EUROPEAN GREEN DEAL RISK RADAR | NEW

What to watch out for in the EU's new legislative term 2024-2029



ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION (ESPR)

Regulation (EU) 2024/1781 establishing a framework for the setting of ecodesign requirements for sustainable products

The ESPR is a tool to achieve the EU's Circular Economy Action Plan, thus moving away from linear processes of production and consumption towards circular ones where sustainability is promoted over the whole life cycle of products. All products to be placed on the EU market will have to comply with the ecodesign requirements, including components and intermediate products.

WHAT'S IN IT?

OBJECTIVE

Climate ambition

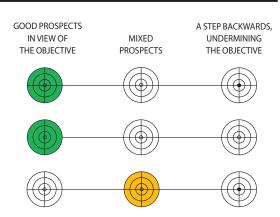
In view of respecting the limit of 1.5°C global warming under the Paris Agreement

Biodiversity

Preserving biodiversity in the EU and beyond

Zero pollution

Achieving zero pollution and a circular economy in the EU and beyond



WHAT'S NEXT?

STATUS

MILESTONES

Entered into force

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April 2025

Adoption of first ESPR working plan.

Mid-2025Acts on banning unsold goods destruction and exemptions.

Late 2025 Acts on Digital Passport Product (DPP) registry, service providers, data carriers and

digital credentials.

Late 2026

Adoption of the first ESPR measures.

2027/2028

First product and horizontal requirements start to apply.

WHAT TO WATCH OUT FOR?

Speed. Slowing down the EU law's progress or implementation.

Money. Conflict on distributional effects or lack of finance for making this EU law impactful.

Licence for polluters. Undermining the polluter-pays principle, increasing global pollution.

Inequalities. Allowing for practices that deepen global inequality.





Ecodesign for Sustainable Products Regulation (ESPR)

WHAT'S IN IT?

Climate ambition

The ESPR's product parameters include environmental footprints, as well as energy use and efficiency, aiming to help decrease products' energy footprint and reduce consumer vulnerability to energy price increases. Improving consumption and production patterns play an important role in addressing climate change.

Biodiversity

By aiming to support more sustainable consumption and production patterns, the ESPR may (indirectly) contribute to reducing biodiversity impacts associated with water use, resource use and generation of waste materials (which are included in the product parameters). However, these are rather indirect impacts.

Tero pollution

The ESPR and its delegated acts should support the EU's 8th Environment Action Plan (EAP) objectives of accelerating the transition to a circular economy, pursuing a zero-pollution ambition and reducing environmental pressures related to production and consumption. Product parameters relevant to zero pollution include the presence of substances of concern in products, generation of waste materials, durability, reusability and possibility of recycling.

WHAT TO WATCH OUT FOR? RISKS









Money Licence for polluters Inequalities



Implementation is rather complex, and progress may be slowed by the detail of the product-by-product approach, although this should also result in delegated acts appropriate to specific products. Also, it entails new and relatively untested approaches such as the digital product passport, which will need detailed and careful implementation.

Funding is also a risk, as the implementation of requirements is likely to necessitate adjustments by producers, with possible cost implications. However, if 5-year working plans are adopted, this should give some prior warning for potential investments.

WHAT'S NEXT?



Transposition by EU Member States

Direct application in Member States. Adoption of the first ESPR measures is expected for late 2026; first product and horizontal requirements will apply between 2027 and 2028.

Revision clauses and reporting duties

In April 2025, the European Commission will adopt the first ESPR working plan, which is likely to cover a 5-year period to 2030. It is expected to include several products (iron and steel, aluminium, textiles for clothing, furniture, tyres, energy-related products, information and communications technology products and other electronics), as well as two horizontal requirements (repairability, and recyclability and recycled content of electrical and electronic equipment).

Delegated acts and other related legislative action

The Commission is empowered to adopt delegated acts with product-specific and horizontal requirements. Working plans will determine the priorities for the delegated acts, and impact assessments will form the basis for the establishment of productspecific measures. In addition to this, there is scope for common horizontal ecodesign requirements to be set for similar products. In mid-2025, acts on banning unsold goods destruction and exemptions will be presented, followed by acts on Digital Passport Product (DPP) registry, service providers, data carriers and digital credentials in late 2025.

HOW TO IMPROVE IT? OPPORTUNITIES

The law has the potential to be very progressive, depending on the specifics of the future delegated acts to be adopted by the European Commission, with product-specific and horizontal requirements. To improve the law, companies, in particular small and mediumsized enterprises, would require further support to adhere to the requirements set, as well as with associated tools such as digital product passports.

The Commission's new Ecodesign Forum offers an opportunity for stakeholders to maintain a high level of ambition.

FURTHER READING

IEEP: More standards for more circular products? Navigating the Ecodesign for Sustainable Products Regulation, June 2024