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Brussels, 25 January 2008

**Position of ECOS, EEB, CAN-Europe,
INFORSE-Europe, Greenpeace and WWF**

on the Study for preparing the first Working Plan of the Ecodesign Directive

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

Document reference: ECOS/EuP/2008-01

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Position of ECOS, EEB, CAN-Europe, INFORSE-Europe, Greenpeace and WWF

on the Study for preparing the first Working Plan of the Ecodesign Directive

ECOS, EEB, CAN-Europe, INFORSE-Europe, Greenpeace and WWF (hereafter “Environmental NGOs”) welcome this study and congratulate the consultants for the impressive amount of work and data collected within the short timeframe of the study. This study will help fuelling and structuring the debate about the next EuPs to be covered by the Ecodesign process.

However, Environmental NGOs would like to express three main concerns that still need some consideration in order to draft the best possible EuP Working Plan. They also wish to submit detailed comments (see next pages).

- The first main concern is about the **definition and size of some of the proposed product groups**. By trying to include as many EuPs as possible in the final short list, the consultants sometimes aggregated very different types of products together, which leads to complex categories. The rationale to build each of these categories is not always clear (is it based on a function? Is it a technology approach? Is it a sectoral approach?) Some of these categories might be difficult to treat under one comprehensive Implementing Measure, or lead to endlessly confusing debates over definitions and base cases in the future. Environmental NGOs are of course convinced that as many as (if not all) EuPs should be ecodesigned, but they consider pragmatism should be a key driver to ensure a quick, efficient and easily monitored Ecodesign policy. Simple enough product groups, with straightforward IMs, should be the way.
- The second concern relates to the **reliability of the methodology used in this study** to provide a ranking. A sort of partial MEEuP with several assumptions and simplifications has been applied. Therefore results may depend on the consultants’ views and skills at extrapolating in the short timeframe of the study. Such an approach is questionable as potential bias might have had an influence on the outcome. But probably no completely sound scientific approach could have brought indisputable results there.
- The third concern is about **using only one criterion to perform the ranking for the final list of 25**. Environmental NGOs do not back an approach based only on global energy consumption, as it is too much dependant on the arbitrary choice of the groups’ boundaries and excludes other environmental aspects (which can sometimes be as relevant for ecodesign).

As a consequence, Environmental NGOs believe it is not possible to rely on pure calculations to draft the WP and one should admit that **“political choice” is involved to a certain degree** (*the consultants even noted in one of the stakeholder meetings that “politics is indeed involved” in their work*). Therefore Environmental NGOs suggest that such “political choice” favours **simplicity and pragmatism** as two main complementary drivers to establish the final WP list.

By “simplicity” and “pragmatism” Environmental NGOs mean that the WP should ideally be a tool to support and already facilitate the Ecodesign process in the next years.

Its first aim should be to specify product categories in a way to simplify the preparatory studies and drafting of efficient IMs. The lighting lots have already shown that mixing technology-based with use-based approaches could bring some confusion.

Its second aim should be to rank in priority product groups where environmental gains can be easy and substantial (i.e. where IMs will deliver). It is not worth spending time and efforts on product categories where no improvement will happen in the real life.

Detailed comments

Overview

Products considered as priorities by NGOs even if they were not put in the study 'A list':

- mobile phones & blackberries,
- gaming consoles,
- equipment for personal care (especially hair dryers),
- commercial coffee machines (together with domestic coffee machines),
- cold and hot vending machines,
- clocks & watches,
- building & public work equipment,
- signalling panels and luminous advertising,
- swimming pools (*if insufficiently covered by lots on motors*).

Proposals to reshape some of the product groups in order to facilitate the Ecodesign process:

- Groups 6-17 (food processing) replaced by 4 groups: "domestic ovens", "commercial ovens", "toasters & grills", "domestic and professional coffee machines"
- Groups 28-29 (sound & image processing) replaced by 3 groups: "portable sound & image devices", "domestic sound & image", "professional sound & image".
- Groups 39a-39b (end equipment for data use) replaced by 3 groups: "mobile phones & blackberries", "desk phones & faxes" and "calculators".

Comments

Product Groups 4 (Tool machines), 5 (Machines for personal care), 6 (food preparing equipment), 7 (clothes caring), 10 (power electronics products), 15 (refrigerating equipment), 17 (food and drink production), 22 (electric toys), 32 (textile industry), 49 (plastics industry) and 57 ("others") **seem much too broad and cover too different kinds of products**. This eclectism may jeopardize the quality of the prep. study and the possibility to draft comprehensive and efficient IMs. **These groups should be further split or treated with different lots**.

For all Product Groups about industrial equipment, a **stringent enforcement of IPPC BREFs** should be the priority. Products not already covered by BREFs could be further explored in EuP.

In Group 5, **electric hair dryers should be the priority** with a dedicated IM.

A way to further split Group 6 could be to treat domestic ovens together in one IM, commercial ovens in another sub-group, toasters and grills together. **Coffee machines is a very important product group** (because of the high energy consumption and volume of sales) and could be covered under one IM (or together with kettles), including commercial and household machines.

In Group 7, irons are very different from sewing machines; **irons should be the priority**.

In Group 8, cold vending machines are important but could be covered in existing Lot 12. **Hot vending machines should also be investigated**.

Group 16 (Lifting, moving, loading) is an **important group**, since the number of big shopping centers' escalators are increasing and most of them are still always-on.

Group 22 (electric toys) has been excluded from the final ranking on unconvincing arguments. The consultants used an average energy consumption for toys that does not apply to gaming consoles. **These consoles are expanding quickly and should be covered by an IM**.

Group 23 (clocks & watches) is a symbolic group because nearly everyone owns one and there are major concerns for the disposal of small batteries. **We do not support the consultants' decision to exclude this group** only based on rough energy consumption figures and a statement that the battery directive solves everything. Probably some easy design solutions (such as mechanical or solar-fuelled systems) could help phase out millions of highly toxic batteries here.

Group 25 (heating equipment) is very broad and the consultants assume it consumes more energy than e.g. all compressors or industrial furnaces. But no data has been provided nor has the simplified MEEuP been applied. Where do this figure come from? We also question on which basis the special Group 26 has been created out of this. The main concern about Groups 25 & 26 is the difficulty to **figure out how a limited number of IMs could cover all these apparatus**. More thinking is clearly needed here.

<p>On the contrary, Group 27 (printing equipment) is a very narrow one (and partly covered by an existing lot). Therefore it is not rationale to compare its energy consumption to one of the other very broad Groups in the list. Such a comparison should not be a valid argument to exclude these products. Moreover the semi MEEuP has apparently not been applied to this Group.</p>
<p>The splitting of Groups 28 (sound and image processing) and 29 (sound processing) looks quite artificial as many of these EuPs are doing both functions (images and music). Another way of splitting could be to create one sub-group for portable equipment working with batteries (cameras, iPod, mp3 players, portable video players, etc.), one sub-group for household sound and image processing (CD & DVD players, video projectors, Hi-fi, loudspeakers, etc.) and one sub-group for professional equipment for sound and image processing (concert halls, professional projectors, etc.).</p>
<p>Group 30 (boilers) looks strange as boilers are supposed to be already covered by Lot 1. It is also strange that this group has been put in the “B list” without any figure or data.</p>
<p>Same remark for Group 31 (generators) which has been placed in the “B list” without details.</p>
<p>There is very few data in the study about Group 32 (textile industry), its environmental impact and improvement potential. So the basis to exclude this Group remains unclear.</p>
<p>Group 33 (electronic units parts) represents an enormous amount of devices but doesn’t seem to have been considered seriously by the consultants; they just mentioned that one should rather have a “system-approach”. We don’t believe this is a valid argument to reject any ecodesign requirements on electric components, because their production phase has high environmental impacts whatever the system they are used in.</p>
<p>We consider Groups 34 & 35 (network equipment) as essential. Servers and personal equipment for internet access can still be highly inefficient and should be quickly regulated as they are always on. DSL modems could have their own IM. Reducing exposure to wireless fields should be part of this IM.</p>
<p>Group 37 (signalling & alarm equipment) should not be excluded as the Lot 6 IM on standby will probably not cover emergency systems; this would be an opportunity to fill this gap. Also with the fast increase of signalling panels and luminous advertising it would sound strange not to try to improve this sector performance.</p>
<p>Products in Group 39.a) (end equipment for data use) have very different environmental impacts, so sub-groups need to be established, i.e. one on “mobile phones & blackberries” (where increased lifetime, recyclability, reparability, use of hazardous substances, effects on health and harmonisation of battery chargers are the priorities); desk telephones might be another sub-group (with phone sets, answering machines and portable receivers).</p>
<p>Group 39.b) is very narrow, therefore there is no clear reason to separate it from 39.a), especially in the line of the proposed ranking system.</p>
<p>We would prefer Group 42 (lighting not already covered) to be included in the on-going IMs.</p>
<p>Group 43 (mowers) could probably be covered by a group on motors, since the motor is the essential source of environmental impacts.</p>
<p>Group 44 (farming machines) has been excluded by the consultants because they feel these products could be covered by other lots, but they did not clearly say where and how to ensure that.</p>
<p>The consultants have decided to exclude Group 45 (building-public works equipment) mainly because manufacturers already made efforts through voluntary schemes and standardisation. We are opposing such an argument as the main driver of the EuP process is not to reward the past but to reach BATs and least life cycle costs for consumers. Moreover the semi MEEuP has not been applied and nearly no data is provided about this Group. Further consideration is needed.</p>
<p>We consider Group 48 (cashiers and ticketing) as an interesting one as some straightforward ecodesign requirements could probably be quickly set and easy to enforce.</p>
<p>For Groups 51 to 54 (motors) it is essential to present an overarching concept and overview of the preparatory studies and related IMs. The problem is similar to the lighting sector.</p>
<p>Group 54 (large and small motors & pumps) is very important since energy performance is often worse than for average motors. We wonder how the consultants managed to assess the global energy</p>

consumption for this Group as it is very wide and diversely used.

Group 55 (swimming pools) has been excluded because parts of the components should already be covered in other lots. However we insist here on the **need to ensure that this actually happens** and exemptions are not tolerated. Swimming pool is a fast developing and highly impacting leisure equipment; stringent requirements are needed.

Group 57 seems to include all EuPs that could not be included anywhere else. **The consistency of this group is therefore questionable.**

Potentially missing products

Environmental NGOs have identified a few possible gaps in the list of products:

➤ **Automatic doors** (in offices, public buildings, shops...): they might be partly covered through lots on motors (*to be confirmed*). But there could be a specific IM for these products, promoting higher energy efficiency and low consuming sensors and standby. In particular always-on revolving doors (turning endlessly all day long) could be phased out.



➤ **Outside heaters**: these products working on gas or electricity are mushrooming (especially in countries where ban on cigarettes have been introduced in restaurants). Trying to heat the outside air in winter is an astonishing waste of energy. These products should be phased out.



➤ **Towel heaters**: the rationale of these always-on products is questionable when they are just used for heating the towel (always on 24h a day just for a 1 minute use). At least these products should have a mandatory hard off switch and a timer/standby mode.



END.