

CO₂ Value Europe's feedback on New Product Priorities for Ecodesign for Sustainable Products Regulation

Background

CO₂ Value Europe is the European association dedicated to Carbon Capture and Utilisation (CCU) and represents over 85 members along the CCU value chain, from CO₂ producers, converters and users of CCU products to researchers and project developers.

CCU refers to established and innovative industrial processes that aim at capturing carbon – either from industrial point sources, including from biogenic sources, or directly from the air – and transforming it into value-added products such as synthetic fuels, chemicals and building products.

CCU technologies lead to reduction of CO₂ emissions and eventually substitution of fossil resources by non-fossil resources. CCU provides permanent alternatives to fossil resources by using recycled carbon in carbon-containing everyday products, for example for the production of chemicals¹, or cement.

About the Ecodesign for Sustainable Products Regulation

The Ecodesign for Sustainable Products Regulation (ESPR) aims to improve EU products' circularity, energy performance and other environmental sustainability aspects.

As CO₂ Value Europe, we see the development of new requirements for sustainability of a wide range of products as a crucial signal given to a variety of sectors to intensify their efforts to decrease the carbon footprint of daily products. CCU can play a key providing alternative carbon feedstock for the production of daily products through **carbon circularity**: rather than extracting additional fossil resources from the ground to use carbon in everyday products, Europe should support **circular carbon solutions by reusing unavoidable emissions on one end to deliver essential products to another**.

The current criteria around sustainability appear limited for certain products to use of recycled content, reusability and design for recycling. We consider it would be crucial to include as an additional element the use of renewable materials such as CO₂-based feedstock. Such an inclusion would be in line with the objectives set by the European Commission in its Communication on Restoring Sustainable Carbon Cycles, and in particular that *"at least 20% of the carbon used in the chemical and plastic products should be from sustainable non-fossil sources by 2030"*.

It would also give a crucial signal that products need to be defossilised, by mobilising different levers including use of recycled content, biobased materials and renewable carbon from CCU processes.

As CO₂ Value Europe, we call for including as a horizontal measure in the ESPR a minimum percentage of non-fossil carbon to be included in EU products to be more circular and sustainable, in line with the 20% non-fossil carbon target in plastics and chemicals set out in the EU Communication for Sustainable Carbon Cycles.

¹ CCU has the technical potential to decouple chemical production from fossil resources, reducing annual GHG emissions by up to 3.5 Gt CO₂-eq in 2030. Source: [Kätelhön et al., 2019](#)