

Japan Machinery Center for Trade and Investment

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Our Comment on the Public Consultation on the Sustainable Products Initiative

We Japan Machinery Center for Trade and Investment would like you to consider improving the following points.

1. Requirements for resource efficiency by self-certification

For resource efficiency requirements such as products' durability etc., it is preferable to establish a self-declaration, and to set up a mechanism to improve the circular economy through evaluation developed by such as CEN/CENELEC.

2. Digital Product Passport

While we understand the purpose of Digital Product Passport, the existing legislation, such as WEEE and WFD Directives, resulting in overlapping legislation. This would increase the burden on manufactures, so should be avoided. We suggest establishing a system in which information is linked to already disclosed information.

3. Concerns over adding requirements for chemical substances to the Eco Design Regulation, etc. for each product group

Careful consideration should be provided whether it is appropriate to add requirements for chemical substances to the Eco Design Regulation, etc.

Duplication with existing legislation should be avoided to maintain law validity and consistency. Please remind; for example, ecodesign requirements for electronic displays include a ban on specific chemical substances which should be regulated in the applicable chemical legislation.

4. Ban the use of a substance in a given product, found to inhibit product recyclability

Producers use various substances for the purpose of enhancing the functionality, durability, etc. of products. Even if it is prohibited as a substance that inhibits recyclability in the future, it may have adverse effects from a viewpoint other than recyclability unless there is an alternative material that satisfies the above purpose.

5. Modulation of fees on the sustainability of products

The concept that promotes the circular economy by providing incentives for producers through a modulation of fee regarding their voluntary environmental performance, on which we agree. It should be in place so far as not to create the burden on the producers.

6. Ensuring of transparency of responses regarding the sustainability requirements of products

We would like you to thoroughly monitor the conformity of products in order to prevent "free riders" from avoiding the application of sustainability-related measures and to ensure sound and equal competition conditions and transparency of responses regarding the sustainability requirements of products.

End