



A vibrant Ecodesign Working Plan 2015-2017: Cornerstone to the EU's energy and resource efficiency strategy

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WHY IT MATTERS

Thanks to Ecodesign and Energy Labelling, adopted energy efficiency measures are expected to decrease Europe's energy dependence by as much as 175 million tonnes of oil equivalent annually by 2020¹, 48 percent of Europe's 2020 energy savings target. That is a staggering amount, enough to offset 219 large coal power stations (500 MW) producing the equivalent electricity, or the equivalent CO₂ from 182 million cars. An ongoing European Commission study² highlights that these energy savings could increase by 50% by 2030 and triple consumer savings. Yet occasional attacks from anti-European media outlets, resentful of policies impacting the daily life of citizens, could mothball the successful implementation of this policy. This Coolproducts briefing explains what is at risk and highlights the priority products that should be included in the Ecodesign Working Plan 2015-2017, as an essential cornerstone for the EU 2030 energy and resource efficiency strategy.

AT RISK

Setting EU-wide product standards and labelling schemes, supported by EU Member States in the June 2014 Energy Council³, is an essential and powerful tool to strengthen the EU single market, reinforce energy security, industrial competitiveness and a circular economy, instead of prompting national regulations to do the job. If ignored, the need for any environmental requirements for certain product groups could potentially result in up to 28 new and different regulations at national level, instead of a streamlined single law for the EU.

Giving in to populist media attacks against the EU setting binding efficiency standards for energy-related products poses a risk for the future of the policies. It could result in a weak or even 'empty' Ecodesign Working Plan 2015-2017, leading to a gradual phasing-out or 'exit strategy' for Ecodesign policies in the EU, a new direction that endangers significant energy saving potentials in the order of 10 Mtoe annually by 2030. This is particularly important following Eurostat's recent confirmation that the gap to achieve the EU 2020 energy saving target remains wide open⁴. Moreover, this is at odds

¹ <http://ec.europa.eu/energy/sites/ener/files/documents/Infographic%20Energy%20label.pdf>

² https://ec.europa.eu/energy/sites/ener/files/documents/2014_06_ecodesign_impact_accounting_part1.pdf

³ <http://www.consilium.europa.eu/en/meetings/tte/2014/06/13/>

⁴ <http://www.endseurope.com/39159/gap-to-2020-energy-efficiency-target-remains-wide?referrer=search>

with other world regions that are intensifying their work as international cooperation on energy efficiency of products increases⁵, while in parallel posing a risk that the EU loses its leading role compared to other similar legislation in important economies like the US, China, Japan or Australia.

It is crucial to note that products included in the Ecodesign Working plan do not necessarily equal regulation. Rather, it means the product will be assessed according to strict criteria safeguarding consumer and industrial interests that avoid unnecessary or burdensome regulation. Only after a preparatory study is finalised, a decision to regulate will be considered (or not). Disqualifying products from the Ecodesign Working Plan prevents further investigation, reducing our ability to meet efficiency and circular economy goals; goals designed to ease Europe's resource and energy weaknesses.

WHAT SHOULD THE EUROPEAN COMMISSION DO

Building on the available preliminary assessment of potential new product groups tackled by the draft preparatory study⁶, Coolproducts calls for the following product/aspects to be included as a priority in the next Ecodesign Working Plan 2015-17:

Building automation and control systems (BACS), hand dryers, lifts, PV inverters, refrigerated containers, high pressure cleaners: products destined primarily for commercial/industrial use that are not controversial, should be included. In addition, the industry federation for BACS is calling for Ecodesign regulation⁷, which could deliver strong savings without press criticism.

Gateways, base stations, wireless chargers, signage displays: the intensification of the digital society and use of connected devices, with the consequent boom in energy and resource use, as highlighted by the International Energy Agency⁸, should also spur further the investigation of these products. Uncertain energy savings potential should not be used as an argument to disqualify products early but on the contrary, inclusion will allow their in depth investigation, which should underpin future policy decisions.

Mobile phones: the material savings potential of these products is significant, according to the aforementioned preparatory study. Given that these are also vulnerable to supply shortages on rare material imports, they certainly merit further investigations in a fully-fledged follow up preparatory study for clarifying the actual improvement potential. Benefits in this area are expected to contribute to the targets set under the new Circular Economy package; it is therefore imperative they are included in the next working plan.

Kettles, hair dryers and toasters: the risk of proliferation of green claims and self declarations for these mass market products could deprive end users of valuable and trustworthy information, leaving them prey to a confusing maze of self-declaration and the type of baseless marketing hype we observe for products like showerheads today. To the contrary, end users would benefit from investigating further the need for a pro-consumer energy label only, without attracting press criticism.

⁵ <http://www.unep.org/NEWSCENTRE/default.aspx?DocumentId=2796&ArticleId=10999>

⁶ http://www.ecodesign-wp3.eu/sites/default/files/Ecodesign%20WP3_Draft%20Task%204%20Report_15102014.pdf

⁷ <http://j.mp/BACS-and-ErP>

⁸ <http://www.iea.org/etp/networkstandby>

Professional & commercial product standby and off modes: Recital 16 of the Ecodesign Directive clearly states that '*as a general principle and where appropriate, the energy consumption of energy-related products in standby or off-mode should be reduced to the minimum necessary for their proper functioning.*' without any discrimination between product types (domestic, office, professional, etc.). Yet Regulation 1275/2008 limiting standby and off mode power only covers domestic (and some office) equipment. An expansion of the scope to professional and commercial products would be necessary, and the review of the Regulation (currently under development) is supposed to look into this potential. However, it is not certain at this stage that the topic can be adequately assessed through the chosen fast-track review process, as it may require a more in-depth preparatory study. Should it be concluded that the issue deserves an independent preparatory study, the 2015-17 Working Plan should explicitly include this item in its priority list, so that the study can be launched within the next three years. The same comment applies to **energy-aware appliances** should the decision be taken not to cover them under the ongoing study on Smart Appliances (Lot 33). Finally, following the decision taken in 2014 regarding **non standard air compressors**, we also invite the European Commission to add this product group to the Working Plan 2015-17 priority list.

A horizontal approach to investigate more systematically the potential of adequate Ecodesign requirements to drive the EU's efforts towards a more circular economy. The new working plan should set a strategic focus to address **reparability and durability**⁹ of products (including availability of spare parts and instruction manuals) as well as **other design-related aspects** (e.g. **specific design-for-recycling options**¹⁰ and **tackling problematic or hazardous substances**¹¹ hindering cost effective recovery), for resource conservation and recovery of critical materials. As proposed by the preparatory study on the next Ecodesign Working Plan, this would be of paramount importance to deliver the European Commission's pledge for a more ambitious Circular Economy package, including the promotion of new business models.

In summary, given the overall track record of EU product policies so far, a failure to seize further potentials at hand would represent a clear missed opportunity for our energy, climate and foreign policy goals, for our resource efficiency policy, as well as for empowering further consumers as well as end users overall, through EU policy. **We call for the adoption of the next Ecodesign working plan 2015-17 as a key element of the EU action plan for the circular economy, taking into consideration the above elements.**

The Coolproducts for a Coolplanet coalition is a group of European non-governmental organisations working to ensure the EU Ecodesign Directive and related Energy Labelling policies are as ambitious as possible for the good of consumers, businesses and the environment.

www.coolproducts.eu

⁹ Components not glued, welded or fixed together using systems that cannot be handled with commonly available tools (e.g. no specific or proprietary screws / fixing features).

¹⁰ Marking of products containing components with high amounts and/or high concentrations of rare earth materials eases their localisation and access to separate treatment for recycling.

¹¹ <http://www.eeb.org/index.cfm/library/the-circular-economy-and-reach-an-essential-partnership/>