



Brussels, 21 September 2011

## **Final comments from ECOS (on behalf of Environmental NGOs) on the study for the amended Ecodesign Working Plan 2012-14**

Contact:

ECOS – European Environmental Citizens' Organisation for Standardisation  
Edouard Toulouse  
[edouard.toulouse@ecostandard.org](mailto:edouard.toulouse@ecostandard.org) / Tel: + 32 2 894 46 57

*Note: the most important comments are highlighted in bold.*

In addition to our previous comments on tasks 1-2-3<sup>1</sup>, we would like to stress the following concerns with respect to the study and draft task 4.

### **Cost analysis**

---

As mentioned in our previous comments, **we maintain that the proposed approach for the simplified cost analysis (p. 77) is unacceptable**. Claiming that for all product groups an energy efficiency increase triggers an increase in price of the same magnitude is simply unrealistic.

**We would like to suggest an alternative approach**. The simplified cost analysis could be qualitative instead of trying to provide arbitrary figures. For each product group, the improvement potential identified in task 3 could be subcategorised into different main types of improvement, such as:

1. better power management (auto-power down feature, sensors...)
2. use of improved components (better motor, fan, insulation...)
3. complete redesign of the product (breakthrough innovation...)
4. Savings enabled by better interaction with the user (set-up menu, eco-programs...)

To each of these subcategories a cost evaluation can be attributed (for instance from 'low' to 'high' - category 1 would get 'low cost', category 2 'medium', category 3 'high', category 4 'low', etc.)

For each product group, the consultants could indicate the main improvement types enabling to reach the improvement potential, and make a list of the associated cost effect.

**Example:**

Product YYY

Improvement potential: xxx TWh/year by 2025

Main sources of the improvement potential:

1. better power management (30%) - cost: low
2. improved components (70%) - cost: medium

---

<sup>1</sup> [http://env-ngo.eup-network.de/fileadmin/user\\_upload/ENGOS\\_Intern/Position\\_Papers/ECOS\\_comments\\_VHK\\_study\\_ErP\\_WP2012-Aug2011.pdf](http://env-ngo.eup-network.de/fileadmin/user_upload/ENGOS_Intern/Position_Papers/ECOS_comments_VHK_study_ErP_WP2012-Aug2011.pdf)

## Comments on draft Task 4

---

➤ p. 14: the sentence *'No preparatory study so far has identified re-use as a major environmental aspect'* is unclear. 'Re-use' in itself is not an environmental aspect, but a solution to reduce some environmental aspects. Some preparatory studies have investigated how to promote reuse and refurbishment. Examples are: lot 7 where the benefits of a standardised connector have been mentioned to enable the reuse of battery chargers across brands - lot 4 (options to facilitate the reuse of cartridges in printers) - lot 12 (refurbishment option for commercial refrigeration). To avoid controversy, we suggest deleting this sentence and the next.

➤ p. 15: we do not agree with the statement: *'Therefore it is expected that plastics recycling will not be highlighted as a particular area of concern for the product groups assessed'* We consider plastics recycling as an important issue, where Ecodesign measures can help (e.g. by imposing the marking of plastics for recycling and/or prohibiting certain material mixes that prevent material separation). So far the Ecodesign implementation has focused on energy use, but there is nothing to suggest that other aspects such as plastics recycling will still be neglected in future revisions or studies. It is also possible that this aspect will be tackled by a horizontal measure covering a wide scope (including some of the products of the 2<sup>nd</sup> Working Plan).

➤ p. 21 (thermal insulation): the use of renewable / non-renewable material for insulation should also be considered an area of particular environmental relevance (impact on resource efficiency and carbon footprint).

➤ p. 25 (taps and showerheads): the issue of increased lifetime through easier repairability should be mentioned as an environmental aspect of relevance (impact on resource/metal use)

➤ p. 31 (windows): the use of renewable / non-renewable material in window frames should also be considered an area of particular environmental relevance (impact on resource efficiency and carbon footprint).

➤ p. 38 (detergents): it is unclear why toxicity has not been included in the areas of environmental relevance. Biodegradability is not the only parameter related to the toxic content.

➤ p. 39 (servers): embedded energy, carbon footprint and end-of-life treatment should also be mentioned in the areas of environmental relevance.

➤ **p. 48 (mobile phones): we question the relevance of restricting the product category only to 'mobile phones'. Mobile phones are nowadays multi-functionality products (phone, camera, mp3 player, etc.). So it would make much more sense to consider a broader category of 'mobile electronics' including mobile phones, blackberries, digital cameras, media players, PDAs, tablets, video games.**

**Besides, the identified main environmental aspects (and solutions to them) are valid for all these mobile products: impacts of manufacturing of electronic components, presence of hazardous substances, energy efficiency of the product and battery charging cycle, end-of-life treatment. These aspects could be best covered by a horizontal Ecodesign measure for mobile electronics.**

**If the consultants do not have sufficient time to assess such a broadened category, we would at least request that our remark is mentioned in the study as a potential way of dealing with these products and even triggering a much higher improvement potential.**

➤ p. 51 (electric kettles): we had already suggested in 2008 to include electric kettle under Ecodesign Lot 25 (coffee machines), as kettles and coffee machines have similar functions (boiling water to prepare a hot drink). **The best way forward could be to include electric kettles in the future Ecodesign measure for Lot 25 (right now or in the revision clause).** This would spare the need to create an additional lot.

- p. 55 (hot beverage vending machine): **the issue of plastic cup waste should be mentioned as an area of environmental relevance.** Through Ecodesign requirements, the use of non-reusable cups could be tackled.
- p. 56 (sub-stations): why does the category only encompass mobile phone stations and not other sources of electromagnetic signals (radio stations, wi-fi accesses, etc.)? It seems the environmental aspects would be very similar.
- p. 57 (home audio products): please replace the following sentence about DG ENTR Lot 3
  - *'The study's conclusion focused on regulating energy efficiency'*
  - by *'The study identified several environmental aspects and improvement potential options (covering not only energy use but also other environmental criteria). Its conclusions have been mostly focused on energy efficiency as for the other aspects a more horizontal measure for electronics is deemed more suitable.'*
- p. 64 (cash dispensers): as cash dispensers include a display and sometimes lights, the mercury content is an area of specific environmental relevance (as is the case for Lot 5 Televisions).
- p. 65 (medical equipment): lifetime and upgradability could be added to the list of environmental areas of relevance.
- **p. 66 (traffic lighting): we consider this product group could be included in a broader category of 'signal lights' including traffic lights, luminous advertising, emergency signals, indicator lights on cars, etc. For all these cases the objective is to promote high-efficient LED solutions. The saving potential would be much higher than for traffic lighting alone.**  
**If the consultants do not have sufficient time to assess such a broadened category, we would at least request that our remark is mentioned in the study as a potential way of dealing with these products and even triggering a much higher improvement potential.**
- p. 68 (cloth ironing): we would recommend to include professional cloth ironing and professional dry wash equipment to be included in this product category, as there have been reports on the toxicity of the products involved in dry wash processes.
- p. 77 (kitchen appliances): several kitchen appliances have a very low duty cycle as they are rarely used or for short time periods. Therefore the energy during the use phase is low and the embedded energy becomes more significant in comparison. Embedded energy should be added to the list of environmental areas of relevance for these products.
- The product group 'cables' has been mentioned during the study stakeholder meeting on 16 Sept. but is not covered in the draft task 4. Is this going to be modified?

END.