**Suggested Amendments: Ecodesign for Sustainable Product Regulation (ESPR)**

**Date: X/ X/ 2022**

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The Policy Hub – Circularity for Apparel and Footwear,uniting more than 700 brands, retailers, manufacturers, and other stakeholders within the industry, and representing more than 50% of the apparel and footwear sector, welcomes the European authorities’ efforts to reduce the environmental impact of products placed on the European markets. As an industry, we are supporting the expansion of the ecodesign principles to apparel and footwear products.

**Green Flags**

**@Members - Instruction:** provide an example of what you support in the current proposal

* **Harmonisation for a single market:** The harmonisation of requirements across Europe to ensure the functioning of the single market.
* **Tailored product-specific requirements:** The EU Commission’s approach towards vertical, product-specific requirements to ensure these are tailored and fit for purpose.
* **Impact-focused LCA approach:** The focus per product group on a selection of requirements that are most relevant/ impactful from a circularity perspective following an LCA approach that is based on the Product Environmental Footprint (PEF).
* **Comprehensive assessments:** Emphasising the need for comprehensive assessments for the development of the Delegated Acts.
* **Strong engagement of key stakeholders including industry:** Involvement of relevant stakeholders, including technical experts from the industry will be key to ensuring that the requirements developed as part of the ecodesign forum will be relevant and realistic.
* **Digitalisation of product information:** Increasingly sharing product information through digital means e.g., the Digital Product Passport (DPP).

**Red Flags**

**@Members - Instruction:** provide an example of what you disagree with in the current proposal, **Policy coherence between different EU legislations**

1. **Destruction of Unsold Goods**
2. **Declaration of Conformity (DoC) and CE marking**
3. **Substances of Concern**

**If you have detailed information regarding the specific articles you disagree with please fill in the table below and provide the suggested amendments.**

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| --- | --- | --- | --- | --- |
| **Issue** | **Paragraph & initial text** | **Relevant suggested EP Amendment** | **Alternative Suggested wording** | **Comments** |
| X | No of Paragraph | Number – Name of MEP | X | X |