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Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030

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1. INTRODUCTION

1.1. A single market for sustainable products

The **Ecodesign for Sustainable Products Regulation** (**ESPR**) ([1]) is the legal framework for setting ecodesign requirements. Together with the **Energy Labelling Framework Regulation (ELFR)** it facilitates consumer choice and encourages the take-up of more sustainable and energy-efficient products. This Communication specifies the products to be prioritised for the work to be carried out up until 2030 under the ESPR and the ELFR.

Setting harmonised ecodesign requirements applicable throughout the single market helps boost the uptake of sustainable products, production and consumption. Stakeholders support this initiative because it reduces compliance costs, simplifies the system and enables producers and consumers to benefit from the economies of scale that a market with 450 million consumers provides. This stimulates investment and innovation, creating more demand for sustainable products, which promotes the competitiveness of EU manufacturers and encourages sustainable choices throughout the value-chain. Setting ambitious thresholds to place products on the EU market, which apply to both EU and non-EU companies, is a valuable opportunity to increase the sustainability of global value chains. Moreover, incentives can help promote sustainable products and ensure their affordability for all consumers.

Ecodesign requirements are effective in reducing the environmental, energy and climate impacts of products and energy consumption and in improving circularity. By providing more information on product sustainability, the requirements help consumers make better informed purchase decisions and create economic benefits for producers of more sustainable products. The development of ecodesign requirements on the repairability of consumer products is also relevant for extending the consumer's right to repair established by the Directive EU/2024/1799 on promoting the repair of goods ([2]). As a result, ecodesign requirements contribute to major EU policy goals related to the environment, energy, climate, consumer protection, competitiveness, resilience and the single market.

This working plan will also contribute to the aims of the recently adopted Competitiveness Compass ([3]) by helping to close the innovation gap and to boost competitiveness, decarbonisation and EU economic security. Moreover, it can help develop lead markets for

([1]) Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products.

([2]) Directive (EU) 2024/1799 of the European Parliament and of the Council of 13 June 2024 on common rules promoting the repair of goods and amending Regulation (EU) 2017/2394 and Directives (EU) 2019/771 and (EU) 2020/1828 (Text with EEA relevance), OJ L, 2024/1799, 10.7.2024, ELI: http://data.europa.eu/eli/dir/2024/1799/oj

([3]) COM(2025) 30 final.

sustainable and circular products, in line with the recent Clean Industrial Deal ([4]) and the Steel and Metals Action Plan ([5]). The Commission plans to issue a related Circular Economy Act and an Industrial Decarbonisation Accelerator Act to complement this initiative.

ESPR is a key contribution to the Clean Industrial Deal's ambition to make the EU the world leader on circular economy by 2030. The adoption of the product requirements under ESPR – complemented by the upcoming Circular Economy Act – will be central for making our economies more circular by developing lead markets for sustainable and circular products, making sure that products containing valuable and scarce materials are reused efficiently and for as long as possible before they become waste, and by incorporating criteria promoting reparability, recyclability and recycled content. In brief, the ESPR will significantly advance our goal of a clean, decarbonised, and resource-efficient EU economy.

1.2. Contributing to the goals of simplification and burden reduction

This working plan is the first to apply the wider scope of the ESPR to specific products. It aims to strike a balance between the ESPR's potential positive environmental impacts, its capacity to deliver and the need to simplify regulations. Several provisions of the ESPR explicitly require that the Commission, when setting ecodesign rules (including on reporting), avoids placing a disproportionate administrative burden on businesses, in particular on SMEs ([6]).

The goal of simplification is at the very core of the ESPR. By setting harmonised product sustainability requirements at EU level, applicable across all Member States, it will prevent barriers to trade and level the playing field for businesses operating on or exporting to the EU single market, in turn reducing their administrative burden.

The working plan identifies the first set of key priorities to build up experience and the capacities needed for the ESPR to reach its full regulatory potential, in partnership with Member State authorities. In parallel, it paves the way to cover more product groups in future by conducting preliminary scoping studies and detailed assessments of the potential impacts and improvements. This approach helps keep the commitments to issuing new regulatory measures, reduces the risk of delays and contributes to a stable business environment.

The building up of experience includes methodological aspects, especially on carbon accounting where the working plan implementation will contribute to the objective of the Clean Industrial Deal communication to simplify and harmonise carbon accounting methodologies, in complementarity with the voluntary label also announced in the Clean Industrial Deal.

([4]) COM(2025) 85 final.

([5]) COM (2025) 125 final.

([6]) In particular, ESPR Articles 5, 7, 13, 16, 36, 39, 47 and 60.

1.3. Building on the success story of the ecodesign and energy labelling

The ESPR builds on the approach successfully pioneered under the EU's **current Ecodesign and Energy Labelling Framework for two, respectively three, decades now.**

It is estimated ([7]) that the current ecodesign and energy labelling requirements achieved a **12% reduction in final energy consumption in 2023.** This is more than the combined final energy consumption of Belgium and Czechia combined, avoiding **145 million tonnes of CO_2** emissions that year. In 2020, the requirements are also estimated to have led to an increase of **346 000 jobs**, and cost savings of between EUR 182 and EUR 266 per household, a figure estimated to rise to between **EUR 473 and EUR 736** per household by 2030. It has also paid off for business: **93% of consumers recognise the energy label** when buying labelled products and suppliers and retailers see an increase in demand for higher performance products (helping consumers factor in more than simply the cost of purchase). Lastly, this framework has promoted more energy efficient production patterns worldwide and it has encouraged many third countries to bring in similar legislation.

The ESPR aims to replicate this success on a broader scale while maintaining the close synergies achieved with the Energy Labelling Framework. The ESPR will enable ecodesign requirements to be set for a much wider range of products ([8]). The requirements may cover two aspects: *product performance* (e.g. durability, availability of spare parts, minimum recycled content) and/or *product information* (e.g. key product features, its carbon/environmental footprint). Product information will mainly be made available via the Digital Product Passport or, for products with energy labels, via the European Product Registry for Energy Labelling (EPREL). Ecodesign requirements will be set via delegated acts, on a product-by-product basis, or horizontally for groups of similar products at a time. When developing ecodesign requirements, the Commission will pay special attention to the needs of SMEs, in particular micro-enterprises and small mid-cap enterprises, and will provide tailored support in line with Article 22 ESPR.

2. PRODUCTS TO BE PRIORITISED IN THE WORKING PLAN FOR 2025-2030

2.1. Legal requirements

The ESPR sets out criteria for prioritising products and including them in working plans that cover a minimum of three years. Inclusion in the working plan must be based on their potential to contribute to the EU's climate, environmental and energy efficiency objectives. It must also consider factors such as any gaps in EU law, range of product performance, volume of sales and trade, impacts across the value chain and the need to review existing requirements.

For this first working plan, the priorities were set in the Regulation (Article 18) itself: iron and steel; aluminium; textiles, in particular garments and footwear; furniture, including mattresses;

([7]) 2024 Ecodesign Impact Accounting, https://europa.eu/!THcmy4

([8]) ESPR Article 1 (2).

tyres; detergents; paints; lubricants; chemicals; energy-related products and ICT products and other electronics. However, the Regulation gives the Commission some discretion to omit some of these products or to add new products, if it provides a justification.

The ESPR working plan also includes a list of products to be prioritised for energy labelling, in conformity with the **Energy Labelling Framework Regulation** ([9]). Under this Regulation, older labels are to be rescaled and updated to reflect market and technology developments.

To mirror the duration of the Commission and Parliament's mandate and to ensure predictability for businesses, **the Commission proposes a five-year ESPR and energy labelling working plan (from 2025 to 2030) with a mid-term review after three years (in 2028).**

2.2. Evidence-based, inclusive and transparent process for predictable results

The selection of priority products is underpinned by a thorough technical analysis ([10]), including an extensive consultation process involving stakeholders, including the Member States.

This process included a wide public consultation ([11]) in 2023 and presentation and discussion of the draft working plan at the first meeting of the **Ecodesign Forum on 19 February 2025. Over 200 participants attended** (on site and online), representing various sectors of industry, academics, NGOs and international partners, as well as Member States and EEA countries ([12]). The consultation feedback was thoroughly examined when finalising this working plan.

Following the preparatory process described in the previous section, the first working plan will include **four final products**, **two intermediate products** and **two legal acts setting horizontal requirements**, in addition to a list of substantial work prepared and carried over from the last ecodesign and energy labelling working plan ([13]).

2.2.1. New products to be included in the working plan

Product/Measure	JRC ranking	Stakeholders' opinion	Market size (EU)	Improvement potential	Indicative timeline for adoption
Final products					

([9]) Regulation (EU) 2017/1369 setting a framework for energy labelling and repealing Directive 2010/30/EU.

([10]) https://publications.jrc.ec.europa.eu/repository/handle/JRC138903

([11]) https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13682-New-product-priorities-for-Ecodesign-for-Sustainable-Products/public-consultation_en

([12]) In addition, the ESPR **Member States Expert Group** met on 21 February 2025 to elicit specific views from Member States and EEA countries. See related documents here: https://ec.europa.eu/transparency/expert-groups-register/screen/meetings/consult?lang=en&meetingId=59861&fromExpertGroups=3969

([13]) https://energy.ec.europa.eu/publications/ecodesign-and-energy-labelling-working-plan-2022-2024_en

Textiles/Apparel	1st	High support	EUR 78 billion (out of EUR 142 billion of all textiles and footwear in market size, 2019)	High potential to improve product lifetime extension, material efficiency and to reduce impacts on water, waste generation, climate change and energy consumption. Information requirements under the ESPR will work in synergy with the Textile Labelling Regulation, currently under review.	2027
Furniture	2nd	Support	EUR 140 billion (2021)	High potential to improve aspects of resource use, with impacts of production and supply of materials often being the main contributor across different environmental impact categories (e.g. climate change, acidification, eutrophication), and waste generation. Positive impact on other categories such as air, soil and biodiversity.	2028
Tyres	3rd	High support	EUR 45 billion (2021)	Though already regulated by other pieces of EU legislation (including the Tyre Labelling Regulation (EU) 2020/740), potential to improve recyclability and recycled content and to mitigate risks related to waste management of end-of-life tyres.	2027
Mattresses	4th	High support	EUR 10 billion (2022)	High potential to improve waste generation, lifetime extension and material efficiency.	2029
Intermediate products					
Iron & Steel	1st	High support	EUR 152 billion (2023)	High potential to improve the impacts on climate change, energy consumption, water, air and to boost the EU's resilience, strategic autonomy and technological innovation. Measures under the ESPR will complement the green steel label announced in the Clean Industrial Deal as well as existing environmental and climate measures on steel products and production such as the ETS and CBAM.	2026
Aluminium	4th	Support	EUR 40 billion (2019)	Potential to improve effects on climate change, energy consumption, air, water, biodiversity, soil pollution and raw	2027

				materials. Incorporating secondary materials during manufacturing can reduce greenhouse gas emissions by up to 11 times. Aluminium is one of the metals with the highest potential for recyclability and for increasing EU supply resilience. Measures under ESPR are expected to complement existing environmental and climate measures on aluminium products and production such as ETS and CBAM.	
Horizontal requirements					
Repairability (including scoring)	N/A	High support	N/A	High potential for improvement; depending on the scope of the measure and coverage of resource use, increased circularity for (critical) raw materials, climate change, and targeted requirements on durability (reliability) could also be included. The scope, to be refined during the preparatory study, could include products such as consumer electronics and small household appliances.	2027
Recycled content and recyclability of electrical and electronic equipment	N/A	Support	N/A	High potential for improvement, depending on the exact scope of the measure and coverage of resource use, increased circularity for (critical) raw materials, climate change and waste prevention.	2029

Information and communication technologies (ICT products) are not listed above but they are included in the first working plan as they will be covered in the work to prepare the two horizontal requirements. Some specific ICT products will be covered in the work on energy-related products discussed in the following section.

The specific situation of **intermediate products** needs to be considered when setting ecodesign requirements. Regulating these products could have consequences not only on the manufacturing of intermediate products but also on all final products made from these intermediate products. This calls for a careful assessment of the potential impacts on relevant markets, including impacts on markets for final products, to avoid negative downstream consequences, in particular for manufacturers of final products that contain regulated intermediate products as components

([14]) ([15]). The options being assessed to mitigate this risk will include setting only **information requirements**. The option to include in the scope of the corresponding delegated acts selected final products containing high quantity intermediate products will also be carefully considered. The analysis will also look at the reliability and cost of associated verification mechanisms.

The definition of **horizontal requirements**, valid for a wide range of products with similar characteristics on specific aspects where this is technically possible, will carefully consider any product-specific aspect that could be affected by the horizontal rules, to identify and address any trade-off between product aspects. This new approach to ecodesign rule-setting will be brought in progressively, in a gradual approach to build on experience with the first cases.

2.2.2. Energy-related products

In future, energy-related products, including those already regulated under the Ecodesign Directive, will be regulated under the ESPR. The Ecodesign and Energy Labelling working plan for 2022-2024 covers 35 products and considerable progress in implementing this plan is described in the accompanying staff working document ([16]). For 19 of these products, the ESPR sets a transition period until 31 December 2026 ([17]) under which the measures continue to be covered by the Ecodesign Directive.

For the remaining 16 products, the Commission considers that the analysis of the potential for improvement is still valid. For most of these products, the Commission has already begun the necessary preparations. Therefore, for reasons of efficiency, these 16 products are carried over to the 2025-2030 working plan.

([14]) This includes potential 'leakage' effects leading to an increase of the imports of final products containing concerned intermediate products to circumvent their use regulated only at intermediate level, a study to evaluate a similar risk is currently ongoing in relation to CBAM.

([15]) For instance, some sectors like defence and security, the space sector, medical devices, require a careful evaluation to ensure that performance of the final products is not compromised in view of their specific applications (in line with ESPR Recital 19).

([16]) [SWD(2025)112].

([17]) Article 79 lists these as: photovoltaic panels, space and combination heaters, water heaters, solid fuel local space heaters, air conditioners including air-to-air heat pumps and comfort fans, solid fuel boilers, air heating and cooling products, ventilation units, vacuum cleaners, cooking appliances, water pumps, industrial fans, circulators, external power supplies, computers, servers and data storage products, power transformers, professional refrigeration equipment and imaging equipment.

The following 16 items are carried forward and included in the first ESPR working plan.

Energy-related products	New product	Ecodesign requirements	Energy label	Indicative timeline
Low-temperature emitters	Yes	No	Yes	Adoption: 2026
Displays	No	Yes	Yes	Adoption: 2027
EV chargers	Yes	To be specified	To be specified	Adoption: 2028
Household dishwashers	No	Yes	Yes	Adoption: 2026
Household washing machines and household washer-dryers	No	Yes	Yes	Adoption: 2026
Professional laundry appliances	Yes	Yes	To be specified	Adoption: 2026
Professional dishwashers	Yes	Yes	To be specified	Adoption: 2026
Electric motors and variable speed drives	No	Yes	No	Adoption: 2028
Refrigerating appliances (including household fridges and freezers)	No	Yes	Yes	Adoption: 2028
Refrigerating appliances with a sales function	No	Yes	Yes	Adoption: 2028
Light sources and (only for ecodesign) separate control gears	No	Yes	Yes	Adoption: 2029
Welding equipment	No	Yes	No	Adoption: end 2030
Mobile phones and tablets	No	Yes	Yes	Adoption: end 2030
Local space heaters	No	Yes	Yes	Energy label: adoption in 2026 Ecodesign requirements: Adoption: mid-2030
Tumble dryers	No	Yes	Yes	Adoption: end 2030
Standby and off mode consumption	No	Yes	No	Adoption: end 2030

2.2.3. Products not included in the first working plan

Based on the assessment methodology referred to above, on the resources available and on the justifications below, the following products listed in Article 18 ESPR are not included in the first ESPR working plan. However, it is proposed to initiate work on a few of the products in this list by conducting studies and then to use the mid-term review after three years to reassess the situation.

For **detergents, paints and lubricants**, the JRC study on new product priorities shows that these product groups have lower impacts and lower improvement potential than the final products selected in this working plan. The open public consultation also showed a relatively lower level of support for these products than for the final products prioritised in this working plan.

Footwear is in a separate product category from textiles due to the distinct use of materials, product functionality and supply chains. It also has lower impacts than the list of priority final products. However, given the significance of these impacts and the potential use of ecodesign requirements for the eco-modulation of extended producer responsibility fees for footwear under the Waste Framework Directive, a study will be commissioned during the implementation of this working plan. The study will evaluate the potential to improve the environmental sustainability of footwear under the ESPR and will be completed by the end of 2027.

The product group '**chemicals**' was highly ranked in the JRC study in terms of high impacts and high improvement potential. The open public consultation also found support to include chemicals in the list, but it is a very complex product group that the JRC study assessed as an intermediate product, focusing on large-volume organic and inorganic chemicals. However, the scope of the chemicals product group is commonly understood to be much wider, and there is an overlap with other segments such as petrochemicals, polymers, specialty chemicals and plastics. Given this complexity, a study will be launched by the end of 2025 to define more precisely the potential chemicals in scope as well as a potential focus area(s) for product aspect improvements for (a) future ESPR delegated act(s) related to chemicals (including polymers & plastics) to be considered for inclusion in the review of this or in a following working plan.

In line with ESPR Article 5(6), the Commission can, at any stage, set ecodesign requirements on product groups that are not included in the working plan. For example, for **electrical switchgears**, the Commission will monitor closely the developments under Regulation (EU) 2024/573 on fluorinated greenhouse gases ([18]) before considering setting ecodesign requirements.

3. KEY ENABLERS

3.1. The international dimension – integrated in all stages of the process

Future rules under the ESPR may have significant implications at international level, since all goods placed on the EU market, including imports, will have to meet the new standards (as they do under the Ecodesign Directive). This is why the process to develop ecodesign requirements must be based on granular assessment and understanding of the implications on third countries.

The **Commission will ensure a proportionate, systematic and high-quality assessment of international dimensions in the preparatory studies and impact assessments** to ensure that the impact on third country operators is thoroughly understood sufficiently in advance, proportionate, and in line with the Commission's Better Regulation guidelines ([19]). Timely

([18]) OJ L, 2024/573, 29.2.2024, ELI: http://data.europa.eu/eli/reg/2024/573/oj

([19]) https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox_en

communication and outreach in this regard will be essential in order to explain and engage with EU partner countries notably via EU Delegations. Building on this, actions will be envisaged and prepared to support EU partners to fulfil the enhanced ecodesign requirements.

3.2. Information on all parts of the value chain: the digital product passport

A key pillar of the ESPR is the **digital product passport**. Every product for which ecodesign measures will be adopted will have a digital product passport, except if there is an alternative digital system providing equivalent information, for example the EPREL ([20]) database for energy-related products carrying an energy label. This will open up data access on a need-to-know basis for businesses, consumers and public authorities, based on open, non-proprietary international standards. The Commission has initiated the standardisation process to set rules on data carriers, infrastructure and data interoperability, which are needed to enable the product passport system to develop. The information to be collected and made available in the digital product passport will be specified in product-specific delegated acts under the ESPR, and possibly under other legislation where applicable. The digital product passport will ensure traceability along the value chain after the product has been placed on the market. This might boost the voluntary deployment of traceability solutions, which will stimulate market development and promote sustainable trade beyond EU borders. Information on material composition and any substances of concern in the product will be included, together with information on how it can be safely used, recycled and disposed of. This will **facilitate end-to-end product life cycle management**.

3.3. Empowering consumers: clear and informative labels

The ESPR has a strong focus on product information. Information requirements are needed to help consumers make informed choices and stimulate the behavioural change that can powerfully unlock the environmental sustainability benefits of the ESPR beyond the level achievable solely by regulating minimum performance. This is clearly demonstrated by the current **energy label,** which consumers have rated highly in providing robust, reliable information as an aid to purchase decisions. It is widely recognised and used, increasingly via QR links from the label to the EPREL database with almost two million models registered by over 3 000 verified suppliers.

The energy labels will continue to be used as the default option for relevant energy-related products, unless after a careful assessment it is concluded that they are unable to provide the most relevant information for consumers.

For other products in scope, information will generally be provided in the digital product passport. Some products may also carry an **ESPR label** and/or other labels governed by specific EU legislation, such as the Textile Labelling Regulation, currently under review. These labels

([20]) European Product Registry for Energy Labelling.

will provide clear and trustworthy information on relevant product features or performance such as carbon footprint, water consumption, durability, repairability or recyclability. Moreover, under the Directive on Empowering Consumers for the Green Transition ([21]), the Commission will establish a harmonised label for commercial guarantees of durability. This will be a new product label for producers willing to promote the durability of their products and for consumers interested to choose for products with a longer lifespan.

3.4. Developing lead markets: green public procurement

The ESPR provides for the possibility to set mandatory minimum requirements for public procurement in ad hoc implementing acts, whenever the products regulated by ESPR delegated acts are relevant for public buyers and it is economically feasible for them to buy the best environmentally sustainable products. These measures are designed to foster the creation of lead markets, stimulate investments and help the EU industry improve its competitiveness in line with the Clean Industrial Deal's objectives. The Commission will assess the scope to set those minimum public procurement requirements for the products prioritised in the working plan together with the assessment of the specific ecodesign requirements for the same products.

Despite being two separate legal acts, the delegated act setting ecodesign requirements and the implementing act setting public procurement requirements are closely linked because the product aspects covered in both acts must be the same. Therefore, the Commission will study and assess the measures jointly and run the two adoption procedures in parallel. For energy labelled products, the ELFR and the Energy Efficiency Directive together already specify requirements linking public procurement to the energy label class ([22]).

4. CONDITIONS FOR SUCCESSFUL IMPLEMENTATION

4.1. Teaming up with Member States to conduct market surveillance

Effective market surveillance is key to ensuring that ecodesign and energy label requirements are implemented, the expected benefits materialise, a level playing field for businesses is secured, reliable product information is supplied to consumers and the framework builds trust.

Market surveillance is a national competence with the Commission in a support and coordination role ([23]). The available evidence ([24]) indicates that the level of non-compliance is significant, leading to an estimated 10% in foregone benefits. Non-compliance associated with online sales is

([21]) Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information (Text with EEA relevance).

([22]) See Section 6 in Commission Recommendation (EU) 2024/1716 of 19 June 2024 setting out guidelines for the interpretation of Articles 5, 6 and 7 of Directive (EU) 2023/1791 of the European Parliament and of the Council as regards energy consumption in the public sector, renovation of public buildings and public procurement.

([23]) Regulation (EU) 2019/1020 on market surveillance and compliance of products.

([24]) For example, https://www.eca.europa.eu/en/publications?did=52828

particularly pervasive and challenging to address, especially for sales on non-EU online platforms. New challenges will emerge as new products and new types of requirements are embraced. This suggests that any additions to the Member State resources spent on market surveillance would be highly cost-effective.

The importance of strengthened enforcement to uphold market integrity is highlighted in the 'Letta report' ([25]). The 'Draghi report' ([26]) also recommends that the EU should better support Member States in conducting effective market surveillance and in implementing EU rules and it made explicit reference to ecodesign and energy labelling.

To respond to these needs, and as announced in the affordable energy action plan ([27]), the Commission intends to work with national authorities to step up action on this front. For example, it will regularly convene the Ecodesign Forum to examine '*the effectiveness of the established market surveillance mechanisms*' and discuss any need for adaptation or reinforcement. It will continue supporting national market surveillance authorities through the Ecodesign Administrative Cooperation Group and the European Product Compliance Network work programme, including cooperation with customs authorities. To facilitate their work, it supports IT tools such as the Information and Communication System for Market Surveillance and EPREL.

In addition to these administrative support measures, the Commission finances the EUR 8 million EEPLIANT4 Concerted Action for Member State authorities covering six product groups over 2024-2028. It will also continue to support industry-driven compliance efforts. This includes the Energy Efficient Products Portal ([28]), a dedicated mailbox, FAQs, guidance documents and the EUR 2.4 million 'ComplianceServices' project. Customs have an essential role in supporting policy delivery for imports given the availability of information from DPP in the context of customs processes. Moreover, in the context of e-commerce, there is a need for an integrated, data-driven approach to cooperation between customs and market surveillance authorities, with a focus on strategic action against non-compliant supply chains.

4.2. Preventing the destruction of unsold goods

The ESPR provides scope for the Commission to update the list of products for which a ban on the destruction of unsold products applies, and to include the products considered for a ban in ESPR working plans. **For this first ESPR working plan, the Commission does not intend to use this provision.** It is premature because the insights gained from implementing the mandatory disclosure of information on the destruction of unsold consumer products (that will provide the basis for any bans in future working plans) are not yet available.

([25]) Enrico Letta, Much more than a market, April 2024.

([26]) Mario Draghi, The future of European competitiveness, September 2024.

([27]) https://energy.ec.europa.eu/publications/action-plan-affordable-energy-unlocking-true-value-our-energy-union-secure-affordable-efficient-and_en

([28]) https://energy-efficient-products.ec.europa.eu/index_en

5. CONCLUSION

The ESPR was established to improve the environmental sustainability of products placed on the EU market by reducing the overall carbon footprint and environmental footprint of products over their life cycle, and to enable the free movement of sustainable products in the internal market.

This working plan is a first important step towards this objective. The new final and intermediate products to be regulated annually account for over EUR 1 trillion in annual sales on the EU market – around EUR 600 billion in energy-related products ([29]) and nearly EUR 500 billion in new products in the wider scope of ESPR ([30]). They also represent a significant share of the environmental impacts of EU consumption – they account for around 31% of climate change impacts and 34% of fossil resources use (plus other impacts) of the basket of products representing overall EU consumption ([31]). Saving energy and other resources, including through action to extend product lives, will reduce unnecessary consumer expenditure, saving money for other uses.

By pitching the level of ambition sufficiently high and yet realistic, this working plan will contribute to the Clean Industrial Deal and the EU Competitiveness Compass, which emphasises that manufacturing sectors should successfully combine competitiveness with their transition to low-carbon and sustainable production. It will also enable stakeholders to get involved in the rules-setting process, building on the success of the ecodesign and energy labelling framework.

([29]) See 2024 Ecodesign Impact Accounting status report

([30]) See table in section 2.2.2. (source: JRC https://publications.jrc.ec.europa.eu/repository/handle/JRC138903)

([31]) Updated from above mentioned JRC report.