

ESPR: What companies need to know

Ecodesign for Sustainable Products Regulation (EU/2024/1781)

Martin Solé, SPF SPSCAE



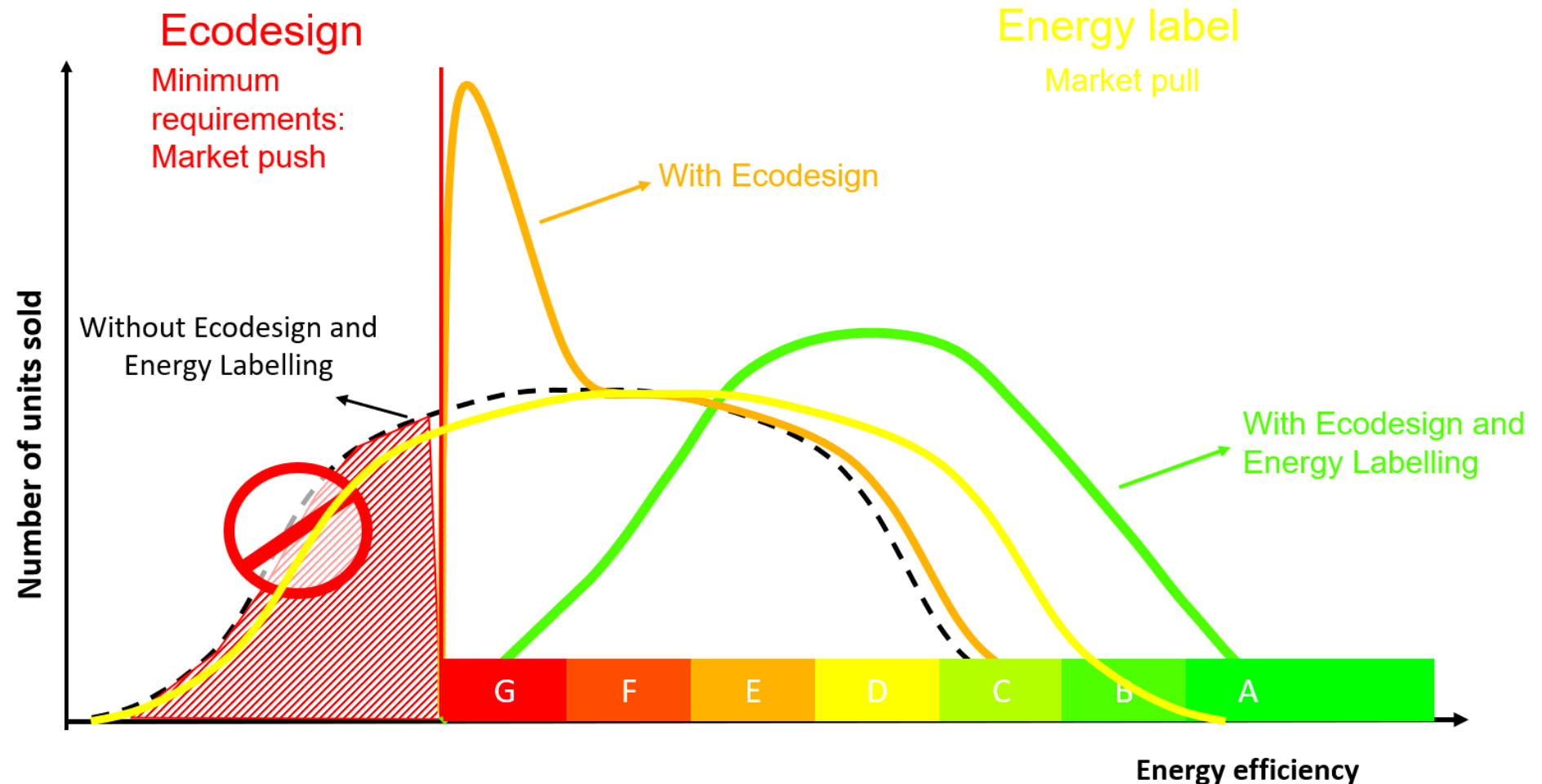
Health
Food Chain Safety
Environment

Why does ESPR matter ?

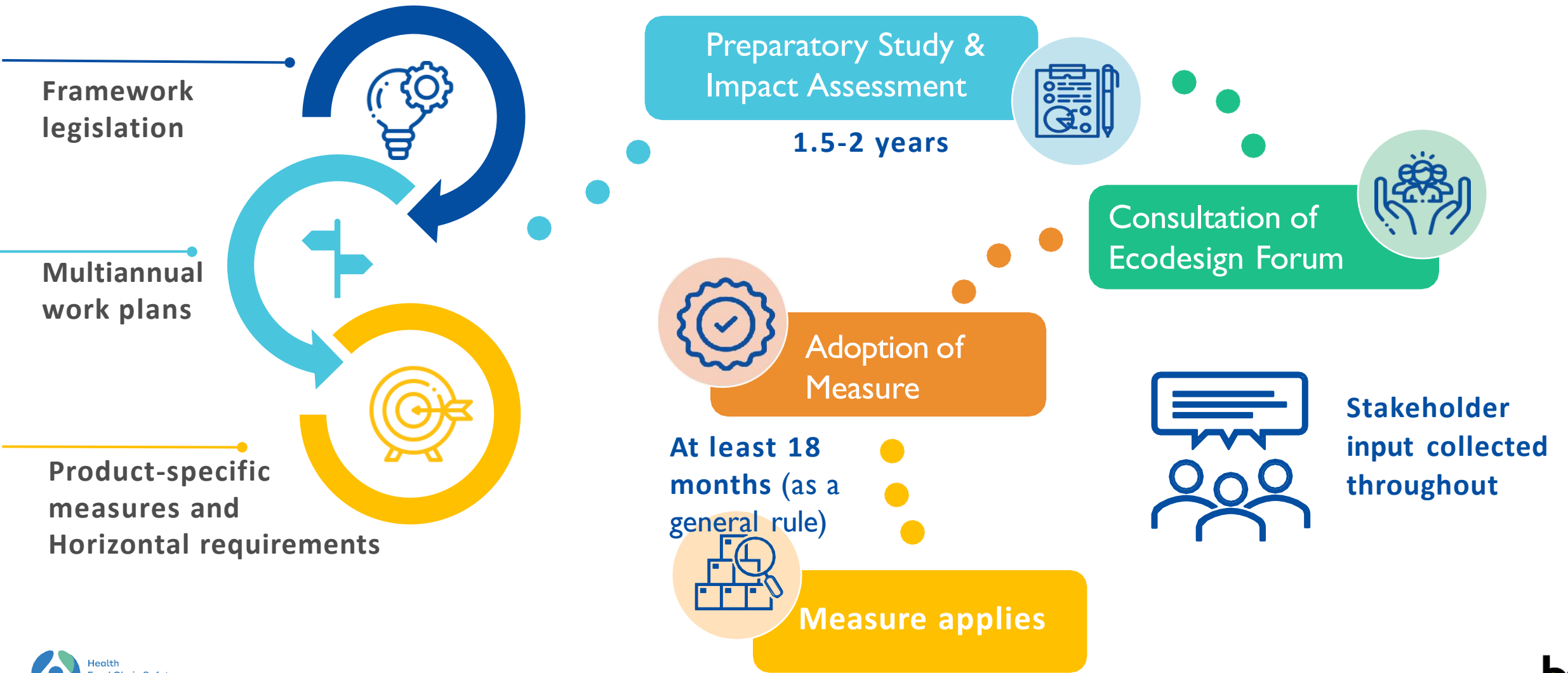
- Almost all products will be affected
- Major impact on design, data and supply chains
- Sustainability becomes a market condition

From ED to ESPR : A paradigm shift

- From only energy-related products → All kind of products
- From energy label → full lifecycle sustainability labels
- Stronger environmental and data requirements



ESPR – developing ecodesign requirements



Framework legislation

Multiannual work plans

Product-specific measures and Horizontal requirements

Preparatory Study & Impact Assessment

1.5-2 years

Consultation of Ecodesign Forum

Adoption of Measure

At least 18 months (as a general rule)

Measure applies

Stakeholder input collected throughout

Priority product groups

ESPR Working Plan 2025-2030

Final products included



Textiles/Apparel

2027*



Furniture

2028*



Tyres

2027*



Mattresses

2029*

Intermediate products included



Iron & Steel

2026*



Aluminium

2027*



Energy-related
products

2026 - 2030*



ICT products

2029*

Products included under the transition rules

Horizontal measures :

Repairability (2027) and Recycled content (2029)

Key requirements for products

- Durability & reliability
- Repairability (spare parts, instructions)
- Recyclability and recycled content
- Information requirements (DPP)

Digital Product Passport

- Product information becomes digital
- Covers composition, repair, recycling, etc



DPP is accessible via a **data carrier** and supported by **technical systems** (web-portal; registry).

DPP data is **product-group specific** (toys, textiles, detergents etc.) and defined through **secondary legislation processes**.

Informations in the DPP



Instruction of use



Certificate of conformity



Carbon footprint



Origin



Composition



Manufacturing processes



Disposal options



Reuse options

Business implications

- New compliance obligations
- Need to redesign products
- Opportunities in repair and circular services

What should companies do now?

- Identify your exposure (products/sectors)
- Monitor upcoming regulations (e.g. via sector federations)
- Engage as stakeholder (e.g. through the public consultations)
- Start mapping your product data
- Anticipate changes in design and supply chains
- Start early – do not wait

Questions?

Textiles in ESPR

Caro Coosemans

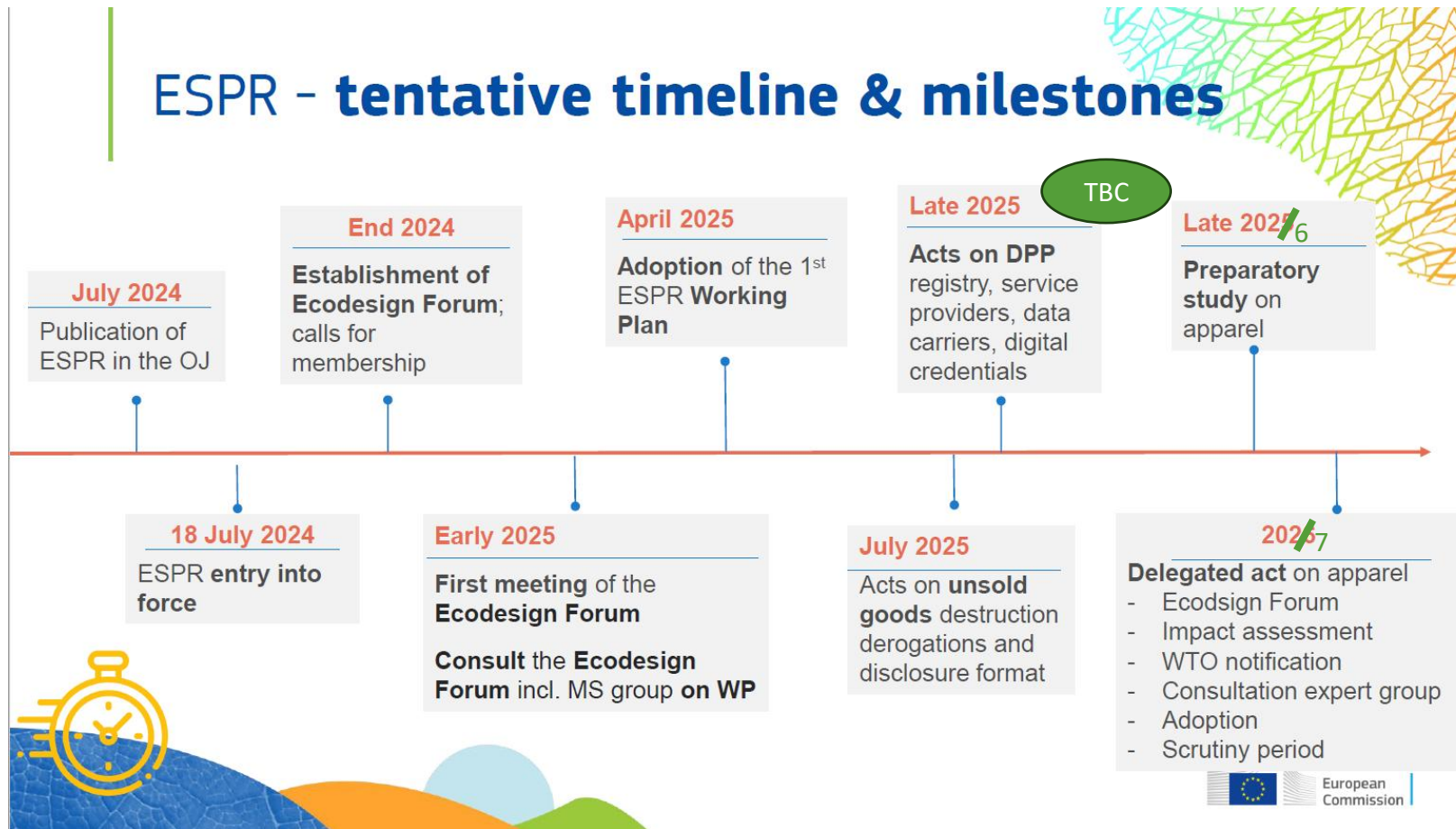


Volksgezondheid
Veiligheid van de Voedselketen
Leefmilieu

Content

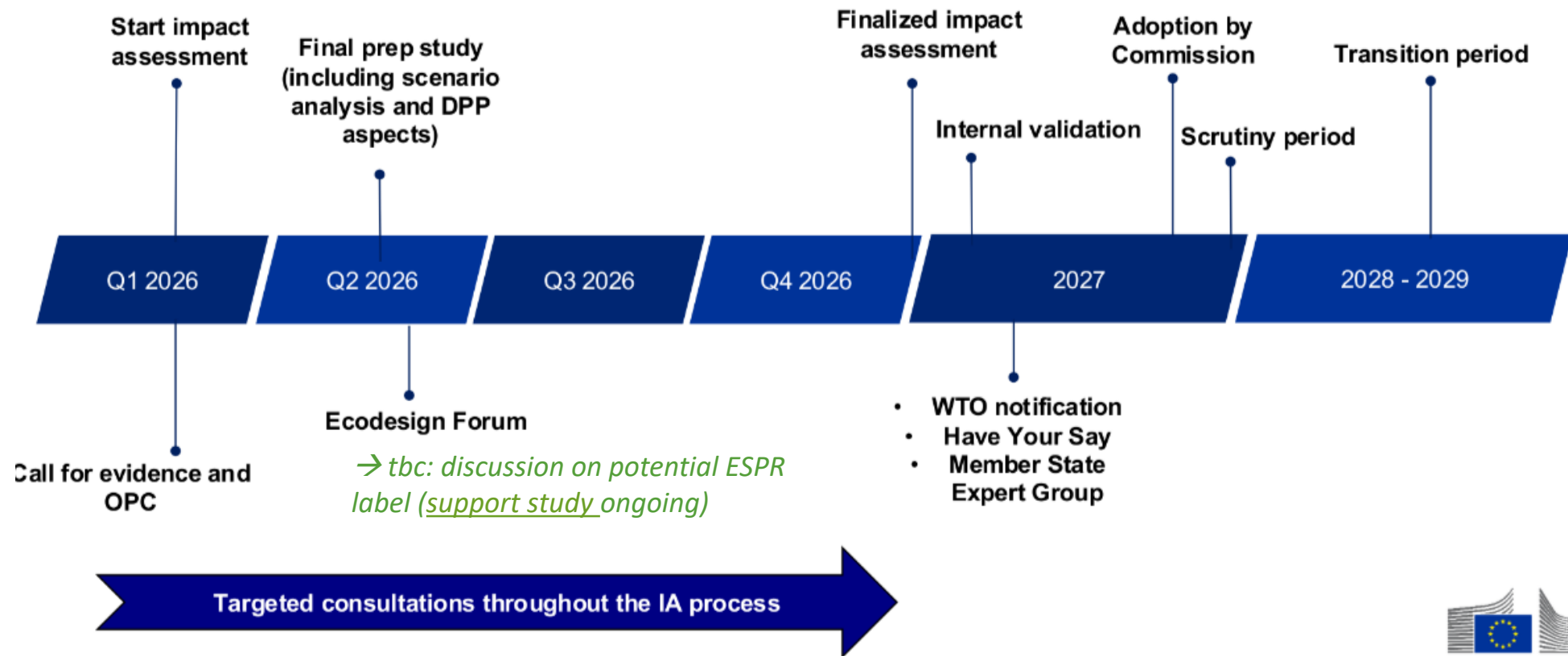
- **Timeline ESPR – Textiles**
- **ESPR & other textile initiatives**
- **Ban on destruction of unsold apparel and footwear**
- **Preparatory study on textiles**
- **Preparatory study on textiles (I,II)**
- **Preparatory study on textiles (III)**
- **Preparatory study on textiles: next?**
- **Study on DPP for textiles**
- **Q&A**

Timeline ESPR - Textiles



Timeline ESPR - Textiles

Next steps and indicative timeline



ESPR & other textile initiatives



Textile Labelling Regulation revision (*tentatively planned for adoption in 2026*): Using the revision to ensure the use of one repository for sustainability and circularity information and other textile labeling domains (i.e. fiber composition, care instructions)



Waste Framework Directive: Using ecodesign requirements as a basis for EU harmonized eco-modulation of fees under extended producer responsibility schemes for textiles

Ban on destruction of unsold apparel and footwear



“Destruction” = deliberate damaging or discarding of products so that they become waste

→ includes recycling, energy recovery, and disposal (e.g. incineration or landfilling)



Ban applies from 19th of July 2026 for large enterprises and from 19th of July 2030 for medium-sized enterprises. Micro and small enterprises are temporarily exempt.

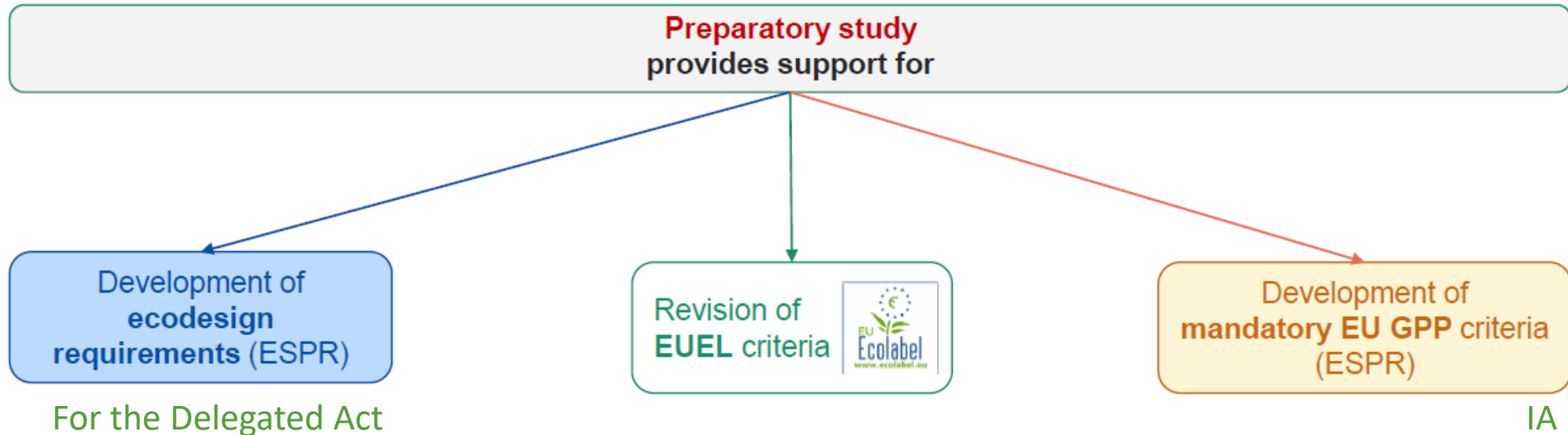


Only in exceptional cases destruction is allowed (*delegated act*)



Companies will have to opt for sustainable alternatives such as resale, donation, or upcycling

Preparatory study on textiles

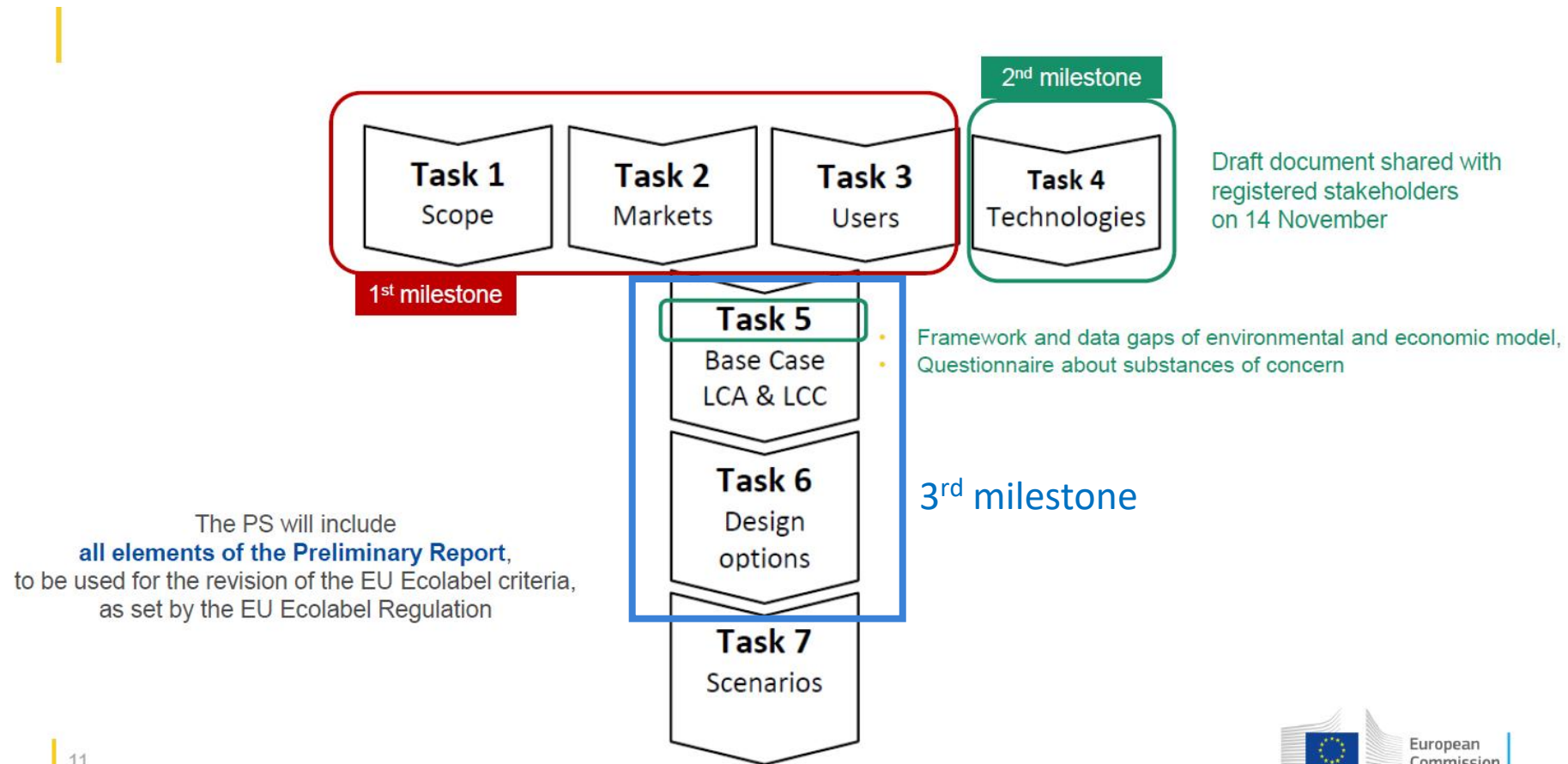


Preparatory study on textiles

- Projectpagina: [Project plan | Product Bureau](#)
- Registreer: [Registration for Product Groups | Product Bureau](#)
- Planning:

Milestone	Topic addressed	Date
Initial questionnaire	Definitions, Scope, Market analysis, User Behaviour, Ecodesign aspects, EU Ecolabel, EU Green Public Procurement	30 March 2023 – 8 May 2023
1 st milestone	Scope, market, user behaviour, current EU Ecolabel criteria, current EU Green Public Procurement criteria	23 February 2024 – 22 April 2024
2 nd milestone	Technologies, framework and data gaps of environmental and economic model, and a questionnaire about substances of concern	14 November 2024 – 17 March 2025
3 rd milestone	Analysis of base case and design options	16 December 2025 – 23 March 2026
4 th milestone	Policy scenarios, and elements to be included in the Digital Product Passport	To be communicated

Preparatory study on textiles



Preparatory study on textiles (I,II)

- **Proposed scope**

= textile apparel

- **Technical textile apparel** (workwear & sportswear) **included**
if = textile apparel (containing at least 80% by weight of textile fibres) & not < excluded products
- **Footwear NOT included**
(will be reassessed in mid term review ESPR after further evaluation of potential to improve environmental sustainability by end 2027)

Initial textile apparel categories = product categories < PEFCR Apparel & Footwear

ID	Category
1	T-shirts
2	Shirts & blouses
3	Sweaters & mid-layers
4	Jackets & coats
5	Pants & shorts
6	Dresses, skirts & jumpers
7	Leggings, stockings & socks
8	Underwear
10	Textile apparel accessories f.e. hats, scarves, ties, belts

Preparatory study on textiles (I,II)

- Proposed product aspects:
 - **Physical durability**, including physical durability, reliability and reusability
 - **Maintenance**
 - **Repairability**, including repairability, upgradeability, possibility of refurbishment, possibility of remanufacturing
 - **Generation of waste**
 - **Recyclability and recycled content**
 - **Environmental impacts**, which includes environmental impacts, energy use and energy efficiency, water use and water efficiency, resource use and resource efficiency
 - **Presence of substances of concern**

Possibility of recovery of materials: not relevant

Preparatory study on textiles (III)

- Design options aim to improve environmental performance without disproportionate costs
- Analysis of woven vs knitted vs denim: LCA, LCC, sLCC
- Options, not final proposals of ESPR-requirements

DO	
1	Product with increased robustness
2	Product with a higher share of weight going to recycling
3	Product with higher recycled content
4	(1) Product with decreased environmental footprint of the manufacturing (2) Product with decreased carbon footprint of the manufacturing

Preparatory study on textiles (III)

1. Physical durability (→ robustness)

What is proposed?

- **An information requirement: robustness score (0–10)** on the basis of
 - Visual inspection (color change, pilling, seams, non-textile parts...)
 - Spirality
 - Dimensional change (shrinkage/expansion)

Different approach for woven vs knitted products
- Test methods are being developed (ISO-standards)
- **No performance requirement:** no reliable test method to simulate aging

Preparatory study on textiles (III)

2. Maintenance

What is proposed?

- Reference to upcoming revision of **Textile Labelling Regulation**:
→ potentially harmonised, partly mandatory care-labelling rules
- **No ESPR-requirement**

Preparatory study on textiles (III)

3. Repairability

What is proposed?

- **No performance requirement** due to a lack of objective criteria including subjective consumer choices, repair suitability, designers' creativity...
- **Potential voluntary information "requirement":**
 - Disclosure of **brand-owner repair services** through the Digital Product Passport

Preparatory study on textiles (III)

4. Waste generation

What is proposed?

- **No product requirements** because waste is largely system-driven (business models, production processes, consumption, etc.), BC/BAT/BNAT cannot be defined at product level.

Preparatory study on textiles (III)

5. Recyclability

What is proposed?

- **Information requirement: recyclability score (0–10)**
based on:
 - Elastane content ($\geq 15\%$ → not-recyclable; $> 20\%$ PA6-rich blends)
 - Inner/outer composition (same?)
 - Monomateriality; presence of prints, coatings, sequins, dyes
 - Recyclable via mechanical/chemical/thermomechanical process
- **No ban** on elastane or other components; **performance requirement is seen as disproportionate**

Preparatory study on textiles (III)

6. Recycled content

What is proposed?

- **Information requirement:**
 - Reporting of **mass-percentage (%) recycled fibers**
 - Potentially also origin: post-industrial, pre-consumer, post-consumer waste (*not only textile waste in first phase: open loop recycling allowed bv. PET*)
- **Performance requirement (possible):**
 - Minimum thresholds by product type (to be analysed further)
- Verification via **chain of custody**, since no test exists that can distinguish recycled/virgin fibers

Preparatory study on textiles (III)

7. Environmental impacts

What is proposed?

- **Voluntary information “requirement”**, two options:
 - **Environmental footprint or Carbon footprint**
(during manufacturing (LCS2) only: insufficient comparable data raw materials stage)
- Potentially via “excellence label” (= better than average, %)
- PEFCR & indication primary of secondary data
- **No performance requirement:**
 - High administrative burden
 - Incomparability datasets raw material stage

Preparatory study on textiles (III)

8. Substances of Concern (SoCs)

What is proposed?

- **Information requirement:**
 - Reporting of SoCs by thresholds inspired on SDS/GHS
 - Focus on **intentionally added substances** that stay in product
 - Phased introduction by SoC-category
- **No performance requirement** on chemicals due to insufficient information on SoCs in textile

Preparatory study on textiles (III)

Product aspect	Potential ESPR requirement	Type (information/performance)
Physical Durability	Information on robustness of product → Robustness score (0-0)	Information
Recyclability	Information on recyclability of product → Recyclability score (0-10)	Information
Recycled Content	Report % recycled fibers; possible minimum thresholds	Information + performance (?)
Environmental Impact	Environmental OR Carbon Footprint (during manufacturing only) → label?	<i>Voluntary</i> information
Substances of Concern	Declaration based on thresholds	Information
Maintenance	/	/
	<i>(tbd: Revision Textile Labeling Regulation)</i>	
Waste generation	/	/
Repairability	Info about reparation services brand	<i>Voluntary</i> information

Study identifies **almost exclusively information requirements**, with the exception of potential minimum recycled content thresholds

Preparatory study on textiles: next?



Next steps: 4th milestone → Impact Assessment COM → Delegated Act (DA) proposal



Analysis of different policy scenarios and extrapolation from a representative product to the entire EU stock to estimate environmental and social impacts

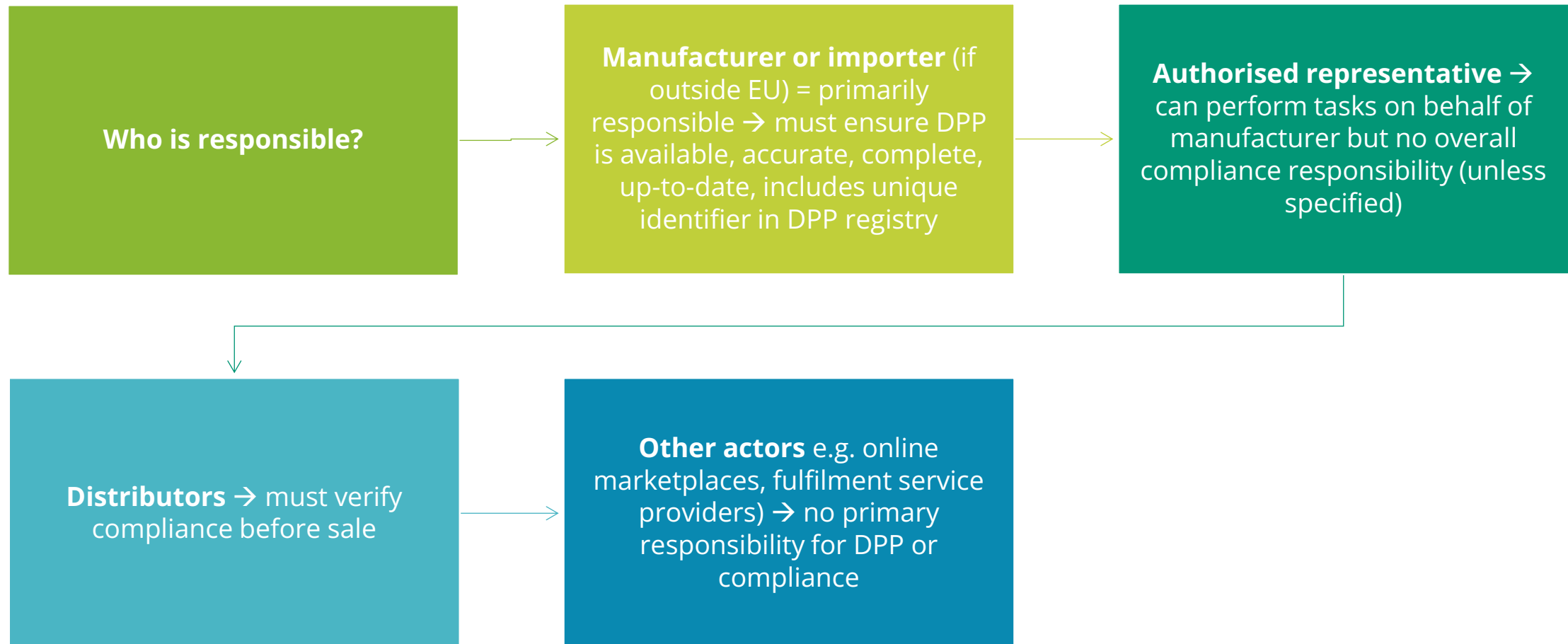


The analysis of the policy scenarios will feed into the Commission's Impact Assessment, which will further evaluate these scenarios to define the ESPR requirements and incorporate them into the Delegated Act

Study on DPP for textiles

- DPP = digital identity for products & key enabler for circular textiles
- High potential for:
 - transparency (for consumers, businesses and authorities)
 - sustainability & circularity
 - market surveillance
 - industrial competitiveness

Study on DPP for textiles



Study on DPP for textiles

Data category	Data field(s) *voluntary
Identification & classification	Unique product ID*, batch ID, model ID, ESPR & PEFCR product category, commodity code
Producer identification	Unique operator identifier, operator name & address, operator contact, unique facility identifier
Product information: material	Fiber composition, components specification
Product information: mechanical properties	Robustness score, visual inspection, spirality, dimensional change, conformity certification
Product information: chemical properties	Substances of concern: location & concentration, relevant instructions for safe use, information relevant for disassembly; reuse; recycling and management at end of life
Product information: recyclability	Recyclability score, conformity certification
Product information: recycled content	Recycled content (%), type of waste, weight, amount of recycled material, conformity certification
Product information: other EU law	Organic content (%)*, amount of organic material*, conformity certification*, EU ecolabel
Product information: product footprint	Product carbon/environmental footprint (class and absolute value), calculation parameters, conformity declaration
Product information: manuals and instructions	Care instructions, repair instructions*, contact of repair services offered by brand*, warranty duration

Potential data points for DPP textile: data points could be asked on batch, model or item-level

Questions?

Ecodesign - Reparability

Circlemade.brussels - Webinar - 4th July 2026

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Health
Food Chain Safety
Environment

In this presentation

Background

Timeline horizontal requirements

Product scope

Minimum requirements

Web references

Ecodesign Directive (2009/125/EC)

reparability requirements, availability:

1. spare parts
 2. repair instructions
- till 5-10 years after end of production
- for consumers or professionals
- product list next slide

reliability (e.g. phones/tablets: drop test, IP class, battery cycles, ...)

reparability score (similar to French index)

1. Phones & tablets
2. Tumble driers
3. Printers and copiers (in progress)
4. ...

To be **continued**: Ecodesign for Sustainable Products Regulation (**ESPR**)

Directive EU/2024/1799 on promoting repair (1/2)

Obligation to repair for manufacturers if repairability requirements exist in Union legal acts:

1. household **washing machines** and household washer-dryers
2. household **dishwashers**
3. **refrigerating** appliances
4. electronic **displays**
5. **welding** equipment
6. **vacuum cleaners**
7. **servers** and data storage products
8. **mobile phones**, cordless phones and slate **tablets**
9. household **tumble dryers**
10. **light means of transport** using **batteries**

Directive EU/2024/1799 on promoting repair (2/2)

European online platform for repair with links to the national online platforms

1. **voluntary** and **free** of charge
2. find **repairers, refurbishers** and community-led repair initiatives

European Repair Information Form

Member States shall take **at least one measure** promoting repair.

Applies from **31 July 2026**

Horizontal reparability requirements ?

Many **small household appliances** with low energy consumption but relevant for **material consumption** and **EEE waste**.

- > Waffle irons, hair dryers, drills, juicers, wireless boxes, audio equipment, air purifiers, ...
- > **Extending lifetime** to keep value people-planet-profit win

Product specific Regulations practically **impossible** amount of work

Horizontal requirement ESPR

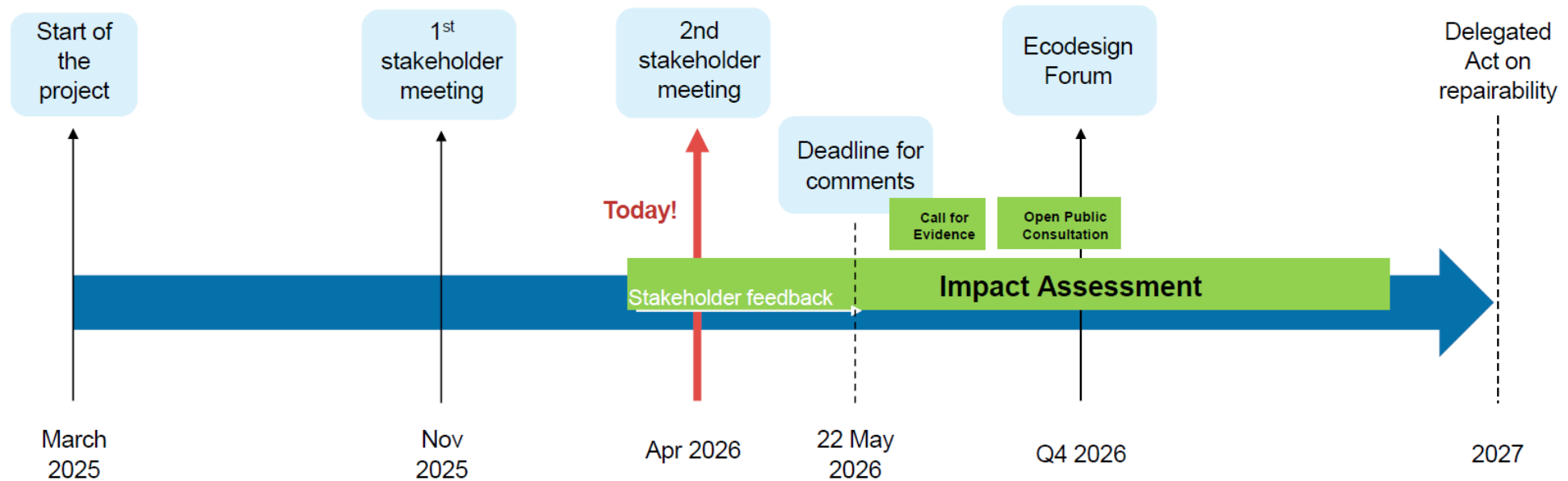
Article 18 - **Prioritisation** and planning ...

- 2. When prioritising aspects to be covered by horizontal ecodesign requirements, the Commission shall **take into consideration** the **benefits of covering a wide range** of products and product groups in the same delegated act in relation to reaching the objectives of this Regulation.

Recital (15) ...

- Horizontal ecodesign requirements **should be established where the technical similarities** of product groups **allow** their environmental sustainability to be improved based on the **same requirements**. It is important that horizontal requirements be developed **in particular concerning durability and repairability**.

Timeline Preparatory study



10



Entry into application 2029 – 2030 ?

Product scope proposals ?

Minimum requirements on

- Consumer **electronics**
 - Audio and video,
 - Wearables, ...
- Light means of transport
 - **Electric bicycle,**
 - **E-scooter, ...**
- **Small household appliances**
 - steamers, grills, air fryers, food processors, electric knives, ...
 - hair dryers, electric toothbrushes ...
 - air purifiers, digital scales, ...

Exemptions ?

- Products subject to implementing **measures** under **Ecodesign** Directive or **ESPR** (EU) 2024/1781
- **Electronic cigarettes** (non-single use) ?
- **External drives**; power banks ?
- **Complex set-top boxes**; Home and office **network equipment** (router); Home **NAS** (network-attached storage) ?

Reparability score ? Handheld game consoles, Smartwatch, Headphones/earbuds, Speakers, Coffee machines, E-scooters, ...

Minimum requirements: proposals

Same as **existing** requirements in product specific regulations

- Access to **repair information/instructions**
- **Spare parts** availability
- **Software updates** availability
- Delivery time - Price
- Disassemblability (**tools** and **fasteners**)
- **Password** encryption and **factory reset**
- **No software barriers**

Spare part availability: two lists

Manufacturers, importers or authorised representatives shall make available to **end-users and professional repairers** at least the following spare parts, when present: **enclosures** (doors/casings/covers/lids), door **gaskets**, hinges, switches, knobs, dials, **buttons**, trays and **baskets**, handles/**handlebars**/handlebar tubes, levers, remotes/control panels, bowls, liquid **tubes**, indicator lights, blades/knives, tweezers, **brushes**, cushions/pads, **filters**, cassettes, external power supplies, upgradeable **memories**.

Manufacturers, importers or authorised representatives shall make available to **professional repairers** at least the following spare parts, when present: **PCBs**, displays/dashboards, ports/connectors, **LEDs**/light sources, speakers, microphones, external audio connectors, optic elements, internal **power supplies**, DVD/Blue-Ray modules, HD/SSD modules, connection **cables**, heating elements/plates, **motors** and motor elements (including motor brushes), pumps, **fans**, braking systems, wheels (rim + tyre), folding systems, chains/belts, saddles, mudguards, forks, **axles**, stems, frame **shock absorbers**.

Duration spare part availability

Manufacturers, importers or authorised representatives shall make spare parts available to end-users and/or professional repairers until at least **5 years after the date of end of placement on the market.**

From the date of end of placement on the market to at least **5 years after** that date, manufacturers, importers or authorised representatives shall **make available software, firmware, and operating system updates.**

Delivery time - Price

Spare part **delivery time**: within **7 working days** after having received the order

Spare part **price** and **price info**

- provide **indicative pre-tax prices** for spare parts and the product
- **most expensive** spare part must not exceed **30%** of price of the **product**.

Access to repair information

5 years to consumers and/or professional repairers:

- a **disassembly map** or exploded view;
- **wiring** and connection **diagrams**,
- electronic **board diagrams**,
- **instructions for repair**
- diagnostic fault and **error information**
- instructions for **software** and firmware (including reset software)
- information on how to access professional repair

...

Disassembleability - Fasteners & Tools

For spare parts available to **end-users**:

- fasteners shall be **resupplied** or **reusable**;
- replacement with **no tool**, tools supplied with product or spare part, or **basic tools**.

For spare parts available to **professional repairers** only:

- fasteners shall be **removable**, resupplied or reusable;
- replacement with no tool, tools supplied with product or spare part, basic tools, or **commercially available tools**.

Password, factory reset & software barriers

Encryption of data is essential to **data privacy** and **second-hand market**.

Products which **store user data**:

- **encrypt** by default the user data stored, and
- include a software function that **resets** the product to its factory **settings** and **erases securely** by default the **encryption key**

Software barriers:

- Software shall **not** be used to **impede** the **replacement** of a spare part with another compatible part.

Links EU legislation

Today

[ESPR](#)

[Preparatory study Horizontal Reparability Requirements](#)

Examples

[Energy Labelling Smartphones](#)

[Ecodesign Smartphones](#)

[Energy Labelling Tumble Dryers](#)

[Ecodesign Tumble Dryers](#)

Also relevant

[Right to Repair Directive](#)

[Batteries Regulation](#)

Thank you for your attention !

Questions ?

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