

FEEDBACK

Feedback on the format of the ESPR Ecodesign Forum

16.04.2024

This feedback concerns the discussion points on the format of the ESPR Ecodesign Forum as provided during the Consultation Forum meeting on computers on March 19, 2024. We welcome and thank the Commission for the opportunity to provide our feedback on these points.

Feedback on general principles

- We support a **continuously open call** for membership applications. This is especially crucial to ensure civil society representation, as capacity to work on certain issues for organisations might change over time, meaning that some organisations might have to stop working on a certain issue, while others will start. A continuously open call could prevent such changes leading to a loss in civil society representation.
- **Membership criteria:** we welcome and call for an implementation of “balanced representation of relevant know how and areas of interest” in that there is sufficient civil society representation, and that industry representation does not outweigh other stakeholders.
- We support having **hybrid meetings as default**. This allows for broader participation, especially in the context of civil society organisations with limited human and financial resources that might render it difficult to travel to Brussel. Furthermore, we would stress the need for **inclusive moderation of online participation**: thus far, we often notice that online participants are not given the floor despite having asked for it, and preference given to on-site participants. While we fully understand the challenge of moderating hybrid meetings, especially considering the time constraints, we would like to stress the importance of a balanced moderation in order not to disfavour online participants.

Accessibility to the general public

We support the idea of making meetings of the Ecodesign forum more accessible to the general public via web streaming or other possibilities. We believe that this would make the meetings more transparent and democratic.

Optimising the process for consulting on draft working plans

See our general suggestions for feedback below.

Suggestions for improvement or changes

With regard to general suggestions for improvements, we would like to express our full support and agreement with the recommendations provided and explained in detail in [ECOS' Recommendations for Ecodesign Forum](#), notably:

- In order to ensure civil society representation, it is crucial to provide sufficient long-term and stable funding. This is necessary to ensure that CSOs have the necessary capacity and human resources to participate in the feedback processes.
- Delays in holding the meetings, short notice, and multiple meetings and feedback processes at the same time are difficult to manage for civil society organisations with limited human and financial resources. Clear timelines that are adhered to, longer feedback times and providing documentation well in advance of meetings are helpful in mitigating that.
- Clear and up-to-date product pages with easy to locate documentation.
- While we appreciate the involvement of civil society in the consultation process overall, this could be improved by increasing the share and diversity of civil society organisations involved, as well as involving social economy and circularity operators.

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