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AMBER
Advancing Materials for Impact

Consultation on Ecodesign for Sustainable Products Regulation (ESPR)

Response from Prof. M A Morris, AMBER Director, Trinity College Dublin

The consultation on the potential implementation of legislation to enhance the use of ESPR and an accompanying Digital Product Passport is welcome. These are critical elements in developing a circular economy in Ireland. The role of manufacturing in enabling a tangible and valuable circular economy in Ireland has been largely ignored and our climate goals will not be met unless circular ecodesign becomes engrained in our industries. If Ireland is to maintain a strong manufacturing economy, it must adopt ESPR and the circular economy as quickly as possible. Countries such as the Netherland, Germany are much further along this journey than us. The need to fully adopt these policies and develop support measures for transitioning towards their implementation must be seen as critical investments in Ireland.
The following general comments are provided:

1. ESPR and DPP are critical needs for enhancing the circular economy (CE) in Ireland and vital if our climate change goals are to be met. Whilst energy may be the easiest target towards reduction in CO2 emissions, it is now clear that carbon neutrality cannot be achieved unless the CE is grasped at a commercial and manufacturing level.

2. Strong legislation and its monitoring is needed if companies are going to transition to a CE and adopt the concept of circular ecodesign.

3. Unless Ireland provides strong legislation that is properly implemented and monitored/assessed, it will not favour strong economic development as companies will locate/grow/develop in countries where both measures are for implementation and support from Government for those measures are available.

4. The Government must provide financial and other supports (such as advice and training centres) for businesses developing or transitioning to ESPR led manufacturing.

5. The Government must think about ESPR within a CE. It must provide infrastructure that enables sustainable product strategies (repair centres, collection centres, recycling centres etc) if action is to be meaningful.

6. Strong standards need to be developed and assessed. These standards should be developed to best practice and prevent ‘greenwashing’. Accompanying DPPs should account for claims to be verifiable and support data published. The adherence to the principles set out in emerging international (TC 323) and EU standards (CEN 350) should be a key target.

7. The Government should set out a national framework of committees to develop meaningful, information led policy be developed. A key objective is to create a dynamic advice panel of

national and international leaders in ESPR and the CE, to provide support to Government during development of the ESPR framework.

8. We have little resource or education for a transition to an ESPR led manufacturing economy. There are no 3rd level courses and only one small higher diploma course. Research in the CE is underfunded. There are no resources available, e.g. software, life cycle assessment training that would help companies develop an ESPR approach.

9. It is necessary to implement these policies on an all-island basis and strong cross-border collaboration is a pre-requisite.

10. The scale of the task in developing ESPR in Ireland is considerable. We have the least effective CE in Europe and are at the bottom of the international circularity gap league tables. The EU ESPR objectives include the following topics that Ireland will need to make very significant investment in:

- product durability, reusability, upgradability and reparability

We have no Irish standards for these and lag most EU nations in providing firm guidance for use, reporting or validating any claims.

- presence of substances that inhibit circularity

Whilst we have adapted chemical policies such as REACH, we have no clear policies on e.g. plastics that can be readily recycled or measures to prevent companies using these. Measures such as the single-use plastic initiative have been adapted but widely ignored or assessed.

- energy and resource efficiency

Whilst having clear programmes for development of renewable energy, their implementation is behind schedule. The role of renewable energy in the manufacturing sector has not be considered at the national level in enough depth. Material resources and their re-use etc are not the subject of meaningful legislation and with a circularity of 1.5% in Ireland needs very significant work.

- recycled content

Strict definition and measures are required if this is to be validated. E.g. is scrap material recycled or will strict definition of terms be introduced?

- remanufacturing and recycling

The national facilities for this are minimal and below EU expectations. The reuse and recycling of materials and resources on the island need considerable investment.

- carbon and environmental footprints

We have no legislation around forcing companies to report meaningful carbon data. We also have no national centres or resources for helping companies calculate these values.

- information requirements, including a Digital Product Passport

This must be addresses urgently if companies are to provide these in an appropriate time frame.

Yours Sincerely,

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