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SPI Impact Assessment – Targeted Survey for all types of stakeholders

Fields marked with * are mandatory.

1.1 Introduction

This consultation aims to gather stakeholder views regarding the Sustainable Products Initiative (SPI), which was announced by the European Commission in last year's Circular Economy Action Plan (CEAP) and is due to be delivered towards the end of 2021. The SPI will aim to make **products placed on the EU market** fit for a climate neutral, resource efficient and circular economy, reduce waste and ensure that the performance of frontrunners in sustainability progressively becomes the norm.

A core part of SPI will focus on widening the scope of the Ecodesign Directive beyond energy-related products so as to make it applicable to the broadest possible range of products and make it deliver on circularity. The CEAP identifies a list of value chains which should be prioritised under SPI, but clarifies that further product groups will be identified based on their environmental impact and circularity potential.

In the context of this survey, sustainable products can be understood as those goods and services which are designed to have a long lifetime; are durable, repairable, upgradable and manufactured with minimum impact on the environment; and their impacts and emissions are minimised across their life cycle.

The objective of this Targeted Survey is to gather the views of expert stakeholders, with a higher degree of detail in comparison to the Open Public Consultation on SPI which was published in March 2021 and which runs until 9 June 2021. As part of this Targeted Survey, tailored questionnaires have been developed for stakeholder groups whose opinions have been identified as particularly relevant for the preparation of SPI. Please note that SMEs are also being consulted in a targeted way, via the Enterprise Europe Network.

For further information, please contact: spi-ia@trinomics.eu

1.2 About you

* 1. In what capacity are you completing this questionnaire? *(Please note that depending on your answer, a more targeted second part of the questionnaire is made accessible to you automatically. This is however not the case if you choose 'other'.)*

Manufacturer/importer

*

If you selected *Manufacturer/importer*, please specify which of the following product groups are most relevant to you (multiple options are possible):

- [x] Food or beverage products
- [x] Textile, leather, or wearing apparel products
- [x] Manufacturing
- [ ] Wood or wood and cork products (except furniture)
- [ ] Paper and paper products
- [x] Printing and reproduction of recorded media
- [x] Coke and refined petroleum products
- [x] Chemicals and chemical products
- [x] Pharmaceutical products and pharmaceutical preparations
- [x] Rubber and plastic products
- [x] Other non-metallic mineral products
- [x] Basic metals
- [x] Fabricated metal products (except machinery and equipment)
- [x] Computer, electronic and optical products
- [x] Electrical equipment
- [x] Machinery and equipment
- [x] Motor vehicles and other transport equipment
- [x] Furniture
- [ ] Other*

* For *manufacturers/importers*: do you deal with final or intermediary products or with both:

Both final and intermediary products

2. Please indicate your name, role, decision making level, and the name of your company, organisation, or institution:

* 2a. Name of respondent

200 character(s) maximum

Emilie Bartolini

* 2b. Position in the organisation (name of the position or function)

200 character(s) maximum

Associate policy manager

* 2c. Level of decision making in the organisation (more than one level is possible)

- [ ] Owner
- [ ] Senior Management
- [ ] Operations management
- [x] Environmental manager
- [ ] R&D / innovation manager
- [ ] Other

* 2d. Name of Company, Organisation or Institution

200 character(s) maximum

American Chamber of Commerce to the EU (AmCham EU)

* 3. Please provide a contact email address (it will not be published):

eba@amchameu.eu

* 4. Please indicate the location of your organisation:

Belgium

* 5. Please indicate the level at which your organisation operates:

- ○ Local/ Regional
- ○ National
- ◉ EU
- ○ International/global
- ○ I do not know/ No opinion

* 6. Please indicate the size of your organisation:

- ○ Micro (1 to 9 employees)
- ◉ Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ○ Large (250 or more)

1.3 Questions for all types of stakeholders

The scope of the initiative

7. The intention for the SPI legislative proposal is to widen the scope of the Ecodesign Directive beyond energy-related products so as to make it applicable to the broadest possible range of products and make it deliver on circularity. The CEAP sets out a list of key value chains which should be prioritised in this respect and clarifies that further product groups will be identified based on their environmental impact and circularity potential. How would you characterise the **circularity potential** (i.e. potential to successfully adapt to more circular processes that reduce overall environmental impact) of the following sectors?

Please rate the choices below from very low potential to very high potential.

	Very low	Low	Neutral	High	Very high	I do not know/ no opinion
Electronics and ICT	○	○	○	○	○	◉
Telecommunication and information services	○	○	○	○	○	◉

Textiles	○	○	○	○	○	◉
Wearing apparel	○	○	○	○	○	◉
Furniture	○	○	○	○	○	◉
Steel	○	○	○	○	○	◉
Other basic metals (please specify)	○	○	○	○	○	◉
Fabricated metal products	○	○	○	○	○	◉
Cement	○	○	○	○	○	◉
Intermediary chemicals (such as basic chemicals)	○	○	○	○	○	◉
Batteries	○	○	○	○	○	◉
Electrical equipment	○	○	○	○	○	◉
Vehicles and transport equipment	○	○	○	○	○	◉
Machinery and equipment	○	○	○	○	○	◉
Packaging	○	○	○	○	○	◉
Plastics	○	○	○	○	○	◉
Construction products and construction works	○	○	○	○	○	◉
Waste collection, treatment and disposal services; materials recovery services	○	○	○	○	○	◉
Repair services of computers and personal and household goods	○	○	○	○	○	◉
Human health services	○	○	○	○	○	◉

If you consider additional product groups as highly relevant, please mention them here:

1500 character(s) maximum

Product Sustainability Principles

8. In addition to specific product requirements in the revised Ecodesign directive, the SPI may develop "Sustainability Principles", intended to apply to a broad range of products, and to guide broader policy and legislative developments in the future. The following table shows examples of what such Sustainability Principles could look like. How effective do you believe each would be in minimising environmental and social impacts? Please rate the choices below from very low importance to very high importance.

		Low	Neutral	High		I do not

	Very low				Very high	know/ no opinion
Principle of design for sustainability The designer minimises the negative environmental and social impacts of a product and of the process and maximises the well-being of the workers and communities involved	○	○	◉	○	○	○
Principle of sustainable sourcing of materials The purchaser of materials minimises the negative environmental and social impacts and maximises the well-being of the workers and communities involved	○	○	◉	○	○	○
Principle of sustainable manufacturing The manufacturer minimises the negative environmental and social impacts of the manufacturing processes and maximises the well-being of the workers and communities involved	○	○	◉	○	○	○
Principle of management for circularity The user retains its use for as long as possible and disposes it in a sustainable way when the product is no longer needed. The manager of the disposed product retains the maximum usage value from the product, while the product manufacturer provides the necessary information for the user and manager to perform their duties	○	○	◉	○	○	○
Principle of responsibility for information Each party in the value chain of a product keeps track of and shares with the other parties the information necessary for all parties to evaluate the sustainability of operations	○	○	◉	○	○	○
Principle of avoidance of destruction The usage value of products is not deliberately destroyed	○	○	◉	○	○	○

If you wish to add another sustainability principle that could be applicable to a broad range of products, please do so and elaborate in the textbox below:

3500 character(s) maximum

Work on wording

Incentives to mobilise market actors

9. How would the following measures related to **economic incentives** contribute to achieving greater product sustainability and market penetration?

	No benefits	Limited benefits	Average benefits	High benefits	Very high benefits	I do not know/ no opinion
Require Member States to implement minimum VAT differentiation based on products' sustainability performance [1]	○	○	○	○	○	○
Require Member States to implement tax exemptions based on products' sustainability performance	○	○	○	○	○	○
Introduction of an excise duty proportional to the life cycle environmental footprint of the product	○	○	○	○	○	○
Support Member States in the implementation of fiscal incentives (e.g. through guidelines) to reward products on the basis of their different sustainability performance	○	○	○	○	○	○
Establishing minimum mandatory green public procurement criteria or targets on the basis of their different sustainability performance	○	○	◉	○	○	○
Extending the producer's responsibility for their products to the post-consumer stage, including collection and treatment of post-consumer products (extended producer responsibility, EPR)	○	◉	○	○	○	○
EU-harmonisation of fee-modulation in EPR schemes based on products' different sustainability performance (e.g., lower fees for recyclable packaging)	○	○	○	◉	○	○
Require Member States to implement fiscal incentives for						

the use of eco-vouchers for purchasing high-performing products (e.g. linked sustainability performance classes defined by SPI)	○	○	○	○	○	◉

[1] In the context of incentives, sustainability performance is understood as performance related to one or more aspects intended to be addressed by the SPI (e.g. recyclability, reparability, life-cycle environmental footprint).

10. How would the following measure related to **reputational incentives** contribute to achieving greater product sustainability and market penetration?

	No benefits	Limited benefits	Average benefits	High benefits	Very high benefits	I do not know/ no opinion
Introducing information requirements on specific sustainability performance aspects (e.g. carbon footprint or recycled content)	○	○	◉	○	○	○
Introducing a label including classes of performance related to life-cycle environmental impact - presented like the existing Energy Label and directed at consumer at the point of sale	○	○	○	○	○	◉
Introducing a label including classes of performance related to specific sustainability aspects (e.g. comparable to the French reparability index) - presented like the existing Energy Label and directed at consumer at the point of sale	○	○	○	○	○	◉
Further including circularity in existing EU-level labels, especially Energy Labelling	○	○	○	○	○	◉
Set up a scheme to facilitate the verification of sustainability performance (outside of obligatory verification of minimum information requirements), based on the ETV	○	○	○	○	○	◉

Increased EU investment in the creation and availability of industry standards (e.g. ISO or CEN) related to product sustainability (e.g. durability, recyclability)	○	○	○	○	◉	○
Allow industry to propose a 'gold standard' representing best-in-class sustainability performance for products that are not yet covered by SPI – if accepted, adherence to the standard would guarantee free circulation of the product on the EU market	○	○	○	◉	○	○

11. If you wish to add other ideas for incentives (that we have not considered), please do so and elaborate in the textbox below:

3500 character(s) maximum

12. What would be the economic impact of extending the responsibility of manufacturers through EPR schemes?

	Very low	Low	Neutral	High	Very high	I do not know/ no opinion
EPR schemes should incentivise the eco-design phase of product sustainability;	○	○	○	○	○	◉
EPR schemes should be introduced for most products in the EU market, excluding intermediary products	○	○	○	○	◉	○
EPR schemes should be introduced for all products in the EU market, excluding intermediary products	○	○	○	○	◉	○
EPR schemes should be introduced for most products in the EU market, including intermediary products	○	○	○	○	◉	○
EPR schemes should be introduced for all products in the EU market, including intermediary products	○	○	○	○	◉	○
EPR schemes should be extended to distributors, importers and exporters of products in the EU market.	○	○	○	○	○	◉

Digital Product Passport

13. One of the measures being considered for the Sustainable Products Initiative is the development of a digital 'product passport', which would provide producers and other key supply chain actors, consumers and market surveillance authorities with information relevant for ensuring the sustainable management of a product (maintenance, repair, re-manufacturing, recycling, control of compliance, etc.). The Digital Product Passport (DPP) should satisfy a range of requirements. To what extent would you agree or disagree that a Digital Product Passport should comply with the following requirements?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	I do not know/ no opinion
Its content should be written in an open, standard, inter-operable format	○	○	○	○	◉	○
This standard should be usable under open licences or under Fair, Reasonable And Non-Discriminatory (FRAND) legal and economic conditions	○	◉	○	○	○	○
This standard should be usable over very long periods of time	○	○	◉	○	○	○
The content of the Digital Product Passport should be machine-readable, in order to be easily processed by a computer	○	○	○	○	◉	○
The content of the Digital Product Passport should be searchable, e.g. with a search engine	○	◉	○	○	○	○
If needed, it should be possible to restrict the rights to access or modify information to some persons or organisations only	○	○	○	○	◉	○
The author of the information should be authenticated, so as to avoid usurpation of identity	○	○	○	○	◉	○
Information on the DPP is Green Public Procurement, unless deliberate action by the company to keep it confidential	○	◉	○	○	○	○
Information on the DPP is confidential by default, unless						

deliberate action by the company to make it public	○	○	○	○	◉	○
The information on the passport should be true	○	○	○	○	◉	○
The information, once written on the passport, should not be unduly modified	○	○	○	○	◉	○

1.4 Questions for manufacturers and importers

14. The transition to the manufacturing of products with a higher level of sustainability is hampered by many hurdles, but it can generate many benefits and opportunities. To what extent would you agree or disagree with the following statements regarding this transition in your sector / your company?

The reliability of information

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	I do not know/ no opinion
It is difficult to obtain trustworthy information on the environmental conditions of processing along the supply chain	○	○	○	○	○	○
It is difficult to obtain trustworthy information on the social conditions of work along the supply chain	○	○	○	○	○	○
In its current state, social and environmental auditing is unreliable to provide true information on the social and environmental conditions in the supply chain	○	○	○	○	○	○
Certificates of good environmental or social credentials are often duplicated and applied to products that do not deserve them	○	○	○	○	○	○

The transition to sustainable products

		Disagree	Neutral	Agree		I do not know/

	Strongly disagree				Strongly agree	no opinion
The transition to sustainable products requires a level of investment that is beyond our financial capacity	○	○	○	○	○	○
The transition to sustainable products would cause the premature depreciation of our productive assets and thus cause financial losses that we cannot afford	○	○	○	○	○	○
The transition to sustainable products would cause a strong reduction in our production volume, and hence a strong reduction in employment in our company/our sector	○	○	○	○	○	○
The transition to sustainable products would generate either a strong investment in training or massive layoffs and recruitments	○	○	○	○	○	○
The transition to sustainable products would generate new business opportunities	○	○	○	○	○	○
The transition to sustainable products is not sufficiently supported by clear, comprehensive and binding legislation	○	○	○	○	○	○

Enforcement

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	I do not know/ no opinion
The enforcement of sustainability requirements in the EU is insufficient to protect us against the unfair competition of non-compliant products – and this situation would become worse should these requirements become more stringent	○	○	○	○	○	○

Provided they are adequately enforced within the EU, more stringent requirements on the sustainability of our products would improve our competitive position	○	○	○	○	○	○

15. How often does your company purposively and strategically engage in the following activities?

Type of innovation for sustainability	Almost always	Frequently	Sometimes	Occasionally	Hardly ever	I do not know/ no opinion
Circular Business models	○	○	○	○	○	○
Sustainable product innovation	○	○	○	○	○	○
Innovation in marketing to promote the company or the products as green,	○	○	○	○	○	○
Innovation in reverse logistics (separate sub-answer)	○	○	○	○	○	○
Innovation with positive environmental benefits (eco-innovation)	○	○	○	○	○	○
Innovation with positive social benefits (social innovation)	○	○	○	○	○	○
Innovation with positive environmental and social benefits (sustainable innovation)	○	○	○	○	○	○
Innovation focusing on the circularity of products and services (product-services, repairability, reuse, recyclability, remanufacturing, durability, etc.)	○	○	○	○	○	○
Innovation in eco-design	○	○	○	○	○	○
Innovation in product-service delivery	○	○	○	○	○	○
Innovations for inclusive and bottom of the pyramid markets	○	○	○	○	○	○

16. Which of the following circular business models have the highest potential to support sustainably design products and services?

	Highest potential	High potential	Medium potential	Low potential	No potential	I do not know/ no opinion
Product-service systems	○	○	○	○	○	○
Collaborative and sharing economy	○	○	○	○	○	○
Reverse logistics models	○	○	○	○	○	○
Reuse	○	○	○	○	○	○
Repair	○	○	○	○	○	○
Remanufacturing / refurbishment	○	○	○	○	○	○
Recycling	○	○	○	○	○	○
Upcycling / upgrade	○	○	○	○	○	○

17. What would be the economic impact of the strengthening of the following circular business models within the SPI on your sector of business/interest?

	very low	low	neutral	high	very high	I do not know/ no opinion
Product-service systems	○	○	○	○	○	○
Collaborative and sharing economy	○	○	○	○	○	○
Reverse logistics models	○	○	○	○	○	○
Reuse	○	○	○	○	○	○
Repair	○	○	○	○	○	○
Remanufacturing / refurbishment	○	○	○	○	○	○
Recycling	○	○	○	○	○	○
Upcycling / upgrade	○	○	○	○	○	○

18. In your opinion, what would be the positive and negative economic and administrative impacts of incentivising circular business models for your area of business/interest?

3500 character(s) maximum

Please add any evidence or data you may have. You can upload a file here:

19. Please evaluate the validity of the following statements related to drivers for the uptake of sustainable products in Europe.

	Strongly agree	Agree	No opinion	Disagree	Strongly Disagree
Regulations and incentives enable circular business models	○	○	○	○	○
Regulations and incentives incentivise innovation in sustainable products	○	○	○	○	○
Presence of market opportunities in Europe	○	○	○	○	○
Policy support facilitates fair commercial practices enabling circular business models	○	○	○	○	○
Sufficient access to financing enable circular business models	○	○	○	○	○

20. What are the characteristics, focus and services that a pan-European facility dedicated to support circular business models for sustainable products should have?

	Great importance	important	Somewhat Important	Somewhat unimportant	Not at all important	I do not know/ no opinion
Hosting services (e.g. co-working, meeting rooms)	○	○	○	○	○	○
Financial support	○	○	○	○	○	○
Technical support	○	○	○	○	○	○
Advisory services	○	○	○	○	○	○
Self-assessment tool to identify and design suitable business model patterns	○	○	○	○	○	○
General business intermediation services (change management, business plan, etc.)	○	○	○	○	○	○
Valorisation, incubation, acceleration, etc. services	○	○	○	○	○	○
Staff exchange and mobility of highly skilled personnel	○	○	○	○	○	○
Information hub (e.g. legal, intellectual property rights , markets, etc.)	○	○	○	○	○	○
Joint research programmes with higher education institutions	○	○	○	○	○	○
Educational and training programmes	○	○	○	○	○	○

21. The environmental performance of products will have to be assessed based on a robust methodology. The European Commission has developed a harmonised methodology for the calculation of the environmental footprint of products and organisations, called Product Environmental Footprint (PEF) and Organisation Environmental Footprint (OEF), respectively. To what extent would you say that this methodology is appropriate to be used for setting product performance requirements?

- Fully
- To a large extent
- To some extent
- Not at all
- I do not know/ no opinion

22. There is in general a comprehensive framework for the assessment of environmental performance of products. Their social performance, however, is more difficult to assess. Are you aware of existing frameworks that assess the social impact of products?

3500 character(s) maximum

23. Which of the following **new circular business models** are you familiar with and/or (where appropriate) which are already being applied by your company?

Product-service pattern category	Not applicable	Unfamiliar	Somewhat unfamiliar	Somewhat familiar	Familiar	Already applied
Product-related services, Take-back management, Knowledge intensive business services, circularity services.	○	○	○	○	○	○
Use-oriented services, Pay-per-use, Product leasing, Subscription	○	○	○	○	○	○
Result-oriented services, Functional sales, Pay for success, Services instead of products, Service and performance model	○	○	○	○	○	○
Result-oriented services, Functional sales, Pay for success, Services instead of products, Service and performance model	○	○	○	○	○	○
Access provision, Sharing business, Product renting or sharing	○	○	○	○	○	○
Use-oriented services, Product leasing, Product pooling, Self-service points	○	○	○	○	○	○
Cooperative model, Community platform	○	○	○	○	○	○
Takeback management, Take-back service network, Material reverse logistics	○	○	○	○	○	○
RL for advanced industrial products, RL for high-value EPR products	○	○	○	○	○	○
RL for spare parts and maintenance	○	○	○	○	○	○
RL for low-value EPR products	○	○	○	○	○	○
Second-life retailing	○	○	○	○	○	○

Other sustainability-oriented business models, where the sustainability performance of supply chains, processes, products, and services is considered as an integral part of an organisation value creation.

	Not applicable	Unfamiliar	Somewhat unfamiliar	Somewhat familiar	Familiar	Already applied
Giving model, Social mission model, Inclusive sourcing, Providing access, Repurposing business	○	○	○	○	○	○
Pricing and revenue model, Financing model	○	○	○	○	○	○
Eco-design model, Green products, By-product synergy, Green razor and blade	○	○	○	○	○	○
Industrial symbiosis, Cradle-to-cradle, Closing-the-Loop model	○	○	○	○	○	○
Green supply chain management, Shorter supply chains	○	○	○	○	○	○

24. Which of the following well-established circular business models are you familiar with and/or (where appropriate) which are already being applied by your company? It is possible to select more than one option.

Reuse models, where an object is used again, sometimes for its original purpose, sometimes in a very different way.

Product-service pattern category	Not applicable	Unfamiliar	Somewhat unfamiliar	Somewhat familiar	Familiar	Already applied
Reuse network, Used product remarketing, Used product sales	○	○	○	○	○	○
Prolong product usability, Product life extension, Revitalised products	○	○	○	○	○	○
Secondary material reuse, By-product synergy, Industrial symbiosis, Online waste exchange platform	○	○	○	○	○	○
Circular supply systems, Recovery management	○	○	○	○	○	○

Repair models, prolonging the life of goods by fixing the parts that are damaged or worn out.

Product-service pattern category	Not applicable	Unfamiliar	Somewhat unfamiliar	Somewhat familiar	Familiar	Already applied
Repair service model, Repair transaction, Repair gap exploiter	○	○	○	○	○	○
Repair-based rental	○	○	○	○	○	○
Out-of-warranty repair service	○	○	○	○	○	○
Customer advice	○	○	○	○	○	○

Remanufacturing / **refurbishment models** used to transform used products into a ‘like new’ state by restoring original product functionalities.

Product-service pattern category	Not applicable	Unfamiliar	Somewhat unfamiliar	Somewhat familiar	Familiar	Already applied
Refurbishment model, Product life extension, etc.	○	○	○	○	○	○
Remanufacturing model, Take-back management	○	○	○	○	○	○
Next life sales / remarketing	○	○	○	○	○	○
Product performance upgrade, Product redesign	○	○	○	○	○	○

Recycling, upcycling/upgrade Recycling typically involves collection, toxic removal/cleaning, dismantling, refining, and selling used material whereas upcycling involves adding value via usability and life extension.

Product-service pattern category	Not applicable	Unfamiliar	Somewhat unfamiliar	Somewhat familiar	Familiar	Already applied
Product upcycling, By-product upcycling,	○	○	○	○	○	○
Waste upcycling	○	○	○	○	○	○
Post-consumer recycling, Waste recycling	○	○	○	○	○	○
Closed-loop production, Rematerialisation, Industrial symbiosis	○	○	○	○	○	○
Waste management, By-product generation from waste Resource recovery	○	○	○	○	○	○

25. The Sustainable Product Initiative is likely to introduce more stringent sustainability requirements on products and on production processes, some of which already could be activated based on the existing Ecodesign Directive. These requirements are likely to elicit some effort from your side, but also to generate a competitive advantage.

Please rate the level of effort necessary for your company / your sector to comply with these categories of requirements, from very low effort to very high effort:

Requirements already foreseen in the existing Ecodesign Directive	very low effort	low effort	Medium effort	High effort	very high effort	I do not know/ no opinion
Minimum lifetime of the product	○	○	○	◉	○	○
Ease of dis-assembly and re-assembly	○	○	○	◉	○	○
Repairability	○	○	○	◉	○	○
Availability of spare parts	○	○	○	◉	○	○
Recyclability of materials	○	○	○	◉	○	○
Minimum recycled content	○	○	○	◉	○	○
Restriction on hazardous substances	○	○	○	◉	○	○

Please rate the level of effort necessary for your company / your sector to comply with these categories of requirements, from very low effort to very high effort:

Requirements on maintenance and reliability	very low effort	low effort	Medium effort	High effort	very high effort	I do not know/ no opinion
Existence of preventive maintenance features in the product	○	○	○	○	○	○
Existence of maintenance infrastructure coordinated by manufacturer / importer	○	○	○	○	○	○
Minimum duration of support of product by the maintenance infrastructure	○	○	○	○	○	○
Minimum material efficiency of repair / maintenance operations (minimising the size of the replaced spare part)	○	○	○	○	○	○
Minimum lifetime, conditioned on the performance of preventive maintenance	○	○	○	○	○	○
Reliability (Mean Time Between Failures)	○	○	○	○	○	○

Availability (Mean Time to Repair) expressing the performance of the maintenance and repair infrastructure	○	○	○	○	○	○

Please rate the level of effort necessary for your company / your sector to comply with these categories of requirements, from very low effort to very high effort:

Requirements on recyclability	very low effort	low effort	Medium effort	High effort	very high effort	I do not know/ no opinion
Restrictions on the variety of alloys / of textile mixtures / of plastic additives permitted for some applications (e.g. packaging) to enhance the purity of recycling and avoid downcycling	○	○	○	○	○	○

Please rate the level of effort necessary for your company / your sector to comply with these categories of requirements, from very low effort to very high effort:

Requirements facilitating refurbishment / re-manufacturing	very low effort	low effort	Medium effort	High effort	very high effort	I do not know/ no opinion
Pre-defined licensing regime applicable by default to re-manufacturers, re-furbishers and upgraders of products to use technologies protected by Intellectual Property Rights	○	○	○	○	○	○

Please rate the level of the competitive advantage that you may gain from their enforcement, from zero competitive advantage to very large:

Requirements already foreseen in the existing Ecodesign Directive	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Minimum lifetime of the product	○	○	○	○	○	○
Ease of dis-assembly and re-assembly	○	○	○	○	○	○
Repairability	○	○	○	○	○	○
Availability of spare parts	○	○	○	○	○	○
Recyclability of materials	○	○	○	○	○	○
Minimum recycled content	○	○	○	○	○	○
Restriction on hazardous substances	○	○	○	○	○	○

Please rate the level of the competitive advantage that you may gain from their enforcement, from zero competitive advantage to very large:

Requirements on maintenance and reliability	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Existence of preventive maintenance features in the product	○	○	○	○	○	○
Existence of maintenance infrastructure coordinated by manufacturer / importer	○	○	○	○	○	○
Minimum duration of support of product by the maintenance infrastructure	○	○	○	○	○	○
Minimum material efficiency of repair / maintenance operations (minimising the size of the replaced spare part)	○	○	○	○	○	○
Minimum lifetime, conditioned on the performance of preventive maintenance	○	○	○	○	○	○
Reliability (Mean Time Between Failures)	○	○	○	○	○	○
Availability (Mean Time to Repair) expressing the performance of the maintenance and repair infrastructure	○	○	○	○	○	○

Please rate the level of the competitive advantage that you may gain from their enforcement, from zero competitive advantage to very large:

Requirements on recyclability	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Restrictions on the variety of alloys / of textile mixtures / of plastic additives permitted for some applications (e.g. packaging) to enhance the purity of recycling and avoid downcycling	○	○	○	○	○	○

Please rate the level of the competitive advantage that you may gain from their enforcement, from zero competitive advantage to very large:

Requirements facilitating refurbishment / re-manufacturing	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Pre-defined licensing regime applicable by default to re-manufacturers, re-furbishers and upgraders of products to use technologies protected by Intellectual Property Rights	○	○	○	○	○	○

26. As set out above, the Digital Product Passport is a digital document containing information related to the product. Providing this information is likely to elicit some effort from your side, but also to generate a competitive advantage.

Please rate the level of effort necessary for your company / your sector to provide the following elements of information, from very low effort to very high effort:

Identity	very low effort	low effort	Neutral effort	High effort	very high effort	I do not know/ no opinion
Unique Identification Number of the item	○	○	○	○	◉	○
Identity and contact details of the manufacturer, the importer, or the distributor of the product	◉	○	○	○	○	○
Identifier of the product model and batch number of the item	○	○	○	◉	○	○
Unique Identification Number of each part assembled to constitute the item	○	○	○	○	◉	○

Please rate the level of effort necessary for your company / your sector to provide the following elements of information, from very low effort to very high effort:

Technical specifications	very low effort	low effort	Neutral effort	High effort	very high effort	I do not know/ no opinion
Performance level of the product, expressed with standard metrics relevant for the product group	○	○	○	○	○	◉
Reliability of the product, expressed with standard metrics relevant for the product group	○	◉	○	○	○	○
Expected life duration of the product along standard metrics relevant for the product group (e.g. number of cycles)	○	○	○	○	○	◉

Please rate the level of effort necessary for your company / your sector to provide the following elements of information, from very low effort to very high effort:

Environmental sustainability						I do not

	very low effort	low effort	Neutral effort	High effort	very high effort	know/ no opinion
Consolidated Product Environmental Footprint	○	○	○	○	◉	○
Consolidated Green-house Gases (GHG) emissions associated with the whole product	○	○	○	○	◉	○

Please rate the level of effort necessary for your company / your sector to provide the following elements of information, from very low effort to very high effort:

Social sustainability	very low effort	low effort	Neutral effort	High effort	very high effort	I do not know/ no opinion
Consolidated average of working time performed on the item under the protection of a sector-wide collective agreement	○	○	○	○	◉	○
Consolidated average of data on social conditions of work (working hours, wages & benefits, employee treatment, health & safety, termination) and on the relation to the local community	○	○	○	○	◉	○

Please rate the level of effort necessary for your company / your sector to provide the following elements of information, from very low effort to very high effort:

Information to other players along the life-cycle	very low effort	low effort	Neutral effort	High effort	very high effort	I do not know/ no opinion
Material composition: exact nature of each material being used in the product	○	○	○	○	◉	○
Presence and location of hazardous substances in the product	○	○	○	○	○	◉
Instructions for use (incl. operating conditions, e.g. temperature), for the product to operate safely	○	◉	○	○	○	○
Instructions for installation and (de) commissioning	○	◉	○	○	○	○
Instructions for maintenance and repair, incl.: test, diagnostic, dis-assembly, re-assembly	○	○	○	◉	○	○

List of maintenance operations performed on the product	○	○	○	○	◉	○
Bill of Materials = list of parts	○	○	○	○	◉	○
Specifications of the parts	○	○	○	○	◉	○
Technical drawings or 3-D printing files of mechanical parts	○	○	○	○	◉	○
Electric circuit schematics	○	○	○	○	◉	○
Software specification and code	○	○	○	○	◉	○
Results of tests performed to check the compliance with essential requirements placed on the product	○	○	○	○	◉	○
Date of manufacture of the product	○	○	○	○	◉	○
Total consolidated number of seconds of human work performed on the product	○	○	○	○	◉	○

Please rate the level of the competitive advantage that you may gain from their disclosure, from zero competitive advantage to very large.

Identity	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Unique Identification Number of the item	○	○	○	○	○	○
Identity and contact details of the manufacturer, the importer, or the distributor of the product	○	○	○	○	○	○
Identifier of the product model and batch number of the item	○	○	○	○	○	○
Unique Identification Number of each part assembled to constitute the item	○	○	○	○	○	○

Please rate the level of the competitive advantage that you may gain from their disclosure, from zero competitive advantage to very large.

Technical specifications	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Performance level of the product, expressed with standard metrics relevant for the product group	○	○	○	○	○	○
Reliability of the product, expressed with standard metrics relevant for the product group	○	○	○	○	○	○
Expected life duration of the product along standard metrics relevant for the product group (e.g. number of cycles)	○	○	○	○	○	○

Please rate the level of the competitive advantage that you may gain from their disclosure, from zero competitive advantage to very large.

Environmental sustainability	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Consolidated Product Environmental Footprint	○	○	○	○	○	○
Consolidated Green-house Gases (GHG) emissions associated with the whole product	○	○	○	○	○	○

Please rate the level of the competitive advantage that you may gain from their disclosure, from zero competitive advantage to very large.

Social sustainability	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Consolidated average of working time performed on the item under the protection of a sector-wide collective agreement	○	○	○	○	○	○
Consolidated average of data on social conditions of work (working hours, wages & benefits, employee treatment, health & safety, termination) and on the relation to the local community	○	○	○	○	○	○

Please rate the level of the competitive advantage that you may gain from their disclosure, from zero competitive advantage to very large.

Information to other players along the life-cycle	Zero competitive advantage	Small competitive advantage	Medium competitive advantage	Large competitive advantage	Very large competitive advantage	I do not know/ no opinion
Material composition: exact nature of each material being used in the product	○	○	○	○	○	○
Presence and location of hazardous substances in the product	○	○	○	○	○	○
Instructions for use (incl. operating conditions, e.g. temperature), for the product to operate safely	○	○	○	○	○	○
Instructions for installation and (de)commissioning	○	○	○	○	○	○
Instructions for maintenance and repair, incl.: test, diagnostic, dis-assembly, re-assembly	○	○	○	○	○	○
List of maintenance operations performed on the product	○	○	○	○	○	○
Bill of Materials = list of parts	○	○	○	○	○	○
Specifications of the parts	○	○	○	○	○	○
Technical drawings or 3-D printing files of mechanical parts	○	○	○	○	○	○
Electric circuit schematics	○	○	○	○	○	○
Software specification and code	○	○	○	○	○	○
Results of tests performed to check the compliance with essential requirements placed on the product	○	○	○	○	○	○
Date of manufacture of the product	○	○	○	○	○	○

Total consolidated number of seconds of human work performed on the product						

27. Which are the main environmental, social, and economic impacts that could emerge due to the introduction of a Digital Product Passport in your sector of business/interest? Please rate the following options from very low probability to very high probability to occur.

Environmental

	very low	low	neutral	high	very high	I do not know/ no opinion
Gradually phase out the use of environmentally harmful materials in products on the EU market	○	○	○	○	○	◉
Contribute to products with low climate impact	○	○	○	○	○	◉
Contribute to the mitigation of biodiversity loss	○	○	○	○	○	◉
Contribute to the lower pollution levels in air, land, and water	○	○	○	○	○	◉

Social

	very low	low	neutral	high	very high	I do not know/ no opinion
Contribute to consumer empowerment due to greater availability of product information	○	○	○	○	○	◉
Contribute to decent conditions of work	○	○	○	○	○	◉
Contribute to the reduction of environmental crime at a global level	○	○	○	○	○	◉

Economic

	very low	low	neutral	high	very high	I do not know/ no opinion
Contribute to higher economic returns for EU companies	○	○	○	○	○	◉
Contribute to the decoupling of economic growth from environmental impact in the EU	○	○	○	○	○	◉
Increase administrative burden due to higher monitoring and reporting obligations	○	○	○	◉	○	○

28. In your opinion, what would be the positive and negative economic and administrative impacts of the introduction of a Digital Product Passport for your area of business/interest?

3500 character(s) maximum

The impact of this measure would vary per models of products. It is therefore very difficult to assess how this would play out at sectoral and cross-sectoral level.

Please add any evidence or data you may have. Please upload your file:

If you selected “Other option”, please specify here which option you had in mind:

3500 character(s) maximum

Additional feedback

If you wish to elaborate on any of your answers above, please do so here:

3500 character(s) maximum

Or you may upload a file here:

359ccb0a-d9d0-44f0-9ad5-ea51acda8020/SPI_paper__FINAL.pdf

Contact

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