



DIGITALEUROPE



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CECED, DIGITALEUROPE, EPEE and LightingEurope Position on the revision of the Ecodesign Framework Directive

CECED, DIGITALEUROPE, EPEE and Lighting Europe welcome the fact that a preparatory study has been carried out to assess the Ecodesign Framework Directive. Nevertheless, our key conclusion is that sufficient grounds do not exist at this point to pursue a revision of the Directive.

We therefore call for the current legislative framework to be maintained, and suggest to focus on initiatives to stimulate the replacement of the installed park of old and less efficient appliances.

Please find our detailed comments as follows.

1. Costs for consumers must be kept at a minimum, while allowing room for innovation
2. It is counterproductive to propose ecodesign regulations for components in products already covered by other ecodesign measures
3. Resource efficiency requirements could only be considered if the reliable, reproducible and enforceable standards to measure them exist
4. Keep energy efficiency as the basis for regulations
5. Mandatory product registration will not solve the problem of market surveillance

1. Cost for consumers must be kept at a minimum, while allowing room for innovation

One of the founding principles of the Ecodesign Directive has been that implementing measures should have “no significant negative impact on consumers, in particular as regards the affordability” of the product (Article 15.5(c)). The Least Life Cycle Cost (LLCC) approach sets the basis for developing measures that increase the overall energy efficiency of products, while keeping the cost for consumers at a minimum and maintaining room for innovation and competition.

Diverting from the LLCC approach by applying learning curves, as suggested by some stakeholders, is risky given that it is impossible to make accurate predictions on micro and macro-economic developments. Indeed, [Eurostat argues](#) that “price levels cannot be compared over time to estimate inflation since differences in prices from one year to another may come from other reasons.” Such reasons include the emergence of internet shops – which play a role in price decrease due to lower overhead costs – currency exchange rates and increasing competition in countries that are not members of the Eurozone.

Given the multitude of uncertainties, the risk of moving beyond LLCC is disproportionate versus the potential benefits: consumers may refrain from buying more energy efficient appliances due to the unacceptably long payback times. This would be counterproductive and undermine the successful Ecodesign concept.

2. It is counterproductive to propose ecodesign regulations for components in products already covered by other ecodesign measures

We would like to draw your attention to the joint industry [position papers](#) of October 2014 on motors and fans, where we explain how multiple requirements do not necessarily lead to significant savings. In fact, extra costs are introduced with no return on the investments made.

Moreover, market surveillance on components incorporated into equipment is complex and often not possible.

On this point, the Framework Ecodesign Directive, at Art 15.2(c)(i) states that to be regulated, “the product shall present significant potential for improvement in terms of its environmental impact without entailing excessive costs, taking into account in particular: the absence of other relevant Community legislation or failure of market forces to address the issue properly”.

Double regulations also oblige manufacturers to modify the regular product re-design cycles to comply with this overlapping legislation (final product and single components). The resulting misalignment of requirements – in time and ambition – has a disruptive impact on the industry.

We therefore urge the Commission to refrain from proposing Ecodesign requirements for components incorporated into equipment that is already covered by Ecodesign requirements.

3. Resource efficiency requirements could only be considered if reliable, reproducible and enforceable standards to measure them exist

Currently, there are proposals to set requirements on resource efficiency aspects of products, including the use of materials, end-of-life requirements and durability. We would like to draw the attention of the legislator to the fact that the cost of materials in itself is already a driver for resource efficiency and a key aspect for manufacturers when designing products. Our industries have provided a significant contribution through the design and manufacture of innovative products that actively seek to reduce resource use. In addition, we have also improved end-of-life recycling techniques that enhance material recovery.

Article 15.7 of the Ecodesign Directive states that “the requirements shall be formulated so as to ensure that market surveillance authorities can verify the conformity of the product with the requirements of the implementing measure”. Therefore, in the context of resource efficiency, measurability and enforceability are key aspects that can prove very difficult to assess. It is further complicated by a lack of appropriate standards and high costs in terms of the time and effort required for testing.

In addition, several products targeted by Ecodesign have a lifetime of at least 15 years. Setting end-of-life requirements 15 years in advance would be pure speculation in view of *inter alia* future recycling technologies or material prices, and is, thus, not a basis for sound and enforceable legislation.

Finally and importantly, other regulations already address resource efficiency, such as WEEE and RoHS. Extending Ecodesign to resource efficiency bears the risk of legislative inconsistencies and unnecessary complexity which needs to be avoided in view of “better regulation”.

4. Keep energy efficiency as the basis for regulations

Today, Ecodesign requirements and energy label classes are calculated on the basis of energy efficiency, intended as the energy consumption to carry out a specific task or provide a particular service. This represents a balanced approach and should be maintained.

We see no justification in setting caps for the absolute energy consumption or to introduce malus in the calculation of energy efficiency – to prevent larger appliances from qualifying for the top classes. The choice should be left to the consumer, who buys an appliance due to its performances and features. The legislator should refrain from “overadvising” consumers in this respect.

Ideas like an artificial malus for larger appliances could be even detrimental to the effort of reducing the overall energy consumption. In some circumstances, consumers could be driven to purchase two smaller appliances rather than a larger but more efficient one – badly ranked due to an artificial malus – leading to an increase in total consumption.

5. Mandatory product registration will not solve the problem of market surveillance

In a recent [joint call to action](#), industry has outlined some key aspects for the improvement of market surveillance. It is clear that the main problems surrounding market surveillance for Ecodesign are related to a general lack of resources, a fragmented approach and a lack of information sharing between market surveillance authorities. Mandatory product registration is unlikely to solve these problems, but will add burden and complexity for all actors involved.

CECED, DIGITALEUROPE, EPEE and LightingEurope call upon the Commission, Member States and market surveillance authorities to address the points outlined in the joint call to action – for example, by making better and more efficient use of already existing frameworks and databases such as the ICSMS system.

Conclusion

Industry needs the best possible environment for industry to grow and contribute to the competitiveness of Europe, rather than adding additional burden that slows down innovation without creating significant environmental benefit. CECED, DIGITALEUROPE, EPEE and LightingEurope call for the current legislative framework to be maintained and to further complement this by focusing on initiatives that stimulate the replacement of the installed park with more-efficient appliances.

To date, Ecodesign and Energy Label have increased the offer of more efficient products, while leaving room for innovation and competition. Nevertheless, despite the availability of highly efficient appliances, the transformation of the installed appliance park is much slower than the transformation of the offer. On the other hand, the pace of efficiency gains has slowed down as technology approaches the physical limits. In particular for those product groups that have been in the regulative scope of Ecodesign and Energy Label for some time. Further efficiency improvements are possible, however, without a “technological revolution”, the steps towards this goal will be marginal, while costs for industry and consumers will increase.

About CECED

CECED is a Brussels-based association representing household appliance manufacturers in Europe. Its members, European producers and non-EU companies that have operations in the EU, cover around 90% of the European market of household appliances. The products manufactured range from large (refrigerators, washing machines), small (vacuum cleaners, coffee machines) to heating ventilation and air conditioning appliances (heaters, heat pumps). With a turnover of 35 billion euros and half a million employees, this is a major sector for the EU economy. CECED has 19 Direct Members and 26 National Associations covering 25 countries. More information about CECED is available on our website www.cec.eu

About DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 58 corporate members and 36 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

About EPEE

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies, national and international associations.

EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment.

EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market. As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. Please see our website (www.epeeglobal.org) for further information.

About LightingEurope

LightingEurope is an industry association of 30 European lighting manufacturers, national associations, and companies producing materials. LightingEurope members represent over 1,000 European companies, a majority of which are SMEs; a total workforce of over 100,000 people in Europe; and an annual turnover estimated to exceed 20 billion euros. LightingEurope is dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort, and the health and safety of consumers. More information about LightingEurope is available on our website www.lightingeurope.org