

Have Your Say: New product priorities for Ecodesign for Sustainable Products.

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13682-Ecodesign-for-Sustainable-Products-Product-priorities_en

Deadline: 12 May 2023 (midnight Brussels time)

Ref. Ares(2023)693197 - 31/01/202 Ref. Ares(2023)693197 - 31/01/202

Initiative:

New product priorities for Ecodesign for Sustainable Products

Feedback on the **INITIATIVE New product priorities for Ecodesign for Sustainable Products**

Contributor: Verband Deutscher Industrie Designer e.V. (VDID), Bundesverband Kommunikationsdesigner (BDG), members of Deutscher Designtag e.V., BEDA – The Bureau of European Design Associations

Author: Lutz Gathmann (VDID), Regina Hanke (BDG)

BEDA – The Bureau of European Design Associations, together with the Verband Deutscher Industrie Designer e.V. (VDID) and the Deutscher Designtag e.V., welcomes the initiative of the European Commission, leading DG ENV (Unit B4, Sustainable Products), DG GROW (Unit I3, Green Economy and Circular Economy) and DG ENER (Unit B3, Buildings and Products) to improve consumption and production patterns in terms of sustainability. Furthermore, we support establishing product-specific rules and regulations for product groups with common characteristics in existing EU products and internal market legislation.

Thank you for the detailed draft of the preliminary study for the new Ecodesign Directive. To support the preparatory work to identify the priority topics for the Commission's Ecodesign Regulation, BEDA would like to contribute with its opinion on the following issues, as requested.

We agree with the selection of end-use products, intermediary products and horizontal measures but would like to urge that the product segments listed so far, as already considered, should only be a start; ultimately, the initiative must include all products. Furthermore, even if the segments requested so far use the listed intermediary products as a basis, a separate consideration at this point and not in a possible expansion is unavoidable due to the market relevance.

We agree with the horizontal measures listed, although we would extend the product coverage for the lightweight design measures. In addition, we propose to complement the horizontal measures with environmental and circular system design for a more user-friendly behaviour. Participatory design approaches support a societal willingness to act more sustainably. Reuse, reparability, and upgrading will only succeed if users are involved in the circular economy and their participation is easy. The planned easy-to-understand labelling, including easy-to-view product passports, must simplify participation in resource recovery. Systemic solutions for recycling must also be examined.

We favour the standardisation and revision of the Ecodesign Directive for better compatibility in the internal market. We assume that the additional integration of the product mentioned above segments will increase the potential of the regulation and accelerate its effectiveness. Furthermore, the level of detail of the requirements within the regulation's scope is understandable and comprehensible in the segments listed.

To ensure the functioning of the overarching, integrated policy instrument of the EU and to elaborate product passports, as well as to develop and control environmental and circular aspects of the corresponding value chains, stakeholders along the value chains need to be trained, including the EU-wide operating controller (market surveillance authorities) of the future regulations under the EU initiative.

The following applies to design in this context:

Expanding design training at the European level is essential so that future and practising designers can acquire additional qualifications in the safety-relevant aspects of products or components. In addition, they should be able to familiarise themselves with the existing conditions of European legislation in product safety and consumer protection, as well as product liability and occupational safety.

Just as the demands for simple reparability, also by users reach their limits where safety-relevant components and their correct replacement during maintenance and installation are concerned. Last but not least, for this reason, some trades are subject to licensing, for which appropriate training is mandatory.

In the end, technical training was already an essential pillar of the two-master principle of the "old" Bauhaus idea, in addition to artistic training.

In addition, intensive training should enable designers to develop technical solutions that prevent unintentional reparability by non-professionals to ensure the safe use of products at all times and in all product life cycles.

Training and continuing education under lifelong learning must find financial support for all stakeholders along the value chains. Otherwise, the initiative will fail due to the high demand for more skilled workers along the value networks. BEDA, the Deutsche Designtag and the VDID agree that clear and easily accessible product information can contribute significantly to the change in consumer behaviour.

However, product communication, information and product labelling must be aligned – as they play a crucial role in consumption and consumer behaviour. As consumer behaviour is primarily driven by emotions and only partially by rationality, those behavioural aspects must be considered and included accordingly.

One possibility is the prevention of stylistic obsolescence. Obsolescence does not have to be limited to premature material wear, non-repairability (technology) and/or lack of update possibilities (software). Stylistic and software obsolescence due to the development of ever-faster product cycles, new product families and model variants must be monitored and included in the control framework.



Isabelle Vérilhac - BEDA President
on behalf of BEDA – The Bureau of European Design Associations



Lutz Gathmann
Designer
Signiert von: 345e598eb0596add

Lutz Gathmann,
on behalf of Verband Deutscher Industrie Designer e.V.
Deutscher Designtag e.V.