

IVSH Feedback on the Call for Evidence

Ecodesign for Sustainable Products Regulation (ESPR) – Delegated Act on Iron and Steel Products

Executive Summary

IVSH welcomes the objectives of the European Commission to improve the environmental performance, circularity and transparency of iron and steel products under the Ecodesign for Sustainable Products Regulation (ESPR). The initiative foresees measures on carbon footprint information, recycled content, recyclability and Digital Product Passport (DPP) requirements across the value chain.

Although the consumer products made of iron and/or steel represented by IVSH are currently not within the direct scope of this proposed Delegated Act, our members are significant downstream users of iron and steel products and will be possibly affected by requirements generated upstream in the supply chain.

From the perspective of downstream manufacturing industries and SMEs, the following priorities are of particular importance:

1. **Simplification and avoidance of duplicate reporting requirements.**
2. **Application of a strict “collect once – report once – use many times” principle for sustainability data.**
3. **Prevention of Digital Product Passport proliferation along the value chain.**
4. **Recognition of sector-specific Product Carbon Footprint (PCF) methodologies and guidance developed in line with recognised standards.**
5. **Ensuring proportionality and practicality for SMEs.**
6. **Promoting interoperability, data reuse and regulatory coherence across EU legislation.**

IVSH particularly welcomes the Commission's renewed focus on competitiveness, simplification and burden reduction. These principles should also guide the implementation of sustainability information and Digital Product Passport requirements under the ESPR.

IVSH sees considerable potential in the Digital Product Passport to improve transparency, facilitate data exchange along value chains and reduce administrative burdens through the digital

provision and reuse of product information. When designed in a robust, practical and interoperable manner, the DPP can become an important enabler for efficiency, simplification and the reduction of duplicate reporting obligations across supply chains.

General Remarks

The Industrieverband Schneid- und Haushaltwaren e.V. (IVSH) represents manufacturers and suppliers of cutlery, cookware, kitchenware and household products in Germany and Europe.

While finished consumer products represented by IVSH are currently not within the scope of this initiative, the sector is highly dependent on steel and steel-containing inputs and therefore has a direct interest in the future structure of sustainability information and traceability requirements throughout the value chain.

IVSH supports the Commission's objective of increasing transparency and fostering sustainable production. At the same time, future requirements should be designed so that they contribute to sustainability objectives without creating disproportionate burdens for downstream industries and SMEs.

The Digital Product Passport should become the primary source of sustainability information throughout supply chains and help replace proprietary customer questionnaires, supplier surveys and duplicate information requests.

1. Simplification and Avoidance of Duplicate Reporting

IVSH welcomes the Commission's broader efforts to strengthen European competitiveness and reduce unnecessary regulatory burdens.

The future Delegated Act should be guided by the principle that sustainability information should be generated efficiently and reused wherever possible.

Particular attention should be paid to avoiding situations where identical information must be collected, verified, reported or transmitted repeatedly under different regulatory frameworks or at different stages of the supply chain.

The Commission should therefore:

- apply a strict **“collect once – report once – use many times”** principle;

- maximise the reuse of existing sustainability data;
- prevent duplicate reporting of identical information;
- avoid overlapping information requirements across different legislative instruments;
- minimise additional administrative burdens for companies and public authorities.

A Digital Product Passport should simplify the exchange of information across value chains. It should not create multiple reporting channels, repeated data submissions or redundant verification processes for the same underlying information. The initiative explicitly envisages DPP requirements throughout the supply chain, making this consideration particularly important.

2. Avoid a Cascade of Digital Product Passports Along the Value Chain

IVSH supports the use of Digital Product Passports as a tool to improve the accessibility and reliability of sustainability information.

However, the Commission should avoid creating a situation in which every intermediate product, semi-finished product, component and final product is required to maintain separate and largely duplicative DPP records.

Steel often passes through multiple processing stages before becoming a finished consumer product.

Without a clear governance framework, the same environmental information could be replicated multiple times throughout the manufacturing chain.

IVSH therefore recommends that the Delegated Act:

- apply a strong **once-only principle** for sustainability data;
- allow downstream operators to reference and inherit upstream data;
- avoid multiple reporting obligations for identical information;
- ensure interoperability between DPP systems and different product categories.

The Passport should facilitate data sharing rather than multiply documentation obligations throughout supply chains.

3. Recognise Sector-Specific Product Carbon Footprint Methodologies

IVSH strongly supports the use of harmonised European and international standards as the foundation for Product Carbon Footprint calculations.

At the same time, the Commission should explicitly recognise that sector-specific calculation guidance developed in accordance with recognised standards can provide substantial practical value.

Industry sectors frequently face unique product structures, manufacturing processes and allocation challenges that are not adequately addressed through generic methodologies alone.

IVSH therefore recommends that:

- sector-specific PCF methodologies and guidance documents remain permissible where they are aligned with recognised standards;
- industry-developed guidance should be recognised as a valid implementation instrument;
- companies should not be required to recalculate footprints under multiple parallel methodologies where equivalent results can be achieved;
- compatibility with existing standards-based PCF initiatives should be ensured.

This approach would support comparability while allowing practical implementation across complex industrial supply chains.

4. Ensure Proportionality for SMEs

The impact assessment should carefully consider effects not only on steel producers but also on downstream manufacturers.

Many businesses operating in downstream value chains are small and medium-sized enterprises with limited administrative resources.

Requirements that may be feasible for large industrial operators can become disproportionately burdensome when multiplied throughout supply chains.

The Delegated Act should therefore:

- ensure proportionality for SMEs through robust testing and implementing mechanisms (e.g. ex ante go-live testing, etc.);
- provide simplified compliance pathways where appropriate;
- minimise manual reporting obligations;
- maximise automated data exchange and reuse.

5. Ensure Regulatory Coherence Across Legislative Frameworks

The iron and steel initiative should not be viewed in isolation.

Many companies are simultaneously preparing for requirements arising from:

- the ESPR and Digital Product Passports;
- packaging legislation (PPWR DPP);
- sustainability and environmental reporting requirements;
- product compliance and market surveillance obligations and possible upcoming EU Product Act DPP-requirements;
- EU Business Wallet;
- other emerging sustainability-related regulatory initiatives.

The Commission should therefore ensure maximum coherence and simplification between legislative frameworks and avoid creating overlapping information requirements.

Alignment of data models, reporting structures and digital systems across EU legislation would significantly enhance both effectiveness and competitiveness.

7. Prevent Proprietary Information Requests and Supplier Questionnaire Proliferation

A key objective of the Digital Product Passport should be the simplification and harmonisation of information exchange throughout supply chains.

Today, many manufacturers face a growing number of customer-specific questionnaires, proprietary reporting templates and individual documentation requests seeking largely identical information.

This results in significant administrative burden for suppliers and SMEs, despite the fact that much of the requested information already exists elsewhere within the supply chain.

The Commission should therefore ensure that the future Digital Product Passport becomes the primary trusted source of sustainability information and prevents the emergence of parallel reporting systems.

IVSH recommends that:

- information made available through the DPP should be considered sufficient evidence wherever possible which clear punitive cut-offs for additional requests;
- companies, esp. SMEs, should not be required to provide identical information repeatedly in different formats;
- proprietary customer questionnaires requesting information already available through the DPP should be avoided;
- standardised digital data exchange should replace fragmented supplier surveys and ad-hoc information requests;
- the DPP should contribute to reducing supplier reporting obligations rather than creating additional layers of documentation.

The success of the Digital Product Passport should ultimately be measured not only by the amount of information it contains, but also by its ability to replace existing administrative processes and reduce the need for duplicate requests throughout the value chain.

Conclusion

IVSH supports the objectives of improving sustainability, transparency and circularity in iron and steel value chains.

To ensure successful implementation, the future Delegated Act should:

1. place simplification and burden reduction at its core;
2. apply a strict “collect once – report once – use many times” principle;
3. prevent DPP proliferation throughout supply chains;
4. recognise standards-based sector-specific PCF methodologies;
5. ensure proportionality for SMEs;
6. Prevent Proprietary Information Requests and Supplier Questionnaire Proliferation;
7. promote interoperability and data reuse; and
8. avoid duplicate reporting and overlapping regulatory requirements.

The transition towards more sustainable products will be most successful where environmental ambition is combined with practical implementation, regulatory coherence and international competitiveness.



About IVSH

The Industrieverband Schneid- und Haushaltwaren e.V. (IVSH) represents companies in the cutting and household goods industry across Germany. This industry is responsible for thousands of jobs and billions in revenue in Germany. The sector produces high-quality everyday products that are appreciated and loved worldwide and contribute to social cohesion.