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Roadmap towards an EU Product Policy Framework contributing to the Circular Economy – Eurometaux’s input to the consultation

Introduction

The European non-ferrous metals industry is a key materials supplier and recycler of valuable metals from cars, buildings, packaging, e-waste, batteries and other applications.

We fully support the transition to a true circular economy. We believe that a coherent EU Product Policy Framework will be integral to improving product design, manufacturing, use and end-of-life treatment.

This paper is an input to the public consultation on the Roadmap on EU Product Policy Framework and it reflects on specific initiatives listed in the document.

Key recommendations

- **Reflection on Product Environmental Footprint (PEF)** – The Commission and stakeholders should continue making improvements to the Environmental Footprint (EF) method during the Transition Phase (2018 – 2021). Consideration is then needed on how to incorporate EF elements into existing policies.
- **Incorporation of material efficiency in ecodesign** – We support the ongoing development of material efficiency ecodesign standards. A consistent, generic approach is needed for application across all ecodesign product groups.
- **Complementary chemicals, product and waste policies** – A coherent approach to regulating hazardous substances in products is needed, which supports their safe production, use and recycling in Europe.

Product Environmental Footprint

We coordinate the PEF Pilot on Metal Sheets, which together with other Pilots is helping to improve the EF methodology. This will eventually allow for a benchmark to be set and the performance of similar products to be compared.

A thorough strategic reflection is needed on how to align the EF methodology with the EU’s other methods and initiatives for measuring the environmental impact and green claims. We see this as an opportunity to streamline and optimise the EU’s Product Policy Framework instead of expanding it. Elements of the EF methodology could potentially be integrated in existing tools, for example EMAS, Green Public Procurement (GPP) or Ecolabel.

However, a number of methodological issues still need refinement during the Transition Phase (2018 – 2021), including: toxicity, ecotoxicity, land use, Circular Footprint Formula (CFF) and Abiotic Depletion Potential (ADP).



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Our recommendation: Benchmarking and comparison of products should remain voluntary and industry-led. EF methodology should complement existing tools after essential developments and corrections are made.

Material efficiency in ecodesign

We support measures to encourage the consideration of a product’s material efficiency at the design stage. Improvements to a product’s recyclability can facilitate, amongst others, the recovery of strategic and critical metals at end-of-life, alongside a consideration of economic and technical viability. In this context the “potential for multiple recycling”, recently adopted in the Circular Economy legislative package, should be equally considered. This requires cooperation between product designers and material producers.

In that respect, we continue to support the development of horizontal EU standards on material efficiency, fulfilling the mandate M/543 under the Ecodesign Directive.

Our recommendation: The EU should continue to develop horizontal standards for assessing a product’s material efficiency. A consistent, generic approach is needed, appropriate for application across all ecodesign product groups.

Coherence between chemicals, products and waste policies

We have a vision for a “risk-controlled” Europe, where hazardous substances are used when their risk to human health and the environment is controlled. Many strategic products often contain metals with hazardous properties, but are produced, used and recycled safely in Europe (i.e. batteries for clean mobility).

A coherent policy approach is required to secure the safe management of essential hazardous substances across their lifecycle, without unnecessary stigmatisation. This will allow the EU to achieve its sustainability objectives at the same time as safeguarding jobs and competitiveness.

Our industry supports the European Commission’s ongoing work to clarify the interface between chemicals, products and waste legislation. The outcomes of that work should contribute to further development of the EU’s product policy framework.

In addition to the above, we would like to indicate that contrary to what the Roadmap is assuming, construction products and buildings are already covered by the Construction Products Regulation (EU 305/2011) including Basic Requirement for Construction Works n° 7: “Sustainable use of natural resources”.

Our recommendation: The EU’s product policies (i.e. ecodesign, Ecolabel) should not be used to set extra requirements or limits for the use of hazardous substances in products. Coherence with the EU’s chemicals policy framework should be secured, to respect Better Regulation principles.

