

The Eco-Design Directive work plan for 2015-2017 FEAD statement 18 April 2016

As previously highlighted by FEAD in its position paper on the revised Circular Economy Package¹, eco-design is meant to play a determinant role in the success of the transition towards a circular economy. Eighty percent of the environmental impact of products is determined at their design stage and design choices “*directly impact the complexity and economics of after-use processes*”². Eco-design strategies are needed in order to ensure better coherence between the manufacturing and waste management processes and to close loops. Therefore, this is an excellent opportunity for Europe to take the lead in smart eco-design.

FEAD believes that the following points should be discussed and supported by the Commission:

- **The Eco-Design Directive work plan for 2015-2017 should go beyond energy efficiency and improve measures for material resource efficiency.**

The transition towards better eco-design could start with the replacement of formats and materials designs that prevent effective sorting and recycling with known alternatives. Then, the success of the development of eco-design will also depend on the capacity to foster ongoing efforts and innovation.³ Material resource efficiency can be improved through the establishment of durability, reparability and recyclability requirements, for selected products (such as electronics).

- **The Commission should facilitate the cooperation between the manufacturers and waste managers, in eco-design processes.**

As pointed out in the EEA report, the development of eco-design requirements is closely related to the capacity of involving all the players of the value chain and to provide them with specific indicators that will enable effective monitoring⁴. An intensified cooperation will ensure that products are designed to prevent waste and to be easily reused, dismantled and recycled. FEAD suggests that the Eco-design Directive work plan includes the set-up of a platform for product designers and the waste management sector to learn from each other.

- **The Commission should ensure that extended producer responsibility schemes take account of products' re-usability and recyclability.**

Fees paid to EPR schemes should provide incentives to manufacturers to design their products in a recyclable and non-hazardous way. Member States, when determining the best national/local financial mechanism, should take into account good practices, for example, a bonus/malus system. Therefore, fees paid by waste producers to EPR systems could be modulated by taking into account products' re-usability and recyclability. Moreover, EPR schemes should ensure fair and equal access to materials and resources.

¹ FEAD, “[FEAD position paper on a revised Commission proposal on Circular Economy](#)” March 2016

² Ellen Mac Arthur Foundation, “*The New Plastic Economy, rethinking the future of plastics*”, 2016, p.50

³ Idem, p.50

⁴ EEA, “*Circular economy in Europe, developing the knowledge base*”, EEA Report – No 2/2016