

Joint Statement on ESPR Label



In the context of the Ramboll Questionnaire for an ESPR Label under Article 16 of the ESPR Framework, we wish to formally express profound concern regarding the consultation process and the methodology employed for establishing a label under the ESPR. We urge the study team and the EU Commission to re-evaluate their current approach to this critical matter.

Key Concerns and Principles

Reasons for a Label: Instead of already investigating the adoption of a common label layout, the EU Commission should clearly outline the rationale for establishing another label during the development of product group-specific delegated acts (DA), especially when alternative solutions for providing information to consumers, including digital ones like the Digital Product Passport (DPP) and QR codes, are already being developed under the Ecodesign for Sustainable Products Regulation (ESPR) or exist under other legislation for certain product groups. In the context of the DAs development, the EU Commission needs to specify the problems this label is intended to solve (e.g., providing pre-sale or post-sale information) and demonstrate why existing EU tools, such as the DPP and the Energy Label, are not sufficient. The creation of premature and overlapping labelling requirements would go against the EU Commission's 2025 Single Market Strategy and the commitment to reducing regulatory complexity and fragmentation. Providing consumers with similar information through several channels risks overwhelming them and thus undermining the objective of efficiently informing consumer decisions. In that connection, prior to introducing a new label, the EU Commission should carefully assess whether it improves consumer understanding or, on the contrary, increases confusion. The assessment of the need for product group-specific ESPR labels should also take into consideration market surveillance authorities' capacities to ensure compliance, as they are at present insufficiently equipped to cope with overlapping requirements.

Flawed approach: The EU Commission/Study Team's current approach is flawed as it prioritises label design over the definition of scope, key metrics, parameters considered, measurement methodologies, assessment of added value and consumer reception before introduction, and compliance controls. Establishing a robust and measurable methodology is crucial before finalising the label's design. It is also premature to consider a label layout design without first having evaluated the added value in introducing one, the existence of other tools already planned to offer that information, and the coherence with other labelling and information requirements resulting from other legislation.

Avoid a One-Size-Fits-All Label Layout/Size: We believe that a common label layout for all products under the scope of the ESPR is unfeasible and runs counter to the EU's agenda for simplification and digitalisation. Products such as appliances, furniture, and textiles have vastly different functions, sizes, and information requirements. It is impossible to define a single layout before knowing the specific information requirements for each product group. The layout of a label will always depend on the amount and type of information requirements that will be set. We urge policymakers to leave decisions on the layout and content of any potential future ESPR label to product-specific delegated acts that thoroughly assess the most appropriate requirements relevant to the overall sustainability of the product, and the information considered relevant to be provided to consumers.

Process & timeline: We fully support the objectives of the ESPR and share the EU Commission's ambition to foster more sustainable production and consumption. However, the current consultation timeline and methodology are not only inefficient but also contradict the EU Commission's stated commitment to fostering competitiveness and creating a robust, future-proof regulatory framework. The survey on the ESPR label, a tool that can fundamentally alter marketing and competition within the EU, has been given a severely limited two-week window for feedback, ending on 15 September. This is simply not enough time for stakeholders to consolidate a response and for our members—a diverse group of national associations/federations and/or companies of all sizes—to properly analyse the proposals, collect internal feedback, and provide their considered, high-quality input.

Prioritise Digitalisation & Existing Labels: The ESPR should prioritise digitalisation and the use of digital tools like EPREL, the DPP and QR codes. This hybrid approach offers a flexible way to provide detailed information to consumers without cluttering physical packaging. Adding a new physical label would not only increase costs but also risk consumer confusion and contradict efforts to minimise packaging, especially for products with small formats. An additional physical label would also run counter to other regulatory objectives, notably packaging minimisation under the PPWR, the digitalisation of product information promoted by the new Single Market Strategy, and the overall legibility and readability of on-pack consumer information. At the same time, it is important to maintain consistency in product labelling, whether in-store, physical or online, to ensure a fair consumer experience and avoid confusion. Finally, it would be important to consider other existing labels and how they would be impacted by yet another label coming on the market.

Recommendations

Given the above, we urge the EU policymakers to:

- **Critically evaluate the need for a label and its added value compared to the DPP, for products that will introduce one.** We call for the postponement of developing an ESPR label until after the DPP and product-specific ecodesign requirements have been fully implemented and evaluated. At this moment, we will be in a better position to assess how to make information more accessible and understandable to consumers.
- **Leave the decision on whether to introduce an ESPR label or not, and on its layout and content, to the future product-specific delegated acts setting out ecodesign requirements, when the latter mandate a label.** Only by knowing the content of the information requirement and the applicable product group will it be possible to define the layout of a label, in cases where introducing an ESPR label has been assessed to be of added value.
- **Generally, give stakeholders at least a 4-week timeline to provide their input.**