

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'.)*

Waste operator (incl. value-retaining and -recovering operators)

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

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

200 character(s) maximum

Senior Policy Officer

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

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

* 2d. Name of Company, Organisation or Institution

200 character(s) maximum

RREUSE

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 Please provide a contact email address (it will not be published):

mathieu.rama@rreuse.org

* 4. Please indicate the location of your organisation:

Other

* If other, please specify:

100 character(s) maximum

RREUSE currently has 30 members from 26 countries in Europe and the USA

* 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Telecommunication and information services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Textiles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Wearing apparel	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Furniture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Steel	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other basic metals (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fabricated metal products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Cement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Intermediary chemicals (such as basic chemicals)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electrical equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Vehicles and transport equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Machinery and equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Packaging	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plastics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Construction products and construction works	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Waste collection, treatment and disposal services; materials recovery services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Repair services of computers and personal and household goods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Human health services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

1500 character(s) maximum

Sport and leisure equipment, toys, bicycles, small e-vehicles

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.

	Very low	Low	Neutral	High	Very high	I do not 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>Principle of management for circularity</p> <p>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</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Principle of responsibility for information</p> <p>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</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Principle of avoidance of destruction</p> <p>The usage value of products is not deliberately destroyed</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

Principle of circular inclusiveness
Products and services are designed/provided in ways that allow independent operators (sharing, repair and re-use operators) and consumers to be involved in the life extension and management of used products. Producers/importers are limited in their ability to develop monopolies on the repair and maintenance of the products they give access to.

Principle of sustainable innovation
The designer/manufacturer and the provider of services limit innovation to features that make products and services decrease their negative environmental and social impacts. Innovations should not be used as excuses to trigger the obsolescence of functioning products unless impact assessments (led by truly independent organisations) demonstrate their positive environmental and social impacts.

RREUSE also believes that these transversal principles must be turned into transversal requirements applying to all products by default. Principles will not be enough to trigger the systemic change that is needed.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Require Member States to implement tax exemptions based on products' sustainability performance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of an excise duty proportional to the life cycle environmental footprint of the product	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Support Member States in the implementation of fiscal incentives (e.g. through guidelines) to reward products on the basis of their different sustainability performance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establishing minimum mandatory green public procurement criteria or targets on the basis of their different sustainability performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-harmonisation of fee-modulation in EPR schemes based on products' different sustainability performance (e.g., lower fees for recyclable packaging)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Further including circularity in existing EU-level labels, especially Energy Labelling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Set up a scheme to facilitate the verification of sustainability performance (outside of obligatory verification of minimum information requirements), based on the ETV	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increased EU investment in the creation and availability of industry standards (e.g. ISO or CEN) related to product sustainability (e.g. durability, recyclability)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Most of the incentives suggested in table 9 are highly relevant, but are targeted at the wrong products and services. It is in priority repair services and second-hand goods that need to be incentivised. It is also essential to ensure that encouraging consumers to purchase new "sustainable" products will not compete with less resource-intensive repair and re-use activities that currently need financial support. For each type of product category (eg. textiles/footwear) and sub-category (eg. t-shirts, pair of jeans, coats, shoes, etc.), minimum prices should be set (at least at national level) to ensure that they do not compete with repair services and second-hand goods. These minimum prices should be calculated in a transparent way and take into account the average price of second-hand products and repair services and the psychological price threshold that discourages consumers to prefer using these more circular services instead of purchasing new (if the reparation or the second-hand product costs more than X% of the price of a new product, the consumer might prefer purchasing a new product). In addition, the price of new products should always internalise the social and environmental negative externalities. A transparent way to measure these externalities should be developed at EU level and help to set prices that reflect the true cost of products.

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

Concerning the next table on EPR (for which, unfortunately, no text-box is provided), RREUSE would like to attract the Commission's attention to the following position paper: <https://www.rreuse.org/extended-producer-responsibility-and-the-role-of-social-economy-re-use-operators-implementing-a-socially-inclusive-waste-hierarchy/>

EPR must enforce implementation of waste hierarchy through:

- a) Prioritising and financing re-use and preparing for re-use activities through further incentives including quantitative targets
- b) Granting priority access to discarded re-usable products to preparing for re-use operators
- c) Setting strong eco-design measures alongside modulation of EPR fees

EPR must foster relations between Producer Responsibility Organisations (PROs) and social economy re-use operators through:

- a) Thorough impact assessments related to EPR impacts on the re-use and preparing for re-use sectors
- b) Inclusion of social economy actors in the development and governance of EPR schemes
- c) Not making the concept of "necessary costs" disadvantage social economy re-use operators

RREUSE insists that it is if and only if these previous demands are fulfilled that EPR can have a positive impact on the circularity of products. If EPR schemes are set in ways that allow producers/importers to prioritise recycling over re-use, these models will be highly counterproductive.

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;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EPR schemes should be introduced for most products in the EU market, excluding intermediary products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EPR schemes should be introduced for all products in the EU market, excluding intermediary products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EPR schemes should be introduced for most products in the EU market, including intermediary products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EPR schemes should be introduced for all products in the EU market, including intermediary products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EPR schemes should be extended to distributors, importers and exporters of products in the EU market.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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, interoperable format	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
This standard should be usable under open licences or under						

Fair, Reasonable And Non-Discriminatory (FRAND) legal and economic conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
This standard should be usable over very long periods of time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The content of the Digital Product Passport should be machine-readable, in order to be easily processed by a computer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The content of the Digital Product Passport should be searchable, e.g. with a search engine	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
If needed, it should be possible to restrict the rights to access or modify information to some persons or organisations only	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The author of the information should be authenticated, so as to avoid usurpation of identity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Information on the DPP is Green Public Procurement, unless deliberate action by the company to keep it confidential	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the DPP is confidential by default, unless deliberate action by the company to make it public	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The information on the passport should be true	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The information, once written on the passport, should not be unduly modified	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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

3500 character(s) maximum

The DPP should always be available on products themselves, and not simply on their packaging. This will help making it accessible to repairers, re-use operators and future users. Products that are too small to contain the DPP might be exempted from this obligation, but the minimum volume that triggers the obligation to make the DPP accessible on the product itself should be set legally.

1.6 Questions for Value-retaining and -recovering operators and waste operators

36. The transition to products with a higher level of sustainability can generate many benefits and opportunities, specifically for value-retaining and -recovering operators and waste operators, but they may also face difficulties. To what extent do you agree or disagree with the following statements regarding this transition in your sector?

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	<input type="radio"/>	<input checked="" type="radio"/>				
It is difficult to obtain trustworthy information on the social conditions of work along the supply chain	<input type="radio"/>	<input checked="" type="radio"/>				
Social and environmental auditing is unreliable to provide true information on the social and environmental conditions in the supply chain	<input type="radio"/>	<input checked="" type="radio"/>				
Certificates of good environmental or social credentials are often duplicated and applied to products that do not deserve them	<input type="radio"/>	<input checked="" type="radio"/>				

The transition to sustainable products

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	I do not know/ no opinion
The transition to sustainable products requires a level of investment that is beyond our financial capacity	<input checked="" type="radio"/>	<input type="radio"/>				
The transition to sustainable products would cause the premature depreciation of our	<input checked="" type="radio"/>	<input type="radio"/>				

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The transition to sustainable products would generate either a strong investment in training or massive layoffs and recruitments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The transition to sustainable products would generate new business opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The transition to sustainable products is not sufficiently supported by clear, comprehensive and binding legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provided they are adequately enforced within the EU, more stringent requirements on the sustainability of our products would improve our competitive position	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

37. In your opinion and according to your experience in repair and recycling, what types of incentives would work best to stimulate further repair and recycling of products? In addition, are there any good practices you are aware of that have achieved significant results at Member State level?

- RREUSE has compiled policies that reduce the cost of re-use and repair in the following document:
https://www.rreuse.org/wp-content/uploads/RREUSE-position-on-VAT-2017-Final-website_1.pdf

- Austria makes repair more affordable through different systems of VAT reduction, "repair bonus" and vouchers. More information can be found here: <https://repair.eu/news/austria-makes-repair-more-affordable/>

- A repair scoring system has been developed in France and could be replicated at EU level. However, the issue at the moment is that this scoring has to be done by manufacturers themselves. This scoring system would be more reliable if conducted by independent operators.

- A Solidarity Re-use Fund: To support the creation of 70.000 jobs for the most disadvantaged groups by 2030, the "Fonds pour le Réemploi Solidaire" has been set up in France. It will guarantee that 5 % of the fees collected via Extended Producer Responsibility (EPR) schemes covering re-usable waste streams (such as textiles, furniture and WEEE) are used to finance re-use and preparing for re-use activities conducted by social enterprises. This very welcome tool will ensure that EPR schemes do not only finance recycling activities – a phenomenon the RREUSE network previously noticed during the introduction of EPR in certain Member States.

- Repair Cafés and tool libraries (such as Tournevie in Brussels) are local initiatives that could be supported at national level.

- Repair Trucks, Province of Barcelona, Spain: The repair truck run by the social enterprise Solidança Treball is a mobile self-repair service that gives citizens the opportunity to learn how to fix and modify their things. Inspired by the success of the first repair truck for small electric appliances and bicycles ('Reparatruck'), a textiles repair truck ('DidalTruck') was launched as a second project in cooperation with other social enterprises and the Catalan Waste Agency. The trucks contain all the tools needed to repair the products covered, as well as experienced staff to help people repair their stuff. The primary objective is to make people repair their products themselves. The truck has regular 3 hour sessions in different places in Barcelona based on a fixed schedule. The advantage of the mobile service is that it can also reach small municipalities on the periphery of Barcelona and participate in public fairs to reach a wider audience. It is a free and public service financed by a grant from a public waste agency, which also covers communication aspects.

38. Product repair has not been yet the default option for consumers, especially for specific types of products (e.g. clothing). Which do you think are the main drivers that limit product repair and reuse? To what extent do you agree or disagree if the following statements are a main driver.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	I do not know/ no opinion
Prices of new products are low and thus replacing a broken product seems a more economical solution than repairing it	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

There is limited availability of spare parts of products and repair is often impossible	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Consumers appreciate new products more than repaired ones even if the latter are cheaper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumers perceive repair as an unreliable solution for their broken products (i.e. it will break down soon after repair)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumers do not have easy access to repair shops	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recycling centres are not set up to support reuse and thus functional products that end up in these centres are not returned to repair/reuse	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you wish to elaborate on your answer or add another driver that you consider highly relevant, please do so in the textbox below:

3500 character(s) maximum

"Prices of new products are low and thus replacing a broken product seems a more economical solution than repairing it": Indeed, it only seems to be a more economical solution as this is, most of the time, not the case.

"Consumers appreciate new products more than repaired ones even if the latter are cheaper": This is often true, but should not be used as an excuse to prioritise recycled content over repair and re-use. The fact that consumers are more attracted to new products than to second-hand ones is mostly due to the almost unlimited advertisement power that producers/importers have to make consumers want to buy their products. Limiting this power could be a way to reduce the interest that consumers have in purchasing new products. Another reality is that more and more consumers are looking for sustainability when purchasing goods, but do not necessarily know that buying second-hand or repaired goods are often the most sustainable solutions. More information about the positive impact of re-use and repair should be accessible to EU citizens through educational programs.

"Consumers perceive repair as an unreliable solution for their broken products (i.e. it will break down soon after repair)": According to RREUSE, the main reason why it sometimes happens that second-hand and repaired products fail too early is the lack of durability and reparability of the products currently put on the EU market. Restricted access to repair information and the high price of spare parts (that are sometimes bundled) are also limits to the ability of repairers to get back a product to its like new condition. In the future, it might be relevant to set rules for repair activities at EU level to reassure consumers on the quality of repair operations, but RREUSE considers that it is way too soon to start regulating a sector which is currently facing difficulties. Priority should be given to make these activities less expensive and more mainstream.

39. In order to maintain up to date the information on the product contained in the Digital Product Passport, the value-retaining and -recovering operators and waste operators would be requested to provide some information. Please rate the level of effort necessary for your company/sector to provide the element of information, from very limited effort and costs very high effort and costs beyond your means.

	Very limited effort	Limited effort	neutral	High effort	Very high effort	I do not know/ no opinion
Update of the Unique Identification Number of the part(s) that were replaced during the maintenance/ repair operation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Update of the list of maintenance operations performed on the product: date, nature of operation performed, unique identifier of the organisation having performed the operation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

40. The transition to the manufacturing of products with a higher level of sustainability will have an impact on value-retaining and -covering operators and waste management operators in general. To what extent might the following potential impacts emerge in your sector? Please rate from very low probability to very high probability.

	Very low	Low	neutral	High	Very high	I do not know/ no opinion
Value-retaining and -recovering operators will enhance their cooperation with manufacturers in terms of information and knowledge sharing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Value-retaining and -recovering operators will enhance their cooperation with retailers in terms of the management of unsold and end-use products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Value-retaining and -covering sector will see a further increase in business opportunities and jobs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The profitability of value-retaining and -covering companies will increase due to the emphasis on recycling and repair	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The administrative burden for retail companies will increase disproportionately due to higher monitoring and reporting requirements	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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:

Contact

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