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Regeringskansliet (Miljödepartementet)

Yttrande över EU-kommissionens förslag till förordning om ekodesign för hållbara produkter

Stockholms universitet har av Regeringskansliet (Miljödepartementet) anmodats att inkomma med synpunkter på EU-kommissionens förslag till förordning om ekodesign för hållbara produkter.

Stockholms universitet tillstyrker i stort förslaget. Bifogade till detta beslut är synpunkter och ändringsförslag i vissa delar, vilka har beretts vid Stockholms resilienscentrum.

Detta beslut är fattat av rektor, professor Astrid Söderbergh Widding, i närvaro av prorektor, professor Clas Hättestrand, och universitetsdirektör Åsa Borin. Studeranderepresentanter har informerats och haft tillfälle att yttra sig. Övrig närvarande har varit Ulf Nyman, Ledningssekretariatet (protokollförare). Föredragande i ärendet har varit utbildningsledare Rikard Skårfors, Ledningssekretariatet.

Supplement: comments on the proposal and its annexes

In brief, Stockholm University has highlighted where the proposal may have under-examined cross-scale systemic social and ecological consequences.

There is relevant research from sustainability scientists at Stockholm University and in their networks that both highlights global systemic risks and provides inputs to new assessment toolkits.

COM(2022) 142 final 2022/0095 (COD)

- Page 4 of the Explanatory Memorandum mentions the Commission initiative on **Green Claims** and its requirements to use life cycle analysis (LCA) and Product Environmental Footprint (PEF) method. Stockholm University notes that LCA and PEFs have known gaps regarding large-scale and long-term dynamics of ecosystem change – see also point C3.c in SWD(2022) 82 final PART 2/4 which mentions the need for other assessment methods to be used and further developed.
 - Absolute Environmental Sustainability Assessment methods are currently being developed with the aim of better assessing the overall magnitude of impacts, eg, Bjørn et al <https://doi.org/10.1111/jiec.12820>.
 - Also, both LCA and PEF methodologies are changing rapidly to better capture the complex shifting dynamics of the environmental impacts. Some kind of adaptiveness is needed in the regulation, in light of evolving scientific understanding of interdependent environmental pressures at all scales up to global (e.g. as captured in the planetary boundaries framework of Rockström et al 2009 in *Nature*, Steffen et al 2015 in *Science*, and issue-specific updates in Persson et al 2022 in *Environ Sci Technol* and Wang Erlandsson 2022 in *Nature Reviews Earth & Environ*).
- Ecology is essentially absent in the proposal text. There are just two passing mentions of biodiversity: page 18 paragraph 6 mentions biodiversity in the context of the European Council's 'Making the Recovery Circular and Green' conclusions, and page 38 paragraph 87 refers to the objective of transitioning to circular economy that protects public health and biodiversity. This sidelining of ecological knowledge and principles for maintaining the resilience of ecosystems could lead to a convention that obstructs an ecologically informed production of the living resources used in ecodesign. Ecological footprinting and LCA methods are not solutions that necessarily guarantees ecologically informed conservation and sustainable use.

SWD(2022) 82 final PART 1/4

This Commission Staff working document provides very important context and supporting information for the proposed regulation.

Its clear messages about capturing the systemic planetary impacts and risks of ecodesign failures could be better carried through to the proposal.

For instance

- Page 5 section 1.1 – climate change, biodiversity loss and pollution are recognized as being interlinked with cascading effects, and are described as ‘planetary crisis’ but the links between these environmental pressures are not made clear in the Memorandum and proposal text.
- Page 16 section 2.1 *Planet* describes the global scale ecological impacts of inefficient resource use and inadequate regulation, including the current regulation of ecodesign and its green claims. See Stockholm University’s first point on COM(2022) 142 about the need for better and more integrated global change environmental assessments.

COM(2022) 142 final Annex VII

- Self-regulation measures for ecodesign call for an ‘integrated approach’ to economic and social dimensions of sustainable development. What social and ecological safeguards are being considered, to redress the well-known tendency for self-regulating corporate interests to pursue narrowly defined economic gains first?
- Cost effectiveness ought to consider non-market costs such as the loss of natural capital. SEEA Ecosystem Accounting could be useful in this context, but here too the quality (not just quantity) and the dynamic behavior of life and nature (including telecoupling of impacts and costs, see e.g. Zimmerer et al 2018 <https://doi.org/10.5751/ES-09935-23013>) should be taken into account.