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## **ECOS, EEB and UK SNS discussion paper on the draft standardisation request on material efficiency aspects for Ecodesign products**

### **Background**

Aware of the importance of material efficiency with regards to product design, the European Commission aims to shift from a focus mainly on energy efficiency in Ecodesign regulations, toward greater inclusion of resource efficiency considerations. To support the inclusion of requirements addressing resource efficiency in implementing measures, metrics and standards need to be established to address areas such as reusability, recyclability, recoverability and durability. Therefore, the Commission developed a standardisation request addressed to the European standardisation organisations (ESOs) to develop generic methodologies related to material efficiency. The existence of such horizontal standards would allow for a discussion of potential material efficiency requirements in regulatory meetings for Ecodesign products. A first standardisation request was already published by the European Commission, but was rejected by the ESOs on the basis that it was too prescriptive on the requirements asked for and also the inability to fully develop the methods within the proposed timescale.

This paper provides proposals formulated by ECOS, the European Environmental Bureau, and the UK Sustainability Network for Standardisation. We hope that to reinvigorate and re-focus the discussions, both by proposing alternative approaches and by involving other critical stakeholders, namely the reprocessing industry, who have hitherto been absent from the discussion.

## Principles to a revised Standardisation Request (SR)

We consider the following principles as critical for the successful formulation of a standardisation request that adequately specifies the production of measurement standards to underpin the regulatory and market surveillance framework of Directive 2009/125/EC:

### Clear statement of policy objectives

The overarching policy objectives that are common to all product groups should be stated, and include (but not be restricted to) the following goals:

- To extend product lifetimes through design for upgradability, durability and reparability
- To increase the reuse, refurbishment and remanufacture of whole products.
- To increase the recovery of key components and assemblies for reuse / remanufacture.
- To increase the recovery of materials to facilitate increase resource circularity

This order of environmental objectives, based on the waste hierarchy, is in line with the understanding that the greatest material efficiency gains are made by avoiding product replacement – however, it is recognised that at a product level, priorities may differ. The wider policy aim of increased resource circularity requires the presence of end-markets for the products, components and materials recovered, as well as the existence of appropriate recycling infrastructure and business models. It is difficult to address these in an Ecodesign-based measure, which relies upon changes being made to products before they are placed on the market. However, we do see some opportunities for the standardisation request to address the wider market and regulatory context through the facilitation of market development mechanisms such as quality specifications for reusable and remanufactured components, guidelines for stipulating minimum levels for recycled content and remanufactured/reused components and metrics for ease of material and/or key component recovery through existing recycling technologies.

### Horizontal and vertical standards to be developed in parallel streams

The focus of this standardisation request is rightly on horizontal standards, which are essential in order to establish consistent approaches to addressing overarching material efficiency considerations and setting out consistent methodologies common to all product categories.

However, work on product-specific (vertical) standards should not be delayed until the outcomes of the horizontal SR become available. Where there is a need for these to support

regulation in the short to medium term, they should be developed concurrently, via a separate standardisation process, as required by the regulatory timelines for the relevant products. Experience in developing product specific standards can feed into refinements of horizontal methodologies and vice versa. Such approaches already exist in other areas of energy efficiency legislation, for example the Energy Performance of Buildings Directive.

Once horizontal standards are established, a work programme for further product specific standards for products that have not yet been specifically addressed could also be developed.

### Revision toward a succinct, less prescriptive “overarching framework” SR

The standardisation request should focus on providing an overarching framework and a set of guidelines for measuring and testing material efficiency requirements for energy-related products, which can be applied to each individual product group to ensure consistent methodologies within product-specific standards.

The rejected standardisation request should be revised, with less prescription of calculation methods, whilst referencing options for exploration at working group level.

### Outcome-focused standards and regulations

A revised draft standardisation request must provide greater clarity on the outcomes that the proposed standards, in conjunction with regulations, are intended to achieve. The section “Description of the Requirements for the Requested Deliverables and for the Standardisation Work” could be revised with a focus on the production of **an overarching framework that provides a foundation for product-specific standards, and enables Ecodesign regulations** to address the following areas:

- Standardised approaches to address product durability, including upgradeability and reparability,
- Standards for quality of reusable and remanufactured products, assemblies and components,
- Metrics to allow relative comparison of products by ease of repair, reuse, and recovery of products, key components and materials using existing recycling technologies.
- Means to stipulate reusability, recyclability and recoverability of products at end of life
- Means to stipulate minimum levels for reused, recycled and recovered (RRR) content within products,

## Favour relative not absolute measurement

It is our understanding that the ultimate objective of the measurement standards to be developed is to provide a *comparative framework* whereby products within a given product category can be assessed in terms of their relative, rather than absolute, material efficiency. This would echo the approach taken for energy efficiency, whereby individual models are assigned an energy efficiency rating based on the Energy Efficiency Index (EEI) and manufacturers are required to test models for energy performance and declare the rating achieved. The ultimate aim of this is to provide a means to identify the worst performing products and gradually eliminate them from the market.

Therefore we propose to shift emphasis to developing a framework that allows for relative comparison (“product ratings” or similar) rather than the measurement of absolute values, such as the time required for disassembly.

By way of example, ease of recoverability of a key component or material could be calculated as a rating using a typical time range required for disassembly of each fastener by type and volume. Such ranges could be established in a database through tests performed as part of the standards development process and market surveillance authorities would only have to verify number of fastenings in order to verify manufacturers’ declarations.

Such alternatives could break down some barriers of previous disagreement and misinterpretation. Calculated rather than measured ratings are already commonly used in other areas where the exact measurement of performance is either difficult or unnecessary, such as the energy use of individual buildings under the EPBD.

## Flexibility in deliverables

Standards should be preferred over Technical Specifications or Technical Reports whilst allowing room for these alternatives where full standards are not feasible (and this is sufficiently justified by evidence). There should be flexibility in the development of calculation methods to allow for a range of referenced and new approaches to be properly assessed and refined by working groups as long as these meet the goals of the standardisation process.

Deliverables of the standardisation request should include (as relevant for each of the areas listed under number 4):

- Methods to identify key components (by criteria relevant to the area e.g. financial considerations, potential for re-manufacture/re-use, those most likely to cause product failure, those with highest material impacts)
- Metrics and calculation methods

- Test methods, e.g. to evaluate number of fasteners required to extract a key component.
- Data tables, lists and indices
- Labelling and other Information formats
- References

## Stakeholder representation

Vital stakeholders, who form a critical part of the value chain, have up till now not been part of the discussions. Notably recycling, reuse and remanufacturing operators have been absent. Their presence is critical to assess the feasibility of the implementation of requirements on recycling, remanufacture and reuse and to harness their support and commitment to implementing the standards developed.

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