

CONSULTATION RESPONSE

MAY 2023

Response to the Call for
Evidence on the new product
priorities for Ecodesign for
Sustainable Products (ESPR)



RESPONSE TO THE CALL FOR EVIDENCE ON THE NEW PRODUCT PRIORITIES FOR ECODESIGN FOR SUSTAINABLE PRODUCTS (ESPR)

We welcome this [Call for Evidence](#) on the product priorities for the ESPR and the ongoing work to ensure that the EU policy framework reflects the true cost of all products. As noted in [our consultation response](#) to the Sustainable Products Initiative (SPI), it's important to further initiatives that we **strengthen sustainability across a wide range of instruments and make both the environmental and climate impacts of products visible.**

We take note of the [Joint Research Centre's preliminary assessment](#) regarding product priorities. **Our feedback focuses on the 7 intermediary products** identified in this assessment: Iron and Steel; Non-Ferrous Metals; Aluminium; Chemicals; Plastic and Polymers; Paper, Pulp Paper and Boards; Glass. **With both considerable CO2 footprints and mitigation potential, it is paramount that these large product groups and industries are given first priority.**

It is concerning that cement is not included among these intermediary products, when it accounts for approximately 8% of global CO2 emissions, which is more than steel's 7%, and is arguably at least as relevant as any of the other intermediary products. The fact that construction product cement is not yet addressed (e.g. in the JRC preliminary assessment, citing the on-going revision of the Construction Products Regulation (CPR)) is regrettable. **Cement should be regulated under the ESPR**, not the CPR, along with the other aforementioned intermediary products. This is because the ESPR has a stronger decarbonisation track-record than the CPR and because the ESPR-related process is likely to ensure a higher degree of transparency.

All of these products – and cement – are crucial for the economy, while their production also leads to a significant portion of not only environmental, but also climate impacts and externalities both within the EU and beyond. Global material use is predicted to double from 2015-2060, and just four materials – aluminium, concrete and cement, steel and plastics – account for 78% of GHG emissions from the materials sector¹. Any measures to accelerate the decarbonisation of said materials, such as **deployment of Carbon Capture and Storage, should be fast-tracked, and barriers for innovative and low-carbon alternative products to enter the market reduced.** Reducing CO2 emissions associated with these products is crucial to reach the EU's 2030 and 2050 targets as well as the Union's obligations under the Paris Climate Agreement.

¹ International Resources Panel (2019) Global Resources Outlook 2019, cited by Eunomia & Zero Waste Europe (2022) [Is Net Zero Enough for the Material Production Sector?](#)

We urgently need to drive a shift in material-use to lower-carbon options. The measures to be provided by the ESPR hold potential to **bolster the creation of lead markets for low-carbon products**. The fundamental step of creating such lead markets is to generate a comprehensive CO₂-accounting of the product in order to identify what is 'green' and which products should be pulled to the market. To ensure alignment with carbon neutrality goals, such a system needs to **account for the whole-life carbon emissions of a product** and include both the 'operational carbon' (the CO₂ emitted during use) and the 'embodied carbon' (the CO₂ from input materials and processes going into a product, as well as the emissions resulting from products' refurbishment and end-of-life treatment).

Furthermore, the information on products' climate performance that the ESPR will generate, and the related enhanced data transparency in various industries, should enable a necessary **continuous strengthening of climate targets and limits**, so as to reflect the best available possibilities for CO₂emission reduction at any given time.

OTHER COMMENTS

- The **climate impact of the products (or any product) needs to be measured across its entire lifecycle, from cradle to grave**. For these intermediary products, transparency on embodied carbon content and whole life carbon is paramount to reducing their carbon footprint. This precautionary principle will ensure that all emissions caused by their production, use and disposal are accurately accounted for. Selective lifecycle assessments not taking into consideration the full value chain can no longer be accepted.
- **Circularity is not a closed loop as it requires additional energy and resources to undertake, and must therefore be complemented by other activities**. Many forms of recycling do not prevent flows of GHGs to the atmosphere but reduce them. Recycling carbon only prevents emissions from going into the atmosphere if there is a system-wide reduction in virgin material use and if it is a circular process with no leakage. Furthermore, high amounts of energy are needed that are currently rarely decarbonised. Reducing the environmental impacts of products means that resources extracted must be used as efficiently as possible. Consequently, **measures to reduce the environmental impacts of products should prioritise long lifecycles and value retention**.



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Bellona Europa is an independent, non-profit organisation that meets environmental and climate challenges head-on. We are result-oriented and have a comprehensive and cross-sectoral approach to assess the economics, climate impacts and technical feasibility of necessary climate solutions. To do this, we work with civil society, academia, governments and polluting industries.