Introduction

NSAI's work, across standards, certification, and metrology, is both vital and significant to an effective economy, and impacts on many aspects of everyday life for citizens and businesses. NSAI provides a channel for Irish businesses and societal stakeholders to engage and influence European and International Standards development that supports today's innovative and regulatory environment.

The consensus-achieving standardization process is a powerful force for good and provides critical support for enterprise policy. Through involvement in the International Organization for Standardization ISO and European Standards Development Organisations such as CEN, CENELEC and ETSI, NSAI's influential stakeholders and experts are helping to define standards to advance the digital transformation, transition towards the green economy, as well as address other economic and societal challenges.

The NSAI is very much committed to embracing change in the area of climate action and sustainability. This is clearly demonstrated within the NSAI's recently published Strategic Plan 2022-2026[1] *Innovating to shape a safer, better, and sustainable future* and by the organisation's responsibilities as part of the National Climate Action Plan 2021[2]. The NSAI's Strategic Plan centrally places climate action and sustainability as a key strategic project of the Plan, with sustainability being a strategic premise underpinning how NSAI carries out its mandate in supporting enterprises. NSAI is engaged in a significant programme of work and range of activities in the area of climate action and sustainability.

European Context

CEN, the European Committee for Standardization, is an association that brings together the National Standardization Bodies of 34 European countries, including the NSAI. CEN provides a platform for the development of European Standards and other technical documents in relation to various kinds of products, materials, services and processes.

CEN and CENLEC position paper on Sustainable Products Initiative in June 2022[3] supported in principle the Eco Design and Sustainable Products Regulations. It was noted that the proposed Regulations will play a key element of the deliverer of the entailing sustainability requirements as one of the means to achieve the European Green Deal[4], and EU Circular Economy Action Plan[5].

CEN and CENLEC have noted that "By applying the Ecodesign approach to a very broad range of products and enabling it to set a wide range of targeted product requirements, this regulation seeks to address the most detrimental environmental impacts of products. It therefore lays down a framework for setting ecodesign requirements based on the sustainability and circularity aspects listed in the Circular Economy Action Plan, such as product durability, reusability, upgradability and reparability, the presence of substances of concern

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[1] NSAI-Strategic_Plan_2022-2026.pdf
[2] gov.ie - Climate Action Plan 2021 (www.gov.ie) Accessed August 2022
[3] Cencenelec.eu CEN and CENELEC response to the EC consultation on a SUSTAINABLE PRODUCTS INITIATIVE 22 June 2022 cen_cenelec_sustainableproductsinitiative_2022.pdf (cencenelec.eu) Accessed August 2022
[4] 4 European Commission. Green Deal: New proposals to make sustainable products the norm and boost Europe's resource independence. Accessed: July 2022: New proposals to make sustainable products the norm (europa.eu)
[5] DG Environment, European Commission. Circular Economy Action Plan. Accessed: July 2022: Circular economy action plan (europa.eu)

in products, product energy and resource efficiency, recycled content of products, product remanufacturing and high-quality recycling, and for reducing products' carbon and environmental footprints." [6]

In doing so, it will contribute to achieving the EU's overall climate, environmental and energy goals, while supporting economic growth, job creation and social inclusion. By making materials last for longer, ensuring their value is retained for as long as possible and boosting the use of recycled content in products, it will promote decoupling of economic development from natural resource use and reduction of material dependencies – thus fostering EU open strategic autonomy and resilience. [7]

Green transition

Standards provide a solid base on which innovation can thrive and are essential tools to help governments, industry and consumers contribute to the achievement of each and every one of the UN Sustainability Development Goals (SDGs). To this end governments can rely on standards as a base on which to create public policy that helps further SDG goals such as *industry innovation and infrastructure*, *work and economic growth*, *water* and *energy efficiency*, *public health,* and others. Standards can help achieve Ireland's national climate objective, as standards, provide methods for measuring, testing of emissions and open markets to the safe use of new technologies. They provide a common framework and solutions to complex and global green challenges. At a National Level NSAI is assigned and is already delivering on goals listed in the National Climate Action Plan 2021 Annex of Actions.

The green agenda is critical for all organisations and businesses in terms of enterprise policy, addressing the challenge of sustainability requires a harmonised approach at a European level such as the European Green Deal. That recognizes the importance of standards being an integral part of the mechanism to deliver solutions. The Green Deal will influence the way we design, develop, and offer products, processes and services. Standards will be a mechanism to support this endeavour providing common frameworks and innovative technologies adoptions.

NSAI as competent body for EU Ecolabelling Scheme

NSAI is Ireland's designated competent body responsible for verification of applications for an EU Ecolabel[8] licence for products. This Scheme aims to promote products and services with reduced environmental impact and covers certain categories of products such as detergents and cleaning products, paper products, cosmetics, textiles, furniture and electronics, as well as tourist accommodation. Once products receive approval for the EU Ecolabel, the producer can place the EU Ecolabel logo on the product and its packaging. The EU Ecolabel is a multi-criteria label certifying excellent environmental performances for a product throughout its life cycle.

The NSAI is cognisant that work is ongoing to enhance this Scheme and the NSAI is willing to work with relevant Government Departments, including DETE, DECC and DHPLG, to identify and pilot enhanced awareness of the Scheme to provide greater clarity to consumers and enable Irish producers to differentiate themselves via the Ecolabel, in terms of commitment to offering products and services with reduced environmental impact.

NSAI notes that this legislative proposal intends to introduce enhancement to the EU Ecolabel Scheme and consequently will be keen to monitor progress.

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[6] Cencenelec.eu CEN and CENELEC response to the EC consultation on a SUSTAINABLE PRODUCTS INITIATIVE 22 June 2022 cen_cenelec_sustainableproductsinitiative_2022.pdf (cencenelec.eu) Accessed August 2022
[7] Cencenelec.eu CEN and CENELEC response to the EC consultation on a SUSTAINABLE PRODUCTS INITIATIVE 22 June 2022 cen_cenelec_sustainableproductsinitiative_2022.pdf (cencenelec.eu) Accessed August 2022
[8] DG Environment, European Commission. EU Ecolabel. Accessed July 2022: https://ec.europa.eu/environment/topics/circular-economy/eu-ecolabel-home_en

Standards on Eco labelling

NSAI is Ireland's designated competent body responsible for the development of standards. Currently, there is a low level of engagement by NSAI at CEN and ISO level on standards development in this area. We note with the potential changes in the scope of EcoDesign Regulations and the revision to the Construction Product Regulations, that there maybe be related overlapping work which would be of benefit.

Further Queries

By way of assistance, some queries that will be important to clarify as part of the legislative negotiation / implementation process are as follows:

- *As CEN have raised, it will be important for there to be clarity on whether the digital passport is voluntary and not mandatory?*
- *Clarification on what standards will be harmonised by the new Regulations.*
- *It will be important that there is clarity on how this will be enforced in Ireland and the role of relevant regulatory bodies.*
- *Similarly, it will be important for there to be clarity regarding the Market Surveillance role. Article 59 requires Member States to draw up an action plan for market surveillance activities, which must include 'priorities for market surveillance', to be identified based on a number of criteria laid down in the Article, and the nature and number of checks planned.*
- Regarding harmonised standards providing a presumption of conformity (*Article 34*), the Proposal for a Regulation provides for the possibility for the Commission to adopt common specifications where harmonised standards are not available (*Article 35 & Article 67*). It is preferable that harmonised standards are developed without the necessity for common specifications.

Conclusion

NSAI concurs with the CEN and CENLEC position on the new proposed Regulations which will support the overarching EU and Irish policy in relation to Climate Action, Circular Economy, and Sustainability. NSAI acknowledges that by applying the Ecodesign approach to a very broad range of products and enabling it to set a wide range of targeted product requirements, this Proposal for a Regulation seeks to address the most detrimental environmental impacts of products. By making materials last for longer, this will preserve our limited natural resources.