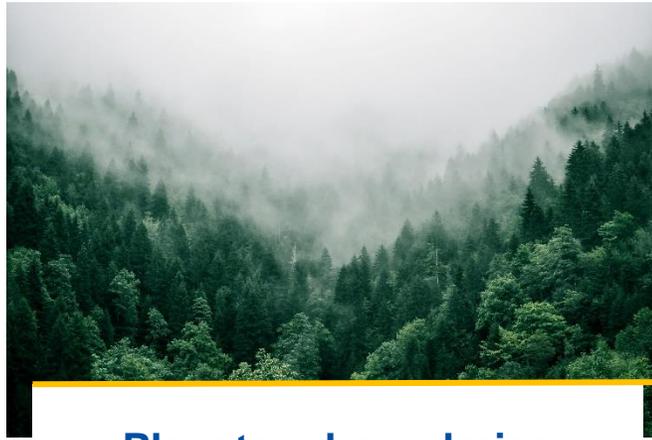
- Corporate sustainability due diligence
- Global sustainable consumption and production forum

# Why is ESPR needed?



## Inefficient use of resources

- Global extraction of **materials tripled** since 1970; **waste generation** set to increase **70%** by 2050;
- Over **90% of biodiversity loss and water stress** from resource extraction and processing
- High strategic and **material dependency**



## Planetary boundaries exceeded

- EU has less than 10% of world population, yet its **consumption-based impacts are close to or exceed boundaries** for climate change, particulate matter, land use and mineral resources (Sala et al, 2020)



## Missed business opportunities

- EU industry still accounts for **20% of the EU's greenhouse gas emissions**
- **Demand for recycled materials remains low**

# How will ESPR work?

## Extending the Ecodesign approach



### Scope extension

Moving beyond energy-related products to a wide product scope



### New requirements

Plus clarification of existing requirements



### Horizontal approach

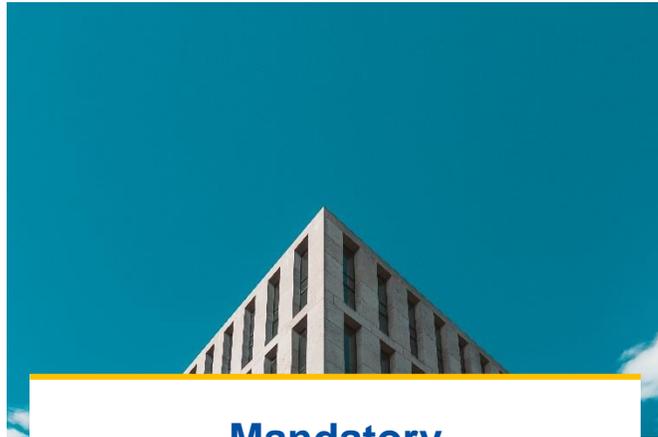
Now allowed for in addition to product-specific requirements



### Increased focus on product information

e.g. Digital Product Passport; labels

# Other tools provided by ESPR



## **Mandatory Green Public Procurement**

ESPR will enable mandatory GPP criteria to be set in delegated acts for public contracting authorities



## **Prevention of destruction of unsold consumer goods**

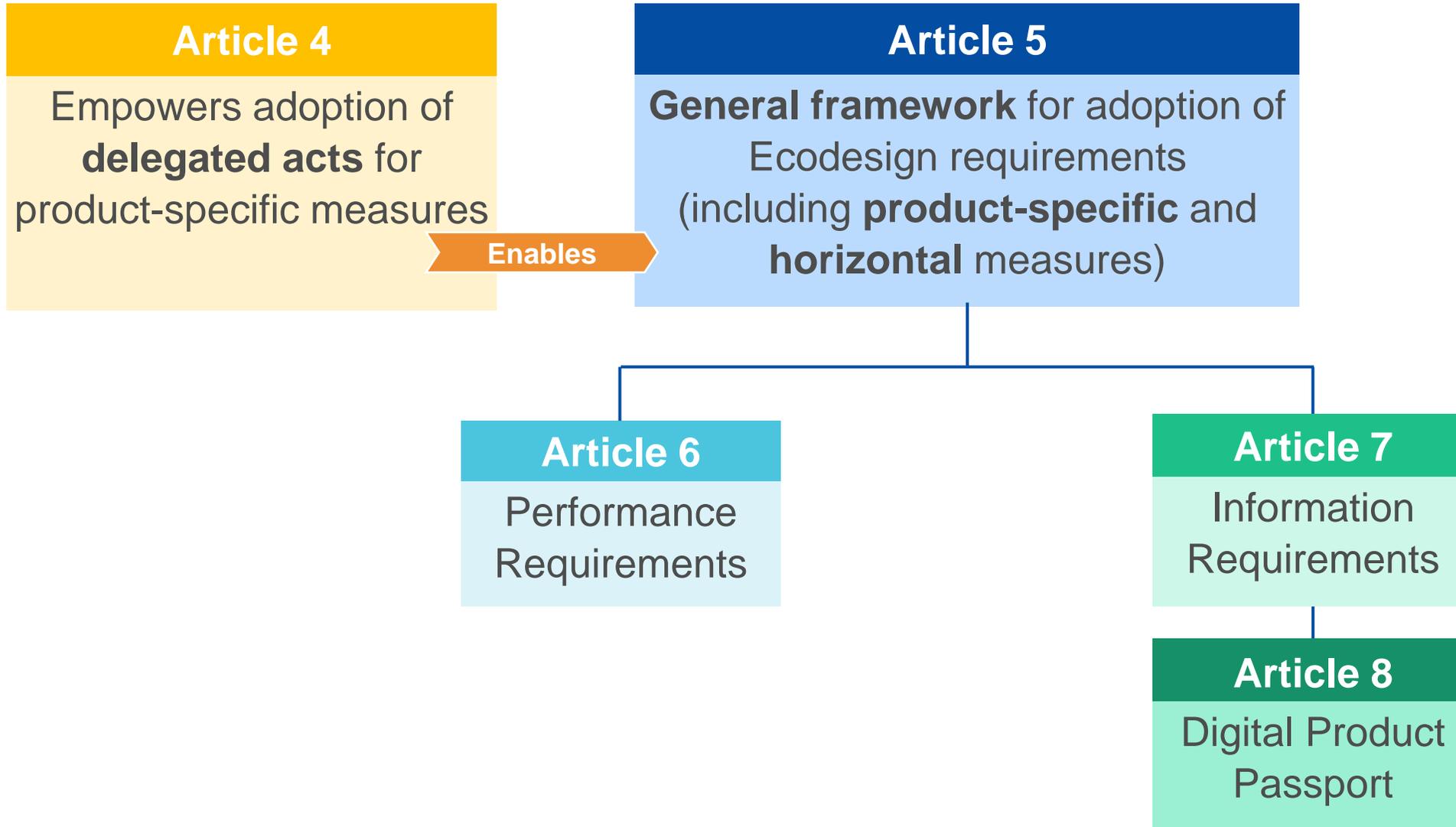
Transparency requirements for those choosing to discard unsold goods, and possibility to ban their destruction for relevant product groups.



## **Market surveillance and customs controls**

Reinforcing controls on regulated products, including market surveillance implementing plans, possible targets on checks, support to common projects and investments

# Proposed ESPR



# Key product aspects under ESPR

- Durability
- Reliability
- Reusability
- Upgradability
- Repairability
- Possibility of maintenance and refurbishment
- Presence of substances of concern
- Energy use or energy efficiency
- Resource use or resource efficiency
- Recycled content
- Possibility of remanufacturing and recycling
- Possibility of recovery of materials
- Environmental impacts, including carbon and environmental footprint
- Expected generation of waste materials

# The EU Digital Product Passport (DPP)



Internal Market

## WHAT

*A structured collection of product related data with predefined scope and agreed data ownership and access rights conveyed through an **unique identifier***

## HOW

***Decentralised** system with a central registry*

## SCOPE

*Information related to sustainability, circularity, value retention for re-use/remanufacturing/recycling*

# ESPR

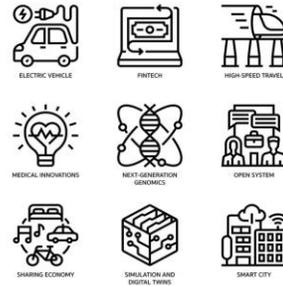
## Digital Product Passport (DPP)



Tracking of **raw materials extraction/production**, supporting due diligence efforts



Benefit **market surveillance authorities and customs authorities**, by making available information they would need to carry out their tasks



Enable **manufacturers** to create products **digital twins**, embedding all the information required



Make available to **public authorities and policy makers** reliable information. Enable to link **incentives** to **sustainability performance**



Tracking the life story of a product, enabling services related to its **remanufacturing, reparability, re-use/re-sale/second-life, recyclability**, new business models



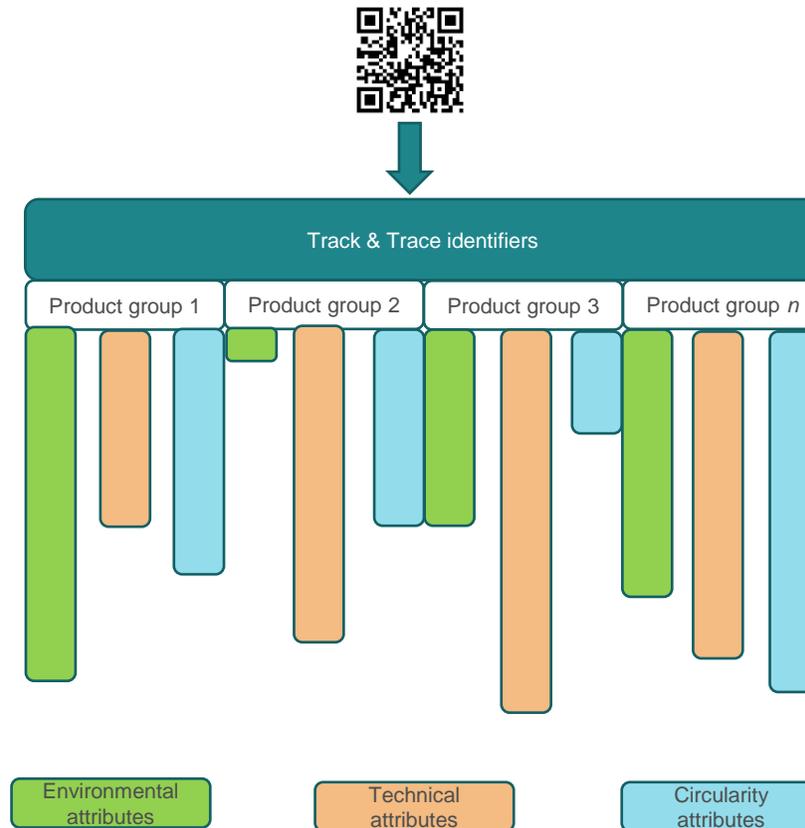
Allow **citizens** to have access to **relevant and verified information** related to the characteristics of the products they own or are considering to buy/rent (e.g. using apps able to read the identifier)

# DPP

## Working principles

The economic operator responsible for placing the product on the market fills in all the information required in the corresponding delegated act

A master data is created as part of the delegated act preparatory study. It includes the structure and template of the DPP for that specific product group



### Possible Track & Trace identifiers

- Economic operator's name, registered trade name
- Global Trade Identification Number or equivalent
- TARIC code
- Global location number
- Authorised representative
- Reference of the back-up data repository
- ...

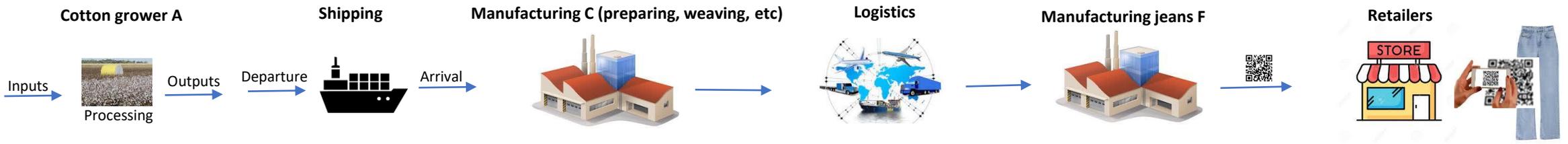
### Example of potential attributes

- Description of the material, component, or product
- Recycled content
- Substances of concern
- Environmental footprint profile
- Classes of performance
- Technical parameters
- Bill of materials (if relevant)
- Manuals
- Labels
- ...

# DPP

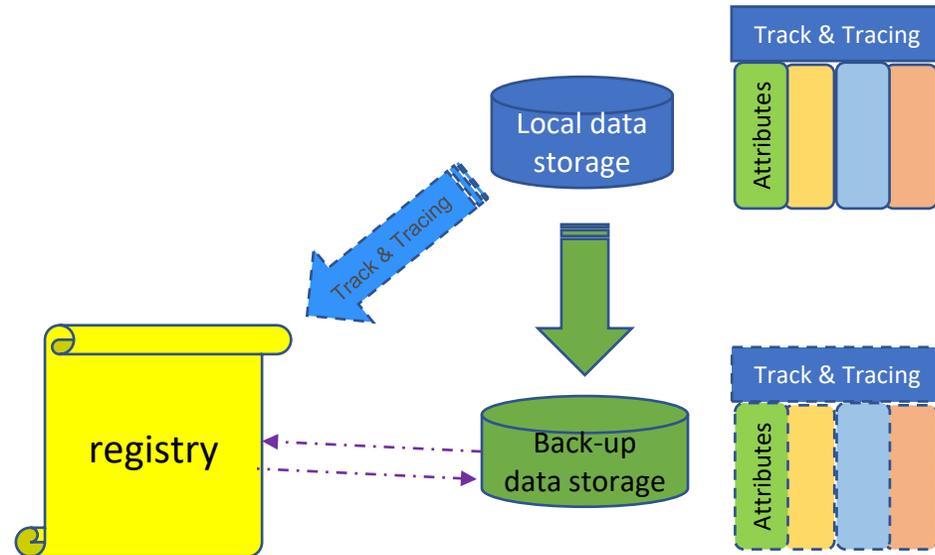
## Working principles

The economic operator organises the information in his/her own web-page and store it on an own server or through an external service provider (the external service provider may always be needed to guarantee an independent back-up storage location)



Only the Track & tracing information is transferred to the registry managed by the Commission. All the attributes (including the more confidential information) remains with the economic operator.

In case of bankruptcy liquidation, cessation of activity or in any other case in which the data are not accessible from the economic operator's own data storage, then the Commission and enforcement authorities can access (all) the data from the (decentralized) back-up data storage



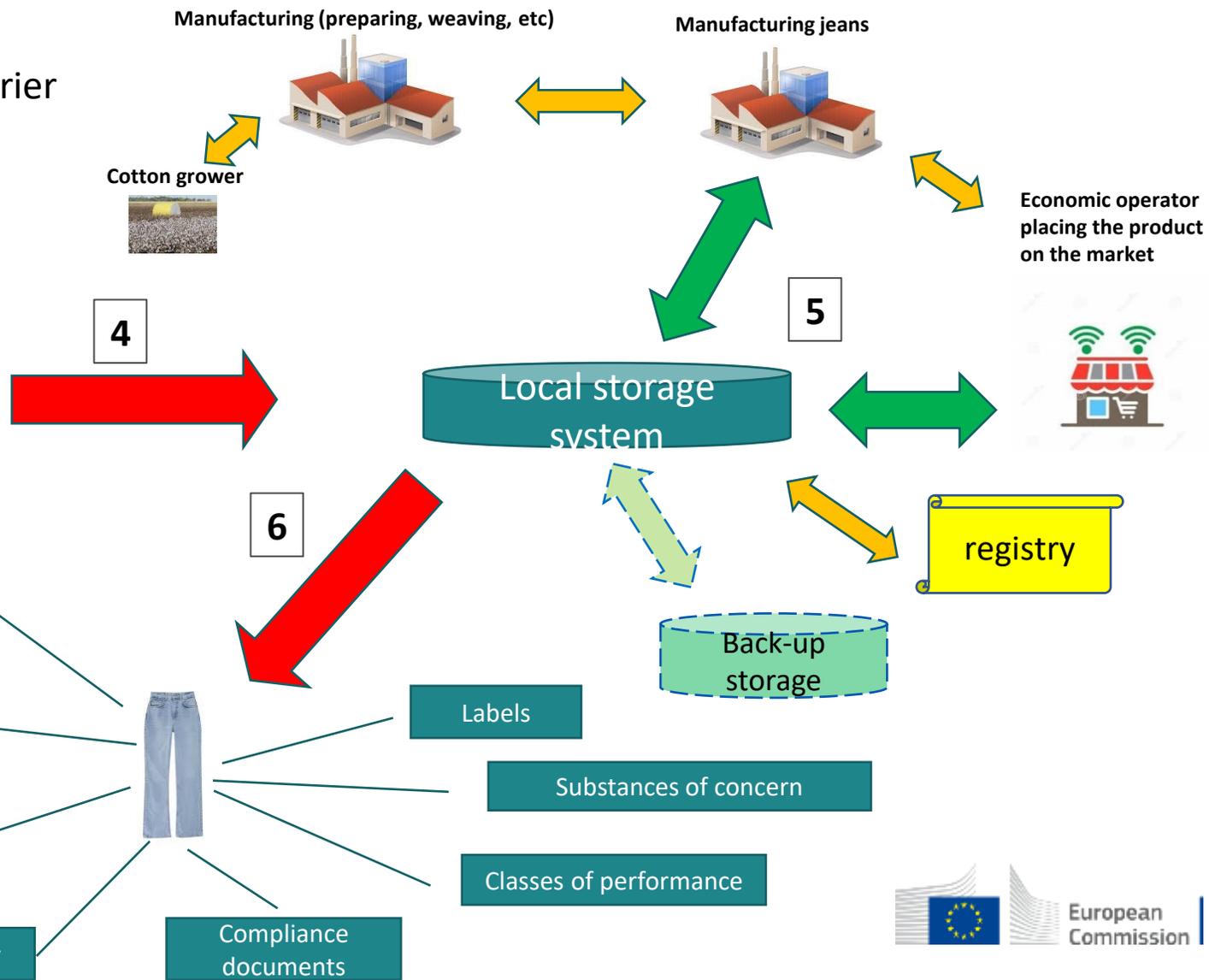
# DPP

## Working principles

Access to information is enabled through a data carrier and the corresponding unique identifier



2  
<https://{domain}/identifier1>



# ESPR

## Digital Product Passport (DPP)

There are 3 'milestones' introduced ahead of the full operationalisation of the DPP:

1. Regulation: Introduction of the DPP **concept**, description of the **scope**, identification of some **key features**.
2. Identification of **essential technical requirements** to be developed through standardisation process. A safety clause is introduced in case of delays or if the quality of the standards is not 'fit for purpose'. In such case the Commission shall adopt **common specifications** with the technical requirements needed.
3. Delegated acts: Identification of the **specific information** to be included in the DPP for each product or product group.

DPP mandatory for all products for which there is a delegated act

# Key features already included in the ESPR regulation

- **No proprietary solutions:** All information included in the product passport shall be written in an **open, standard, inter-operable format** and shall be machine-readable, structured, and searchable, in accordance with the essential requirements included in Article 9.
- **Granularity:** The information included in the product passport shall refer to the product **model** (e.g. iPhone 13), **batch** (e.g. iPhone 13, produced in factory XYZ), or **item** (e.g. iPhone 13, serial number 123456789) as specified in the applicable delegated act referred to in Article 5(1).
- **Access rights ('need-to-know')**: the access to information included in the passport shall be regulated in accordance with the essential requirements included in Article 9. The specific access rights at product group level will be identified in the applicable delegated act referred to in Article 5(1).
- **Liability:** The **economic operator** placing the product on the market is responsible for making available the EU DPP and for the information included therein.
- **Track & tracing:** Article 11 specifies that unique **operator** identifiers and unique **facility** identifiers may be requested. These are key information component to allow the track & tracing of information along the supply chain

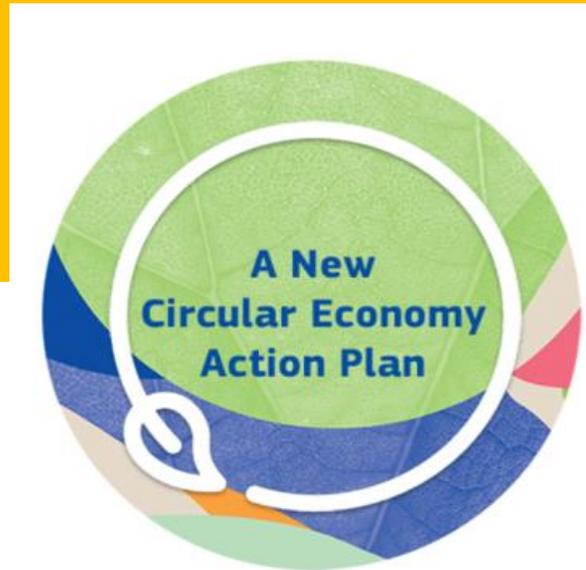
# ESPR

## Digital Product Passport (DPP)

International or European **Standards** will be needed at least in the following areas:

- Data carriers and unique identifiers
- Access rights management
- Interoperability (technical, semantic, organisation), including data exchange protocols and formats
- Data storage
- Data processing (introduction, modification, update)
- Data authentication, reliability, and integrity
- Data security and privacy

# Thank you



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## Orgalim Policy Exchange: *Sustainable Products and Digital Product Passports*

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# Time for polls

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# Statements and questions from Orgalim and ECOS





## Orgalim Policy Exchange: *Sustainable Products and Digital Product Passports*

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# Statements and question from Orgalim

**Louise Bünemann**, Chair of Orgalim  
Environmental Sustainability Working Group  
and Head of EU Environmental Policy at the  
Confederation of Danish Industries

# Orgalim welcomes the ESPR

Orgalim represents Europe's technology industries, providing innovative technology solutions which are underpinning the twin green and digital transitions and can unlock a greener, healthier and more prosperous future for the European Union and its citizens. Our industries welcome the Ecodesign for Sustainable Products Regulation as a key measure to further optimise the way resources are used throughout the economy and society as well as bringing new business opportunities – a win-win for the environment and the economy, making the most of new digital solutions.



# What we support: the principles



## WHAT WE SUPPORT: THE PRINCIPLES

- The contribution to the circular economy, a functioning internal market, a level playing field and ensuring effective enforcement and market surveillance system
- The approach and the legal framework: the Ecodesign instrument, product by product rules, harmonised EU requirements, industry involvement and harmonised standards
- The potential benefits of the Digital Product Passport, economic incentives for circularity and the principle of a ban on the destruction of unsold durable goods



# What concerns us: how it will work in practice



## WHAT CONCERNS US: HOW IT WILL WORK IN PRACTICE

- Protection of confidential business data, data within the scope of the Digital Product Passport and interplay with other legislation
- Duplication of efforts and double regulation, in particular for chemicals
- Implementation with a disproportionate impact on the competitiveness of economic actors (third party verification, regulation of components and non-enforceable requirements)



# For more details...please see our new Position Paper

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**orgalim**  
EUROPE'S TECHNOLOGY INDUSTRIES



**POSITION PAPER**

Brussels, 1 June 2022

**Position and recommendations from Europe's technology industries on the proposed Ecodesign for Sustainable Products Regulation**

Orgalim represents Europe's technology industries, providing innovative technology solutions which are underpinning the twin green and digital transitions and can unlock a greener, healthier and more prosperous future for the European Union and its citizens. Our industries [welcome](#) the Ecodesign for Sustainable Products Regulation as a key measure to further optimise the way resources are used throughout the economy and society as well as bringing new business opportunities – a win-win for the environment and the economy, making the most of new digital solutions.

 <b>WHAT WE SUPPORT: THE PRINCIPLES</b>	 <b>WHAT CONCERNS US: HOW IT WILL WORK IN PRACTICE</b>
<ul style="list-style-type: none"> <li>• The contribution to the circular economy, a functioning internal market, a level playing field and ensuring effective enforcement and market surveillance system</li> <li>• The approach and the legal framework: the Ecodesign instrument, product by product rules, harmonised EU requirements, industry involvement and harmonised standards</li> <li>• The potential benefits of the Digital Product Passport, economic incentives for circularity and the principle of a ban on the destruction of unsold durable goods</li> </ul>	<ul style="list-style-type: none"> <li>• Protection of confidential business data, data within the scope of the Digital Product Passport and interplay with other legislation</li> <li>• Duplication of efforts and double regulation, in particular for chemicals</li> <li>• Implementation with a disproportionate impact on the competitiveness of economic actors (third party verification, regulation of components and non-enforceable requirements)</li> </ul>

SHAPING A FUTURE THAT'S GOOD

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## Orgalim Policy Exchange: *Sustainable Products and Digital Product Passports*

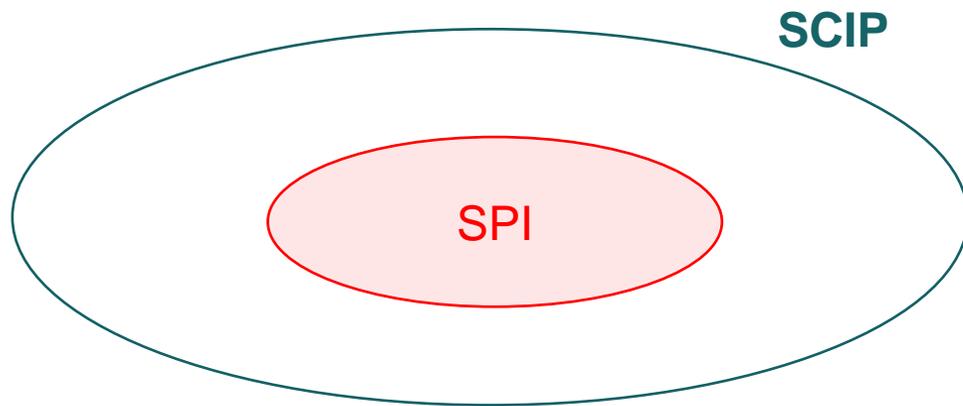
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# Response from the Commission

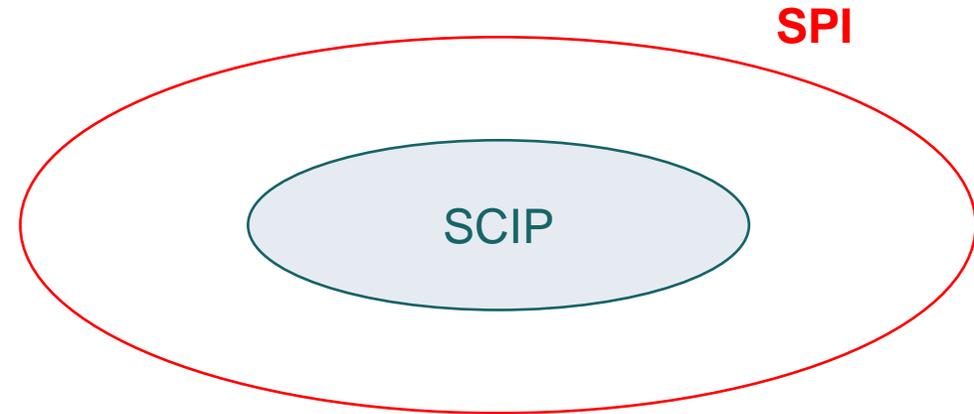
**Michele Galatola**, Policy Officer  
European Commission, DG GROW

# DPP and SCIP

Product groups



Chemicals



Moreover:

Data in SCIP are collected at **batch** level. Data in DPP may be requested at **model**, **batch**, or **item** level

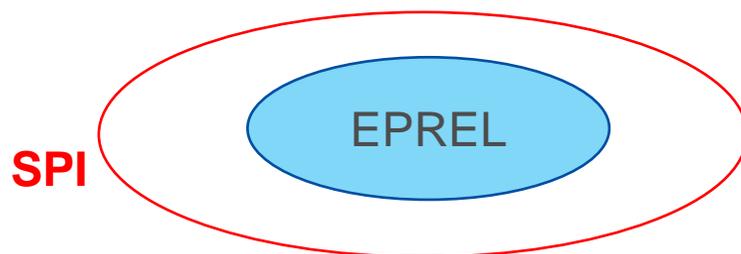
# Comparison with EPREL (1)

## DPP

- information required by the applicable delegated acts based on Article 7 (e.g. recycled content, chemical content, etc);
- relevant commodity codes, such as a TARIC code as defined in Council Regulation (EEC) No 2658/87;
- existing compliance documentation and information required by other EU legislation applicable to the product, such as the declaration of conformity, technical documentation or conformity certificates;
- information related to the manufacturer and, when relevant, to the supply chain.

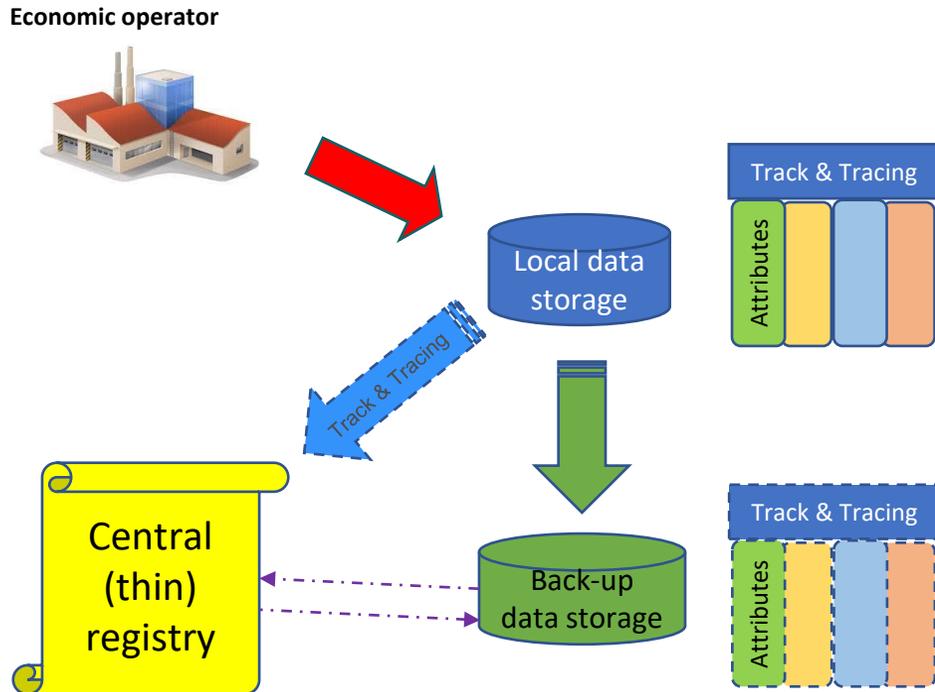
## EPREL (example of electronic displays)

- Supplier and model information
- Energy efficiency class and power consumption for SDR and HDR (if available) modes
- Power consumption of low power modes (standby, off mode and networked standby)
- Information on screen size, resolution and size ratio
- Information on technical characteristics
  - Panel technology, availability of Automatic Brightness Control, availability of voice recognition and room presence sensor, image refresh frequency rate (Hz)
- Minimum guaranteed availability of spare parts and software/firmware updates
- Minimum guaranteed product support
- Minimum duration of guarantee
- Information on External Power Supply (including on standardised compatible external power supply)
- existing compliance documentation (i.e. technical documentation), link to ICSMS

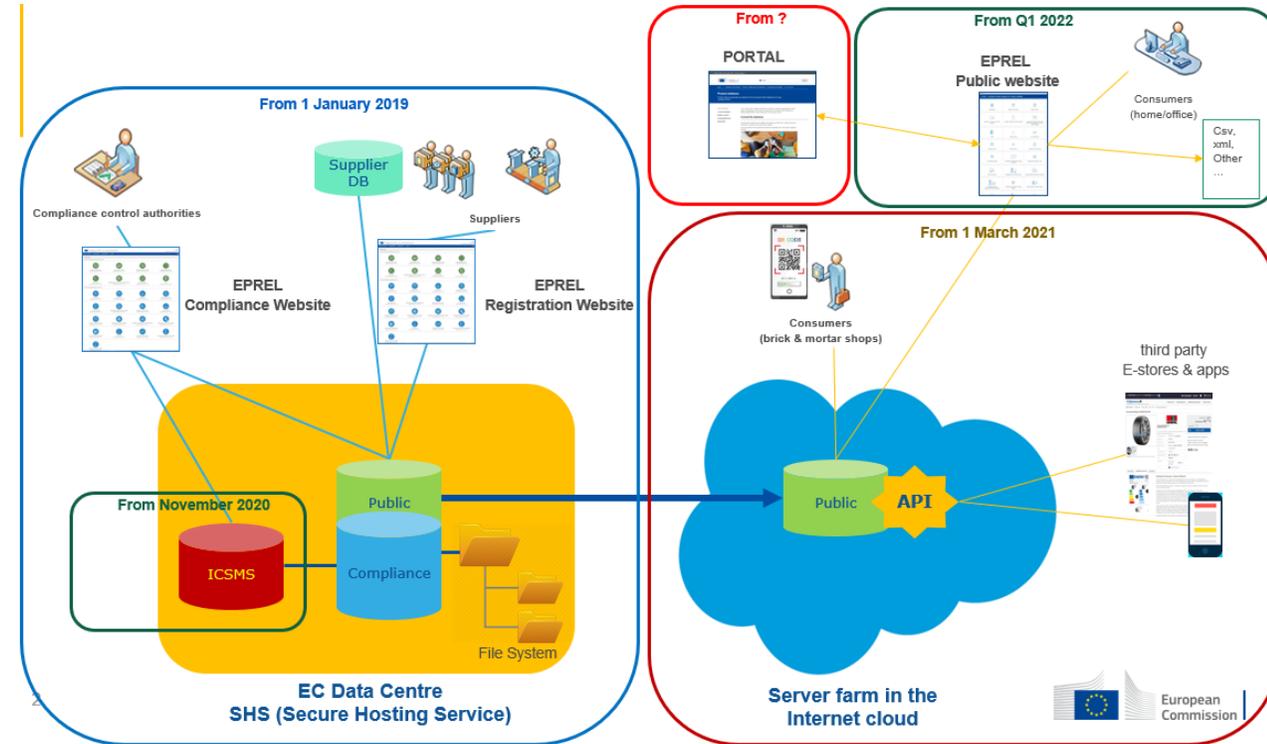


# Comparison with EPREL (2)

## DPP - decentralised



## EPREL - centralised





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# Statements from ECOS

Margaux Le Gallou, Programme Manager, ECOS,  
the Environmental Coalition on Standards

# ECOS

## Environmental Coalition on Standards

is an international NGO with a network of members and experts advocating for environmentally friendly technical standards, policies, and laws.



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## ECOS MEMBER ORGANISATIONS

### National member organisations

#### Austria

- Umweltdachverband
- Global 2000

#### Belgium

- Bond Beter Leefmilieu Vlaanderen (BBLV)
- Inter-Environnement Wallonie (IEW)
- RepairTogether
- Repair & Share

#### Bulgaria

- Institute for Ecological Modernisation (IEM)

#### Croatia

- DOOR – Society for Sustainable Development Design

#### Czech republic

- Zelený Kruh (Green Circle)

#### Cyprus

- Terra Cypria – The Cyprus Conservation Foundation

#### Denmark

- The Danish Society for Nature Conservation (DN)
- Danish Ecological Council (Det Økologiske Råd)

#### France

- Zero Waste France
- Women in Europe for a Common Future (WECF-France)
- Halte à l'Obsolescence Programmée (HOP)
- CLER – French Energy Transition Network
- Ethikis

#### Germany

- Bund Für Umwelt und Naturschutz Deutschland (BUND)
- Bundesverband Bürgerinitiativen Umweltschutz (BBU)
- Deutscher Naturschutzring (DNR)
- Nature Friends Germany (NaturFreunde Deutschlands)
- Deutsche Umwelthilfe
- Runder Tisch Reparatur

#### Greece

- Ecocity Greece

#### Hungary

- Clean Air Action Group (CAAG)

#### Italy

- Legambiente
- Giacimenti Urbani

#### Ireland

- Community Reuse Network Ireland (CRNI)

#### Latvia

- Friends of the Earth Latvia (Zemes Draugi)

#### Lithuania

- Žiedinė ekonomika

#### Luxembourg

- The Luxembourg Ecological Center (Oekozenner Lëtzebuerg)

#### Netherlands

- Stichting Natuur en Milieu (SNM)
- Leefmilieu

#### Norway

- BELLONA Norway

#### Poland

- Polish Foundation for Energy Efficiency (FEWE)
- ClientEarth Poland

#### Portugal

- ZERO
- Circular Economy Portugal

#### Slovakia

- REPAIRABLY

#### Spain

- ECODES

#### Sweden

- The Swedish Society for Nature Conservation (SCNC/SNF)

#### Switzerland

- WWF Switzerland

#### United kingdom

- Energy Saving Trust (EST)
- UK Sustainability Network for Standardisation

#### USA

- Green Science Policy Institute

### International member organisations

#### Bellona

- Bellona Europe

#### EEB

- European Environmental Bureau

#### FoEE

- Friends of the Earth Europe

#### HCWH

- Health Care Without Harm Europe

#### HEAL

- Health & Environmental Alliance

#### RREUSE

- European umbrella for social enterprises with activities in reuse, repair and recycling

#### T&E

- European Federation for Transport & Environment

#### WWF-EPO

- WWF – European Policy Office

#### ZWE

- Zero Waste Europe

# ECOS position on ESPR

- Promising framework, notably its extended scope beyond energy related products.
- Success will depend on :
  - The **level of ambition** in delegated acts;
  - The **timeframe** for adopting the delegated acts.
- We regret the **exclusion of construction products**, which will not benefit from the framework (workplan, Ecodesign Forum).

# ECOS position on the DPP

- **Ambitious** information requirements, should be completed with **full material and chemical composition** and **product assembly scheme**.
- Interface differentiation per **user type will support uptake** of information.
- DPP **should not replace on-product** information but **support circular practices** with complementary information currently missing, and clearly **differentiate legal from marketing** information.
- Important to ensure that information is **provided, reliable and accessible**.
- There should be strict enforcement of **No data no market** principle.

# For more details, please see [ECOS Factsheets](#)



## Make-or-break aspects of the EU's Sustainable Products Initiative

### Review of the Ecodesign Directive

Since its first adoption in 2005, the Ecodesign Directive has not only massively improved the energy efficiency, but also the overall environmental performance of energy-related products, including a wide range of common appliances, such as washing machines or screens. However, today the Directive faces many issues: powerful industrial lobbies weakening the requirements and slowing down the process; a lack of resources provided by the Commission; [important delays](#) in the implementation of the measures; poor enforcement; and free riders undermining further savings.

With the ambition to make all products more sustainable, the European Commission now intends to extend the scope of the Directive beyond energy-related products. This requires a major rethinking of this legal instrument. In our view, the revamped framework should not only keep delivering on circularity and energy-efficiency, but also follow a life-cycle approach and mandate requirements linked to environmental and social aspects.

 **The SPI will be successful if it includes...**

- ✔ **Ambitious and timely legal requirements.** The revised ecodesign framework should remain ambitious and not compromise on hard-won achievements in the energy field. The implementation of product-specific minimum design measures under the SPI should not suffer from further delays. Voluntary agreements should no longer be a possibility, as the existing self-regulatory measures have fallen short in ambition.
- ✔ **High sustainability standards and transparent information.** Measures covering the full life-cycle of products should address performance and durability requirements, to ensure that the most low-carbon, non-toxic, resource-efficient and long-lasting products become norm. Minimum environmental performance requirements must ensure that environmentally damaging products are removed from the market. This should be accompanied by mandatory, transparent and accessible information requirements through the introduction of a digital product passport.
- ✔ **Inclusive consultation process.** The law should ensure that stakeholders, including civil society, are consulted during the development of preparatory studies that lead to the introduction of implementing measures, are part of the Consultation Forum, and participate in the development of the multi-year working plans which establish priority product groups to be regulated.
- ✔ **A comprehensive scope and a full life-cycle approach, starting at the design phase.** The extended scope of the revised framework should influence product legislation generally to mainstream circularity and cover the whole value chain of products, including supply chain and end-of-life, and its carbon footprint. Definitions should be clear, forward-looking, and free from loopholes.
- ✔ **Product assessment methodologies.** The methodology used for the assessment of the environmental impact of each product group before legal requirements are drawn up should be updated. Evaluations should consider all environmental and social externalities to define environmental hotspots that go beyond the use phase only. The currently used 'least life-cycle cost' criterion, that only looks at energy efficiency gains that can pay back quickly, should be replaced with a criterion where environmental savings are maximised.



## Make-or-break aspects of the EU's Sustainable Products Initiative

### Digital Product Passport

Information is key to ensure that products are sustainably designed, sold, (re)used, repaired and treated at the end of their life. As part of the Sustainable Products Initiative, the European Commission proposes to create Digital Product Passports (DPP), with the aim to store and share all relevant information along the product lifecycle. Ambitious information requirements, ones that are mandatory, wide-ranging and properly enforced, could create an incentive to make more sustainable choices, starting at the manufacturing stage and finishing at end-of-life.

The DPP has the potential to create new opportunities for circularity and make circular business models viable. It would enable buyers to better assess product sustainability performance and choose accordingly. It could also help identify which products pose a threat to our health and the environment (e.g. substances of concern, wasteful components or types of products), and incentivise their replacement.

 **The SPI will be successful if...**

For the Digital Product Passports to play their crucial role, the SPI should require them to:

- ✔ Become mandatory and ultimately apply to all products on the EU market.
- ✔ Be used to generate data needed to accelerate the phase-out of unsustainable products (including substances of concern). The DPP can be used by manufacturers and designers to better understand product performance, and what is needed to improve them. But it could also be used by public authorities to refine regulatory requirements when it comes to ecodesign legislation.
- ✔ Introduce mandatory information requirements, supporting ecodesign of products, long product lifetime, and improved material recovery. For example, the DPP should provide details on spare parts availability, repair history and a full list of chemical contents.
- ✔ Be accessible to all relevant actors, including consumers and market surveillance authorities, and adapt information to the targeted user.
- ✔ Include due diligence and information on the conditions in which products are manufactured.
- ✔ Standardise the information format to allow comparison between.
- ✔ Verify the accuracy of information through dedicated enforcement mechanisms.

2-Jun-22

## Orgalim Policy Exchange: *Sustainable Products and Digital Product Passports*

1 June 2022 | Partner Event of the EU Green Week

# Response from the Commission

**Michele Galatola**, Policy Officer  
European Commission, DG GROW



2-Jun-22

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# Presentation of Finnish Pilot Project on DPP

Jussi Mäkinen, Director EU Regulation,  
Technology Industries of Finland





# Finnish Joint Project on DPP

- Joint Project between Technology Industries of Finland and Finnish Textile and Fashion Industries
- Objectives:
  - General design concept for Digital Product Passports
  - Verifying the concept by use-cases of plant-based textiles and batteries
  - Provide industry-driven point of view, especially on incentives and value-drivers of DPP

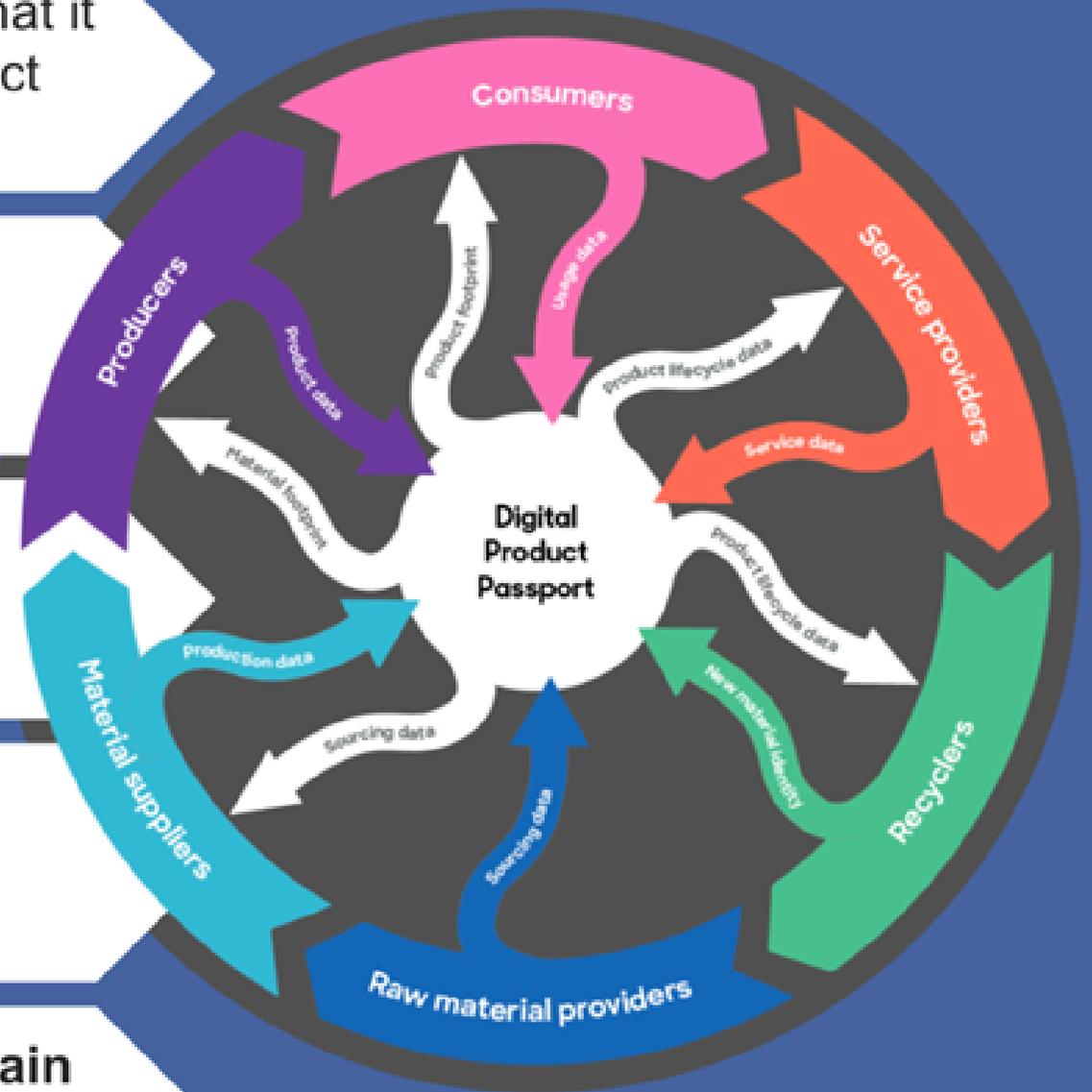
**0. Digitalization of the existing product info**, so that it follows the subject. Enabling same up-to-date product info to everyone.

**1. Transparency and standardization**, same ground rules and viewpoints to everyone

**2. Product value chain info** builds a picture about product safety and sustainability

**3. Easier communication** about product quality and sustainability. **Brand and reputation benefits**

**4. Critical evaluation of company's own value chain** (inc. partners & subcontracting) becomes easier. Inc. social & ecological viewpoints.





# Preliminary key Take-aways

- **Incentives** for digitalisation of product information and making data available
- Comprehensive picture of product **safety and sustainability** using value chain data
- Brand and **reputation benefits**

## Data

- **Consistency, standards** and administrative burden
- **Access rights** to data vis à vis **trade secrets** and IPRs – minimum viable product (MVP) for each player
- **Decentralised verifiable credentials**, carefully phased, modular ramp-up

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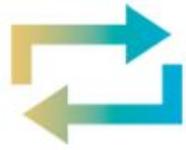
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# Q&A session between panellists



# Speakers



Orgalim  
Policy Exchange



## Sustainable Products and Digital Product Passports



**Louise Bünemann**

Chair of Orgalim Environmental Sustainability Working Group; Head of EU Environmental Policy at Danish Industries



**Michele Galatola**

DG Internal Market, Industry, Entrepreneurship and SMEs (GROW)



**Margaux Le Gallou**

Programme Manager at ECOS, the Environmental Coalition on Standards



**Stéphanie Mittelham**

Manager Energy and Environment at Orgalim, Europe's Technology Industries



**Jussi Mäkinen**

Director EU Regulation, Technology Industries of Finland

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# Closing remarks

Stéphanie Mittelham  
Manager Energy and Environment,  
Orgalim – Europe's Technology Industries



**Thank you very much also to all speakers & participants!**

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**Thank you for your attendance!**

**SHAPING A FUTURE THAT'S GOOD.**

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Thank you



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