



Brussels, 29 April 2020

To the attention of:

President of the European Commission Ursula von der Leyen

Executive Vice-President Frans Timmermans

Commissioner Kadri Simson

Commissioner Thierry Breton

Commissioner Virginijus Sinkevičius

RE: NGO and repair groups reject industry calls to delay legislation on sustainable products in the aftermath of the COVID-19 crisis

The devastating impact of the COVID-19 pandemic is affecting every aspect of our society, and the immediate priority for the EU must be to protect human health. However, subsequent actions to stimulate economic recovery should continue to place human health and well-being at their core by investing in measures that address the ongoing climate and environmental emergencies.

The actions outlined in the European Green Deal provide an ideal basis for a coordinated EU economic response. For example, the Sustainable Products Initiative, the broadening of ecodesign, and the “right to repair” legislation can all play a pivotal role in fostering economic recovery across Europe. Likewise, waste policy implementation, waste prevention, and proper collection and recycling will secure employment and reduce Europe’s dependency on imported materials. These measures will improve environmental health, which protects public health. In this context, we welcome the recent initiatives coming out of the Commission¹ and the Parliament² to highlight the importance of making this a green recovery.

Meanwhile, we are aware that some industry associations have called for a delay to the application of several key environmental policies. An example of this is the recently published open letter by the European home appliance industry association (APPLiA)³.

While the organisations active under the umbrella of the Coolproducts and the Right to Repair campaigns (including over 200 national and EU NGOs working in the field of environmental policy) understand the challenges associated with the outbreak of the COVID-19 pandemic, we strongly believe that this is not the time to halt or compromise progress towards climate neutrality, zero pollution and sustainability.

¹ <https://www.euractiv.com/section/energy-environment/opinion/which-world-do-we-want-after-covid-19/>

² <https://www.euractiv.com/section/energy-environment/news/green-recovery-alliance-launched-in-european-parliament/>

³ See APPLiA’s [press release](#) date 6 April 2020 – note that several other industry associations have made similar statements.

In particular, the timely and effective implementation of the EU legislation on ecodesign and energy labelling must not be slowed down. This framework contributes significantly to improving Europe's material and energy efficiency. Crucially, it also supports innovation, reduces costs for citizens and businesses, and prevents pollution – thus making it more necessary now than ever before. These measures were designed precisely to strengthen Europe's resilience to the economic and environmental crises.

In this context, the request to delay legislative commitments in relation to the EU's product, waste and chemical policies – as proposed by APPLiA and other industry groups – lacks any clear justification and appears unreasonably disproportionate. For example, there is no tangible evidence to justify the (multi-)annual delays in the application of eco-design requirements (e.g., APPLiA's request to delay measures which take effect in 2024 until 2026) or the postponement of the WEEE collection targets, the transposition of the Waste Framework Directive and the delivery of chemical data (SCIP database).

Furthermore, it is a matter of concern that, while focusing on delaying environmental obligations, the industry's demands do very little to address the need to support employees and consumers, who are likely to be affected the most.

We urge the Commission to consider the bigger picture and the societal benefits associated with these sustainable product policies. Lawmakers should explore how to best support economic actors in meeting environmental obligations and pursuing the objectives of the Green Deal, while investing in the recovery from the crisis.

We therefore call on the European Commission to:

- Prioritise public health and well-being by using the objectives of the Green Deal as conditionality for stimuli launched in Europe's economic recovery plan;
- Mobilise the recently agreed comprehensive economic policy response to the COVID-19 pandemic towards meeting environmental legislation and other legal obligations;
- Encourage the private sector to genuinely serve the interest of the recovery effort, including commitments to support citizens and workers;
- As a minimum, maintain legal commitments in areas such as public health, environmental protection and social equality, which strengthen Europe's resilience;
- Use online tools and media to continue, as far as possible, the development of Europe's circular economy and energy policies including those set out to improve products and reduce waste.

Finally, in the event that delays are considered, they should be very short and based on a rigorous analysis and subject to scrutiny by the public and our elected officials.

Yours sincerely,

Justin Wilkes



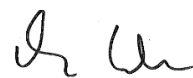
Executive Director, ECOS

Marie Baton



Europe Lead, CLASP

Jeremy Wates



Secretary General, European
Environmental Bureau (EEB)

Coolproducts (www.coolproducts.eu) is a coalition of NGOs promoting energy and resource efficiency through eco-design and energy labelling. **Right to Repair Europe** (www.repair.eu) brings together green groups and repair advocates to campaign for repairable and longer-lasting products.