

SHAPING A NEW ECODESIGN REGULATION WITH C2C QUALITY CRITERIA

Position of Cradle to Cradle NGO on the Ecodesign for Sustainable Products Regulation (ESPR)

About Cradle to Cradle NGO

[Cradle to Cradle NGO](#) is the largest NGO in Germany that has been campaigning for a genuine circular economy based on Cradle to Cradle (C2C) for more than ten years. Founded in 2012, our team is now over 40 people strong. C2C NGO sets the course for change according to Cradle to Cradle: We promote ideas and empower organizations and individuals to rethink, redesign and reform: through educational work, networking formats and by implementing groundbreaking transformation projects such as the renovation of our [C2CLAB](#) or the [Labor Tempelhof](#) with open-air concerts by the bands Die Ärzte and Die Toten Hosen with 60,000 spectators. For politicians and companies, we are an independent and competent partner for exchange and cooperation for a genuine circular economy. We bring C2C pioneers together in our network of C2C companies, our municipal network [C2C Regions](#) or in our [school network](#). We offer them and their best practices platforms for networking and exchanging ideas. In this way, we enable relevant stakeholders to learn and benefit from each other. With our network of around 1,000 volunteers in German-speaking countries, we spread our message to all parts of society and get involved in public debates. Our [Cradle to Cradle Congress](#) is the world's largest platform for C2C innovations with over 1,000 participants.

Cradle to Cradle in the Ecodesign for Sustainable Products Regulation

With the revision of the Ecodesign Regulation, the EU is taking an important step towards ensuring healthy and circular products for all EU citizens. We welcome that the regulation covers a broader range of products and no longer only includes energy-related products. Ecodesign requirements must not be limited to just a few products and sectors; instead, it should be the EU's aim and ambition to define precise quality requirements for all products.

The new Ecodesign Regulation moves away from the previous focus on the energy efficiency of products and places a clearer focus on a circular economy and

instruments such as the digital product passport. This focus is urgently needed as it is the only way to achieve the targets set out in the European Green Deal and the Circular Economy Action Plan. However, the core of the new Ecodesign Regulation must be precisely defined quality criteria: products must be suitable for their intended purpose, materially healthy and circular. Only with such clearly defined (cradle to cradle) quality criteria, which apply to all products, can we achieve a genuine circular economy. The ecodesign requirements must not be limited exclusively to reducing the environmental impact and ecological footprint as well as efficiency measures, but must have the long-term goal of ensuring truly circular and healthy products. This can only be achieved with Cradle to Cradle (C2C) quality criteria.

Prioritization of end and intermediate products

The aim of the regulation should be to include as many products as possible. We welcome the fact that the scope of the regulation has been expanded and hope that the list of product groups presented in the work plan in March 2025 will be comprehensive.

Whether cosmetics, textiles, tires, toys or fishing nets: The regulation can only fulfill its purpose if it is clearly defined what ecodesign means and what quality criteria a product must meet in order to be placed on the market. This means starting directly with product design and not just with waste treatment. Cosmetics, for example, enter our environment via waste water and we absorb them through our skin when we use them. All cosmetic products must therefore be suitable for the biosphere and healthy for people and the environment. The same applies to other products of consumption such as tires or shoes, which generate abrasion during use. All released materials must be biodegradable in order to prevent pollutants and microplastics from entering the environment. (Intermediate) products such as steel or metal, on the other hand, are suitable as products of usage for the technosphere. They must be produced and used in such a way that they can be recycled again and again without any loss of quality.

This definition of a product's purpose and quality criteria is the basic prerequisite for a genuine circular economy and for instruments such as the digital product passport. Because only if we know which (positively defined) materials our products

contain and digitally record how we can take them apart again, as well as circulate them, it makes sense to keep these products in the cycle and digitize material flows.

Horizontal Measures

The regulation also contains horizontal measures that are intended to have an impact beyond product boundaries: Durability, recyclability and post-consumer recycled content.

Durability

The term “durability” in the proposal covers the aspects of reliability, repairability, reusability and upgradability. It is important to consider whether durability and reparability are desirable objectives for all product types, derived from their purpose, particularly with regard to the currently much-discussed aspect of reparability: A cell phone that can be repaired five times and then still ends up in the e-waste bin after many years of use can be a temporary solution, but not a long-term goal. Instead of focusing exclusively on longevity, the first step must be taken in product design: We need to design our products from the outset in such a way that they can be easily dismantled into their individual parts after use and are therefore truly circular. In the next step, we can then examine whether and how products can be made more durable. Especially in industries where technologies are developing very quickly, it can even make more ecological sense to replace older products with new ones. If the products are designed in such a way that we can recycle all the resources used and use them for new products, this does not cause any damage. This process can be further supported by product-as-a-service systems, through which we no longer own products, but only use them. The manufacturer receives the resources back after use and can use them for new products, thus closing the cycle. In this way, we can achieve a genuine circular economy based on C2C. Reparability and the right to repair can only be a first step on this path. What it should really be about: everyone's right to functionality instead of repair and society's right to an intact environment. However, this can only be achieved if we start directly with product design.

Post-consumer recycled content

Quota not without quality: Instead of concentrating exclusively on a fixed recycling quota, the focus should be on the quality of the materials used. Quotas only make sense in the long term if the quality of recycled materials improves. Instruments such as the digital product passport can contribute to this: if we can accurately determine the quantity and quality of all material flows at all times, we can achieve high-quality, continuous recycling.

Further horizontal measures

The definition of clear quality criteria must be incorporated into the Ecodesign Regulation across all products and sectors. We hope that the work plan, which is to be drawn up by March 2025, will take this into account. These criteria must be adapted to the respective purpose of the products: a toy is naturally used differently to a fishing net - the quality criteria that the product must fulfill must be derived from this. What is important is that all products must be designed from the outset in such a way that they can circulate in biological or technical cycles. This basic idea must be reflected in the Ecodesign Regulation if it is to make a contribution to a genuine circular economy.

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