



Brussels, February 2009

Position of ECOS, on behalf of Environmental NGOs, for the EU Regulatory Committee votes in March 2009 on Ecodesign Measures

Six important product groups will be covered by Ecodesign and Energy Labelling votes in March 2009 (under the Ecodesign of Energy-Using Products and Energy Labelling directives).

Environmental NGOs, represented in Brussels by ECOS¹, have been involved in monitoring and providing comments on these policies, but feel that their concerns have not been taken into account adequately. We would like to draw your attention to several fundamental remarks.

General comment on the new format of the Energy Labelling

Environmental and consumer NGOs have on many occasions expressed their deep concerns about the danger of modifying the Energy Labelling format in a way that would make it confusing to consumers. The numerical open-ended system proposed by CECED or the new "A1"... "A3" classes suggested by the European Commission would only create strong misunderstandings and severely jeopardise the effectiveness of the label. This is unacceptable from both an environmental and consumer perspective.

➤ **We urge you again to build the future Energy Labels for televisions, fridges and washing appliances on the simple and clear A-G scale with regular and planned rescaling.** Claims from manufacturers about large financial and social impacts of this solution are based on no evidence whatsoever, and just appear to equate to scaremongering.

Electric motors

This product group has the second largest potential among all energy-using products. Very substantial savings may be achieved, provided the policy is dynamic enough to accelerate market transformation.

The scheme leaving the freedom to go for IE3 motors or IE2 plus mandatory adjustable speed drive is a useful approach, which we are ready to support. However:

➤ The entry into force of this Ecodesign stage could and should start earlier, as it gives increased flexibility to manufacturers and creates huge business opportunities. There is no convincing reason to wait so long and even longer for smaller motors.

The IE3 or IE2+ASD level should start in 2013 and for all motors.

➤ It is necessary to **set minimum performance and energy efficiency requirements for adjustable speed drives** (to avoid the market being flooded by poor quality products). We understand industry favours using standardisation, however we urge you to clarify that requirements on ASD will be set under the EuP policy.

➤ Recitals should be very clear about the need to prepare the revision of the measure much sooner than in 7 years. In particular, **the IE4 level should be prepared more quickly**, to facilitate dynamism.

¹ ECOS is a European umbrella group coordinating the involvement of Environmental NGOs in the EuP policy process. Info: www.ecostandard.org



Televisions

A very ambitious regulation is the only possible response to extremely worrying market trends (with a projected 100% increase of the energy consumption for this product group by 2020).

Most TV manufacturers are already able to introduce 50% more efficient TV sets. The technology is there, but needs improved conditions for fast deployment.

- We consider the proposed 2nd Ecodesign stage to be much too weak compared to existing benchmark models. **We urge you to either advance the 2nd stage to April 2011 or to set it at energy efficiency index 0.7 rather than 0.8**, since several benchmark models already achieve 0.5.
- **The limits on standby and off-mode can and should be made tougher** than in the horizontal regulation. On top of that, **a 0 W mode should be made available** to users.
- Non-energy aspects have not received sufficient attention. We want to see clearer commitments to **limit the use of brominated and chlorinated flame retardants and mercury**, as well as **increase the recyclability and recyclable content of flat screens**.

Fridges and freezers

Despite technological progress in the past, substantial energy savings are still achievable in this product group. Furthermore, the growth in appliance size and stock has annihilated part of the previous gains.

Compared to the initial very weak proposal from the European Commission, the new available draft has been slightly improved - but still not as much as needed. We urge you to:

- Increase the level of ambition of the **1st Ecodesign stage in 2010 to EEI<42** (current A+ level) and the **2nd stage in 2013 to EEI<30** (current A++ level) for compressor-type.
- **Challenge the correction factors** which represent excessive concessions to manufacturers (especially for the tropical class factor). If they are not changed now, at least the recitals should make it very clear that this point will be definitely resolved in the next revision.
- Ensure a **good rescaling of the Energy Labelling, where A only represents the genuine top of the market** at any given moment. This requires a substantial revision and thinner bands based on reduced testing tolerance to 5% max. The time has come to correct the lack of appropriate rescaling in the last decade, and put the Energy Labelling back on proper track.

Washing machines and dishwashers

Despite smaller potential, the measures could be more ambitious for energy and water conservation. Moreover, the proposed new methodology to calculate the energy performance and energy consumption decreases transparency and will make it more difficult to compare models. Therefore, we advise you:

- to set the **first stage of Ecodesign requirements for washing machines at the current “A+” level** (EEI of 59), and the **second stage at EEI of 52**.
- to decrease the **minimum requirement on water consumption by 15%** for washing machines, and **introduce a similar one for dishwashers**.



- to make sure that the calculation methodology is not just a “black box”, and that **manufacturers will have to provide the parameters used in the formulas** (energy consumption in off-mode, left-on mode and on-mode for the different programs).

Circulators

Circulator pumps represent a substantial part of the electricity consumption of households with central heating (up to 10%). No adverse consumer or comfort issues have been identified as consequence of ambitious provisions. Some of the main manufacturers are able to produce highly efficient products already. We see no reason not to go for the “top of the class” level. Therefore:

- We advise you to **advance the entry into force of the first Ecodesign stage to 2011**.
- We urge you to **increase the ambition of the second stage to index 0.18** (current benchmark level). Bearing in mind that a 0.02 tolerance is provided on testing, this makes an acceptable 0.20 level to reach.

We thank you for your attention and hope you will ensure these measures are up to the challenges of climate change and energy security, and will help saving billions of Euros on energy bills.

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