

Position Paper

The ESPR should prioritize all products that are resource-intensive, potentially harmful and contain critical raw materials

This position paper provides feedback to a [public consultation](#) by the European Commission about new product priorities for ecodesign for sustainable products published on January 31, 2023

Ecopreneur.eu welcomes the European Commission's initiative to set priorities for ecodesign for specific product groups as part of a "Ecodesign for Sustainable Products" Regulation (ESPR). We strongly believe that circular design is the basis for an optimal use, reuse and recovery of resources and the transition to a carbon-neutral, inclusive and circular economy.

In principle, the **ESPR should therefore apply to all products but prioritise those that are resource intensive, contain critical raw materials and are potentially harmful to human wellbeing and the environment**. Critical raw materials are important for increasing the strategic autonomy of resources in the European Union in the long run. The prioritisation of specific product groups should also consider **social aspects** and the potential release of **pollutants** such as toxins and microplastics into the environment during the use phase.

From this perspective, Ecopreneur.eu supports the prioritization of textiles. While batteries and construction products are already covered by proper regulation, we advise the European Commission **to also add electrical and electronic equipment, textiles, furniture, mattresses, paints and varnishes to the list of priority products** for the ESPR.

To ensure an optimal impact of the ESPR, it should be complemented by **mandatory targets for reuse and recycled content**, as proposed in the Packaging and Packaging Waste Regulation (PPWR), a **ban of harmful substances** that would compromise recyclability, along with the introduction of both a harmonised system of Extended Producer Responsibility (EPR) with **eco-modulated fees** and the Carbon Border Adjustment Mechanism (CBAM) **for all product groups facing international competition**.

About Ecopreneur.eu

Ecopreneur.eu is the European Sustainable Business Federation of currently seven national associations representing about 3000 sustainable companies - mostly SMEs. A member of the Coordination Group of the European Circular Economy Stakeholder Platform, Ecopreneur.eu is the only cross-sectoral EU business organisation committed to ambitious measures, rules and regulations for a low-carbon circular economy. We advocate a new economic framework in which sustainability is promoted, the environment respected, and ecological principles are followed. Ecopreneur.eu and our members bring concrete experience from pioneering companies into the political debate, show best practice examples and represent the needs of green SMEs in a credible way.

Contact

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