



9th May 2022

To:

Mr. Peter Javorčík, Director-General, Transport, Energy, Environment, Education, Council of the European Union

Mrs Isabel Riaño-Ibañez, Director-General, Competitiveness and Trade, Council of the European Union

Subject: Environment Council needs to lead on Ecodesign for Sustainable Product Regulation

We, the undersigned civil society organisations, urge the Council of the European Union to appoint the Environment Council as the responsible configuration in charge of the Ecodesign for Sustainable Products Regulation (ESPR).

At the end of March, the Commission proposed the ESPR as the cornerstone of its ambition to make sustainable products the norm. This legislation aims to build in sustainability in products throughout their entire lifecycle, starting from the design phase where 80% of environmental impacts are determined. This policy is crucial for the transition to a circular and climate-neutral economy.

The way products are currently designed does not support this goal, leading instead to wasteful and linear patterns of production and consumption ('take-make-use-dispose'). As Ecodesign policy applied to energy related products contributed to our 2020 energy efficiency and GHG emissions reduction goals, ESPR is expected to substantially further reduce the carbon and environmental footprint of products placed on the EU. Without such robust product policy, the European Union would not have met its 2020 goals and cannot meet its 2030 and 2050 climate goals. The policy is also acting to reduce our dependency on imports, notably of critical raw materials and represent a tremendous market driver for a decarbonised industry.

The ESPR proposal is now moving to the co-legislators' hands. While in the European Parliament there are clear indications that the file will be led by the Environmental Committee, the undersigned organisations are concerned the Competitiveness Council will be mandated to lead on the ESPR file. We are concerned about the following aspects:

- While this regulation will substantially impact industries and their responsibilities towards more sustainable products, a high sustainability ambition should be the main driver for the upcoming discussions on this file. The lead Council formation should be the one echoing this goal and the discussions should therefore happen in the Environment Council. This synergy has been even acknowledged in the recent Council discussions on the Battery Regulation proposal, considered as the blueprint for the ESPR, where Council discussions took place in the Environment Council.
- When it comes to finding an agreement between the European Parliament and the Council, there is a risk that having such different perspectives (ENVI Committee in the European Parliament and Competitiveness in Council) will lead to misalignment and unnecessary further delays.

We believe that the ESPR needs to be first and foremost discussed in the Environmental Council (and Environmental Working Party). Alignment with the European Parliament position will be key for a speedy and much needed adoption of this key environmental sustainability regulation, which should not suffer from unnecessary delays.

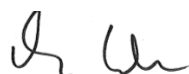
Signatories



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Joan Marc Simon, Executive Director, Zero Waste Europe



Jeremy Wates, Secretary General, EEB

CC:

Mr. Frans Timmermans, Executive Vice President of the European Commission
Mr. Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries
Mr. Thierry Breton, Commissioner for Internal Market
Mr. Raoul Ueberecken, Director COMPET 1, Council of the EU
Mr. Berthold Berger, Director TREE 1, Council of the EU
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Mrs. Sara Matthieu, Member of the European Parliament, Greens/EFA
Mrs. Anna Cavazzini, Member of the European Parliament and Chair of the IMCO Committee, Greens/EFA
Mr. Pascal Canfin, Member of the European Parliament and Chair of the ENVI Committee, Renew

