

The European aluminium industry welcomes the Commission's proposal¹ for the 'Ecodesign for Sustainable Products Regulation (ESPR)' and considers it as an important foundational framework which can ensure coherency and complementarity with all relevant policy areas. Such an approach would allow for a smooth and accelerated transition to a resource-efficient, low-carbon and circular economy which can realise the EU's Green Deal²'s sustainability objectives.

Aluminium is a circular material, capable of being recycled endlessly without losing its original properties (lightness, conductivity, formability, durability, permeability, and multiple recyclability) and as such plays a leading role as a climate and resource frontrunner, contributing to the objectives set under the European Green Deal and the 2020 Circular Economy Action Plan.

We strongly support initiatives such as the ESPR, which have the potential to drive the uptake of circular and low-carbon products and help consumers make informed choices. The ESPR is a unique opportunity to strengthen material sovereignty and open strategic autonomy, boost European competitiveness via sustainable innovations and cement the Union's leadership position in making sustainable products the norm. To ensure that the ESPR principles can fulfil their potential in each covered product category, a carefully assessed and well-balanced approach is required, in conjunction with **market instruments tailored to support the uptake of sustainable products and continued work on (current and new) standards.**

Indeed, the work of standardisation is a key component of measuring important aspects such as recyclability of products. Current standards (e.g EN 45555:2019 under the Ecodesign Directive) should be developed further to reflect the environmental benefits of end-of-life recycling, and multiple recycling, and new standards should be created to offer clarity on the content and degree of information required for the Digital Product Passports.

We strongly support the Better Regulation principle, and therefore welcome that the ESPR will only apply to products not covered by existing legislation, or when legislation does not sufficiently address the sustainability of those products, thereby avoiding duplicating requirements and putting an excessive burden on businesses, whilst setting the conditions for continuous improvement and a direction towards ambitious sustainability goals.

Maintaining the **Ecodesign Forum as the platform for targeted exchanges** across stakeholder groups is an important development and we look forward, where necessary, to offering our knowhow. The active participation of civil society and industry can bring forth all relevant expertise, exemplar case studies and support the practical development of secondary legislation.

The **future development of secondary legislation and the next steps should as a principle reflect the bigger picture.** When developing dedicated approaches for the different product categories, the many sustainability opportunities stemming from a strong lifecycle approach should be considered for each product assessed. Such an approach would ensure that targeted requirements at product level will best enhance the specificities of markets and overall value chains, while acting as a stimulus to (i) incentivize eco-design, (ii) prevent waste, (iii) promote the reuse of materials into products of similar value, (iv) improve the overall environmental performance of materials, and (v) strengthen EU open strategic autonomy and resilience.

Achieving results in sustainability objectives, requires to carefully assess the practical application, relevance, and feasibility of the proposed ESPR criteria per product category as not all criteria would be applicable to all products. For example, as for some products, measures such as recycled content requirements are useful to accelerate performance on the circular economy and could further drive high-quality and closed-loop recycling. Its impact and feasibility should be carefully

¹ https://ec.europa.eu/environment/publications/proposal-ecodesign-sustainable-products-regulation_en

² https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en

assessed per product category, based on market applications, the availability of viable, well-sorted scrap streams and the **different lifespans of fast-rotating vs. long-lifetime products**, as this is a necessity to determine where such provisions will yield the most desirable results. From the perspective of a permanent metal, it has to be noted that not all product categories require the same level of stimulus. Increasing end-of-life recycling by supporting the most efficient collection and sorting of end-of-life products, so that more secondary raw materials will be available on the market for high-quality recycling, is also key to achieving a sustainable circular economy.

We look forward to contributing further to the next steps of this flagship legislative initiative and to the development of the upcoming Ecodesign Working Programme.