ECOS

Annual Review

2015

the green line to standards

Contents

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About ECOS

ECOS' vision is a clean and healthy environment where people live in respect of the planet and its natural resources, preserving them for future generations. Our mission is to influence the development of ambitious strategies to reduce and control sources of environmental pollution, and to promote resource and energy efficiency, environmental health and sustainable development.

To this end, ECOS defends the environmental interests in the European and international standardisation systems, especially through contributing with legal and technical expertise, to the evaluation of standardisation needs and the standards' development or revision process. ECOS particularly focuses on standards developed to support EU environmental legislation and policies. ECOS is also the environmental voice in the development of product ecological policies in the energy efficiency area.

With the support of over 40 environmental NGOs across Europe as members, ECOS is the only environmental organisation worldwide specialised in standardisation and technical product policies.

Our partnerships

ECOS is a Partner Organisation of the European Committee for Standardisation (CEN), the European Committee for Electrotechnical Standardisation (CENELEC), and a member of the European Telecommunications Standards Institute (ETSI). ECOS is also a liaison organisation to several technical bodies of the international standardisation organisations, ISO and IEC.

ECOS is officially recognised as one of the four organisations representing the weakest stakeholders in the European Standardisation System under Regulation (EU) 1025/2012. We have long term partnership agreements with the European Commission and the European Free Trade Alliance (EFTA). In this context, ECOS closely collaborates with the European organisations representing consumers, workers, and the small and medium sized enterprises in standardisation, namely ANEC, ETUC, and SBS.

Inclusiveness in Standardisation

With the increasing importance of standards in European policy-making and the global market, ECOS' endless work towards creating a more transparent and inclusive standardisation system, has never been more important. As one of the "Annex III" organisations, alongside ANEC, ETUC, and SBS, we have continued striving for a greater representation of societal and underrepresented stakeholders in the development of standards.

ECOS' views on how to improve the European Standardisation System from a societal stakeholders' perspective were well reflected in the final report of the Independent Review of the European Standardisation System (ESS), published on 25 May 2015. Building on some of these recommendations, the European Commission issued the Single Market Strategy, presenting an opportunity for ECOS to put forth its vision for the future of European standardisation. In particular, ECOS called for greater efforts to be made to support and facilitate the effective participation of societal stakeholder organisations, at both national and European levels. Further, ECOS shed light on the lack of inclusiveness in the international standardisation system which currently makes it, from our perspective, inappropriate for the development of standards in support of European laws and policies.

ECOS contributed to discussions on the proposal in the Single Market Strategy for a Joint Initiative on Standardisation and committed to engage in its development, expected to commence in January 2016.

ECOS' participation in the revision of the Vademecum on European standardisation has helped include societal and environmental perspectives in the European policy approach to standardisation, and the use of harmonised standards in legislation and policies.

In close cooperation with ANEC and ETUC, we initiated an open and constructive dialogue with CEN and CENELEC, focusing on the feasibility to create a specific category of partnership for societal stakeholders within the European Standardisation Organisations. We believe that a tailor-made partnership would provide a clear identity for civil society organisations, and allow for the allocation of appropriate rights meeting the specific needs of our organisations. Ultimately, this would enable our effective contribution in standardisation and contribute to build confidence in the system.

Climate Change and Sustainable Energy

Bioenergy

After several years of active involvement, in October 2015, ECOS welcomed the publication of international standard ISO 13065, which provides a set of sustainability criteria for bioenergy. The standard delivers a thorough framework for considering environmental, social, and economic aspects within the bioenergy supply chain, which can help guarantee its sustainability.

The standard will be useful for promoting sustainable biofuels and bioenergy, while discouraging the production of bioenergy that harms the environment and local communities.

Bio-based Products

ECOS has been participating in CEN Technical Committee (TC) 411, in the development of standards which help determine and ensure verifiable bio-based content in bio-based products and the sustainability of raw materials used, in line with the EU Resource Efficiency strategy. ECOS' work aimed to ensure the establishment of an internal EU market for sustainable bio-based products, which we consider to be a key enabling technology in the framework of the EU industrial policy, and the EU bio-economy and resource-efficiency strategy.

In 2015, ECOS successfully opposed the extension of the scope of work of CEN/TC 411 to 'Type III products'. Type III products are end-products with no physical bio-based content, but are yet produced using biomass. We believe a scope extension would have led to standards which would have posed risk of misleading information and greenwashing.

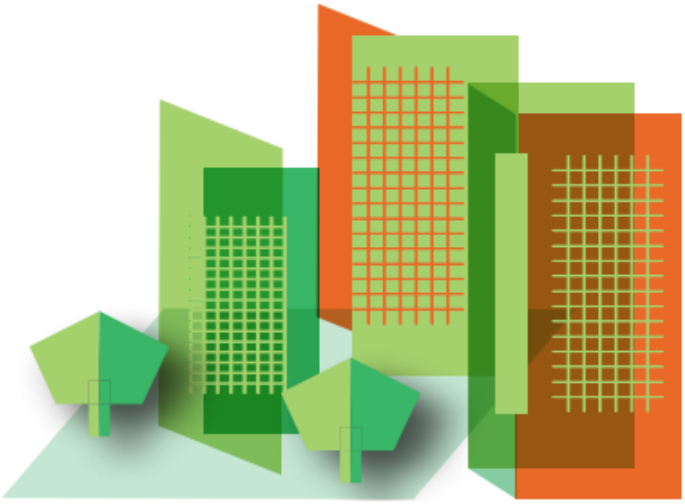
Refrigerants

The European Commission has a mandate to collect information on national codes, standards or legislation with respect to the replacement technologies using alternatives to fluorinated greenhouse gases and publish a synthesis report by the 1st of January 2017.

As a result of our long-term participation in European and international standardisation technical bodies governing the requirements of refrigerants in refrigerators, air conditioners and heat pumps, ECOS contributed to the process of highlighting obstacles to low global warming potential refrigerants in standards and identifying the possible means to address these barriers. Consequently, many of the barriers ECOS identified were captured within the preliminary findings of the European Commission survey and are expected to comprise deliverables of a Standardisation Request currently being developed by the European Commission.

Buildings

With buildings consuming roughly 40% of all global energy, energy savings and improved performance comparability of European buildings is crucial. Throughout 2015, ECOS acted as a main contributor in the development of standards to support the recast Energy Performance of Buildings Directive (EPBD), participating in seven Technical Committees and over 15 related Working Groups.



ECOS effectively contributed to the finalisation of most of the nearly 50 standardisation deliverables, helping provide realistic and pragmatic methodologies which are able to contribute to grasping the full potential of energy efficiency in different aspects of the building, including thermal performance, ventilation, lighting, heating, automation and controls.

Smart Grids and Smart Meters

Following the adoption of the Third Energy Package, a minimum of 80 % of consumers in the EU are expected to have smart meters installed on their premises, where a rollout is possible. The European Commission has recommended Member States to ensure ten minimum common functionalities for smart meters aligned with available standards, in order to fulfil the expected potential of such devices.

In an effort to understand the progress of smart meter rollout in Europe, the Steering Committee of the European Commission' Smart Grid Task Force requested a survey regarding interoperability, standards, and functionalities applied in the large scale roll out of smart metering in the EU. Considering the strong emphasis placed upon standards as the means through which these functionalities would operate, ECOS was an appointed expert in the 'Interoperability and Standardisation' Expert Group to reflect experience of standards intended to support the smart meter rollout. There, we highlighted the inadequacy of European standards to meet the aspirations of the Commission's smart meter recommendations.

As a result, the European Commission issued a recommendation to investigate the mapping of standards needed for in-home energy management across the flexibility demand standardisation architecture, and rectifying deficiencies if identified through appropriate measures to guarantee interoperability.

Electric Vehicles

Transport is responsible for a quarter of all greenhouse gas emissions in Europe and is projected to overtake the energy sector as the largest source of emissions in the near future. A core ECOS objective for the faster market uptake of electro-mobility has been the inclusion of on-board metering of electricity fixed to the electric vehicle. On-Board Metering offers a number of advantages over conventional infrastructure based metering solutions, as it reduces the Total Cost of Ownership (TCO) for electric vehicles through reduced infrastructure costs, improves transparency of energy consumption and billing for the consumer and, enables future charging solutions, such as shared conductive and inductive (wireless) charging.

In this regard, ECOS developed a technical analysis of the benefits for the inclusion of electric vehicle on-board metering for the European Commission Standardisation Request for 'Certain Measurement Instruments'. The request was to contain a number of standardisation deliverables, such as supply of electricity from energy grids to vehicles, and transfer of electricity to the grid from small-scale renewable energy sources (RES) generators. As a result of ECOS' efforts, a text to request on-board metering as a standardisation deliverable from CEN-CENELEC-ETSI was included in the final standardisation request which was accepted by the Committee on Standards, and submitted to the European Standardisation Organisations. Standardisation work is expected to begin in 2016.

Ecodesign and Energy Labelling

In 2015, eight Ecodesign and Energy Labelling measures were published in the EU Official Journal or reached the final stages of the process: Professional Cold appliances, Solid fuel boilers, Local space heaters, Solid fuel local space heaters, Central Heating and Cooling. According to the latest official figures from the European Commission and based on conservative calculations, this leads to at least 13.5 Mtoe equivalent annual savings by 2030.

Including through providing detailed written comments to preparatory studies, ECOS has contributed to the assessment of nine different product groups, laying the ground for possible regulations, giving a special attention to the development of the windows and enterprise servers measures, and the review of implementing measures for domestic appliances.

ECOS has continued co-leading the Coolproducts Campaign alongside the European Environmental Bureau (EEB), working to bring the maximum amount of energy savings possible for Europe and intensifying positive media coverage on Ecodesign and Energy Labelling policies.

Revision of the Energy Labelling Directive

The European Commission included a number of priorities put forth by ECOS and Coolproducts partners in its proposal for the revision of the Energy Labelling Directive in July 2015. In particular, the proposal foresees the establishment of a product registration database, an increase of the longevity of the label by including two top empty classes, and to ensure an effective A-G label layout. The proposal further requires strengthening the enforcement activities and addressing absolute energy consumption.

ECOS has been working to ensure that these priorities are kept, strengthened, and complemented by other priorities in the final legislation during the political negotiations between the European institutions.

Verification Tolerances for Ecodesign

Manufacturers and importers are responsible for declaring the energy efficiency of products regulated by the EU Ecodesign Directive and Energy Labelling Directive, such as TVs and domestic appliances. Authorities are responsible for testing those claims, and may apply a margin for error, or 'tolerance' when doing so, in order to allow for variations in the accuracy of their lab tests. In 2015, it came to light that companies have been taking advantage of those allowances intended for exclusive use by state authorities. ECOS and Coolproducts triggered great media action on the topic, resulting in the European Commission unlocking the file and launching an Inter-Service Consultation on a draft omnibus amendment. This was a clear impact of our work, as only days before, a Commission official had announced that the file was doomed. ECOS will keep the pressure high through 2016 so that the amendment is improved and finally gets adopted.

In parallel, ECOS has also been contributing to the work of Task Force 2 of the CEN-CENELEC Ecodesign Coordination Group, the focal point in standardisation related to Ecodesign, on uncertainties in measurement methods and verification tolerances.

Space and Water Heaters

Throughout 2015, ECOS participated in the development of standards for measuring the energy efficiency of space and water heaters. Our contribution expanded in CEN and CENELEC Technical Committees working on heaters of different types and sizes, and succeeded surfacing a number of issues and inconsistencies with the current Ecodesign regulations. Among these, the treatment of NOx emissions in gas-fired heaters, the settings and modes which heaters are tested under, the absence of a method for selecting load profiles for heaters, and also the need for clarification of the verification procedure and of the information for disassembly, recycling and disposal provide.

Lamps and Luminaires

2015 saw an increased representation of environmental interests in the standardisation of lighting, thanks to contributions made by ECOS. Our involvement helped improve the technical requirements for tungsten halogen lamps, fluorescent lamps performance specifications, LED Module performance specifications, and self-ballasted lamps.

Material Efficiency and other Horizontal Aspects of Ecodesign

Following the rejection of the first version of European Commission Standardisation Request on material efficiency for Ecodesign by the European Standardisation Organisations in November 2014, the involvement of ECOS in CEN-CENELEC Ecodesign Coordination Group Task Force 4 was instrumental in advocating for a swift progress in re-defining the Request and ensuring the most beneficial representation of environmental interests.

The revised request was published in December 2015 and accepted by CEN and CENELEC one month later. The request should lead to the development of a crucially needed set of horizontal material efficiency standards covering issues such as durability, reusability, reparability and recyclability of energy-related products, in support of the EU Circular Economy Package.

Market Surveillance

ECOS' expertise and reputation in the field of market surveillance continued developing throughout 2015. Our work on the MarketWatch project led to a publication and presentation at the European Council for an Energy Efficient Economy (ECEEE) summer study. The project findings thus far were discussed in the wider context of civil society's contributions to market surveillance. The project, which tests products for compliance to see if they are correctly labelled, both online and in stores, will release its final report in the first half of 2016.

The ComplianTV project was concluded in September 2015, providing a detailed methodological guidance to allow Market Surveillance Authorities to face the new legislative and market challenges for TVs in an effective and cost-efficient way. One key achievement was the recommendation for the legislators to consider all energy-affecting factors already within the Ecodesign Consultation Forum factors with a view to set clear legal requirements providing clear guidance to standardisers for the development of the underpinning standards.

Adding to our experience was joining the Advisory Board of the Energy Efficiency Compliant (EEPliant) project, which commenced in May 2015. EEPliant is run by Market Surveillance Authorities, developing knowledge sharing between Member states and carrying out product testing activities on LED lamps, imaging equipment, space heaters and combination heaters.

Finally, ECOS successfully applied for two Horizon 2020 projects in the field of market surveillance which are due to kick-off in 2016: the INTAS project, working on industrial and tertiary product testing and application of standards, and the Digi-label project, aimed to incorporate digital communication tools in on-product energy labels.

Resource Efficiency and Waste

Sludge Management, Biowaste and Fertilisers

ECOS' work on sludges, bio-waste and fertilisers has been driven by the ambition to maximise the use of these organic materials in order to return valuable nutrients to the land, improve soil quality as well as its carbon sequestration potential, and minimise incineration and co-incineration of sludges.

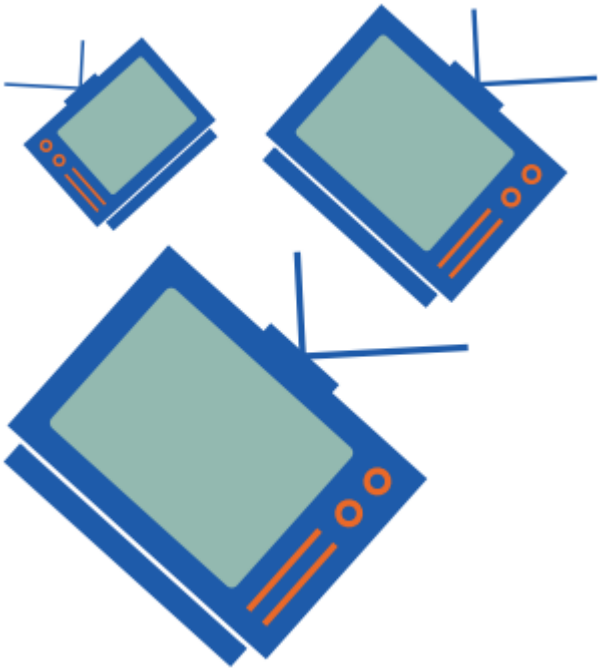
During the development of a series of standards, ECOS successfully advocated for this, laying down the groundwork for appropriate harmonised standards in support of the EU Circular Economy Action Plan, as well as the amended Fertilisers Regulation which aims to create a level-playing field between organic and mineral fertilisers in the EU market.

Environmental Health

Flame Retardants

Studies have found associations between exposure to certain flame retardants and adverse health effects. Infants and young children are the most vulnerable group, as they are acutely susceptible to neurodevelopmental toxicants and endocrine disruptors. In addition, the use of flame retardants makes recycling the casings of electronics more difficult, expensive, and in some cases, impossible. This both reduces the economic viability of recycling in developed countries and, in developing countries, harms the health of recycling workers.

ECOS, strongly supported by our national members, participated in CENELEC and IEC work to oppose the adoption of a fire-resistance clause in safety standards that would have led to an increased use of flame retardants in televisions.



In this regard, votes held on introducing so-called 'external ignition requirements' in televisions were successfully opposed in IEC/EN 60065 'Audio, video and similar electronic apparatus - Safety requirements' and IEC/EN 62368 'Audio, video and similar electronic apparatus - Safety requirements', and the proposal to upgrade IEC/EN TS 62441 to a European and international standard was rejected, ultimately extinguishing the risk of systematically including flame retardants in televisions.

Chemicals

Under the umbrella of CEN, project partners ECOS and the standards bodies of Denmark (DS), Austria (ASI), and Spain (AENOR) are working together on the development of a tailored support to help standardisers develop chemical requirements in product standards. In particular, the future CEN Guide is expected to assist them with developing standards which effectively support, and possibly go beyond, EU chemical laws and policies, thereby contributing to minimising the health and environmental impacts of chemicals in products.

ECOS and the Austrian standard body (ASI) have been co-responsible for drafting recommendations for the content of the future Guide, based on an extensive literature collection and review. The report was finalised based on the input received from the project' Stakeholder Panel, comprised of representatives of the European Commission, national standard bodies, member states, research institutes, ECHA, public authorities, industry, and NGOs.

ASI and ECOS will commence drafting the future CEN Guide in January 2016. The project will be completed in mid-2017, after which the Guide, and proposal for its effective implementation, will be submitted to CEN Technical Board for endorsement.

Nanomaterials

Together with the Center for International Environmental Law (CIEL) and German research institution Öko-Institut, ECOS published a series of factsheets and organised two public workshops on the topic of nanotechnology throughout 2015. The first workshop bridged the gap between science and policy, and the second delved into the life-cycle perspective of nanomaterials, with a particular focus on waste issues. These events allowed ECOS and partners to share expertise and experience after active involvement in standardisation and technical developments under CEN, ISO, and the OECD.

Due to great interest, both workshops were live-streamed, reaching out to an audience around the world. The events, which take place within the framework of a three-year project, have succeeded in making nanotechnology a more accessible topic for stakeholders. As a result, a 'Declaration on waste containing nanomaterials' was created to be launched in 2016.

Financial Information

Income

European Commission and EFTA	€776,797	60%
Foundations	€500,037	39%
Membership Fees	€10,170	1%
Total	**€1,287,004**	**100%**

Expenditure

Governance & Organisational Development	€11,372	1%
Office & Administration	€243,333	19%
Standardisation	€704,405	54%
Policy	€228,735	18%
Projects	€20,864	2%
Communication	€9,700	1%
Reserve	€79,965	6%
Total	**€1,287,004**	**100 %**

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Foundations (39%)
Membership Fees (1%)

Governance & Organisational Development (1%)
Office & Administration (19%)
Standardisation (54%)
Policy (18%)
Projects (2%)
Communication (1%)
Reserve (6%)

Members of ECOS

National Organisations

Austria
Umweltdachverband (UWD)

Belgium
Bond Beter Leefmilieu Vlaanderen (BBLV)

Inter-Environnement Wallonie (IEW)

Bulgaria
Institute for Ecological Modernisation (IEM)

Croatia
Society for Sustainable Development and Design (DOOR)

Cyprus
Terra Cypria – the Cyprus Conservation Foundation

Czech Republic
Zelený Kruh

Danmark
Denmarks Naturfredningsforening (DN)
Danish Ecological Council (DOR)

France
France Nature Environnement (FNE)
Zero Waste France
Women in Europe for a Common Future – France (WECF)

Germany
Friends of the Earth Germany (KNU)
Bundesverband Bürgerinitiativen Umweltschutz (BBU)
Deutscher Naturschutzring (DNR)
Nature Friends Germany (NFD)

Greece
ECOCITY

Hungary
Clean Air Action Group (CAAG)

Italy
Legambiente Onlus

Latvia
Friends of the Earth Latvia

Luxemburg
Oekozenter Pafendall

Netherlands
Stichting Natuur en Milieu (SNM)
Leefmilieu

Norway
BELLONA Norway

Poland
ClientEarth Poland
Polish Foundation for Energy Efficiency (FEWE)

Portugal
QUERCUS
ZERO

Spain
ECODES

Sweden
Swedish Society for Nature Conservation (SNF)

Switzerland
WWF Switzerland

United Kingdom
Energy Saving Trust (EST)
UK Sustainability Network for Standardisation (UK SNS)

Pan-European Organisations

European Environmental Bureau (EEB)

BELLONA Europe

Health Care Without Harm Europe (HCWH-Europe)

Health & Environment Alliance (HEAL)

RREUSE

Transport and Environment (T&E)

WWF European Policy Office (WWF-EPO)