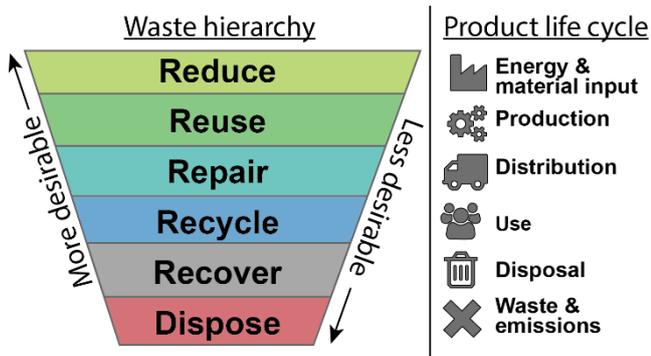


Regulating Product Sustainability



Products can be designed to maximise life cycle energy- and resource-efficiency, from raw material extraction to end-of-life treatment. This POSTnote outlines key aspects of, and consumer attitudes towards, sustainable products. It considers challenges associated with their design, production, regulation and supporting business models as part of a circular economy. 'End-of-life' treatment and value recovery, through reuse, recycling and other methods, are discussed.

Background

Although there is no single accepted definition of sustainability ([PN408](#)), this POSTnote uses the EU definition of 'sustainable products', which should be designed to:²

- Help save energy during production and operation
- Be free of toxic compounds
- Be made of recycled or reused materials
- Be durable and easily repaired
- Minimise environmental impact during the whole life cycle

The UK Government has pledged to double resource-productivity³ and eliminate all avoidable waste by 2050,⁴ but policy is devolved to the nations of the UK. Sustainable products are important for these goals. However, many products have short lifetimes,⁵ reuse, repair and recycling are limited,⁶ and regulatory enforcement is insufficient to ensure consistent compliance with product standards.⁷ Solutions also need to account for the global nature of many supply chains.⁸

In a circular economy, products and materials are kept in use for as long as possible, waste and pollution are designed out,⁹ and materials 'cascade' from one use to the next in a number of closed loops ([PN536](#)).¹⁰ The circular economy is an alternative to the current, linear model of 'take, make, use, dispose'.¹¹

Overview

- Energy- and resource-efficient products could support the UK's waste reduction and net zero carbon goals, potentially saving 12 MtCO₂e/year emissions by 2035.¹
- Various measures are in place to promote product sustainability, and Ecodesign regulations are expanding to more product attributes beyond energy-efficiency to include durability, repairability, recyclability and material efficiency. Existing EU Ecodesign and Energy Labelling Regulations prevented 306 MtCO₂e in 2020 (equivalent to the annual emissions of Spain).
- Globally, waste is increasing, as is material consumption per person in the UK. New measures, such as better data collection, support for resource-efficient business models and improved enforcement may be important for addressing this.

Despite widespread support from governments and industries for the concept of a more circular economy, global economic activity is becoming less circular due to increased material extraction and relatively low levels of recovery.¹² Reducing average material consumption per person in the UK will require extending the useful life of products, increasing use of recycled materials, and recovering components and materials for reuse at end-of-life.

In 2020, the UK transposed much of the EU's 2015 Circular Economy Package (CEP) with, what the Government describes as, 'relatively small technical changes to the EU Directives'.¹³ The Government's Resources and Waste Strategy for England commits to matching or exceeding the EU on ecodesign.^{4,14} The Environment Bill, which had its second reading in the House of Lords on 9th June 2021, seeks to provide powers to set legally binding targets related to product environmental standards, resource-efficiency, and waste ([LLN-2021-0012](#)).¹⁵

This POSTnote considers product sustainability within the waste hierarchy, from higher-level activities for waste prevention, repair and reuse, to value recovery and recycling.¹⁶ Resource-efficient business models, ecodesign, data infrastructure, and enforcement of product regulations are also discussed, using electrical and electronic equipment (EEE) as a case study.

Resource-efficient business models

Resource efficiency has been defined as decoupling material consumption from economic growth.^{4,17,18} The Waste and Resources Action Programme (WRAP) charity's resource-efficient business model (REBM) hierarchy outlines sustainable approaches to products and services. These range from the development of long-life products to complete product-service systems (PSSs), where ownership is replaced by access (such as leasing) to increase the use of individual products.¹⁹ PSSs have operated for many years in business-to-businesses markets (PN536) and are spreading to business-to-consumer markets for some products (e.g. car sharing and fashion subscription services). REBMs may increase profitability,¹⁹ as the same product can be 'sold' multiple times, and manufacturing and consumption of raw materials are reduced.²⁰ WRAP estimated that their Resource Efficient Business (REBus) project (2013-17) delivered ~£5 million in financial benefit, saved ~63kT of materials and prevented ~2,000T GHG emissions across 26 EU REBM pilot projects in a range of sectors (including Argos's gadget trade-in scheme).²¹ Defra's Waste Prevention Programme for England, which was recently consulted on (until 10th June, 2021), aims to reduce waste by increasing repair, reuse and remanufacture of products. The desired outcomes include new business models such as PSSs.²²

In the UK, a network of 'Libraries of Things' lends tools and other intermittently used items,²³ but all rely on external funding and volunteer support.²⁴ The sharing economy may improve resource-efficiency. For example, 91% of a power drill's environmental impact occurs during production and only 2% during use,²⁵ as the average household power drill is used for only 18 minutes.^{26,27} Research shows public support for resource-efficient product-service systems and the sharing economy.^{28,29} However, many people have concerns around hygiene, trust and liability for products, amongst other things.^{25,29} Studies show that consumer purchasing is based more on quality and price than circular economy concerns.³⁰

Design to reduce environmental impacts

Product manufacture and use account for 45% of global greenhouse gas emissions.³¹ Several approaches have been suggested to address this, including 'circular design',³² 'ecodesign'³³ and 'design for environment'.³⁴ For electrical and electronic equipment (EEE), the EU Ecodesign Directive and Energy Labelling Regulations (which cover 24 categories of goods in the UK)³⁵ have pushed the least efficient products off the market (Box 1). It is estimated that these policy measures prevented 306 MtCO₂e of emissions (equal to the annual emissions of Spain) and saved ~£55 billion on consumer energy bills across Europe in 2020.³⁶ The UK Government has recently consulted on the regulation of additional product categories, including electronic displays and more types of white appliances.³⁷ Greater energy-efficiency during use would help reduce emissions in support of the UK's climate change obligations.^{1,18,38,39} The Resources and Waste Strategy for England (2018) pledged to match or exceed the EU on ecodesign,⁴ which will be extended to material efficiency.⁴⁰ Other retained EU legislation, such as the 'Waste Electrical and Electronic Equipment (WEEE)', 'End of Life Vehicles (ELV)', 'Batteries and Accumulators', and 'Restriction of Hazardous

Box 1: Product sustainability labelling

- Energy Labelling Regulations identify more energy-efficient products.³⁶ To clarify which are the best-performing products, the UK and EU rescaled labels from A to G in March 2021 (replacing A+++ to D ratings) for certain white goods and electronic displays.⁴¹
- Commentators suggest that clear labelling is required to improve recycling in sectors such as IT equipment and packaging.^{4,42,43} The On-Pack Recycling Label is an initiative that provides a binary (Recycle/Don't recycle) label for packaging. The labels are recognised by 75% of consumers, although there is no data to show whether the labels have improved recycling rates.⁴⁴
- EU research shows that durability and reparability labelling can significantly increase consumer preferences for longer-life and easier-to-fix products.³⁰
- Other sustainable product 'eco-labels' (resource stewardship, responsible sourcing, no CFCs etc.) have been used increasingly since the 1980s.⁴⁵ Although 80% of UK shoppers identify themselves as 'environmentally friendly'⁴⁶ and 30% claim to be 'very concerned about environmental issues', this may not affect purchasing behaviours.⁴⁷ The range of self-declared, 3rd party-certified and life-cycle-based eco-labels can be confusing, lack consumer trust and suffer from low market uptake.^{48,49}

Substances (RoHS) Directives, contain targets related to recycled content, waste collection and safety for specific product types (PN536).⁵⁰⁻⁵³ Some of this regulation will likely need to be updated to accommodate the shift to electric vehicles.⁵⁴

Ecodesign also relates to characteristics such as durability, reusability and recyclability.⁴ Key considerations are material choice and modular design for ease of disassembly, repair and separation for more cost-effective end-of-life treatment.^{55,56} Under the European Green Deal⁵⁷ and Circular Economy Action Plan,^{58,59} the EU's Sustainable Products Initiative sets out the ambition to expand ecodesign regulation, which England is committed to matching or exceeding.⁴ The initiative will cover these additional product attributes and do more to address the presence of harmful chemicals in various durable goods.⁶⁰

Trade-offs and life cycle assessment (LCA)

Trade-offs occur during product development when competing aspects of sustainability are considered.⁶¹ This is problematic for product sustainability frameworks, as the most sustainable choice for one aspect may conflict with another.⁶² For example, a glass coffee jar is recyclable, yet plastic refill pouches are 97% lighter and less energy intensive to produce.⁶³ Lifecycle assessments (LCAs) consider all aspects of a product to determine its environmental impact (e.g. the United Nations Environment Programme's Life Cycle Initiative).⁶⁴ However, no universal standards exist for weighting or normalising different aspects of sustainability in LCAs.⁶⁵ Shortly after announcing programmes of carbon footprint labelling in 2007, Tesco and other producers gave up on this commitment,⁶⁶ as thorough LCAs can be expensive and time-consuming.⁶⁶ Barriers to LCAs are increased if products are regularly changed or updated, and if limited upstream supply chain transparency prevents accurate data being available.⁶⁷

Product lifetimes for EEE

WEEE is the fastest growing type of waste in Europe.^{68,69} Globally, the UK generates the most WEEE per capita after Norway; 23.9kg per year.³⁶ The 'throwaway society' has been attributed to factors such as premature obsolescence and market oversaturation for consumer goods.⁷⁰ Research suggests that between 2000 and 2010, product lifetimes in Germany decreased by 17% for consumer electronics, 10% for IT equipment and 7.8% for large household appliances.⁷¹ Although some obsolescence occurs with innovation,⁷² most consumers in the UK want more durable and repairable products.⁷³ Using products for longer increases resource efficiency and helps offset embodied carbon emissions associated with production.⁷⁴ The current average lifetime for a washing machine is 6.3 years. However, Green Alliance estimate that it would take 17 years for the energy saved by an energy-efficient machine to be equivalent to the energy used for production of a new machine.³⁶ Regulation can set minimum standards for products placed on the market. For example, the Ecodesign Directive stipulates that electric motors in vacuum cleaners must function for at least 500 hours during testing.⁷⁵ Without information on expected lifetimes consumers are generally unwilling to repair an item if the cost will exceed 30% of the purchase price.^{76,77}

Repairing products to extend their lifetime

Barriers to repair include: design features that prevent disassembly (such as the use of glue, or the need for special tools); lack of manuals and spare parts; warranty and safety concerns (especially with regard to white goods); and the availability and cost of repair services relative to the purchase price of new products.^{68,76,78,79} In 2020, the Environmental Audit Committee recommended the UK should reduce VAT on EEE repairs.⁶⁸ Although the Government stated that it is unable to do this in the current economic situation,⁸⁰ several EU countries have set a precedent by introducing fiscal policies to promote repair. Sweden has halved VAT on repair services and enabled citizens to claim back 50% of labour costs against income tax.⁸¹ In Austria, VAT on repairs to some products has been cut to 10% and some regions offer small grants to cover up to 50% of repair labour costs.⁸² France's Repairability Index, implemented in January 2021, scores a limited range of products based on ease of disassembly, price and availability of spares, and access to repair information;^{83,84} and 92% of Europeans are in favour of an index that covers durability.⁸⁵ From summer 2021, the UK Government plans to implement limited '[right to repair' regulations](#).⁸⁶ Producers will be responsible for ensuring some durable goods can be repaired using widely available tools for up to 10 years, in addition to providing manuals.⁸⁷ But, the decision to only allow registered repairers to carry out work has been criticised as a cost barrier by right to repair groups.⁸⁸

Industry concerns around right to repair (and other information sharing policies such as product passports) focus on protection of intellectual property⁸⁹ and liability for any issues arising from non-sanctioned repairs.⁹⁰ Some companies (e.g. Ikea, Unilever, M&S and Kingfisher) are integrating circular concepts into their business models (PN536), including making spares available for a wider range of products than mandated by incoming 'right to repair' rules.⁹¹ Mandatory warranties (Box 2) could support the development of more durable and repairable products.⁹²

Box 2: Warranties and legal guarantees

- Mandatory extended warranties may indirectly promote more durable products, although current evidence suggests that warranties are used for marketing and that extending them may not lead to improved durability.⁹³⁻⁹⁵
- The EU Directive on Consumer Rights provides a minimum 2-year legal guarantee on sold goods.⁹⁶ Unlike many EU countries, UK implementation of the legislation (the Consumer Rights Act 2015) placed the onus on consumers after 6 months to prove the product was faulty at the point of purchase.^{97,98}
- Warranty length could be used as a determinant of fees, to incentivise better design under extended producer responsibility schemes.⁹⁹

Tech UK suggest that right to repair may require businesses to stockpile, store and distribute spares, with costs passed on to consumers. Accurate forecasting of demand for spare parts may be needed to avoid these becoming waste.¹⁰⁰ Alternative business models (e.g. enabling third party repair through open-source specifications for spares) could address these issues.¹⁰¹

Closing material loops

Durable, repairable and reusable products are insufficient to bring about a circular economy. Closing material loops requires investment in infrastructure for collection, sorting and recycling to produce high quality recycled materials.⁶ Market support for recycled materials may be required to maximise resource recovery and increase the recycled content of products.

Investing in infrastructure

Under the CEP and updated Waste Management Plan,^{102,103} England is committed to recycling 65% of municipal waste and sending less than 10% to landfill by 2035.^{13,104} Since 2010, recycling rates have increased in Wales and Scotland, yet have stagnated in England despite 94% of the UK population supporting recycling.^{105,106} As a result, the CEP targets may be missed by more than a decade.¹⁰⁷ Government and industry have committed £3 billion to Defra's Waste Infrastructure Delivery Programme which runs up to 2042.¹⁰⁸ However, this funding is primarily for non-recyclable waste treatment – predominantly generating energy from waste (EfW).¹⁰⁹ While some view EfW as the best available option to treat residual waste,¹¹⁰ it has been criticised for impeding progress toward net-zero targets,⁶ with suboptimal sorting and separation of materials in complex products leading to incineration of plastics and waste electrical and electronic equipment (WEEE).^{111,112}

At present, there is no substantial public funding available for development of REBMs or repair infrastructure to support higher levels of the waste hierarchy, despite commitments to waste prevention.^{6,113} Investment in recycling is hindered by an unstable market for recycled materials, and collection targets and systems that do not guarantee availability of high quality recycle.¹⁰⁷ However, Green Alliance notes that processing 1000 tonnes of material creates two jobs in recycling compared to 0.1 jobs in waste treatment and disposal, and recycling already employs four times more people in the UK.⁶ Policy may increase producer responsibility for goods placed on the market and promote greater circularity (Box 3), though consumers also need clear product end-of-life information.^{114,115}

Market support for recycling

The 2016 UK Industrial Strategy aimed to promote recycling and support markets for recycled materials,^{4,116} although there is currently little to incentivise manufacturers to reduce virgin material consumption. The incoming Plastic Packaging Tax (2022) will charge £200/tonne for plastic containing <30% recycled material to promote increased use of recycled plastic in packaging.¹¹⁷ An escalator approach to the tax and recycled content threshold could stimulate continued innovation once capacity is established to satisfy demand at 30%.¹¹⁸ The Government is considering how to audit recycled content standards, but this may be technically challenging.¹¹⁹ The EU is taking a different approach, applying a levy of ~£700/tonne to all non-recyclable plastic packaging placed on the market.¹²⁰

For the UK to reach net zero carbon emissions and increase use of recycled materials, more comprehensive carbon pricing may be required.^{121–123} The EU's carbon border levy is expected to tax high-emission imports in specific sectors such as steel by 2023, and expand to cover more sectors in the future.^{124,125} If indirect taxes on the carbon emissions of material production, or direct taxes on virgin materials are set high enough, they may support markets for recycled materials.¹²⁶

Monitoring material stocks and flows

Measurement of progress toward resource-efficiency targets and monitoring the effectiveness of product sustainability regulation (including on chemicals) will require granular data on national material stocks and flows. However, the UK has limited oversight of imports, exports, products on the market, and waste,¹²⁷ hindering progress towards a more circular economy¹²⁸ and limiting oversight of chemicals in products.

National Materials Datahub (NMD)

The Office for National Statistics' NMD is an initiative by BEIS and Defra⁴ to develop the essential data infrastructure necessary for a circular economy. A 10-year plan for its development has been proposed, although the project is currently on hold.⁸⁰ The first objective is to understand critical supply chains, with the ultimate goal of tracking all stocks and flows of materials and their embodied carbon in the UK.¹²⁸ It could also help to improve the UK's methodology for estimating WEEE collection rates and improve oversight of other material leakages from the UK economy.⁶⁸ A key challenge is determining a standardised protocol for data collection and codification of product types across all sectors.¹²⁹

Sustainable chemistry (UK REACH and SCIP)

Reduction of hazardous substances in products improves safety and supports the circular economy by enabling more recycling.¹³⁰ Following Brexit, UK REACH (Registration, Evaluation, Authorisation and restriction of Chemicals) was implemented in January 2021, modelled on the EU REACH system.¹³¹ REACH requires manufacturers to provide information on hazardous substances used in products.¹³² To place goods on the EU market, UK companies must be compliant with REACH and report any potentially hazardous substances in their products using a Substances of Concern In Products (SCIP) identifier.¹³³ SCIP (implemented 2021) is an EU project which aims to promote alternative product chemistry to reduce hazardous waste.¹³⁹ The UK cannot access the SCIP

Box 3: Producer responsibility

Producer compliance schemes (PCs)

- Producers of packaging, EEE and batteries are responsible for contributing to PCs to cover costs of collection, treatment and recycling.^{134–136} PCs obtain recycling certificates on behalf of producers.
- The 12-month WEEE collection targets, which are based on a proportion of the 3-year rolling average of goods placed on the market, have been criticised for being too short to trigger improvements in collection and recycling.⁶⁸

WEEE Distributor Take-back Scheme (DTS)

- Until 2022, small retailers (<£100K/year sales) and online sellers can use the 5th Phase of Defra's WEEE DTS and contribute financially to local authority WEEE collection and treatment. From January 2021, larger retailers must take back unwanted electricals in store on a like-for-like basis of items sold, which may be a disadvantage.¹³⁷

Extended producer responsibility (EPR)

- Under EPR, producers fund the collection, recycling and disposal of post-consumer goods, in line with the 'polluter pays' principle. The Resources and Waste Strategy identifies five priority areas to consult on EPR: textiles (by 2022), bulky waste, construction materials, tyres and fishing gear (all by 2025).⁴ A key consideration is deciding which product features to adjust fees against to motivate improved product design. Defra plan to review the WEEE producer responsibility rules between 2021 and 2024.¹⁰²
- Commentators such as Green Alliance suggest any new extended producer responsibility scheme should extend to e-commerce, which is at present largely unregulated.¹³⁸

database,¹⁴⁰ although Defra has consulted on setting up a similar, domestic system.¹⁴¹

Product passports and comparison tools

Digital product passports detailing chemical composition, efficiency, repair details, reusability, critical raw material content and end-of-life treatment (including recycling) have been suggested.³⁶ Tech UK suggest such a system could be developed with input from reprocessors, so that information is available in an accessible and useful format.¹⁰⁰ Product passports could be supported by the UK NMD¹²⁸ and may inform sustainable purchasing decisions. For IT equipment, energy efficiency comparison tools (INTERACT and EURECA) are being trialled for public procurement in the UK.^{142,143}

Enforcement challenges

Enforcement is necessary to ensure a level playing field for UK businesses and requires oversight of goods placed on the market, measurement of their performance, and the capacity to tackle waste crime. However, from 2009/10 to 2016/17, enforcement budgets were cut by an average of 50% and prosecutions by the Environment Agency fell 80%.⁷ Ecodesign regulations are enforced in the UK by the Office for Product Safety and Standards,¹⁴⁴ yet 10-25% of EU-wide EEE does not satisfy existing energy efficiency and safety labelling rules.³⁶ The Landfill Tax faced by businesses increased 700% between 1998 and 2014, which has reduced the amount of material sent to landfill by >65% but may also be driving high levels of waste crime (PN547).^{145–148} Under the Basel Convention, export of WEEE is illegal,⁶⁸ but unscrutinised export of 'used EEE' may incentivise misclassification.^{68,149}

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