



# Why we need ecodesign for plastics

## Briefing

Brussels, Autumn 2024

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### Prioritising plastics and polymers in the ESPR - EU Ecodesign for Sustainable Products Regulation

Plastic has quickly become one of the most ubiquitous materials used in consumer products. Since the 1950s plastic boom, it has replaced steel in cars, glass and paperboard in packaging, cotton in clothes, and wood in furniture. Plastic is cheap to produce, **persistent in the environment**, and very versatile; it can be rigid or made to bend and stretch, and can be inherently durable.

The way we currently design, produce, consume, and dispose of plastic is, however, highly unsustainable and inefficient. It is crucial to **rethink the place of plastic in our society**, prevent the ever-growing pollution it generates as well as develop the necessary tools and initiatives to for a responsible approach to plastic. To minimise the environmental and health footprint of one of the most widely used materials in countless products, **plastic requires a comprehensive ecodesign approach**.

Plastics and polymers need to be included as an intermediate product in the first working plan under the EU Ecodesign for Sustainable Products Regulation ([ESPR](#)) - foreseen for early 2025. By prioritising plastics and polymers in the first ESPR working plan, the EU will take **a major step in addressing the plastic pollution crisis**, and work towards minimising the environmental footprint of plastic and polymer production.

### EU Ecodesign for Sustainable Products Regulation framework

The new ESPR establishes a comprehensive ecodesign framework, giving the European Commission the authority to implement stricter sustainability requirements across various product categories. This regulation is a key tool to accelerate the European transition to a sustainable, toxic-free, and circular economy. Ultimately, the success of the ESPR will depend on its implementation, including many upcoming activities, secondary legislation, and the role of standardisation. Prioritising products and horizontal measures will reduce potential delays and ensure that the most polluting products are dealt with first.

The first working plan, covering at least three years, is expected to come out in the Spring of 2025. It will likely include the sectors, listed below, which were included in the ESPR text (Article 18(5)). [The Commission has already carried out some preliminary work](#) on these and other sectors, including plastics and polymers. The Commission is empowered to adapt the list for the first working plan, provided that it gives justification. The legislation specifies the following sectors to be prioritised:

- Intermediate products: iron, steel, aluminium, lubricants, and chemicals.
- Products: textiles (notably garments and footwear), furniture (including mattresses), tyres, detergents, paints, energy-related products, and ICT products/other electronics.

## Plastics and polymers sector

Plastic has an outsized impact on human health and the environment<sup>i</sup>, yet the ESPR regulation did not specifically include the plastics and polymers sector as a priority for the first working plan.

The ESPR is intended to improve the environmental impacts of many different product streams and plastics is significantly present in many of them, e.g. paints, textiles, electronics, furniture. **Plastics and polymers should therefore be addressed as an intermediate product** to ensure these other products are well-designed from the foundation.

By prioritising plastics and polymers, the EU will take **a major step in addressing the plastic pollution crisis**, working to minimise the environmental footprint of plastic and polymer production. There are many reasons for addressing the plastic and polymer sector in the first working plan:

- It is projected that plastics production and consumption will grow considerably over the coming decades, with deleterious effects.<sup>ii</sup> By prioritising the sector under the ESPR, some of these impacts could be mitigated.
- It would align several EU policy priorities, providing regulatory certainty to an industry under much scrutiny. The Packaging and Packaging Waste Regulation (PPWR) will also create requirements for plastic products in delegated acts (delivered by 2028), including this sector under the ESPR will ensure that work is not unnecessarily duplicated.
- The EU and its Member States are playing a key role in the UN negotiations for an International Plastics Treaty - a new international legally binding instrument to address plastic pollution. By addressing the plastics and polymers sector under the ESPR, the EU will continue to take the lead in improving the environmental performance of this sector. Establishing performance and information requirements for plastics and polymers in the EU market would provide a roadmap for work at the global level.
- Other intermediate products will likely be addressed in the working plan, including the chemical sector, which has clear overlaps with plastics and polymers. It is therefore a unique opportunity to set up minimum requirements for plastics and polymers, [which ECOS has advocated since 2019](#). There are drawbacks and risks associated with each part of the entire lifecycle of plastic. To minimise the environmental footprint of one of the most widely used materials, in countless products, **plastic requires a comprehensive ecodesign approach**.

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For a more comprehensive overview, read our position paper:

- [Making the case for a holistic plastic strategy: Addressing polymers and plastics under the ESPR](#)

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<sup>i</sup> The Minderoo-Monaco Commission on Plastics and Human Health, [The Minderoo-Monaco Commission on Plastics and Human Health | Annals of Global Health](#), 2023.

<sup>ii</sup> Global Plastics Outlook, Policy Scenarios to 2060. 3. [Plastics use projections to 2060](#) | Global Plastics Outlook : Policy Scenarios to 2060 | OECD iLibrary (oecd-ilibrary.org), 2022