

## **ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION PROPOSAL**

### **Position paper**

**Reference:** *Response to the Public Consultation on the proposal for Ecodesign for Sustainable Products Regulation launched by the European Commission*

Cerame-Unie, the European Ceramic Industry Association, welcomes the objectives of the European Commission for a climate neutral, resource efficient and circular economy. Cerame-Unie thanks the European Commission for the opportunity to partake in the public consultation and set out the industry's view in respect of the proposal for the Ecodesign for Sustainable Products Regulation (ESPR). In this position paper, Cerame-Unie would like to present its views on the proposal.

#### **1) Ceramic products, sustainable by nature**

The ceramic industry fully supports the EU objectives for a more sustainable and circular economy. **Durability of products is a major driver of sustainability**, which can only be appreciated with a holistic approach that takes into account on the one hand the complete life cycle of the product and on the other hand all environmental impacts and not only global warming potential but also biodiversity, water, toxicity, resources etc. when assessing the environmental impact. Made from clay, a broadly available raw material, **ceramic products are by nature sustainable and long-lasting products** which require no or little maintenance or repair and can last for decades or more.

Given the inert nature of fired clay, **ceramic products can be reused and/or recycled after the end-of-life stage**. To minimise the raw material consumption and waste generation during the production process as well as to increase the reuse or recycling of products and raw materials, the ceramic industry has developed innovative solutions and business models such as the reuse of internal production residues (e. g. mass residues, dry broken ware, etc.), the use of waste or by-products from other industrial processes, the reuse of water used in the manufacturing process, an optimized raw material selection or an optimisation of the product design, and supply chain cooperation in the case of recycling.

#### **2) Digital Product Passport**

When it comes to the introduction of a mandatory Digital Product Passport, Cerame-Unie stresses that data must reflect the peculiarities of each specific product. The disclosure of data should be limited to circular purposes and **tailored according to specific product groups and recipients' needs** (e.g a distinction between commercial and technical information) should also be made. Adequate impact assessments would inform this identification process. **Confidential and business critical data should not be disclosed.**



A particular attention should be paid on the **management of the complexity of products and value chains**, as well as the **confidentiality of product composition** and **quantity of required data**.

Last but not least, the DPP should support a **level playing field**, including by means of effective market surveillance and incorporating the needs and peculiarities of SMEs. The collection, preparation, provision, and update of data require considerable efforts for companies.

**Minimising the costs and avoiding creating excessive administrative burden** for manufacturers, will be key to make such a passport effective.

### **3) Information and performance requirements: focus on construction products**

As a general approach, Cerame-Unie points out that performance requirements need to be properly adapted to the specific product or product category, after an in-depth impact assessment and involvement of the industry.

**Construction products** have strong interlinkages between their environmental and structural performance, **Cerame-Unie welcomes the fact that Ecodesign requirements for construction products will be laid down under the revised Construction Products Regulation**. A clear delimitation is important. This will avoid double legislation and additional administrative burden for manufacturers.

We also welcome that requirements for placing on the market packaging as a final product are laid down under European Parliament and Council Directive 94/62/EC and that the ESPR complements that directive. Therefore, to follow a coherent approach, packaging should not fall within the scope of the newly revised CPR. **Cerame-Unie points out that the environmental performance of construction products only makes sense at building level**. A suitable regime and harmonised requirements for assessing the sustainability and environmental performance of construction products are developed within CEN/TC 350. Addressing Ecodesign requirements at product group level is preferred, when possible.

In a broader perspective, Cerame-Unie points out that performance requirements need to be properly assessed to make sure that they are adapted to the specific product or product category.

### **4) Assistance to companies**

Cerame-Unie underlines that it is important to ensure a level playing field for SMEs and all other companies. Measures like one-stop shops and organisational and technical assistance will be of importance for companies of all sizes.

### **5) Ecodesign Forum**

Cerame-Unie welcomes the creation of an Ecodesign Forum which invites stakeholders (e.g. all interested parties including industry) to provide the relevant expertise to the Commission regarding Ecodesign requirements.



*Cerame-Unie Aisbl (CU) is the European Ceramic Industry Association. The European ceramic industry covers a wide range of products including bricks & roof tiles, clay pipes, wall & floor tiles, refractories, sanitaryware, table- & ornamentalware, technical ceramics, expanded clay and flower pots.*