

Brussels, August 2011

**Comments from ECOS (on behalf of Environmental NGOs)
on the study for the amended Ecodesign Working Plan 2012-14:
draft Tasks 1-2-3 as published on 18/07/11**

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ECOS congratulates the study consultants for the huge amount of collected data and clear study structure. The approach and quality of the analysis is greater than in the 2008 study for the 1st Working Plan¹.

However, we would like to make the following remarks and requests:

- p.21: the text could be more clear about the fact that the environmental aspects covered by Ecodesign regulations are not necessarily including all the significant environmental impacts identified (there is a political and feasibility discussion in between). Also, the table on page 22 misses some aspects covered by generic requirements (e.g. information on lead content for TVs) and is not a comprehensive overview of the environmental aspects.
- p. 24: it should be clarified that the MEEuP methodology is not a full-LCA analysis.
- p. 25: it would be useful to provide a table with the list of remaining Ecodesign measures to be adopted or revised during the period of the 2nd Working Plan (2012 to 2014). It would give a useful overview to prioritise efforts and resources of the 2nd Working Plan.
- p. 25: contrary to what is indicated, medical imaging equipment is not currently considered as studied under Ecodesign (it has been clarified in one meeting of the Ecodesign Working Group). It was out of the scope of the 1st Working Plan and for this reason no preparatory study was launched. The fact that the industry proposed a voluntary agreement some years ago does not mean that this product group should be considered covered and excluded from the scope of the 2nd Working Plan and Working Plan study.
- p. 34: according to our information, ice-(cream)-makers were excluded from ENTR lot 1 not because the improvement potential is low but because the overall energy consumption has been considered negligible compared to the rest of the study and for study budget limitations. This does not mean that these products could not be candidates for Ecodesign measures (as is the case in other countries).

¹ which we had commented here:

http://env-ngo.eup-network.de/fileadmin/user_upload/ENGOS_Intern/Position_Papers/Final_ENGO_position_EuP_WP_study.pdf.
Some of our analysis and methodological concerns will remain also valid for the 2nd Working Plan

- p. 37: battery chargers were not excluded from the scope of the Lot 7 study. The study has concluded that performance requirements for battery chargers had a 'lower priority' than for external power supplies. It does not mean that requirements will not be set under this lot in a future revision.
- p. 38: wine storage appliances were not excluded from Lot 13. They are subject to a generic Ecodesign requirement and the revision article of the regulation stipulates that the Commission will assess the need for specific requirements on wine storage appliances.
- p. 48: we consider the comment (in the 3rd paragraph) about the 'dominance of the use phase' rather simplistic. The criticisms about the excessive focus on the use phase are more complex than reported here. Also, contrary to what is said it is not always 'quite normal' to find a dominance of the use phase (e.g. for laptops it is becoming untrue). We suggest removing these three lines.
- p. 56: other problems related to the study for the 1st Working Plan could be reported here, such as the poor energy assessment and ranking of the proposed product categories (*see our position paper mentioned in footnote 1*).
- p. 72: it could be useful to mention that your energy assessment only covers the use phase.
- p. 75: same remark as before on medical equipment.
- p. 74-75: for product groups 4.31 and 4.19, the factor from PJ/year to TWh electric equivalent looks odd (i.e. different from the usual factor 9). In order to avoid some strange figures, we also recommend showing numbers with at least one decimal.
- p. 77: your hypothesis that the price of an improved product is increased by the same percentage as the energy savings that can be achieved is unfortunately a big problem. It is very simplistic and fundamentally incorrect for many product categories (and even for white goods it is not historically true when you consider the evolution of purchase prices in shops - *see the graph from the US at the end of this paper*). Improvements to reduce energy have very varying costs, and can sometimes be close to zero (e.g. software or sensors allowing for auto-power down). Also, they change with time. Your hypothesis gives the wrong impression that the higher the savings potential, the more costly it will be to implement the savings. In reality, it depends on the way you implement it (i.e. in one stage or incremental stages, etc.).

Thus, we cannot support this hypothesis for the analysis.

On p. 78 (and next), several costs figures based on your analysis look unrealistic and should be modified (ex: for escalators, home audio, cash dispensers...) Besides, on p. 81 you admit yourselves that you have no clue whether your analysis for several product categories is valid or not. At this stage, we call for totally removing this arbitrary analysis from the document.

- p. 95: your assumption of a 5% possible improvement on construction machines seems rather low. Besides, there are other significant environmental aspects here (noise, use of lubricants and other fluids, emissions to air, etc.) that could justify ecodesign requirements.
- p.116: the analysis only looks at the improvement potential of fans individually, not the impact of promoting some fan types over others providing the same service. (This could be the biggest source of potential savings).
- p.153: a real-life measurement campaign in France (*Enertech study from 1999 on 100 households - ECUEL project under the EU SAVE program*) showed an average of 37 kWh/year for ironing. This is 3 times more than your assumption. You may want to reconsider it.
- p. 165 & 173 & 197: your remark '*the scenario analysis assumes that the improvement can be achieved without excessive costs to manufacturers or end-users*' is not consistent with the table on p. 79 (where your cost analysis indicates very long payback time).
- p. 183: you seem to consider servers only as direct EuPs. In reality, when servers are made more energy efficient they usually also have less heat losses and thus decrease the need for cooling in data centres. You could also look at the potential savings from decreased cooling needs (impact as indirect ErP).

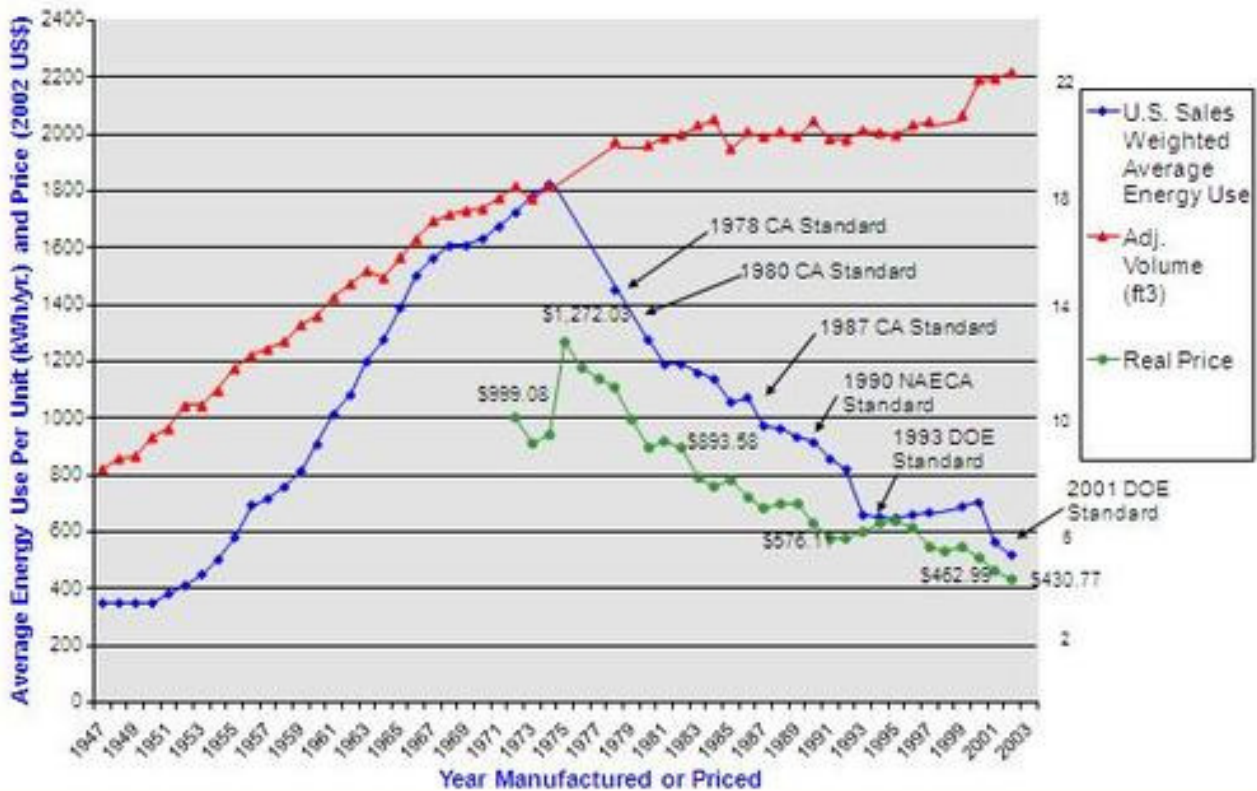
- Could you please clarify the status of the following products that are not yet covered by Ecodesign and do not seem to appear in your study:
 - standby and off mode losses of professional products
 - combined washer-driers
 - advertising panels
 - amusement park attractions
 - devices such as 'standby-killers', multiple plugs with switch, timers, etc (ErPs sending other products in off or standby mode).

In addition to these comments, we would also like to raise an overall methodological issue due to the narrow focus on energy savings as a ranking criteria: your study touches on a number of energy-using products that have very low annual energy consumption patterns because they are rarely used or for short periods (e.g. many kitchen tools, do-it yourself tools, all sorts of gadgets sleeping in cupboards). These products end-up very low in your ranking. However, it could be argued that when the annual energy consumption pattern is low, then the other environmental aspects (production phase, end-of-life, chemical content, resource use, etc.) become all-the-more significant and would justify a different criteria for analysis. As an illustration, an electric children toy may consume little energy, but its other environmental aspects (thus becoming predominant) could justify setting ecodesign requirements on its non-energy aspects.

We would appreciate this methodological limitation to be mentioned in Task 1.

Annex: US graph on fridge efficiency and prices, and impact of minimum requirements

U.S. Refrigerator Energy Use v. Time with Real Price



Source: Goldstein, Nadel (ACEEE)