

Commission's Public Consultation Meeting
on the review of the Energy Labelling and Ecodesign Directives

14 October 2013, Brussels

Minutes

Opening by European Commission

Paul Hodson

- Energy Labelling Directive (ELD) and ED are examples of strong policy – saving money, driving technology.
- Ecodesign space heaters regulation was recently approved by the Regulatory Committee.
- Target of the evaluation is to enable the new Commission to act on the recommendations from the review of the Ecodesign and Energy Labelling directives.

Andras Toth

- Study on consumer understanding of the energy label is on-going, and should have results by January 2014 to feed into the larger ELD evaluation study. These will be input to the 3rd stakeholder meeting of the evaluation study (see [timeline](#)).

Presentation of the literature findings by consultants

Paul Waide and Edith Molenbroek

(see [presentation](#))

General comments from stakeholders

<p>ENEA</p>	<p>Will the study analyse the findings in the literature? Will the consultants be critical of the findings in the literature?</p> <p>Answer: Yes, the consultant will be critical of the findings in the literature. At this point the consultants are gathering the inputs which means that the statements from literature are reflected in the presentation.</p>
<p>Orgalime</p>	<p>What is the literature that is being used?</p> <p>Answer: Literature from CSES study, working papers, conference proceedings, etc. (not just peer reviewed articles)</p>

Q1 - Have the objectives of the Energy Labelling and Ecodesign Directives been met by the delegated acts and implementing measures adopted so far?

EEB	There are no objectives identified for the ELD and the ED. Is it a good idea to consider an overarching goal for ED and ELD? This would help to evaluate the effectiveness of the ED/ELD.
Belgium	Agree. Objective is relevant. Member States could have quantifiable objectives perhaps as well.
Norway	The objective of both directives is to save energy. A differentiation should be made on the product level rather than on the ED/ELD level as a whole. Separate requirements for ELD and ED are needed.
Okopol	<p>Question to the Commission: "Before asking whether objectives have been met it needs to be clarified what the objectives are, as everyone has maybe different things in mind. This question is too general, the study should focus much more."</p> <p>Answer by Commission (Paul Hodson): On the energy side, per product group, identify the appropriate level at which a minimum requirement can be set. Above that energy labelling implies defining a number of performance levels that push the market upwards in terms of energy efficiency. There are constraints on minimum level e.g. regarding affordability.</p>
NL Agency	Difficult to answer what the objective of ED/ELD is from a scientific point of view because there is no Europe without ELD/ED. No hard targets to work towards. Please do not spend too much time on answering this question as it is difficult to assess what exactly is the impact of the ED/ELD framework as a whole.
Defra	An alternative would be to define bottom-up targets i.e. per measure. It would make more sense to assess whether the potential is met rather than defining a quantitative objective upfront.
CECED	ED/ELD is an example of successful legislation. It would be good to identify an objective in terms of energy efficiency overall in the European Commission; and then assess what ED/ELD should contribute to that.
ECOS	<p>ELD does not say much about objectives, nor about how products should be labelled, principles and rules, leads to recurrent discussions and debated.</p> <p>If comparability for consumers is key, then this has consequences. We need to be sure about objectives to know about the consequences, so we would encourage deeper analysis on this issue. Once you have objectives, the next question is how to measure and evaluate.</p> <p>Lack of data makes it difficult to assess the effectiveness of the label. Additional data must be made available</p>
German consumer organisation	Clear objectives are needed for the ED and ELD. How can you suggest that "10% of the yearly savings are lost because of lack of enforcement", if we have no clear goals of the program?
CECED	Regarding the picture on the scope of the different policy programs (slide 32): There must be a coupling between the objectives and the policy instruments in the picture to avoid doublings or un-clarity.

EHI	Do we still have the same objectives of > 200.000 in sales in mind in the future? Will this still exclude tailor-made and non-standardised products after the revision?
Sweden	Principles are more important here. We should consider costs for citizens, not only for consumers. So e.g. emissions of heat pumps are not of interest to the consumer but will affect the neighbour. Don't just look at the cost for manufacturers.
ECOS	The studies must consider the costs for citizens as well. Not only look at the impacts on industry and consumers, where the focus currently lies. The consultants of the preparatory study should allocate a more significant budget to this aspect.
Eurovent	B2B activities have not been addresses well.
Independent	"In order to reduce its fossil energy consumption, Europe is rolling out renewable energy and is willing to pay the extra cost of it. As improved energy efficiency constitutes a parallel road that equally reduces fossil energy consumption, it is equally warranted to pay extra for any EE that goes beyond the private cost-optimum, namely up to the point that the extra cost per unit fossil energy saved (through EE) becomes equal to that of subsidized RE. This will result in an overall societal cost-optimal mix of both. The clause in the ED defining the requirement-level would best be reformulated so that the true overall least life cycle cost (considering the cost of RE) is used, instead of the narrow, non-optimal private cost analysis as is stipulated in the present ED."
Independent	Technical specifications should be harmonised this would remove trade barriers Answer Commission: This is on-going work. Is part of the scope of the Commission's work on this topic.
EC	Additional question: How to compare the effectiveness internationally? How to rate the effectiveness of voluntary agreements?
Defra	A number of MS are involved in international comparisons (4E, SEAD) . Both compare EU against eg Australia, N America. Answer Commission: Important, and reason for international conference. We don't do much international work because of limited resources.
Independent (Dirk van Orshoven)	"The USA and the EU have started negotiations to enhance mutual trade (TTIP). These concern both tariffs and technical obstructions. Will energy labelling and ecodesign requirements be part of the negotiation, and if so, to what extent will an harmonisation or unification of these systems on both sides of the Atlantic be strived for?" Answer Commission: Tariffs are less of an issue for obstacles. Products is an important topic. DG Trade provides info at website.
CECED	Difficult to make the comparison internationally as there are different ways of measuring product performance. What can be concluded is that the European label is leading as concluded in recent CECED work; a) A++ was the best in the world, meaning that Europe is leading b) the value to consumers must be kept in place. The steps in going up a level in terms of energy efficiency are becoming smaller

ECOS	When the label was launched it was not thought of what happens when all products are level A. Here a comparison internationally would be good on how to make the label more dynamic.
NL Agency	I'd like to echo and reinforce what Mike Walker said regarding the question by Paulo Falcioni; if you look at results we have very efficient products. Absolute energy consumption is also an issue though. Remark on 2 nd question (voluntary agreements): these are difficult to compare with mandatory requirements. In practice these are not used as substitutes. Voluntary measures are taken if there is no way to have mandatory measure. VA had their merits. For those products they are now in place. 4E has done the work on comparing between different product worldwide on EE and absolute energy consumption. These documents can be used in the evaluation study.
Okopol	Agree with NL Agency. It is difficult to assess the effectiveness of a voluntary agreement unless a theoretical binding measure is prepared for comparison.
EEB	Coolproducts campaign offers some ideas on the comparison of product energy efficiency policies worldwide. VA are supposed to perform better/quicker. However, we cannot pretend that VA have saved us time or have been less resource consuming. There is major evidence that voluntary label does not result in same market transformation. Suspicious regarding suggestion that voluntary labels should be substitute for mandatory label scheme.
ENEA	Testing methods (standards) are a key element in determining how the European requirements/labelling compare to international ones. I have a good opinion on voluntary labels. I would keep door open for VA. Not because they require less effort from EC, but as a good exercise of democracy and as an option that might work for some products better than the mandatory approach of the ecodesign.
CECED	Voluntary use of energy label before the mandatory date is something that we would like to be addressed. There would be obvious practical problems in forbidding the use before a specific date, and then require that all products are equipped with the energy label on that specific date.

Q2 - Has the current energy label been appropriate for its purpose?

Defra	<p>What is meant by legal protection of the labelling scheme?</p> <p>Answer Paul Waide: other labels borrowing the form of the energy label with e.g. the colour coding</p>
CECED	<p>Industry requires stable policy in order to make the required investments. The outcome should be a system that rewards the frontrunners, while at the same time allowing the presence in the market of a range of different categories products that can be offered to the consumers.</p> <p>EC (Paul Hudson) underlines this comment</p>
Agency NL	<p>Netherlands has always been in favour of using the ELD for industry purposes. The ELD label is the strongest of its kind and we should use this characteristic for commercial/industrial purposes. The ELD can be used for informing the decision makers in the commercial sector. On a product by product basis we should assess the ELD can be used in the commercial sector. Not because technical specialists will be blind to energy and environmental aspects, but it communicates well at board room level.</p>
IKEA	<p>Informing the consumer must be the focus of the policy. Concerns: Overload of information can be damaging. For a number of products there are several labels in place that can be confusing.</p>
German engineering association	<p>Labelling for industrial products or the extension to B2B products is not desirable. Ecodesign can be a good option in many cases. It is difficult to get data on the tailor made and specific products used in industrial applications. Furthermore the industrial client is already well informed on energy consumption and thus the pulling effect of the label would be much smaller.</p>
EHI	<p>If we cover tailor made appliances it will be difficult to assess which option is the best. The energy label must be kept simple and remain an energy efficiency label. Different policies are getting mixed up in the label. Other parameters and policy objectives should not be mixed with energy efficiency within the energy efficiency scale so that end-users identify the product actual energy efficiency and costs in terms of energy.</p>
German SME association (??)	<p>Credibility and recognisability of the system is key. A+++ harms the credibility of the system. Too many inputs into the same labelling system can be damaging for transferring the key information.</p>
Berlin (??)	<p>Re-labelling is a problem. If a product is labelled it should remain in the same class. Industry applications are not suitable for labelling (lack of info, professional users are well informed). Info on individual parameters is better presented separately. The label should focus on the key parameter energy efficiency, although some environmental parameters may be more important for specific regions, e.g. water. More info would make surveillance more complex.</p>
Orgalime	<p>Open scale has been criticized, but there were some benefits for best performers.</p>

	Hope that this will be considered in the review. Relabeling should not have to take place. B2B scope industrial products should not be included in the label: you enter area of tailor made products, < 200.000 units sold. On market surveillance: who would do this job?
Danish Energy Agency	The label should be made simple, not only for consumers, but also for enforcers. The new label should have fewer classes. We are sceptical of broadening the scope to B2B products.
Digital Europe	The energy label does not make sense for industrial products. Horizontal directives (e.g. standby) would not make sense to be labelled
EC	Labelling systems is also an issue. We label hotels, and light bulbs. Why not lighting systems?
ECOS	Why distinguish between b2b and consumers? Of course this is useful. Companies may be even more interested in info than consumers. With the increased use of IT technologies we should be careful on how info is conveyed and how to control it. Today alongside label extra info from manufacturer is provided. Manufacturers may claim their product is A+++ -20%, or include A+++ in the name of their product. Not sure if boilers and water heaters will be more efficient with a single label. We advocate a system approach.
CECED	Coherece between the Ed and the ELD is extremely important
Swedish energy agency	The energy label should be used for other types of products. It must be ensured that it continues to drive innovation in Europe.
ANEC/BEUC	3 points <ol style="list-style-type: none"> 1. Consumers could be divided in different groups depending on the level of awareness and information they seek by the label. However, what we need from an EU energy label is to be simple understandable by all consumers. 2. We need a label that does not break consumer trust! Technical complexity of product groups will always be the case but technology neutrality is also important to consumers 3. Regarding energy consumption: Although product groups become more energy efficient, benefit in terms of energy and cost savings is not always as visible for consumers. The link between energy efficiency and reducing energy consumption needs to be better addressed.
ENEA	The label should remain an energy efficiency label. Different policies are getting mixed up in the label.

Q3 - How could the rulemaking procedures for Energy Labelling and Ecodesign be improved?

Defra	What does the lisbonisation process imply for the Ecodesign Directive?
EC	<p>As of 1 January 2010 the Lisbon treaty is in force. The Treaty foresees basically two alternatives to the old comitology: delegated acts and implementing acts. In the case of delegated acts the EC may consult experts, then adopts regulation, then Parliament and Council have the opportunity to object for any reason. Implementing acts remain subject to comitology procedures and the process of the Commission submitting draft acts for submission and vote.</p> <p>If we had amended the Ecodesign in previous review we would have had to replace the existing procedure with a procedure for delegated acts. If the proposed Omnibus Legislation will pass this will automatically revise the ED so that ED regulations will be made through delegated acts.</p> <p>The question is now if implementing acts would be good alternative for ED. IS there an alternative: implementing act, to go through a committee (but the act would have to be much thinner=> more to be put in FW directive)?</p>
Defra	<p>Many Member States would welcome a convergence of the ELD and ED process.</p> <p>Answer EC: If we propose amendments to ED we must replace that with a set of rules according to Lisbon treaty. EC hopes that Omnibus Legislation will pass.</p>
Belgium	We have set up a MS expert group on ELD. We would set up a MS expert group on ED only if absolutely necessary, as no voting would be possible (just as for ELD).
ENEA	<p>It is up to MS whether to keep comitology, or to go for delegated acts. It is not impossible to keep comitology under Lisbon treaty. In any case, for labelling delegated acts do not work effectively as the previous comitology. The final decision on the value of very technical parameters and technical issues cannot be left to the Commission only with only the possibility of objection by the Council and European Parliament, as in the case of delegated acts, because the latter do not have the detailed technical knowledge of the products and of the specific conditions in each Member States, that instead is well known to Member States experts involved in the (old) comitology.</p> <p>Reaction EC: We are not trying to start a fight with the MS, and support arguments for a committee driven approach. However, we are legally bound to implement the 2010 Lisbon treaty. We fear that we lose an incredibly powerful instrument because we have to do everything through co-decision. This would be a disaster.</p>
Agency NL	To complement ENEA: the technical content is one aspect. Indeed, you do need technical input of experts. A second aspect in the delegated act procedure is: there is no committee that fixes the text. As experts you have discussion. Even if you agree on figure, the text surrounding it is not fixed. Then some lobbyist can call EC next day and change the text to affect its eventual impact. Comitology less prone

	to lobbying on high level.
EEB	<p>We have had bad experience with delegated acts. We would be more in favour of implementing acts or keeping things as they are for ED. Other issues regarding improved rulemaking:</p> <p>1) Create long term visibility. One tier does not provide certainty to investors. Some kind of templates with stages for long term requirements could be investigated.</p> <p>2) Deadlines. Could we commit to some deadline and if we do not reach that, impose more energy savings?</p> <p>3) Insufficient focus on non energy aspects: maybe we could find some provision for more robust analysis requirements? Social cost (e.g. related to air emissions) come in only at a late stage. Right now consultants' budgets are restricted, therefore de facto environmental issues are disregarded.</p>
Swedish Energy Agency	<p>What if there is no committee? Then it is just a MS meeting with an advisory role. We will not have power to decide anything. It is also difficult for MS to allocate resources to a committee that has not power, which will result in poorer advice. EC will be more and more alone. We (EC+MS) have been doing a fantastic job, but EC on its own will be more vulnerable to lobbying.</p>
Germany	<p>The legal question whether implementing acts are possible or not is important. We believe that implementing acts are possible. We agree with Swedish Energy Agency that MS in advisory role will lead to lower quality.</p>
ECOS	<p>Decision-making in the Regulatory Committee is not transparent. Minutes not public to begin with. Is there a way to force MS to be more transparent?</p>
CECED	<p>To us is important that level of expertise is kept. Exercise in democracy in the end.</p>
Belgium	<p>I agree with German colleague. Why not use implementing acts for ELD in the beginning? We will support implementing acts for ELD.</p>
France	<p>MS committees are important for France. For instance in the discussion on boilers: we don't reach agreement but we reach consensus. Committee is very important (but we will see).</p>
Orgalime	<p>rulemaking. Rules for improvement implementation level: technical advisory committee in standardisation: will not help standardisation but weaken standardisation. No parallel tracks! Standardisation needs to strengthened. Standardisation is open process.</p>
ENEA	<p>Regarding non energy aspects: very critical on what is really improvement potential in comparison to existing focus on energy efficiency. Does it meet criterion of significant improvement potential?</p>
??	<p>Impact on market surveillance: raw material product, land use. Impact on cost. Material cost is 45% of product cost (energy about 4%). This is issue. Must be freedom of competition to choose materials.</p>
??	<p>What does extension mean for safety aspects? EMC and LVD directives. Requirements in the ability to disassemble (are already there). How to enforce?</p>
??	<p>Link to substance use and energy efficiency? Link with smart grids? Link to smart appliances. If you go in direction of demand side requirements</p>
??	<p>New market surveillance package already increases cooperation between MS. Is a</p>

	way to go forward. Good
<i>Afternoon session</i>	
Agency NL	Why do we have two FW directives targeting the same products, with same definition, measurement methods? Why not one measure for a product? Much easier for both industry and market surveillance. The NL in favour of structuring it like that, although the issues is not as urgent as the comitology. Yet it would be useful to consider.
EC	We have to consider review process as an entity. Decisions should form a coherent whole. In case of expanding to non ErP, can we still have it under the same umbrella?
Defra	Regarding delays: is that because of the distinction ED and ELD, or not?
Agency NL	In general you can for those products for which both ELD and ED are developed you can consider it a single process. Not possible to attribute delays to either ED or ELD although it might be that two interacting measures might play a role. But difficult to blame one or the other.
Belgium	We have examples of delays for Lot 1 and 2 space heaters and water heaters. Agree that it is difficult to distinguish. EC delayed measure on heaters because of an issue in the ELD part. The same holds for solid fuel boilers. We agree with that Agency NL that is is difficult to put the blame on either ED or ELD.
EC	55 months of rulemaking (presented in the slide) is not an average scenario, for many elements of the process it assumes the worst case.
CECED	We have experienced delays for other products as well. Grouping of products to have substantial savings from a measure. Might be an option to group more products.
Agency NL	Unfortunately process take much longer than 55 months. Perhaps not correct because this includes 8 months for tendering preparatory studies, and 47 may be better estimate. However, products regulated this year took all much longer. Hopefully we reached a peak! Hope that revision will consider these factors, and try to decrease them. We lose savings because of delays.
ENEA	Never bargain a worse regulation for quicker regulation. We will not reach more energy savings in the end, because of bad regulation (market surveillance issues, etc.) If better regulation takes time, so be it. Heaters: problems was EC. Each problem has its own and specific justification for delay (vacuum cleaners, ...).
ECOS	If ED and ELD directives were merged would there be one act for ED and ELD? This would save some time internally. However, if they are rejected then we loose both.
Agency NL	Yes, that is a risk. But my main aim was to have a single implementing measure as preferred format.

Q4 - What are experiences to date with market surveillance and standardization related to Ecodesign and Energy Labelling?

CECED	Clarification on legislative text is often needed. Ideally, it should be so clear that there is nothing to interpret. Not always this is the case. Sometimes different readings are possible. How can the clarification on legislative text be made more transparent and visible?
EHI	We would like to have a joint understanding throughout the MS on an approach to voluntary labelling. In general, it is important to enhance further cooperation between the EC and stakeholders to prepare Q&A to market surveillance authorities. A stakeholder group closely working with the ADCO working group and the EC on FAQs could also facilitate the implementation of legislation.
ENEA	Sometimes clarity is required quicker than the ADCO process allows, as it meets once per six months. Direct contact with the experts/Commission could help the market surveillance authority. Sometimes a very stupid unclear thing prevents MSA to give a simple answer of compliance / non compliance.
EC	It is not fixed in legislation that ADCO have to meet every 6 months. It would be good to learn from product safety legislation procedures, for example, about the use they make of working parties involving industry and other stakeholders.
ENEA	We are currently just focussing on testing when talking about market surveillance, whereas testing is only the beginning. How will we address other types of non-conformity of the products? Are market surveillance entities also able to check formal compliance (i.e. documental completeness and presence of the mandatory information in booklet of instructions)?
NL Agency	What should be the requirements of the market surveillance authorities? It is left open how much effort the MS can put into market surveillance. This should be specified more concretely.
Danish Energy Agency	Put more detailed commitments for MS in Directives to improve market surveillance. As it is now, it is left pretty much open how much MS can do it.
Belgian ministry of Economy	There is a new market surveillance regulation being discussed. To which extent do we use this for ED/ELD? Answer EC: We are using this. The question is to which extent we want to add to this.
Swedish energy agency	How does the market surveillance regulation affect the ED/ELD. Make a database for sharing the data between market surveillance authorities. Robust and harmonised standards are needed to do the surveillance properly.
Belgium (Ministry of Economy)	Third party certification is not an additional area. It is complementary. When products come into market they are compliant. So no problem of additional complexity.
ENEA	Third party certification means that there are certification bodies to be

	<p>appointed by Member States, and certified laboratories and that also a mutual recognition scheme for certification could be put in place. This means that tests does not necessarily have to be done in the EU, but can also be done outside of the EU. There is confusion on what actually third party certification exactly means for those who claim its introduction for compliance assessment of products to be placed on the Community market, and about what this would imply. We first should determine what it means for MS/MSA, and only then decide if third party certification could be used.</p>
ECOS	<p>Testing can be done on a national levels, but sanctioning and enforcement should be done EU-wide. The Commission should decide on this, not the MS.</p>
EHI	<p>Third party certification is a tool for compliance assessment to support market surveillance authorities' work.</p>
CECED	<p>For us market surveillance is fundamental for a fair market. We started a number of projects pro-actively, showing it is possible to do Market Surveillance with limited budget. Encourage study team to look at Athlete I and II, there are answers given to the questions in presentation. Regarding third party certification: the study needs to distinguish between what is needed to place a product on the market and market surveillance. These are different things.</p>
Belgium (Ministry of Economy)	<p>Certification and surveillance are two different but complementary things. Proportionate to the risk the market surveillance must be done. Market surveillance can be much more efficient thanks to third part certification.</p>
CECED	<p>Certified product killed two people, which shows that certified products are not perfect. Therefore market surveillance is equally needed also for products which have been third party certified. Third party certification is not a solution for market surveillance, it adds further complexity because also the laboratories need to be regularly under scrutiny.</p>
NL Agency	<p>Regarding the complexity of market surveillance: this increases if number of products increases, but is also structural due to structure in Europe. Fundamental challenge is that MSA is split up in 28 entities. Once human health is not directly affected then you see diluting effects of delegating this power to lower level. Reducing complexity would be a good objective. Two suggestions:</p> <ol style="list-style-type: none"> 1. Database with technical documentation (difficult to complete) 2. Enhance clarity on which technical documentation belongs to a product.
DGW (?)	<p>Third party certification is a good way forward to reduce the 10-25% of non-compliance.</p>
Belgium (Ministry of Economy)	<p><i>In answer to the remark of CECED.</i> Third party certification is not an additional layer of complexity. It is complementary. Basic work is to have idea of conformity. With cert. party certifies you know they are already complying because of the certification.</p>

	<p>ADCO meetings, meeting other countries, database.</p> <p>For many other directives third party certification already exists. There would be no problem with additional complexity.</p>
CECED	<p><i>In answer to the remark of Belgium</i></p> <p>We are aware that third party certification already exists. It adds complexity because you need to have a reliable network of laboratories. Agree that there is a need for information. But third party certification does not address that, no solution. Regarding a central database: we see more as ex post support than ex ante. Australia, where there is preregistration of products, there is also non-compliance (15-18%). Don't use it as panacea.</p>
Belgium (Ministry of Economy)	<p>There is a good system for accreditation in Europe. There is the possibility to implement third party verification.</p>
ANEC European Consumer Voice in Standardisation	<p>Conclusions of the consultants on standardisation are in line with ANEC views and concerns on the risk of gaps between regulation and standardisation respective timelines of standardisation as expressed in the past during the development of the Ecodesign horizontal mandate. ANEC so far focused more on the regulatory part of the process (which we find a model also for other sectors) and we will participate possibly more now via the tender for NGOs participation in collaboration with ECOS.</p> <p>We count the CEN Ecodesign Coordination group funded for the purpose of a smooth implementation of the Ecodesign mandate will help improving the standardisation. Also, the EC has issued tenders for consultants to monitor ecodesign standardisation on the Commission's behalf to be kept better informed and also for the representation of Environmental and Consumer NGOs; which ECOS is carrying out with the support of ANEC.</p>
CECED	<p>The standardisation process is not "dominated" by industry. It is a democratic process where all parts of the civil society are represented. Standards are developed to be as close as possible to real use conditions while meeting requirement of high reproducibility and repeatability. A valuable standard is the result of good compromise among these factors. It would be good to have access to have access to all references for your findings on market surveillance.</p>
ENEA	<p>Standards were initially dominated by manufacturers because initially their development was for non-regulatory purposes. However, consumer organisations and energy agencies are now more and more on board. There is a tendency of models to perform well in standard conditions indeed. This is logical because that is how requirements are designed. Mind that claims reported in literature may not always be correct: if you repeat your views for a sufficient number of times and sufficiently strongly such views at some point become the truth at least from the literature review point of view.</p>
NL agency	<p>I agree that development of standards is dominated by manufacturers, but in many cases this is not a problem. Standardization work is democratic. When moving from technical realm to policy it is logical that a manufacturer would aim to move to standards that he could comply with.</p>

	<p>Practically it is not feasible to test all programs. You pick the programs that are most used. However we have seen examples of washing machines where long washing cycles are used as a way to improve energy efficiency! In review of product specific regulations these aspects should be looked at, but I doubt if this is a standardization issue.</p>
ECOS	<p>Four remarks regarding the conclusions on standardization:</p> <ol style="list-style-type: none"> 1. We need improved process to have standards in place earlier. Not just responsibility of standardizing bodies. 2. Re consumer habits: have practices been updated? 3. Standardization dominated by manufacturers - yes, but others can provide input. Difficult to challenge as they have most info. 4. Good performance in standard conditions – logical. However, regulation can be influenced by standards.
CECED	<p>Regarding the dominance of manufacturers: We frequently get the request to cover some costs. And for reasons of effectiveness sometimes we do. But at the same time, there are no obstacles for Market Surveillance Authorities to be part of the standardisation process.</p>

Q5 - How do Energy Labelling, Ecodesign and other policies interact?

Defra	The relation with the EPBD and ED can be improved.
Norwegian energy resources and water directorate	Conversion coefficient could be dealt with. Should coefficient be applied? Should it reflect increasing share of renewable energy? We made a comment on the survey questions, but this was not accepted. Can you please check why?
NL Agency	This is not the place to discuss the conversion coefficient. Conversion factors are dealt with in the Energy Efficiency Directive.
Norwegian energy resources and water directorate	Whether we use such a factor we can discuss in this evaluation. What the exact number should be ought to be reviewed in the energy efficiency directive review.
CECED	We should be discussed if primary or final energy should used.
Okopol	This discussion on the interaction of policies should be structured further by asking: a) how do they interact, and b) how should they interact? There are problems with interaction, even between ED and ELD. Just think about the empty classes below the Ecodesign minimum requirements.
EEB	In favour of putting additional emphasis of aligning the other policies with ED/ELD. E.g. Ecolabel or Green public procurement. These can also help on the inspiration for the other impacts. On the topic of recycling special attention is needed. A good direction has taken for TVs and computers. For vehicles we have an end of life regulation. We should strive for mutual reinforcement.
ENEA	What, if any, non-energy aspects would have to be included? Let's not reopen this discussion.
CECED	Like the consultant's picture of how the different policy instruments interact. Here we have an excellent opportunity to understand which topic should be addressed by which legislation. We are in favour of addressing life cycle impacts, but it is necessary to know what should be addressed where? Any new information to be added to energy label should be evaluated against the following four factors: measurability, enforceability, relevance and level playing field for all manufacturers.
Swedish energy agency	The interaction with other policy aspects should be investigated in the preparatory study. This will allow the preparatory study to borrow information from the other studies. We should not decide before the prep study what aspects to include.

Q6 - Should the scope of Energy Labelling and Ecodesign be expanded? If yes, how?

ENEA	Keep it simple and keep it workable. Opening up to all products and parameters will lead to a non-workable legislation.
Danish energy agency	When expanding to non-ERP's – who will do the work?
EEB	Non energy aspects are a priori excluded. This should be avoided. Scope expansion to non-ERP – do not exclude a priori. All that is in the scope must be measurable and enforceable
Swedish energy agency	In the analysis we should not first exclude things and then include more things like Ecolabel, GPP and so on. There probably should be some a priori exclusions, but in general a wide approach is needed. For instance for local boilers air emissions are more important.
ENEA	We need an exit strategy for products – once all significant impacts have been regulated, we need to have a way to stop EU legislation on that product and move to the next product.
EHI	The energy label should give end-users a consistent long-term signal: changing energy classes should not be done arbitrarily and without thorough market analysis to determine how the energy classes are populated in the future (an automatic energy class rating system is not appropriate). Inform consumers on empty labelling classes once prohibited (i.e. products in the lowest energy efficiency classes). Consistency with EPBD is key. The relation between the F-gas regulation and the ED could be improved.
ECOS	The extension of the scope was already covered in the 2012 CSES study. Since then not much has changed so why not reuse their work?
Belgium	ErP are still in the Ecodesign working plan. In the second stakeholder meeting on insulation materials there seemed to be convergence on not covering energy aspects.
Danish energy Agency	I heard both arguments on enlarging as well as restricting scope. You could create a directive on energy (ED-energy part and ELD), concentrating on use phase. And then we have a directive that focuses on environmental methods. Doing this, you might also be able to cut down on the number of months you need to come to legislation. Not in favour of integrating everything. Division of labour can enhance effectiveness, also in legislation.

Q7 - Other aspects (questions from participants)

Consumer association germany	<p>2 points:</p> <ol style="list-style-type: none"> 1. We advise consumers on purchasing decisions and we need to explain a lot. Not as simple as needed. We prefer to have one labelling scale for every product. 2. Many old labels still exist in the market, esp for kitchen appliances. If you now introduce a new label, we may have three different labels simultaneously. Consider transition period for replacing labels.
Swedish energy agency	<p>The system is getting very complex. 30 ED and ELD regulations. Once we start doing the revisions, will there be more regulation or will it replace the existing regulations?</p> <p>Timing is also an issue. There are so many dates and deadlines, can they be streamlined?</p>
Norway	<p>I miss the representation of Norway in the ERP data collection. EFTA states should be consulted on the methodology. In MEErP statistics on MS level presented. EFTA should be included in line with Art. 99/100 in EEA (participation EFTA states in rulemaking procedures).</p> <p>Reaction EC: Probably unintended. This can be addressed in revision of methodology rather than revision of Framework.</p>
ACEA	<p>Regarding the potential extension of the scope. The Centre for Strategy & Evaluation Services concluded in their study commissioned for DG ENTR that existing legislation for passenger cars covers already the relevant Ecodesign issues. There is no need to include passenger cars under Ecodesign. There are already three studies investigating this particular enlargement of the scope. This is confusing.</p> <p>The use phase of cars is regulated in the CO2 labelling directive. Sufficient and adequate information for the vehicle customers are prescribed. Also including it in the ELD would mean double regulation.</p>
EC	<p>What will have changed in the two years between the last Ecodesign review study assessing an extension to means of transport, and the draft conclusions of this study in March 2014? The regulatory context might have changed and the market has already changed. It's not all about cars, for example electric bicycles have boomed recently, they have no environmental labelling or eco design requirements, which means that this study could investigate the possibility of including them under the Energy Labelling or Ecodesign directives.</p>
Belgium	<p>The discussion on means of transport to be included should not be limited to cars. Comparing different types of modalities in one "transport" label could be an option. (e.g. A+++ for a bicycle, A for a train, C for a car)</p>

End of meeting (17:30h)