

## CCIA Europe Comments – Ecodesign for Sustainable Products (ESPR) Forum

# Discussion paper on the disclosure of information on unsold consumer products

March 2025

The Computer & Communications Industry Association (CCIA Europe) appreciates the opportunity to participate in the Ecodesign Forum and contribute to developing key aspects of the Ecodesign for Sustainable Products Regulation (ESPR), including the first ESPR work plan and the implementing acts covering important aspects of the regulation, including the disclosure of information on unsold consumer products.

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## I. Adopt a pragmatic approach to product classification and verification

*A pragmatic approach to product classification focuses on achieving transparency while considering practical challenges. Simplifying reporting to product categories ensures meaningful insights without unnecessary burdens.*

### Recommendations:

1. Ensure feasible measures to disclose the weight of products
2. Allow product-type estimates to be the standard practice
3. Ensure legal certainty for reporting obligations

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## II. Ensure clarity, consistency and alignment in reporting requirements

*Feasible measures for disclosing product weight should prioritise practicality and accuracy. Clear and consistent guidelines will help businesses provide relevant data without creating unnecessary complexity or unrealistic expectations.*

### Recommendations:

4. Clarify the inclusion of packaging in weight reporting
5. Align reporting with existing frameworks

## Introduction

The Computer & Communications Industry Association (CCIA Europe) welcomes the opportunity to contribute to the ongoing discussions on the implementation of the Ecodesign for Sustainable Products Regulation (ESPR)<sup>1</sup>.

As an active participant in the Ecodesign for Sustainable Products Forum, CCIA Europe is committed to ensuring that the regulatory framework fosters sustainability while maintaining clarity, feasibility, and consistency for economic operators. In this context, we appreciate the European Commission's efforts to define the requirements for the disclosure of information on unsold consumer products under Article 24 of the ESPR.

CCIA Europe supports the overarching goal of increasing transparency and reducing unnecessary waste, in line with the EU's broader sustainability objectives. However, the implementing act must strike a balance between meaningful disclosure and the administrative burden placed on businesses. The methodology for defining product types and categories, as well as the level of granularity required for reporting, must be both practical and aligned with existing industry practices.

To achieve this, the implementing act should:

- Adopt a pragmatic and proportionate approach to product classification and verification.
- Ensure clarity, consistency and alignment in reporting requirements

CCIA Europe looks forward to engaging with policymakers and stakeholders to help refine these measures in a way that supports sustainability without imposing excessive regulatory burdens on businesses.

## I. Adopt a pragmatic approach to product classification and verification

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*A pragmatic approach to product classification focuses on achieving transparency while considering practical challenges. Simplifying reporting to product categories ensures meaningful insights without unnecessary burdens.*

### 1. Ensure feasible measures to disclose the weight of products

The study intended for the Joint Research Centre (JRC) of the European Commission and dated 17 January 2025 provides an overview of the comprehensive and standardised format for the disclosure of information regarding the discarding of unsold consumer products based on Article 24 of the Ecodesign for Sustainable Products Regulation (ESPR).

Among the key components of Article 24(1), the study quotes the number and weight of unsold products discarded annually that economic operators are obliged to disclose. The

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<sup>1</sup> Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC, available [here](#)

study specifies that such disclosures must be “differentiated by product type or category,” with this level of granularity important “to ensure transparency regarding the scale of product waste in various sectors.”

For CCIA Europe, this proposed approach would be highly problematic. If businesses are required to measure the weight of individual products, the introduced methodology would not only be unrealistic but also overly burdensome. As stated on page 7, the justification for this level of granularity is to ensure transparency regarding the scale of product waste across sectors. However, this level of detail fails to account for the practical challenges businesses would face in tracking unsold goods at such an individualised level.

As such, **CCIA questions the scientific justification behind the weighing of each product.** Brand differences do not justify an individual weighing requirement.

## 2. Allow product-type estimates to be the standard practice

The proposed draft format for reporting includes the following for the disclosure of the weight of units discarded:

- Total weight of units discarded [in kg]: The combined weight of all discarded units within the respective product category, measured in kilograms.
  - Where appropriate, the economic operator may disclose on the basis of a reasonable estimate based on the total number of units discarded.

While CCIA Europe appreciates the fact that estimates can be reasonable is acknowledged, **providing businesses with the flexibility to report estimated weight data should be the default approach** rather than an exception. The complexity and administrative burden associated with weighing each discarded product individually, especially across diverse product categories, can be disproportionate and impractical.

A clear and consistent framework allowing for reasonable estimations would reduce unnecessary complexity while still ensuring meaningful data collection on waste patterns.

For example, reporting the total unsold weight of a specific category, such as “high-top sneakers from Nike,” would still ensure meaningful transparency while significantly reducing administrative complexity. This method would also enable policymakers and stakeholders to obtain accurate insights into waste trends without imposing disproportionate and unrealistic obligations on businesses.

Furthermore, requiring weight measurements at an individual-product level risks distorting the overall objective of the regulation by shifting focus away from waste prevention and reuse strategies towards excessive data collection. Encouraging businesses to track waste at a reasonable level of granularity would support more effective policymaking while still upholding transparency.

If the standard use of reasonable estimates as a default approach is not feasible, **CCIA Europe strongly believes that the final delegated act should explicitly outline the circumstances in which estimates are considered appropriate**, rather than leaving this determination to subjective interpretation. For example, businesses that manage a high volume of diverse consumer products, including apparel, electronics, and accessories,

should be able to use estimates where precise measurement would be unfeasible or resource-intensive. If the use of estimates remains ambiguous, companies may resort to overly cautious reporting practices, leading to inefficiencies and increased compliance costs.

### 3. Ensure legal certainty for reporting obligations

Article 24 of the Ecodesign for Sustainable Products Regulation (ESPR) requires large and medium-sized companies to disclose information on unsold consumer goods, including weight and classification. However, the European Commission has yet to adopt the implementing acts, creating uncertainty for companies that need to comply. The lack of a standardised reporting format and clear guidance could lead to variations in data disclosure, leaving businesses at risk of involuntary non-compliance.

**To address these concerns, CCIA Europe, along with other stakeholders, has co-signed a [joint letter](#) urging the European Commission to introduce a transitional regime.** This would grant companies flexibility in reporting until the final implementing acts are adopted, ensuring they have enough time to adjust their systems without fear of non-compliance. The letter also calls for a deferred application date for the implementing acts and allows companies to use estimates for reporting before the final format is established.

By signing this letter, CCIA Europe and the other co-signatories contribute to securing a more practical transition to the new reporting obligations, ensuring that businesses can comply with the regulation while avoiding unnecessary burdens.

## II. Ensure clarity, consistency and alignment in reporting requirements

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*Feasible measures for disclosing product weight should prioritise practicality and accuracy. Clear and consistent guidelines will help businesses provide relevant data without creating unnecessary complexity or unrealistic expectations.*

### 4. Clarify the inclusion of packaging in weight reporting

Uncertainty remains regarding whether the weight disclosure requirement includes primary packaging. On page 9, the supporting study acknowledges this issue and suggests operators indicate whether their figures include packaging elements such as tags, plastic wrapping, or protective materials for electronics. The study also argues that “for some product groups (such as EEE), primary packaging can represent a minimal portion of total weight and environmental impact, especially when compared to the product itself. In these cases, requiring the inclusion of packaging weight may not significantly affect overall reporting but could still add unnecessary complexity.”

The ambiguity of the study creates confusion, potentially leading to inconsistent reporting and making it difficult to compare data across businesses and sectors. In this regard, **CCIA Europe urges the European Commission to provide clarifications** on whether packaging is included in the definition of weight and, consequently, how it should be reflected in the reporting template. Companies require clear and precise guidance on what must be reported to ensure accuracy and consistency.

## 5. Aligning reporting with existing frameworks

To ensure consistency and minimise administrative burdens for companies, **the reporting format for unsold consumer goods under the ESPR must align with existing sustainability reporting frameworks**, such as the Corporate Sustainability Reporting Directive (CSRD). Harmonising the reporting requirements across regulations will provide companies with a clear and consistent approach, reducing confusion and ensuring that businesses can report in a way that is familiar and manageable.

Aligning the ESPR reporting format with the CSRD and other established standards will also facilitate data comparability and transparency. It will ensure that the information disclosed is consistent with broader sustainability goals, helping policymakers and stakeholders make informed decisions based on reliable and comparable data. Furthermore, such alignment will minimise the risk of duplicating efforts, helping companies to meet multiple regulatory requirements with a single, streamlined reporting process.

## Conclusion

CCIA Europe appreciates the Commission's efforts in developing the Ecodesign for Sustainable Products Regulation (ESPR) and is committed to working collaboratively to ensure that the regulation fosters sustainability while being practical for businesses.

The Association emphasises the need for clear, consistent, and aligned reporting requirements. This includes adopting a pragmatic approach to product classification, allowing for reasonable estimates in reporting, and providing clarity on the inclusion of packaging in weight disclosures.

CCIA Europe is confident that the suggested adjustments will enable businesses to provide meaningful and comparable data, contributing to a more effective and transparent regulatory environment and the wider EU green transition.

## About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

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