

Eurocolour position on the EU Sustainable Product Initiative

Introduction

The Sustainable Product Initiative (SPI)¹ as part of the Circular Economy Action Plan (CEAP) is one of the main instruments of the European approach for product policy. The SPI specifically targets final products by addressing all aspects of design, production, and sale of products to ensure that “sustainable products” become the standard in the EU. Products are to become more durable and more repairable, and in parallel waste and harmful substances should be minimized and avoided.

The initiative outlines a broad scope with massive consequences for many sectors, including Eurocolour’s sector as supplier industry for a large variety of products.

The SPI foresees a revision of the Eco Design Directive to make products more sustainable. It is expected that the scope of the Eco Design Directive - which addresses currently mainly energy related products such as electric household devices – will be widened. In addition, further criteria for sustainability on the basis of harmonised indicators and assessment of the lifecycle, e.g. CF will be introduced. Within this context it is essential that the EU Commission avoids double regulation or inconsistencies within other existing legislations. In addition, coherence with other strategies under the EU Green Deal, e.g., CSS must be ensured.

Our key remarks and messages:

- The initiative for sustainable products as a central instrument of the renewed European product policy will have major impact on Eurocolour members as manufacturers of chemical precursors.
- Pigments, fillers and intermediates already provide a significant contribution to the sustainability of a wide variety of final products
- The SPI and the related revision of the Eco Design Directive should avoid any duplication or inconsistencies with existing legislations and with other initiatives of the new Chemical Strategy for Sustainability

Sustainability is part of our industry

The sustainability of a product (intended as a final article) depends on all the different steps of its manufacture and includes the contribution from the chemicals used in the production. Eurocolour as part the chemical industry acknowledges its responsibility in providing chemicals which help achieve a higher sustainability of the final articles, and is working continuously on improving, whenever possible, the performance of its products.

¹ See publication of Roadmap [Sustainable products initiative \(europa.eu\)](https://ec.europa.eu/euro-observatory/roadmap-sustainable-products-initiative)
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It is worth noting that chemicals have a different context, use, consumption and features than other targeted product groups; the definition of sustainability principles and standards should consider these aspects carefully in order to be workable.

Chemicals provided by the companies Eurocolour represents (pigments, dyes, fillers, frits) are already designed to improve the durability of products: they are required to satisfy high-performance standards and optimize the specific properties of the final articles. Through this quality, chemicals already have a positive effect on the sustainability of articles, since the articles will keep up the desired performance for longer periods of time.

High-performance chemicals also often enable a reduced consumption of resources (typically, water and energy) during and after their application, with a direct positive effect on the eco-balance of the final product.

An additional contribution to sustainability is provided by the strict control of hazardous substances, both in compliance to regulatory requirements and to voluntary different independent certification schemes.

The quality the manufacturer of chemical substances provide is independent of how the final product is used; therefore, chemicals are not comparable with final articles for which material durability, new features, planned obsolescence and fashion trends are used as strategies with the aim to increase sales of new products (electronics, textile, household appliances).

Our industry supports further solution approaches

There are, however, opportunities for improvement:

- The overall goal is to holistically improve the safety and the sustainability of the final products, therefore an evaluation of the entire value chain is necessary.
- Most of the chemicals in the market have an expiry date based on safety and product properties stability. In some cases, product stability could be longer than the recommended expiry date, if products are correctly stored. Enhancing longer expiry dates for chemicals (considering messages that some products do not expire) will /could reduce the waste of chemicals and improve their long-term consumption.
- Promoting and enhancing reverse logistics in order to reprocess and manage expired products would reduce waste and promote circular economy in the chemical industry.
- The enhancing of Ecolabel products is also a feasible way to promote sustainable products with added value for customers. However, it is important that suitable requirements must be decided for the different products, considering the hazard and risk of the chemicals used. Further, the introduction of new requirements should also consider the impact on SME with limited resources.
- Information on recycled product content (ensuring non-disclosure of know how), could be an alternative to help consumers to choose their best product alternative considering their sustainability requirements.

Chemical companies can show their commitment to sustainability in the value chain of final products by evaluating the sustainability of their manufacturing processes. Here, a clear framework (ideally, a set of existing tools) is needed to allow comparison of different values. In general, IT tools will be critical to monitor sustainability impacts (carbon footprint, greenhouse gas emissions, etc.) but also at extra cost for those smaller companies with fewer resources.

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It should not be forgotten that the EU already has the REACH system as a powerful tool for the evaluation of chemicals. Also in this context, before creating new approaches it should be checked how the existing tools can be used or adapted to reflect new needs.

The example of carbon footprint is quite representative of the current situation: the CFP is a valuable piece of information for R&D and consumers in their decisions for a more sustainable production and can contribute to circular economy and sustainability. However, measuring the CFP is a complex procedure where companies can consider a different scope and have access to a variable amount of information, often also being confronted with lack of data (not available from suppliers or not included in publicly available references on CFP). The availability of complete tables with CFP equivalents as well as the support from standardization and verification bodies are essential for reality-based, fair and comparable information for customer's choices.

Finally, but importantly, the role of imported goods into Europe should not be forgotten. Imported goods should be considered in any new regulatory framework in a way that safeguards, as far as possible, a level playing field to all participants.

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About Eurocolour:

Eurocolour e. V. is the umbrella association for the manufacturer of pigments, dyes, fillers, frits, ceramic and glass colours and ceramic glazes in Europe

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