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Danish Chamber of Commerce's response to the Commission proposal on prioritization of products under the Ecodesign Regulation

Here are the comments from the Danish Chamber of Commerce regarding the consultation on the Commission's proposal for prioritization of products under the Ecodesign Regulation.

General remarks

- There is a need for further differentiation within several product categories, as there is a significant variation in the manufacturing processes of individual products within categories such as textiles and shoes. On the other hand, certain product categories, like mattresses, have more restrictive definitions. As a result, the relevant Ecodesign criteria will also vary greatly, making it challenging to establish common requirements for such broad product categories that align with the environmental goals of the proposal.
- The Danish Chamber of Commerce supports the development of requirements at the product group level, as it allows for clear and achievable criteria. In contrast, it is considered difficult to develop, implement, and monitor horizontal requirements for intermediate raw materials, as proposed by the Commission. Despite efforts to avoid overlapping regulations between product groups and horizontal measures, as highlighted in the JRC report (Ecodesign for Sustainable Products Regulation – preliminary study on new product priorities), introducing and revising such measures is deemed highly challenging in practice.
- The Danish Chamber of Commerce suggests that future Ecodesign work programs prioritize product categories where there is overlap in materials, production methods, and company profiles. This approach would facilitate easier dialogue and interaction between industries, companies, and authorities. For example, it could include a) textiles, furniture, mattresses or b) lubricants, paints, cosmetics.
- Furthermore, the Danish Chamber of Commerce proposes including in the initial list of regulated product categories both groups and industries that have not previously been extensively regulated (e.g., textiles), as well as those regulated by NLF legislation with defined roles, obligations, and a long-standing tradition and experience of meeting documentation requirements. This approach would ensure that all relevant considerations, including environmental protection, are taken into account in relation to the distribution of

technical documentation requirements and the practical organization of compliance processes among various operators in the value chain.

Specific comments

Textiles and shoes

- Textiles and shoes should not be classified under the same category, as there are significant differences in production, composition, and materials used in these respective products. This implies that manufacturers of clothing and shoes face distinct challenges in terms of design, production, disposal, and post-consumer life. By distinguishing between these products and imposing specific requirements and criteria, we can address their unique environmental and climate impacts more effectively.
- Energy efficiency measurements are not relevant when assessing textiles. Therefore, they should be excluded from the evaluation.
- It is crucial to establish consistent subgroups and definitions for textiles across EU regulations, ensuring equality in definitions across different directives such as the Waste Framework Directive and end-of-life criteria.
- To avoid creating unfair competition and to apply uniform requirements to suppliers across various industries, the following products should be included in the definition of textiles: tents, sleeping bags, backpacks, suitcases, and textiles used in the automotive industry.
- The proportion of a material within a product should be differentiated. This means that the inclusion of certain materials should depend on the specific product category, following a similar approach to Product Environmental Footprint (PEF) guidelines. For example, if a pair of trousers consists of leather, it should be taken into account, but if leather is used for accessories, it may not need to be included.
- Non-apparel accessories, such as jewelry, should not be classified under textiles, as their function, use, and care differ significantly from other products within the textile category.

Best regards

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