

Sustainable products initiative

Finnwatch welcomes the initiative to establish a framework for setting ecodesign requirements for sustainable products. Current level of consumption in the European Union is utterly unsustainable and in direct contradiction with the EU goals of stopping climate change and the loss of biodiversity. For example in Finland, our national scientific expert panel on climate change has highlighted the need for Finland to cut down 70% of its per capita carbon footprint. The initiative proposed by the commission aims to address one part of the problem by ensuring that the products sold in the EU are designed to mitigate the harmful impacts on the environment.

We find that the initiative includes many important improvements to the situation under the current directive. The requirement to disclose information on the destruction of returned and unsold products is an important step which provides necessary information for the Commission's delegated regulation to ban destruction where most effective. Banning the destruction of returned and unsold products can curtail the most excessive features of consumer culture that harms the environment. The disclosure requirement and the subsequent ban should not exclude SMEs, as the circular economy requires rapid economy-wide changes.

Digital product passports open a new way of increasing the transparency and sustainability of the supply chains. To achieve these goals the passport should require full disclosure of the supply chain including importers, exporters and all the relevant manufacturers and the origins of used raw materials. The digital product passport should be designed to support other relevant upcoming legislation such as Directive on corporate sustainability due diligence and import ban on products produced with forced labor. To ensure that the data is correct and useful, all the information collected for the passports should be freely available in a single open registry. In addition, the passport data should be complemented by opening the customs data on importer/exporter level for public use.

We applaud the ban on the use of labels which are likely to mislead or confuse customers, such as companies' own "certification" marks that lack third party criteria and monitoring.

Under Article 5 it is stated that "there shall be no significant negative impact on consumers in terms of the affordability of relevant products". Finnwatch would like to point out that including true social and environmental costs to the products will make them more expensive, and to a very large extent this is also needed in order to curtail current unsustainable excessive consumption. The possible negative social impacts should be tackled in other policies (e.g. tax and social policies). Just transition requires the Commission to take into account the need to reduce consumption and increase social justice such as income distribution in all its legislative initiatives.