

# Ecodesign Forum Meeting

Conference Centre Albert Borschette (CCAB 0D)

**19-20 February | Rue Froissart 36, B-1040 Brussels, Belgium**

APPLiA delegation available [here](#).

## 1. Rules of procedure

APPLiA comments in track changes [here](#) and [joint statement](#). During the meeting, the following key points should be emphasised:

### **Adequate Review Period**

The proposed two-week review period for agendas, meetings, and working documents is insufficient. A more appropriate timeframe should be set to allow for meaningful participation and input from stakeholders (at least 6 weeks).

### **Transparency Register and Expert Participation**

Clarification is needed regarding the role of the Transparency Register in expert groups and the process for providing experts on behalf of industry associations.

### **Decision-Making vs. Discussion Body**

Clarification is required on whether the Ecodesign Forum is a decision-making body or solely a discussion platform. If decision-making is involved, clear guidelines on the voting process must be established (e.g., one member equals one vote?).

## 2. Working Plan

Three key messages to ensure correct implementation and fair simplification:

**Cascading approach:** to remain consistent with the Commission approach on implementation and simplification, APPLiA will reinforce its message to avoid regulating components and/or subassemblies integrated into finished products (including if placed on the market as spare parts) already covered by an Ecodesign Delegated/Implemented Acts.

- **Justification:** APPLiA is deeply concerned about the EU Commission's approach to introducing new ecodesign measures for components and subassemblies of products already regulated under specific ecodesign delegated or implemented acts. While we recognize the risk that stand-alone components of finished products may be found on the market (e.g., as spare parts for vertically regulated products), these components are designed for a specific purpose—functioning within the product to



which they belong—and are not intended for widespread use in other applications. Regulating spare parts would undermine circular business models, including repairability efforts promoted by the EU Commission, by forcing manufacturers to phase out spare parts that do not comply with product-specific requirements (e.g., industrial fans, motors, light sources). This would increase costs and resource consumption for manufacturers without delivering additional energy or material savings. Furthermore, components and subassemblies integrated into home appliances are specifically designed for the appliance in question, making their reuse in other applications highly improbable. Finally, appliances are designed to optimize overall performance rather than being dictated by individual components, such as fans. From a systems perspective, imposing requirements on such niche components offers little benefit.

**Intermediate products:** Similarly to the discussion on the components and subassemblies mentioned above, we would also like to emphasise the importance of considering the requirements and evaluation done on materials and/or substances included in the working plan (such as steel and aluminium) which are part of finished products before setting additional requirements on finished products (for instance on recycled content and recyclability). Therefore, manufacturers (including APPLiA members) should be exempt from any requirements related to materials (e.g. steel and aluminium) compliant with the ESPR Delegated Acts for intermediate products.

**Product-by-product approach:** in line with the joint statement with other industry associations, APPLiA will reinforce the position to set a common methodology on recyclability, recycled content and repairability, but to set specific requirements product-by-product.

- *Justification:* Potential horizontal requirements covering different product groups, as the ones the Joint Research Centre (JRC) considered on repairability, recyclability and recycled content, carry risks, as also highlighted by the JRC and the Commission impact assessment on ESPR: 1/ Inadequate requirements; 2/ Overly vague requirements; 3/ Inadequate assessment of trade-offs between different product parameters; 4/ Slowing down the process; 5/ Risk of double regulation and regulatory overlap. See [joint statement](#).

**Realistic timeline and adoption:** Industry stakeholders require clear, pragmatic information on upcoming regulations. Regulatory timelines must align with the Ecodesign for Sustainable Products Regulation (ESPR) framework. Implementation deadlines should remain realistic to allow for proper adaptation and compliance (e.g household refrigerators and household washing machines adoption times differ considerably, one in 2028 and the other in 2026, although they started at the similar time). Finally, given the expanded scope





of the ESPR and the Commission's current resource limitations, we question the feasibility of the proposed working plan and the realism of the established timelines.

- *Justification*: Manufacturers need clear and pragmatic timelines, as upcoming regulations and requirements are crucial in guiding the innovation and research efforts of businesses. Delays, inaccurate estimations, and unreliable processes hinder manufacturers' ability to innovate and prepare for future requirements. This also leads to wasted resources and financial losses for the industry.

### 3. Others

#### Alignment with other EU union legislation

APPLiA emphasises the critical importance of ensuring that EU legislation avoids double regulation. Each piece of EU law should remain clear and distinct, preventing overlapping or redundant requirements. The requirements for products stemming from ESPR need to be fully harmonised with existing/upcoming EU legislation and existing measures to ensure complementary, consistent and non-contradictory application and avoid double or cascading product requirements. We recommend there is no crossover of requirements with WEEE legislation. WEEE legislation should focus on increasing proper collection and recycling. Preventing/ delaying waste from arising and working towards a circular value chain should be handled in ESPR.

Similarly, there should be no overlap between ESPR requirements related to substances of concern and those already set under EU chemical legislation REACH, RoHS, Food Contact Materials etc. The ESPR aims to complement REACH by addressing substances of concern in the context of product sustainability and circularity, while REACH focuses on the broader risks of chemicals to human health and the environment. Clear boundaries and effective coordination are essential to avoid overlap and ensure that both regulations contribute to a safer and more sustainable future.

There should also be consistency with existing more horizontal Regulations such as the Market Surveillance and Compliance of Products Regulation and the General Product Safety legislation. Principles and definitions should also be cross-checked for consistency with relevant standards and the EU Taxonomy criteria.

