



12th August, 2026

Japanese 4EE industrial association's (JP4EE) Comments and Proposals on the European Commission's Call for Evidence for the impact assessment on the Ecodesign for Sustainable Products Regulation Delegated Act on iron and steel products

JEMA (The Japan Electrical Manufacturers' Association)

JEITA (Japan Electronics and Information Technology Industries Association)

CIAJ (Communications and Information Network Association of Japan)

JBMIA (Japan Business Machine and Information System Industries Association)

We, the Japanese electrical and electronic industrial associations – JEMA, JEITA, CIAJ and JBMIA (JP4EE) welcome this opportunity to offer feedback concerning the European Commission's proposal for "Ecodesign for Sustainable Products Regulation Delegated Act on iron and steel products".

We support the objectives of the ESPR to promote environmental sustainability and improve resource efficiency across value chains. At the same time, it is essential that delegated acts are designed in a manner that is proportionate, practical, and aligned with product-specific regulatory frameworks, taking into account the complexity of global supply chains and the diverse uses of iron and steel in downstream products. In this regard, we would like to offer the following comments and proposals.

Comments and proposals

1. The scope of delegated acts under the ESPR should not be expanded to final products containing iron and steel.

Only iron and steel intermediate products were examined in the preparatory study published on 23 March 2026 and presented at the stakeholder meeting on 13 April 2026, although final products containing iron and steel were briefly mentioned.

Only iron and steel in the form of materials whose functions are determined solely by their chemical composition should be covered by delegated acts under the ESPR. Articles that are given a specific shape, surface treatment or design during production, and whose functions are therefore determined to a greater extent by those characteristics than by their chemical composition, should instead be addressed through the applicable ecodesign requirements for their respective end-use product categories.

Product-specific requirements would allow environmental trade-offs to be considered comprehensively, thereby supporting reasonable and effective regulation. By contrast, requirements focusing solely on iron and steel components could adversely affect other environmental aspects that need to be considered in relation to the final product as a whole.

Furthermore, the characteristics, performance and functions required of iron and steel components vary considerably across product categories. Developing horizontal ecodesign requirements for these components across different categories would therefore be excessively complex and impracticable.

2. Final products containing steel intermediate products should be clearly defined and assessed, while duplicative requirements should be avoided.

We are highly concerned that, due to the lack of a clear definition, steel-containing final products could become subject to regulation without conducting an appropriate impact assessment. In particular, the term “steel-rich final products” used in Question 5 is not defined, making it impossible to properly assess the environmental impacts associated with such final products. As a result, respondents are unable to judge whether these products should be regulated, rendering the question potentially misleading. If the intention is to consider regulating final products containing steel intermediate products, such products should first be clearly defined and classified, and a proper impact assessment should be conducted before any regulatory measures are considered.

Downstream supply chains differ significantly by final-product category and may involve multiple stages of processing, distribution and manufacturing across several economic operators. In particular, standardised steel-containing parts may be sourced through complex distribution channels, making it technically and operationally challenging to transmit and link information concerning individual steel inputs to specific final products. It should therefore not be assumed that information requirements developed for steel intermediate products can be applied directly to final products without a separate assessment.

Furthermore, if final products containing steel intermediate products are also brought within the scope of ESPR requirements, duplicated regulation between intermediate products and final products should be avoided. For example, a requirement to disclose the presence of certain substances in steel intermediate products, combined with an equivalent disclosure requirement imposed on final products incorporating those intermediate products, could result in the unnecessary duplication of regulatory obligations. We are concerned about that such double regulation could create unnecessary administrative burden without delivering additional environmental benefits.

In addition, where final products containing steel intermediate products are not themselves subject to ESPR requirements, the ESPR obligations applicable to the steel intermediate products should not automatically apply to those final products. Instead, the timing of applicability should be aligned so that any requirements affecting final products take effect only when the relevant category of final products is formally brought within the scope of ESPR regulation.

Any future consideration of requirements affecting final products containing steel intermediate products should therefore be based on a dedicated impact assessment, clear product definitions, and careful consideration of supply-chain feasibility.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'K. Saito'.

Kiyoshi SAITO

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ABOUT JP4EE

JEMA(The Japan Electrical Manufacturers' Association)

The Japan Electrical Manufacturers' Association (JEMA) consists of major Japanese companies in the electrical industry including: power & industrial systems, home appliances and related industries. JEMA will contribute to sustainable global development through improvement and enhancement of social and living infrastructures by strengthening international competitiveness of Japanese electrical machinery equipment industry.

<https://www.jema-net.or.jp/>

<http://www.jema-net.or.jp/English/>

EU Transparency Register: [871347495386-10](#)

JEITA

JEITA aims to create digital technologies, improve the business environment, enhance industrial competitiveness, and, of course, to realize Society 5.0. To that end, we urgently need to accelerate society's digital transformation (DX). JEITA will work closely with member companies, the government, and related organizations to solve social issues and energize the Japanese economy, contributing to the society and lifestyles of the future.

<https://www.jeita.or.jp/japanese/>

<https://www.jeita.or.jp/english/>

JBMIA (Japan Business Machine and Information System Industries Association)

Japan Business Machine and Information System Industries Association (JBMIA) is the industry organization which aims to contribute the development of the Japanese economy and the improvement of the office environment through the comprehensive development of the Japanese business machine and information system industries and rationalization thereof.

<https://www.jbmia.or.jp/index.php>

<https://www.jbmia.or.jp/english/index.php>

CIAJ(Communications and Information Network Association of Japan)

Mission of Communications and Information network Association of Japan (CIAJ). With the cooperation of member companies, CIAJ is committed to the healthy development of info-communication network industries through the promotion of info-communication technologies (ICT), and contributes to the realization of more enriched lives in Japan as well as the global community by supporting widespread



and advanced uses of information in socio-economic and cultural activities.

<https://www.ciaj.or.jp/>

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