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International Network for Sustainable Energy - Europe

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**Comments from ECOS, EEB, CAN-Europe,  
INFORSE-Europe, Greenpeace and WWF  
on the Draft Working Plan of the Ecodesign Directive  
(Version 28 April 2008)**

*In the context of Directive 2005/32/EC establishing a framework for the setting of ecodesign requirements for energy using products.*

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**This paper provides comments on the Draft Working Plan (p. 2) and suggests an alternative list of 25 product groups for discussion in the Consultation Forum (p.3).**

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ECOS, EEB, CAN-Europe, INFORSE-Europe, Greenpeace and WWF (hereafter “Environmental NGOs”) welcome the publication of the draft EuP Working Plan. This document was long overdue and seems to have experienced several delays.

However, Environmental NGOs consider that this document **fails to respond to its primary goal**, which was to set **a clear list of the next 25 lots** (*product groups*) to be launched under the Ecodesign legislation<sup>1</sup>.

We also **deeply regret that very few of our earlier comments sent in January 2008 on the preliminary study to this Working Plan were taken into account** when drafting this document<sup>2</sup>.

In particular:

- We had expressed major concerns about flaws and inconsistencies in the figures and methodology used in the preliminary study; they are not addressed in this document.
- We had suggested more pragmatism and simplicity in the setting of product group boundaries, so that the next lots and preparatory studies under EuP can be straightforward enough.
- We had also provided detailed comments about several of the product categories considered.

Besides our renewed concerns about the list of product groups, which are addressed below, Environmental NGOs also **strongly oppose the surprising emphasis on « industry self-regulation » in this document**. We do not accept the statement that voluntary commitments are considered superior to Ecodesign regulation, which is repeated 4 to 5 times in this short document. Environmental NGOs grant no support to the call from the European Commission to « *give priority to alternative self-regulation measures* ». The Ecodesign policy and process is about improving the environment, not promoting deregulation. Several studies and organisations have already assessed the flaws and limits of industry self-regulation<sup>3</sup>. The Ecodesign implementing measures are the needed response to these limits.

Regarding the list of product groups, the draft Working Plan only suggests a list of 10 indicative broad categories, most of which are **very heterogeneous and not workable for straightforward preparatory study and implementing measure**. Moreover, the status of the “*product examples*” mentioned for each category is unclear: are they subcategories corresponding to the new EuP “lots”? The rationale and logical framework for the selection of these examples are missing.

Besides, **some important and relevant types of energy-using products are missing in this list**, e.g. cell phones, DSL modems, gaming consoles, lifts & escalators, irons, hair dryers, compressors...

Environmental NGOs globally regret that **the methodology used to set this list is insufficiently described** and even less explicit than in the preliminary study (in particular when energy consumption figures in PJ/year are diverging in the two documents, e.g. for air-conditioning & heat pumps, heating equipment, industrial furnaces & ovens, etc.). Figures and assumptions are very rough and no sensitivity analysis is provided to check the robustness of the selection.

*In order to move forward and add more clarity to the selection process, Environmental NGOs suggest that the discussion of this Plan **focuses on a more transparent list of 25 lots**, rather than on 10 broad categories where « the Commission reserves itself the right to choose EuPs to launch preparatory studies ». As an illustration **such a list is suggested on next page**.*

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<sup>1</sup> “According to the study specifications, a final list of 25 products should have been developed.” (page 6 of the Study for preparing the first Working Plan of the EcoDesign Directive)

<sup>2</sup> “Position of ECOS, EEB, CAN-Europe, INFORSE-Europe, Greenpeace and WWF on the Study for preparing the first Working Plan of the Ecodesign Directive”  
[http://www.ecostandard.org/downloads\\_a/final\\_engo\\_position\\_eup\\_wp\\_study.pdf](http://www.ecostandard.org/downloads_a/final_engo_position_eup_wp_study.pdf)

<sup>3</sup> For instance, the OECD report “*Voluntary Approaches for Environmental Policy: Effectiveness, Efficiency and Usage in Policy Mixes*” notes that there are few cases where such approaches have improved the environment beyond a business-as-usual baseline. It also raises doubts about their economic efficiency. See: [www.oecdobserver.org/news/fullstory.php/aid/1102/Do\\_voluntary\\_approaches\\_to\\_the\\_environment\\_work\\_.html](http://www.oecdobserver.org/news/fullstory.php/aid/1102/Do_voluntary_approaches_to_the_environment_work_.html)

## Alternative list of 25 EuP lots, for discussion

01	Tertiary and professional air-conditioners
02	Electric heating (electric radiators, storage heating radiators, towel heaters)
03	Heat pumps
04	Outdoor heaters
05	Domestic ovens and grills
06	Tertiary and professional cooking ovens and grills
07	Electric hobs
08	Domestic and professional coffee machines, tea machines and electric kettles
09	Professional IT servers
10	DSL modems and Wi-Fi accesses
11	Professional data storage centres
12	Mobile phones and blackberries
13	Gaming consoles
14	Domestic portable sound & image equipment (cameras, video recorders, players, PDA...)
15	Domestic non-portable sound & image equipment (DVD players, hi-fi, loudspeakers...)
16	Chillers and ice makers
17	Power transformers
18	Domestic and professional irons
19	Domestic and professional hair dryers
20	Lifts, escalators and revolving doors
21	Cashiers, ticketing machines and bank automats
22	Small and large motors (>200 kW) not covered by Lot 11 of first phase
23	Compressors
24	<i>Industrial and laboratory furnaces and ovens (provided not adequately covered by IPPC)</i>
25	<i>Machine tools (provided not adequately covered by IPPC)</i>
Extra options	
	Luminous advertising and signalling (if not covered in a revision of the lighting lots)
	Professional sound & image equipment (theatre equipment, concert hall equipment...)
	Professional power supplies

### Further comments:

- Modems and Wi-Fi accesses are always-on products that need to be covered by Ecodesign.
- Mobile phones are a clear priority in terms of addressing the questions of recyclability, hazardous substances and extension of life-time.
- Industrial furnaces & ovens, machine tools and farming machines might be better covered under industrial legislation (such as IPPC with provisions on ecodesign using benchmarks).
- *Water-using equipment* could be covered in the foreseen extension of the scope of the Ecodesign legislation: water cleaning appliances, agricultural machines and irrigation systems should be ecodesigned not necessarily as “energy-using products”.