



*BUILD ELECTRONICS BETTER*

IPC represents the electronics manufacturing value chain including printed circuit board designers and fabricators, assembly companies, suppliers and original equipment manufacturers. The global membership includes more than 6,000 company sites of which over 900 are in Europe and includes both large companies and small and mid-sized enterprises.

IPC is supportive of the objectives behind the Circular Economy Action Plan and the higher-level goals to which they will contribute. IPC appreciates the opportunity to share its position on the upcoming Sustainable Products Initiative, aiming to revise and expand the Ecodesign Directive and propose legislative measures to make products, including electronics, more sustainable. We offer the following initial insights in response to the request for stakeholder feedback and in shared pursuit of the best combination of measures to achieve the objectives for sustainable products set out in the Circular Economy Action Plan.

### **Defining Electronics, a Key Value Chain**

To realize the ambitions in the Circular Economy Action Plan and to successfully coordinate tasks within the Circular Electronics Initiative, the EU should consider defining the electronics and information and communications technology (ICT) key value chains. IPC supports differentiating “electronics” from “ICT” in context of the varied complexity, volumes produced, and expected lifetimes of each product category. Electronics equipment can be a product unto itself or can be found in many other products, e.g., automotive, defense, and medical equipment. Sustainable product initiatives should be targeted differently to differentiated product categories.

### **Expanding the Ecodesign Directive**

The current Ecodesign Directive regulates energy efficiency and, to an extent, material efficiency of energy-related products. Requirements established under an expanded Ecodesign Directive need to be based on technical, economic and environmental considerations, provide structure around trade-off analyses among different sustainability indicators, and allow flexibility in the Directive’s implementation with feasible, interim targets. While we recognize that ecodesign measures play an important role in promoting the circularization of products and can be used to improve the identification of certain materials in products, they are not an appropriate instrument to restrict the use of substances in products.

### **Considering the Ecolabel Instrument**

When developing the Sustainable Products Initiative, IPC believes that the Commission should consider use of data and information that reflects the entire life cycle of a product, for example as advised in the voluntary ecolabel instrument, and how best to:

- use existing life cycle-based frameworks that systematize or standardize the way an assessment is completed for different products or product categories;
- use existing life cycle-based tools and methods that ensure consistent evaluation of environmental and social impact categories; and,
- determine the utility of the product and organizational environmental footprint approaches to achieve sustainable product goals.



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Life cycle-based approaches are often integrated into comprehensive decision-making processes. Comparability of results from life cycle-based approaches is critical when different systems are to be compared; comparisons of sustainability are to be made on the basis of the product's function, a challenge given the varied functions of the key value chains like electronics and ICT.

### **Improving Coherence with Other Directives**

IPC believes that particular attention should be given to the coherence of these product-related initiatives with those to be proposed under other ongoing initiatives, such as those related to substantiating green claims or the Chemicals Strategy for Sustainability. Electronics equipment is well-regulated from design (e.g., RoHS, Ecodesign Directive) through end-of-life (e.g., extended producer responsibility requirements, WEEE). Given that the electronics industry is subject to an already wide range of requirements under various existing legislative instruments, it is important to preserve regulatory coherence to avoid overlapping or conflicting requirements.

### **Elevating the Voices of SMEs**

IPC encourages the Commission to engage with SMEs that will be asked to provide data and information within the value chain to meet the needs of life cycle-based assessments, footprints, or digital product passports. SME's insights regarding feasibility and workability (for example, administrative burdens, training, resources to collect data) of these tools and methods for will be critical to being able to achieve the aims of the Sustainable Products Initiative. IPC is ideally placed to contribute to this process and stands ready to provide its insights and expertise.