



2022/0095(COD)

9.11.2022

DRAFT OPINION

of the Committee on Industry, Research and Energy

for the Committee on the Environment, Public Health and Food Safety

on the proposal for a regulation of the European Parliament and of the Council on Establishing a framework for setting ecodesign requirements for sustainable products and repealing Directive 2009/125/EC (COM(2022)0142 – C9-0132/2022 – 2022/0095(COD))

Rapporteur for opinion(*): Maria Spyraki

(*) Associated committee – Rule 57 of the Rules of Procedure

PA_Legam

SHORT JUSTIFICATION

Waste prevention and circularity are fundamental pillars of the Green Deal. According to the new Circular Economy Action Plan (CEAP), all packaging on the market must be reusable or recyclable by 2030. In that direction, the reduction of natural resources used for production, the extension of a lifetime, the improvement of its repairability and the adoption of circular economies are the best way to extend the useful life of a product¹.

Eco-design addresses the consumption of resources and energy and reduces the lifecycle environmental impacts of products by extending the use phase. Especially for industrial enterprises and SMEs, the transformation to circular business models can be curbed by operational tools and the need for more relevant data². However, the optimal eco-design solution is only sometimes generated in the conceptual design stage due to the complex association of the life cycle design information. Therefore, this policy should also reflect ecodesign alternations³.

The current Ecodesign Directive has successfully delivered environmental and energy efficiency objectives for energy-related products, regulating measurable, verifiable parameters of the product based on a clear and transparent methodology. Therefore, the Rapporteur generally supports many elements of the Commission proposal. However, any new requirement should be measurable on the product and designed to be efficiently enforced unless tested cost-efficiently and within a short enough time. Therefore, the Rapporteur suggests building on the experience of the ecodesign instrument.

Moreover, the proposal for a new Regulation on Ecodesign for Sustainable Products (ESPR) should enable a comprehensive and harmonised set of requirements for the sustainability of products placed on the EU market. The industry should undertake those requirements through continual sustainability improvements and encouraging consumers to adopt more sustainable ways. Even though room for improvement that certain technologies or product design choices may have should be left.

Ecodesign and information requirements harmonisation at the EU level by using harmonised methodologies to assess environmental impact is necessary to achieve the sustainability of products. The Rapporteur stresses that the regulations should bring added value to users, avoiding unnecessary and burdensome replications of information in existing databases. To improve environmental sustainability, future regulation requirements should identify the most appropriate variables, considering that product parameters can be interdependent and affect each other (e.g. repairability can affect reliability, etc.).

Additionally, it is important to ensure that the definitions included in the Regulation are clear and the list of parameters and criteria is exhaustive to cover all possible sustainability aspects across all products. But there is a need to establish overarching product sustainability criteria to minimise the product's negative environmental and social impacts.

Furthermore, information disclosure responsibility along the supply chain should be shared.

¹<https://www.sciencedirect.com/science/article/pii/S2212827122001007>

² <https://www.sciencedirect.com/science/article/pii/S0959652621030432>

³ <https://www.sciencedirect.com/science/article/pii/S0959652622021175>

Sharing responsibilities in the supply chain for generating and providing information should be reflected in the Regulation. Data and information shall originate from suppliers, while the obligation to provide such information will rest on manufacturers placing the final products on the EU market.

Concerning the Digital Product Passport (DPP), it should rely on existing databases to avoid unnecessary and burdensome replication, reduce waste and enable consumers to play a more active role in the green and digital transitions. The DPP could be an effective tool to facilitate communication along the value chain and ensure that the value of information, materials and products is preserved. Information gaps, as identified in the Circular Economy Action Plan, are a key negative externality that needs to be addressed to make sustainable products the norm. Thus, the DPP information should be limited, with added value to the key stakeholders.

Furthermore, the Rapporteur believes that all requirements set by the Regulation must be implemented with sufficient transition times to minimise market distortions. A sufficient lead time should be granted between the publication of legislation and the application of new product requirements, particularly because of the need for developing harmonised standards because the industry needs to adapt its processes for implementing new or updated legal requirements through complex supply chains.

AMENDMENTS

The Committee on Industry, Research and Energy calls on the Committee on the Environment, Public Health and Food Safety, as the committee responsible, to take into account the following amendments:

Amendment 1

Proposal for a regulation

Recital 26

Text proposed by the Commission

(26) The information requirements set under this Regulation should include the requirement to make available a product passport. The product passport is an important tool for making information available to actors along the entire value chain and the availability of a product passport should significantly enhance end-to-end traceability of a product throughout its value chain. Among other things, the product passport should help consumers make informed choices by improving their access to product information relevant to them, allow economic operators other

Amendment

(26) The information requirements set under this Regulation should include the requirement to make available a product passport. The product passport is an important tool for making information available to actors along the entire value chain and the availability of a product passport should significantly enhance end-to-end traceability of a product throughout its value chain. Among other things, the product passport should help consumers make informed choices by improving their access to product information relevant to them, allow economic operators other

value chain actors such as repairers or recyclers to access relevant information, and enable competent national authorities to perform their duties. To this end, the product passport should not replace but complement non-digital forms of transmitting information, such as information in the product manual or on a label. In addition, it should be possible for the product passport to be used for information on other sustainability aspects applicable to the relevant product group pursuant to other Union legislation.

value chain actors such as **professional** repairers or recyclers to access relevant information, and enable competent national authorities to perform their duties. To this end, the product passport should not replace but complement non-digital forms of transmitting information, such as information in the product manual or on a label. In addition, it should be possible for the product passport to be used for information on other sustainability aspects applicable to the relevant product group pursuant to other Union legislation.

Or. en

Amendment 2

Proposal for a regulation

Article 2 – paragraph 1 – point 23

Text proposed by the Commission

(23) ‘environmental footprint’ means a quantification of a product’s environmental impacts, whether in relation to a single environmental impact category or an aggregated set of impact categories based on the Product Environmental Footprint method;

Amendment

(23) ‘environmental footprint’ means a quantification of a product’s environmental impacts, whether in relation to a single environmental impact category or an aggregated set of impact categories based on the Product Environmental Footprint method **and relevant Product Environmental Footprint Category Rules(PEFCRs), or other scientifically validated category rules ensuring accuracy and reliability in accordance with legislation on substantiating green claims;**

Or. en

Justification

It is important to acknowledge the need to use the established PEFCRs or other validated category rules. In this context it will be ensured that the dataset used is regularly. The strive for harmonization in the calculation methods used to determine the environmental impact of products will make it easier for consumers to compare the data they receive and avoid greenwashing practices, thus enabling them to make more accurate sustainable choices.

Amendment 3

Proposal for a regulation

Article 2 – paragraph 1 – point 25

Text proposed by the Commission

(25) ‘carbon footprint’ means the sum of greenhouse gas (GHG) emissions and GHG removals in a product system, expressed as CO₂ equivalents and based on a life cycle assessment using the single impact category of climate change;

Amendment

(25) ‘carbon footprint’ means the sum of greenhouse gas (GHG) emissions and GHG removals in a product system, expressed as CO₂ equivalents, ***as defined in the certification of carbon removals***, and based on a life cycle assessment using the single impact category of climate change;

Or. en

Justification

It is important the information related to the carbon footprint of products is crucial to enable the take up of truly sustainable products. Wood-based products store CO₂ and substitute fossil-based and fossil-intensive materials and energy. The differentiation between carbon sources through separate certificates in the upcoming framework carbon removals framework would support renewable, bio-based products and materials in substituting of fossil-based ones.

Amendment 4

Proposal for a regulation

Article 2 – paragraph 1 – point 59 a (new)

Text proposed by the Commission

Amendment

(59a) “renewability” means the ability of a natural resource to replenish and recover over time.

Or. en

Justification

To support the further development of the bio-based industries it is important to acknowledge the potential bio-based products to reach the climate neutrality targets and, to incentivise the uptake of ‘renewable products’. By including renewability of the raw materials used to manufacture products is among the essential requirements that could be set in the upcoming delegated acts to support the development of the bio-based industries.

Amendment 5

Proposal for a regulation

Article 2 – paragraph 1 – point 59 b (new)

Text proposed by the Commission

Amendment

(59b) "professional repairer" means an operator or undertaking which provides professional repair and maintenance services.

Or. en

Justification

The definition should be included to underline the specifications for the product passport set out in Article 8.2 (f and g). The repairer must notably comply with the applicable standards for electrical equipment, but also have relevant liability insurance in case of redress. The proposed definition is already in several pieces of EU eco design legislation as well as at the applied eco-design legislation.

Amendment 6

Proposal for a regulation

Article 2 – paragraph 1 – point 59 c (new)

Text proposed by the Commission

Amendment

(59c) "renewability of materials and use or content of renewable raw materials" means the ability for a natural resource to replenish and recover over time.

Or. en

Justification

To support the further development of the biobased industries it is important to formally acknowledge the potential biobased products have to reach the climate neutrality targets and, whenever possible, to incentivise the uptake of 'renewable products', where 'renewability' means the ability for a natural resource to replenish and recover over time and thereby is infinite when growth is greater than consumption that come from sustainably managed sources rather than those made from finite/fossil-based resources.

Amendment 7

Proposal for a regulation

Article 4 – paragraph 4 (new)

Text proposed by the Commission

Amendment

Delegated acts referred to in the first paragraph shall apply at the earliest 24 months after the entry into force of that delegated act.

Or. en

Justification

Sufficient transition periods should be allowed by legislation between the entry into force of legislation and the application of new product requirements. Adequate transition time is also necessary to provide the industry with the legal certainty to make the necessary product design changes and to scale them up. For new technologies to be developed and brought to the market they need a proper, predictable framework to unleash their potential.

Amendment 8

Proposal for a regulation

Article 5 – paragraph 1 – point n a (new)

Text proposed by the Commission

Amendment

(na) renewability of materials and use or content of renewable raw materials.

Or. en

Justification

To support the further development of the biobased industries it is important to formally acknowledge the potential biobased products have to reach the climate neutrality targets and, whenever possible, to incentivise the uptake of ‘renewable products’, where ‘renewability’ means the ability for a natural resource to replenish and recover over time and thereby is infinite when growth is greater than consumption that come from sustainably managed sources rather than those made from finite/fossil-based resources.

Amendment 9

Proposal for a regulation

Article 5 – paragraph 5 – point f a (new)

Text proposed by the Commission

Amendment

(fa) they shall be technically feasible in accordance with state-of-the art technology.

Or. en

Justification

Eco design requirements shall be feasible based on available technologies, i.e. companies cannot be required to implement eco design solutions based on technologies that do not yet exist/do not offer scalable solutions.

Amendment 10

Proposal for a regulation

Article 7 – paragraph 6 – subparagraph 3

Text proposed by the Commission

Amendment

Information ensuring the traceability of substances pursuant to paragraph 5 shall be given either on the product or be accessible through a data carrier included on the product.

The information requirements shall be clear and appropriate allowing the users to make comparisons among products.

Or. en

Justification

It is important that the amount of required information remains feasible and understandable for consumers. The information should be clear and allow the users to make meaningful comparisons among products, not overloading them with information that might be difficult to understand.

Amendment 11

Proposal for a regulation

Article 7 – paragraph 7 a (new)

Text proposed by the Commission

Amendment

7a. Any supplier of an article, a substance or a mixture shall provide the recipient of that article, substance or mixture with sufficient information, free

of charge, to allow the manufacturers to comply with information requirements related to the product aspects listed in Article 5(1).

Or. en

Justification

Objective of this amendment is to have communication from suppliers to manufacturers on all aspects related to the Digital Product Passport. Companies can encounter many difficulties when trying to get information from upstream suppliers, particularly those located outside of Europe.

Amendment 12

Proposal for a regulation

Article 8 – paragraph 2 – point (f)

Text proposed by the Commission

(f) the actors that shall have access to information in the product passport and to what information they shall have access, including customers, end-users, manufacturers, importers and distributors, dealers, repairers, remanufacturers, recyclers, competent national authorities, public interest organisations and the Commission, or any organisation acting on their behalf;

Amendment

(f) the actors that shall have access to information in the product passport and to what information they shall have access, including customers, end-users, manufacturers, importers and distributors, dealers, **professional** repairers, remanufacturers, recyclers, competent national authorities, public interest organisations and the Commission, or any organisation acting on their behalf;

Or. en

Amendment 13

Proposal for a regulation

Article 8 – paragraph 2 – point (g)

Text proposed by the Commission

(g) the actors that may introduce or update the information in the product passport, including where needed the creation of a new product passport, and what information they may introduce or update, including manufacturers, repairers, maintenance professionals,

Amendment

(g) the actors that may introduce or update the information in the product passport, including where needed the creation of a new product passport, and what information they may introduce or update, including manufacturers, **professional** repairers, maintenance

remanufacturers, recyclers, competent national authorities, and the Commission, or any organisation acting on their behalf;

professionals, remanufacturers, recyclers, competent national authorities, and the Commission, or any organisation acting on their behalf;

Or. en

Amendment 14

Proposal for a regulation

Article 10 – paragraph 1 – point a

Text proposed by the Commission

(a) product passports shall be fully interoperable with other product passports required by delegated acts adopted pursuant to Article 4 in relation to the technical, semantic and organisational aspects of end-to-end communication and data transfer;

Amendment

(a) product passports shall be fully interoperable with other product passports required by delegated acts adopted pursuant to Article 4 in relation to the technical, semantic and organisational aspects of end-to-end communication and data transfer **and with existing product databases**;

Or. en

Justification

The information displayed in the Digital Product Passport should be drawn directly from the legally mandated EU databases to achieve time efficiency.

Amendment 15

Proposal for a regulation

Article 10 – paragraph 1 – point f

Text proposed by the Commission

(f) the rights to access and to introduce, modify or update information in product passport shall be restricted based on the access rights specified in delegated acts adopted pursuant to Article 4;

Amendment

(f) the rights to access and to introduce, modify or update information in product passport shall be restricted based on the access rights specified in delegated acts adopted pursuant to Article 4, **with specific consideration of information that constitutes trade secrets or proprietary information**;

Or. en

Justification

Adequate protection of confidential and sensitive information is required.

Amendment 16

Proposal for a regulation

Article 16 – paragraph 2 – subparagraph 2

Text proposed by the Commission

When adopting or updating the working plan referred to in the first subparagraph, the Commission shall take into account the criteria set out in paragraph 1 of this Article and shall consult the Ecodesign Forum referred to in Article 17.

Amendment

When adopting or updating the working plan referred to in the first subparagraph, the Commission shall take into account the criteria set out in paragraph 1 of this Article and shall consult the Ecodesign Forum ***in an appropriate timeframe as*** referred to in Article 17.

Or. en

Justification

Given the proven long standing experience with the current Eco design process, we should keep it based on appropriate consultation with all relevant stakeholders.

Amendment 17

Proposal for a regulation

Article 17 – paragraph 1

Text proposed by the Commission

The Commission shall ensure that when it conducts its activities, it observes a balanced participation of Member States' representatives and all interested parties involved with the product or product group in question, such as industry, including SMEs ***and*** craft industry, trade unions, traders, retailers, importers, environmental protection groups ***and*** consumer organisations. These parties shall contribute in particular to preparing ecodesign requirements, examining the effectiveness of the established market surveillance mechanisms and assessing

Amendment

The Commission shall ensure that when it conducts its activities, it observes a balanced participation of Member States' representatives and all interested parties involved with the product or product group in question, such as industry, including SMEs, craft ***and recycling*** industry, trade unions, traders, retailers, importers, environmental protection groups, consumer ***organisations and standardisation*** organisations. These parties shall contribute in particular to preparing ecodesign requirements, examining the effectiveness of the established market

self-regulation measures.

surveillance mechanisms and assessing self-regulation measures.

Or. en

Amendment 18

Proposal for a regulation Article 17 – paragraph 2

Text proposed by the Commission

To that end, the Commission shall establish an expert group, in which those parties shall meet, referred to as the ‘Ecodesign Forum’.

Amendment

To that end, the Commission shall establish an expert group, in which those parties shall meet, referred to as the ‘Ecodesign Forum’. ***The Ecodesign Forum shall advise the Commission on the delegated acts referred to in Article 4 and carry out its tasks in accordance with the principle of transparency. The Commission shall publish the minutes of the meetings of the Ecodesign Forum and other relevant documents on the Commission website.***

Or. en

Justification

The involvement of the industry would ensure delivering concrete environmental benefits in an economically and technically viable way. This can be achieved by building on the model of the Ecodesign and Energy Labelling Consultation Forum (EELCF), which was set up to work on the development and review of implementing measures and delegated acts pursuant to the original Ecodesign Directive.

Amendment 19

Proposal for a regulation Article 26 – title

Text proposed by the Commission

Obligations related to labels

Amendment

Obligations related to labels ***and suppliers***

Or. en

Amendment 20

Proposal for a regulation Article 26 – paragraph 1

Text proposed by the Commission

1. Where a delegated act adopted pursuant to Article 4 requires products to have a label as referred to in Article 14, the economic operator placing the product on the market or putting it into service shall ensure that products are accompanied, for each individual unit and free of charge, by printed labels in accordance with that delegated act.

Amendment

1. Where a delegated act adopted pursuant to Article 4 requires products to have a label as referred to in Article 14, the economic operator placing the product on the market or putting it into service shall ensure that products are accompanied, for each individual unit and free of charge, by printed ***or digital*** labels in accordance with that delegated act. ***For sustainability reasons, preference shall be given to digital labels.***"

Or. en

Justification

Providing printed labels to each product can be an unnecessary burden. Dealers can download the digital copies when needed. This would also be an alternative to having to affix a label on the packaging of the product, which is subject to complexities due to different languages and the limited space on packaging for very small products.

Amendment 21

Proposal for a regulation Article 26 – paragraph 4 a (new)

Text proposed by the Commission

Amendment

4a. Any supplier of an article, a substance or a mixture shall provide economic operators responsible for compliance with Articles 6 and 7 with sufficient available information related to their supplies or services that are relevant to ensure products comply with the performance and information requirements pursuant to Article 6 and 7. If the recipient of the article, substance or mixture is not economic operator responsible for compliance with the information requirements set out in

Articles 6 and 7, the recipient of the article, substance or the mixture shall ensure that the information referred to in the first paragraph of this Article is communicated to the economic operator responsible for compliance with the information requirements set out in Article 6 and 7.

Or. en

Justification

Suppliers of product components or substances are best placed to provide sustainability information to manufacturers, as they own the information, who can then integrate it into the DPP as appropriate. Therefore, it is essential for suppliers to disclose to manufacturers all relevant information required under the DPP and also protect smaller European manufacturers that do not have the negotiating power to induce suppliers into providing them the information needed for the DPP.

Amendment 22

**Proposal for a regulation
Annex I – paragraph 1 – introductory part**

Text proposed by the Commission

The following parameters **may, as** appropriate, **and** where necessary supplemented by others, be used as a basis for improving the product aspects referred to in Article 5(1):

Amendment

The following parameters, **justified by an** appropriate **life cycle and circularity assessment, and**, where necessary supplemented by others, **may** be used, **individually or aggregated**, as a basis for improving the product aspects referred to in Article 5(1):

Or. en

Justification

There is a need for a holistic, integrated approach. Different interdependent parameters could improve the environmental sustainability of the product. Improving the repairability of the product does not necessarily improve its reliability. This is why the methodology must consider several environmental dimensions and assess the variables of different individual product groups until the end of their life.

Amendment 23

Proposal for a regulation Annex I – paragraph 1 – point b

Text proposed by the Commission

(b) ease of repair and maintenance as expressed through: characteristics, availability and delivery time of spare parts, modularity, compatibility with commonly available spare parts, availability of repair and maintenance instructions, number of materials and components used, use of **standard** components, **use of component and material coding standards for the identification of components** and materials, number and complexity of processes and tools needed, ease of non-destructive disassembly and re-assembly, conditions for access to product data, conditions for access to or use of hardware and software needed;

Amendment

(b) ease of repair and maintenance **keeping in mind product safety** as expressed through: characteristics, availability and delivery time of spare parts, modularity, compatibility with commonly available spare parts, availability of repair and maintenance instructions, number of materials and components used, use of components **with standardised size and/or form** and materials, number and complexity of processes and tools needed, ease of non-destructive disassembly and re-assembly, conditions for access to product data, conditions for access to or use of hardware and software needed. **Access to the information should be facilitated on a need-to-know basis and in line with the intellectual property protection rules.**

Or. en

Justification

It is important to clarify what is meant by standard components. Product safety shall always be considered with this product parameter. Intellectual property rights and trade secrets need to be considered. It is also important in relation to anti-tampering measures, as disclosing certain details about the products could enable their subsequent modification in a manner that could endanger product safety.

Amendment 24

Proposal for a regulation Annex I – paragraph 1 – point c

Text proposed by the Commission

(c) ease of upgrading, re-use, remanufacturing and refurbishment as expressed through: number of materials and components used, use of standard

Amendment

(c) ease of upgrading, re-use, remanufacturing and refurbishment as expressed through: number of materials and components used, use of standard

components, use of component and material coding standards for the identification of components and materials, number and complexity of processes and tools needed, ease of non-destructive disassembly and re-assembly, conditions for access to product data, conditions for access to or use of hardware and software needed, conditions of access to test protocols or not commonly available testing equipment, availability of guarantees specific to remanufactured or refurbished products, conditions for access to or use of technologies protected by intellectual property rights, modularity;

components, use of component and material coding standards for the identification of components and materials, number and complexity of processes and tools needed, ease of non-destructive disassembly and re-assembly, conditions for access to product data, conditions for access to or use of hardware and software needed, conditions of access to test protocols or not commonly available testing equipment, availability of guarantees specific to remanufactured or refurbished products, conditions for access to or use of technologies protected by intellectual property rights, modularity.
Access to the information should be facilitated on a need-to-know basis and in line with the intellectual property protection rules.

Or. en

Justification

The intellectual property rights and trade secrets need to be considered; if such level of detail is shared, it has to be clearly established who might have access and measures against misuse shall be put in place. This is also important in relation to anti-tampering measures, as disclosing certain details about the products could enable their subsequent modification in a manner that could endanger product safety.

Amendment 25

Proposal for a regulation

Annex I – paragraph 1 – point d

Text proposed by the Commission

(d) ease and quality of recycling as expressed through: use of easily recyclable materials, safe, easy and non-destructive access to recyclable components and materials or components and materials containing hazardous substances, material composition and homogeneity, possibility for high-purity sorting, number of materials and components used, use of standard components, use of component and material coding standards for the

Amendment

(d) ease and quality of recycling as expressed through: use of easily recyclable materials, safe, easy and non-destructive access to recyclable components and materials or components and materials containing hazardous substances, material composition and homogeneity, possibility for high-purity sorting, ***design for recycling***, number of materials and components used, use of standard components, use of component and

identification of components and materials, number and complexity of processes and tools needed, ease of non-destructive disassembly and re-assembly, conditions for access to product data, conditions for access to or use of hardware and software needed;

material coding standards for the identification of components and materials, number and complexity of processes and tools needed, ease of non-destructive disassembly and re-assembly, conditions for access to product data, conditions for access to or use of hardware and software needed;

Or. en

Justification

Recyclability should indeed be addressed as part of the product parameters mentioned in Annex I (d) as ‘ease and quality of recycling’. High-quality recycling means that the materials are recycled back into the industry and transformed into new products. In order to enable high quality recycling, a requirement for “design for recyclability” can also successfully address the presence of substances of concern, which negatively affect the re-use and recycling of a given product.

Amendment 26

Proposal for a regulation Annex I – paragraph 1 – point e

Text proposed by the Commission

(e) avoidance of technical solutions detrimental to re-use, upgrading, repair, maintenance, refurbishment, remanufacturing and recycling of products and components;

Amendment

(e) avoidance of technical solutions detrimental to re-use, upgrading, repair, maintenance, refurbishment, remanufacturing and recycling of products and components, ***unless required, to ensure the safety of the product;***

Or. en

Justification

It is important that the proposal clearly states that the new eco-design requirements should be in place while ensuring product safety. However, this should be re-emphasised throughout the proposal and taken into account when performing a technical, environmental and economic analysis of the criteria for any product group.

Amendment 27

Proposal for a regulation Annex I – paragraph 1 – point p

Text proposed by the Commission

Amendment

(p) amounts of waste generated, including plastic waste and packaging waste and their ease of re-use, and amounts of hazardous waste generated;

(p) amounts of waste generated, including plastic waste and packaging waste and their ease of re-use, ***ease of recycling*** and amounts of hazardous waste generated;

Or. en

Justification

Recyclability should indeed be addressed as part of the product parameters mentioned in Annex I (d) as ‘ease and quality of recycling’. High-quality recycling means that the materials are recycled back into the industry and transformed into new products. However, ‘ease of recycling’ needs to be consistently addressed throughout the proposal, for example also in the context of the amounts of waste generated and the ease of re-use in Annex I (p).

Amendment 28

Proposal for a regulation Annex I – paragraph 1 – point q

Text proposed by the Commission

Amendment

(q) conditions for use.

(q) conditions for use, ***including the environmental impact and benefits during the use.***

Or. en

Justification

It is especially important to allow taking into account environmental benefits linked to the use of the product. .

Amendment 29

Proposal for a regulation Annex I – paragraph 1 – point q a (new)

Text proposed by the Commission

Amendment

(qa) renewability of materials and use or content of renewable raw materials.

Or. en

Justification

To support the further development of the bio based industries it is important to formally acknowledge the potential bio based products have to reach the climate neutrality targets and, whenever possible, to incentivise the uptake of 'renewable products'. Time is greater than consumption that come from sustainably managed sources rather than those made from finite/fossil-based resources.