



Linking ongoing work on the Eco- design of Energy-Using Products with development of EU Ecolabel criteria

Background report

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Executive summary

This report summarises work undertaken for Phase 1 of the study investigating if and how work conducted in support of the Energy Using Products Directive can be used to inform the development of EU Ecolabel criteria.

Phase 1 formed an assessment of the respective aims, procedures and operations of both policy instruments by comparing the respective Directive and Regulation and making informed comment on the operating principles of both.

The comparison concluded that in both cases, an evidence base of information is generated to inform development of implementing measures and criteria. Both evidence bases share similar characteristics whereby they:

- Clearly set out a product group definition,
- Are life cycle based,
- Consider the EU market in terms of sales,
- Identify differences between technologies in a product group,
- Identify best practice,
- Identify consumers as being important in the delivery of environmental improvement,
- Involve stakeholder consultation.

An important difference between the EuP and ecolabel evidence bases exists in that the latter includes items that one may not ordinarily expect an activity designed to establish priority issues to identify. Examples include the named exclusion of certain chemical substances. Of course this very much depends on what one defines a priority to be and given the wide remit that the EU ecolabel has and the operating principles of national ecolabels, is understandable.

In conclusion, it is clear that there is great similarity between the EuP and ecolabel evidence bases. Any additional demands imposed by the needs of ecolabelling in adopting the EuP evidence base can be adequately addressed by using the ecolabel's tried and tested ad-hoc working group mechanism for exploring and agreeing the sub-set of wider issues.

In conclusion, this report recommends that the Commission's project continues to Phase 2 and, working with the EuP evidence base, develops ecolabel criteria sets for six product groups and in doing so, establishes AHWG's comprising stakeholders to help inform, guide and agree the unfolding work.

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1 Introduction

Whilst the Eco-design of Energy Using Products (EuP) and the Ecolabel have different aims they nonetheless share a similar requirement – the evidence base that informs the measures and criteria developed for both policy instruments.

The European Commission (EC) has therefore commissioned a study, to identify the extent to which the evidence base gathered for an EuP product group could be used to inform Ecolabel criteria development; in other words how the Ecolabel could make best use of and secure added value from EuP activities. If the conclusions from the initial assessment are that the EuP evidence base can be used to develop Ecolabel criteria, then the second phase of the study will develop criteria proposals for six product groups.

This background report focuses on phase 1 of the study. The objective of the phase 1 assessment is to identify whether the two instruments are compatible to a sufficient degree for Ecolabel criteria to be developed from the EuP preparatory studies. This is informed by identifying the degree to which the characteristics of the two instruments are the same or different. In the latter case, comments are made on whether such differences are considered to be insuperable or whether there are options for addressing them.

If phase 2 of the project is implemented, the objective is to identify the six most suitable EuP products to be developed into Ecolabelled products. Section 3 details the methodology for prioritising these product groups, along with recommendations for which six product groups should be chosen.

2 Comparison between EuP and Ecolabel

2.1 EuP and Ecolabel

The purpose of this project is to investigate and determine whether work conducted in support of EuP studies can be used to inform the development of EU Ecolabel criteria. If so, then the study's second phase is to devise criteria proposals for six product groups using EuP information sources.

The first step in the assessment is therefore to compare and contrast the Ecolabel and EuP. Table 1 below forms a simple comparison between the EU Ecolabel Scheme and the Ecodesign of Energy Using Products Directive in terms of 10 characteristics, namely their:

- Objectives – providing background and purpose,
- Approach – describing the work undertaken, scope and issues considered,
- Product selection – factors determining the products included in the Ecolabel or EuP,
- Product definition – the extent to which a clear and bounded product definition is a requirement,
- Market data – identifying the types of information used,
- Issues covered – comment regarding the breadth of life cycle and other issues included,
- Life cycle information – identifying the types of information used,
- Test methods and standards – concerning the need or otherwise for test methods,
- Consumer information – requirements for providing information to consumers,
- Stakeholders – identifying who they are,
- Consultation method – mechanisms used to engage with stakeholders,
- Other – other important aspects

Table 1: Comparison between the EU Ecolabel Scheme and the Ecodesign of Energy Using Products Directive

Characteristic		EU Ecolabel Scheme	Eco-design of Energy Using Products Directive
1	Objective	<ol style="list-style-type: none"> 1. Governed by the Ecolabel Regulation 1980/2000 setting out the operating principles of the Scheme and the input required of Member States. 2. A voluntary scheme to promote products with reduced environmental impacts across their entire life cycle. 3. Provides consumers with accurate, non-deceptive and scientifically based product information. 4. Promotes products and services that have potential to reduce environmental impacts across the life cycle. 5. Is open to applicants worldwide who place products and services on the EU market. 	<ol style="list-style-type: none"> 6. Governed by the Ecodesign of Energy Using Products Directive 2005/32/EC. 7. The Directive recognises that EuPs are responsible for the consumption of significant amounts of natural resources in the EU and that for a given product group, there is a notable variation in the extent of their life cycle impacts. 8. Product improvement should be encouraged to reduce life cycle impacts where this improvement does not entail significant costs. 9. Energy efficiency is regarded as contributing substantially to EU greenhouse gas reduction targets. Energy saving is the most cost-effective way to increase security of supply and reduce import dependency. 10. Whilst environmental improvement generally is desirable, green house gas reduction is a priority hence the focus, at least in the near term, is upon reducing in-use energy consumption. 11. The role of consumers in securing environmental improvement is to be considered in terms of how they use an EuP if the environmental benefit of eco-design is to be maximised. 12. Directive should encourage adoption of eco-design in SMEs and very small businesses.
2	Approach	<ol style="list-style-type: none"> 1. Considers life cycle environmental impacts. 2. Records an evidence base for the product in question encompassing; sales and markets, life cycle impacts, technology variation and innovation. 3. Does this via an open process involving stakeholder 	<ol style="list-style-type: none"> 11. Considers the health, social and economic impacts of eco-design measures developed to reduce environmental impacts. 12. Considers the life cycle of an EuP and all significant environmental aspects. Extent of consideration is

		<p>consultation that includes meetings of an ad-hoc working group (AHWG).</p> <ol style="list-style-type: none"> 4. Invariably consultation leads to issues being included in the evidence base not identified from life cycle thinking. The transparency of doing so is not always clear. 5. Such issues can become onerous consuming significant amounts of AHWG and EUEB time. 6. Uses the evidence base and consultation to develop criteria addressing the impacts. 7. Taken together the criteria are set at a high level such that only 5 – 20% of products in a category can comply. 8. Final proposals progress to Inter Service Consultation. Issues identified in point 5 above can prove problematic at this point. 9. Via the Regulatory Committee, Member States vote to accept the proposals. 10. The Ecolabel Regulation is due to be revised. 	<p>proportional to their significance.</p> <ol style="list-style-type: none"> 13. Records an evidence base for the product in question encompassing; sales and markets, bill of materials, life cycle impacts, technology variation, innovation, benefits and costs. Life cycle information is obtained from a standard tool used for all EuP studies – MEEuP. 14. Does this via an open process involving stakeholder consultation. 15. Proposes measures to reduce impacts assessing their impact on the environment, consumers, manufacturers including SMEs. 16. Implementing measures shall: not affect product functioning; adversely affect health and safety; adversely affect product affordability and life-cycle cost; have no significant affect on industry's competitiveness; not impose proprietary technology; not impose excessive administrative burden on manufacturers. 17. Measures are devised taking account of national legislation. 18. EuP studies are to be readily available in the public domain. 19. Delivery of policy objectives could be by self-regulation (including voluntary agreements) or mandatory measures. 20. A working plan identifies priority products for the three years ahead. 21. Effectiveness of EuP Directive, its implementing measures and market surveillance mechanisms are to be reviewed by July 2010.
<p>3</p>	<p>Product selection for inclusion</p>	<ol style="list-style-type: none"> 1. Does not apply to food, drink, pharmaceuticals or medical devices. 2. For inclusion within the ecolabel scheme, products and services must: <ol style="list-style-type: none"> a. represent a significant volume of sales and trade within the EU, b. involve a significant environmental impacts(s), c. offer a significant opportunity for consumer choice to effect environmental improvement. d. offer a competitive advantage to businesses. 	<ol style="list-style-type: none"> 4. Does not apply to transport of goods or people. 5. Must represent a significant volume of sales/trade in EU typically >200,000 units/year. 6. Must have significant environmental impacts. 7. Must have significant potential for environmental improvement without excessive cost. 8. Product group must have an appreciable variation in environmental performance.

		<ol style="list-style-type: none"> The ecolabel cannot be awarded to substances or preparations that are classified as toxic, dangerous for the environment or mutagenic. 	
4	Product definition	<ol style="list-style-type: none"> A clear statement is devised regarding the extent and scope of the product category. The definition identifies product types excluded from the definition. 	<ol style="list-style-type: none"> An EuP is a product that in service is dependent on consuming energy for its operation or a product for the generation, transfer or measurement of energy. A clear statement is devised of the extent and scope of the product category.
5	Market data	<ol style="list-style-type: none"> A variety of data sources are used; market intelligence reports, surveys of Competent Bodies and interest groups, published reports. Aim is to identify scale of sales across the EU and to identify for example, variations between Member States in the types of product sold. Trends are identified in terms of whether the market is changing either in scale or product type. The latter may influence the proposals. 	<ol style="list-style-type: none"> A variety of data sources are used; PRODCOM statistics, market intelligence reports, published reports. Aim is to identify scale of sales across the EU and to identify for example, variations between Member States in the types of product sold. Trends are identified in terms of whether the market is changing either in scale or product type. The latter may influence the proposals.
6	Issues covered	<ol style="list-style-type: none"> Principally environmental but health aspects may be included. Criteria are devised to address the issues. 	<ol style="list-style-type: none"> Principally in-use energy consumption. Proposals for implementing measures are devised to address the energy aspects supported by a cost-benefit assessment.
7	Life cycle information	<ol style="list-style-type: none"> Process is informal. Variety of sources may be used including published LCAs, reports and past ecolabel papers to augment life cycle thinking. Requests to include other impacts may be made by consultees. 	<ol style="list-style-type: none"> Process is formal. Bill of materials (BOM) information is gathered. BOM is processed through the MEEuP life cycle tool to identify life cycle impacts.
8	Test methods and standards	<ol style="list-style-type: none"> Aim is to identify recognised European or international standards for use when testing product performance parameters. If these are not available, the fall back position is to use 	<ol style="list-style-type: none"> Uses recognised European or international standards for use when testing product performance parameters. Lack of such test methods poses a significant barrier.

		<p>national standard(s).</p> <p>3. Often criteria documents include a clause whereby applicants can use alternative test methods where their equivalence can be demonstrated to the satisfaction of the awarding Competent Body.</p>	
9	Consumer Information	<p>1. 'Information for Consumers' is an important criterion for ecolabelled products.</p> <p>2. Producers are expected to include information as required. This may be on the product label and / or include a separate information sheet in the product user manual.</p>	<p>3. Manufacturers shall in an appropriate form, provide consumers of EuPs with information that: states the role consumers can play in the sustainable use of the product; when required by an implementing measure, the product's eco-profile and the benefits of eco-design.</p>
9	Stakeholders	<p>1. Producers, retailers, consumers, environmental NGOs, trade unions, Ecolabel Competent Bodies, Member States, Commission.</p>	<p>2. Producers, retailers, consumers, environmental NGOs, trade unions, Member States, Commission.</p>
10	Consultation method	<p>1. A key principle for the ecolabel, is that its work is open and transparent. Anyone is free to engage with the process for which information is made available via the Commission's website.</p> <p>2. The Lead Competent Body and their consultant (if there is one) will form an AHWG comprising: producers, retailers, consumers, environmental NGOs, trade unions, Ecolabel Competent Bodies, Member States, Commission.</p> <p>3. AHWG will meet typically three times over an 18 month period.</p> <p>4. AHWG will discuss and help shape criteria proposals.</p> <p>5. Discussion papers and criteria proposals are circulated ahead of AHWG meetings.</p> <p>6. Consultation continues outside of the AHWG to help inform an updated proposal set.</p> <p>7. Proposals are presented and discussed at the EU EB typically on three occasions over 18 months.</p>	<p>8. The Commission needs to consult: Member States' representatives; industry; SMEs and craft industry; trade unions; traders; retailers; importers; environmental NGOs; consumer groups. These parties meet in the Consultation Forum (CF).</p> <p>9. The CF contributes to defining and reviewing implementing measures, examining effectiveness of market surveillance mechanisms and assessing voluntary agreements and self-regulation mechanisms.</p> <p>10. Assessment of voluntary agreements requires information regarding the following: openness of participation; added value, representativeness; quantified and staged objectives; involvement of civic society; monitoring and reporting; cost-effectiveness of administration; sustainability.</p>

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11	Other	<ol style="list-style-type: none">1. Product criteria are valid for between 3 to 5 years by which time an exercise to revise the criteria is undertaken.2. The shorter period is applied to products that undergo rapid development (for example TVs).	<ol style="list-style-type: none">3. EuPs awarded the EU ecolabel are deemed to comply with eco-design requirements.
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2.2 Contrast and compare discussion

Considering Table 1 from the point of view of whether EuP study information could inform the development of ecolabel criteria, the following remarks can be made.

- That products selected for EuP are selected on a very similar basis to the ecolabel's product selection. Specifically an EuP product will have significant environmental impacts associated with its use in the EU and that consumer choice and action offers a route to reducing such impacts. From this we conclude that any EuP is a potential candidate for the ecolabel scheme.
- Both policies centre around the need for an informed and well developed evidence base of life cycle, market, sales and product technology assessment information in order to inform the development of product specific proposals or measures. A further common feature is that such information is developed in an open and transparent manner with the assistance of a range of stakeholders drawn from a number of different groups. Information regarding the work is placed in the public domain and in the case of EuP, via individual websites devised specifically for each individual product group. The availability of this information is a key requisite for the ecolabel and the fact that it has been subject to stakeholder review is very positive.
- The EuP evidence base includes test methods and standards. Again this is very helpful to the ecolabel for which methods for measuring and verifying product performance is a key requirement.

There are some important points to note however that need to be taken into account if an EuP evidence base is used to inform ecolabel product proposals:

- EuP's focus is very much upon energy consumption in the use phase. This we anticipate being too limited for the ecolabel community who can be expected to require other issues to be addressed and included in ecolabel proposals, some of which will not necessarily be key life cycle issues. Examples include material specific exclusions that go beyond the Restriction of Hazardous Substances Directive's requirements.
- The extent to which Ecolabel Competent Bodies have been and are involved in EuP activities is not known but is likely to be variable. We anticipate therefore that the ecolabel CBs and other stakeholders will not necessarily accept the EuP evidence base without their scrutiny and further development.

Neither of these issues is insuperable and both we suggest are overshadowed any way by the very positive similarities between what the EuP evidence base has and what the ecolabel evidence base requires.

To address the issues above, we suggest the ecolabel applies its tried and tested approach of forming an AHWG to discuss and help steer the development of ecolabel proposals based on EuP information. So whilst initially our hope was that the adoption of an EuP evidence base might have saved the ecolabel considerable time and effort, it is clear to us that whilst resource savings are possible, that two meetings of the AHWG are likely to be required to review the EuP evidence base and to add to it those additional issues important to the ecolabel community. This would still of course amount to a saving in both time and resource.

In conclusion, we believe the Commission should progress the project to Phase 2 for which we will identify with supporting rationale six candidate EuP products for which ecolabel criteria can be devised.

3 Product Prioritisation

The project will move forward to phase 2 of the study, if the Commission agrees with the phase 1 conclusion that the two instruments are compatible for Ecolabel criteria to be developed from the EuP preparatory studies.

If phase 2 progresses then the six most suitable product groups to be taken forward and developed into Ecolabel criteria need to be selected. These can be selected from any of the products listed in Table 2 below, each of which is the subject of an EuP study past or present.

Grey shading in the table identifies those products for which a EuP project has most recently started. In other words the work is ongoing and therefore the study report is incomplete and unable to inform the work of this project.

Table 2: List of Energy-Using Products Preparatory Studies

Planning of ecodesign and labelling implementing measures under the Eco-design (2005/32/EC) and Energy Labelling (92/75/EEC) Directives
Measures planned to be adopted by the Commission in 2008
<ul style="list-style-type: none"> • Street lighting products • Office lighting products • Stand-by and off-mode losses • External power supplies • Simple set top boxes
Measures planned to be adopted by the Commission in spring 2009
<ul style="list-style-type: none"> • Domestic lighting products I (including incandescent bulbs) • Televisions
Measures to be submitted for vote in the Committee in 2008 and 2009
<ul style="list-style-type: none"> • Boilers • Water heaters • Washing machines, dishwashers • Domestic refrigeration, freezers • Commercial refrigeration • Electric motors • Circulators (originally under electric motors) • Computers • Imaging equipment • Electric pumps (originally under electric motors) • Industrial fans (originally under electric motors) • Room Air Conditioners • Domestic fans (originally under room air conditioners)
Other measures (preparatory studies finishing in 2009)
<ul style="list-style-type: none"> • Complex set top boxes • Laundry Driers • Vacuum Cleaners • Domestic lighting products II (reflector lamps and luminaries) • Solid Fuel Boilers

The methodology for selecting the proposed six product groups, as well as the results and recommendations are presented below.

3.1 Methodology

The proposed six product groups to take forward into Phase 2, were identified via a two-step methodology:

1. EuP product groups were assessed against a prioritisation matrix, made up of criteria. These were assessed in two separate matrixes:
 - o The first matrix (Table 3) is to prioritise those product group that already hold an EU Ecolabel
 - o The second matrix (Table 4) is to prioritise those product groups that do not already hold a EU Ecolabel.

The reason for the EuP product groups being assessed in two separate matrixes is for the practical reason in that it is a good opportunity for certain EU Ecolabel product group criteria sets that are close to expiry to be revised. It was agreed with the Commission that four existing product groups (i.e. products from Table 3) and two new product groups (i.e. products from Table 4) will be taken forward to the second qualitative filter.

2. The prioritised six product groups are subject to a qualitative check comprising questions designed to identify the most suitable for the Ecolabel in terms of attracting applications.

3.2 Prioritisation Matrix

Both prioritisation matrixes (Table 3 for those EuP products that already contain an EU Ecolabel and Table 4 for those products not yet containing a EU Ecolabel) are assessed using criteria. The only difference between the criteria is that Table 3 includes an additional criterion to take consideration of when the EU Ecolabel product group criteria are to expire.

Every product group is assigned a High (H), Medium (M) or Low (L) symbol depending on their performance against that criterion. These symbols are assigned a value (H = 3 points, M = 2 points, L = 1 point) and the points are totalled for each product group.

Table 3: Prioritisation matrix for product groups already holding the EU Ecolabel

Product Groups	1	2	3	4	5	Total (H=3, M=2, L=1)
	Identified as priority products in GPP studies	Already EU Energy Label	Apparent European Consumption (units)	Apparent European Consumption (value)	Product group expiry within EuP/Ecolabel project contract	
Personal computers (desktops & laptops) and computer monitors:						
<i>Personal computers - desktops</i>	H	H	L	H	H	13
<i>Personal computers - laptops</i>	H	H	L	H	H	13
<i>Computer monitors</i>	H	H	L	H	H	13
Consumer electronics: Televisions	H	H	L	M	H	12
Domestic lighting products 1	M	L	H	L	H	10
Domestic refrigeration, freezers:						
<i>Domestic refrigeration</i>	M	L	L	L	H	8
<i>Domestic freezers</i>	M	L	L	L	H	8
Domestic washing machines, dishwashers:						
<i>Domestic washing machines</i>	M	L	L	L	H	8
<i>Domestic dishwashers</i>	M	L	L	L	H	8
Electric pumps (commercial buildings, drinking water, food, agriculture)	L	H	L	L	L	7

Table 4: Prioritisation matrix for product groups not yet holding the EU Ecolabel

Product Groups	1	2	3	4	Total (H=3, M=2, L=1)
	Identified as priority products in GPP studies	Already EU Energy Label	Apparent European Consumption (units)	Apparent European Consumption (value)	
Imaging equipment: copiers, faxes, printers, scanners, multifunctional devices	H	H	L	M	9
Office lighting	M	L	H	L	7
Commercial refrigeration and freezers, including chillers, display cabinets and vending machines:					
Commercial refrigeration	M	H	L	L	7
Commercial freezers	M	H	L	L	7
(Public) street lighting	M	H	L	L	7
Battery chargers and external power supplies	L	H	M	L	7
Industrial fans (nonresidential)	L	H	L	L	6
Boilers and combi-boilers (gas.oil/electric)	M	L	L	M	6
Water heaters (gas/oil/electric)	M	L	L	M	6
Domestic fans	L	H	L	L	6
Ventilation fans (nonresidential)	L	H	L	L	6
Electric motors 1-150kW	L	H	L	L	6
Circulators in buildings	L	H	L	L	6
Stand-by and off-mode losses of EuPs	L	H	L	L	6
Simple set top boxes	L	H	L	L	6
Room air conditioners	L	L	L	L	4

1 – Identified as priority products in GPP studies

Member States are extracting greater value from the EU ecolabel by using the criteria to inform product specifications for public procurement. Therefore, this criterion identifies those products that are considered to be of highest priority for public purchasers identified from the results of several studies.

- RELIEF study
- EIPRO study
- Take-5 Consortium
- Sustainable Procurement Task Force in the UK (SPTF)
- The study areas of the Energy-using Products Directive
- ICLEI

These six studies have been chosen, as they are all European studies with the exception of the SPTF study. Whilst the SPTF study report is a result of a UK activity, it considered wider experience including European, in determining procurement priorities.

Depending on how many studies each product is identified by, determines whether it is assigned an H, M or L value:

- 0 – 1 studies = L
- 2 – 3 studies = M
- 4 – 6 studies = H

2 – Already covered by EU energy label

Broadly speaking, the take up of the EU Ecolabel is low in those product groups for which an EU Energy Label exists.

In our assessment, those product groups carrying the Energy Label are designated L and those product groups that do not are designated H.

- Yes has an Energy Label = L
- No has not got an Energy Label = H

3 – Apparent European consumption (units)

Apparent consumption is:

Apparent Consumption	=	Total units of a product manufactured in Europe	–	Exports of the product out of Europe	+	Imports of product into Europe
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Apparent consumption gives a good indication of how popular a product is within Europe. Production figures only provide data on the amount of the product manufactured within Europe, omitting the balance of imports and exports.

The apparent consumption unit values were obtained from the EuP preparatory study reports.

- Up to 500,000,000 units = L
- 500,000,001 to 1,000,000,000 = M
- 1,000,000,001 and higher = H

4 – Apparent European consumption (value)

Apparent consumption can also be measured in value of products consumed within Europe. Both units of products and value of products within Europe have been included, so that expensive items that may not sell in large quantities are considered fairly.

- Up to 4,000 million Euros = L
- 4,000 million Euros to 7,000 million Euros = M
- 7,000 million Euros and higher = H

5 – Product group expiry within EuP/Ecolabel project contract (Table 3 only)

It would be beneficially to the EU Ecolabel scheme if those product criteria sets that are close to expiry were revised during this study. Taking this into consideration a high rating has been given to those product criteria that will expiry during this EuP/Ecolabel project contract (i.e. before December 2009) and a low rating has been given to those product criteria sets that do not expiry during this project contract life time.

- Expiry after December 2009 = L
- Expiry before December 2009 = H

Box 1: Six top products from prioritisation matrixes

After stage 1 of the filter process the six product groups that are featuring highest are:

1. Personal Computers – desktop and Computer Monitors
2. Personal Computers – laptops
3. Televisions
4. Domestic refrigeration
5. Imaging equipment: Copiers, faxes, printers, scanners, multifunctional devices
6. Office lighting & domestic lighting products

Note: The above six products are made up of the four top products selected from Table 3 and the two top products selected from Table 4

3.3 Qualitative Check

We know from experience that establishing ecolabel criteria for most product groups is challenging and for some extremely difficult given the wide range of stakeholders involved and their often polarised views.

If at all possible it makes sense to avoid products where the strength of feeling is so acute that such inputs could impact the acceptance of proposals at the Regulatory Committee. The efforts and resource expended in developing the proposals would be wasted and could be used to better effect supporting a different product group.

Hence in the following section we consider some issues that may influence product selection.

- Can any difficulties be foreseen with this product group, considering the comparisons and contrast between the two schemes detailed in Table 1?

Two important issues were raised in section 2.2 that are relevant in this context. Firstly, EuP's focus is very much upon energy consumption in the use phase; it is anticipated that this will be too limited for the ecolabel community and other life cycle issues will need incorporating. Secondly, it is anticipated that the Ecolabel Competent Bodies will not necessarily accept the EuP evidence base without their scrutiny. However, both of these points will need to be addressed in every product group and do not cause a particular problem for any one product group.

- From past experience with the EU Ecolabel scheme are any of these product groups likely to incur significant issues whether technical or political?

It is reasonable to assume that any decisions about inclusion of flame retardants (halogenated FRs in general) will be a problem between the ecolabel CBs on the one hand and Commission Services and business on the other. However, the commission is looking to resolve this problem, as it is generic to a large majority of product groups and therefore by this issue being resolved the disruption to development of the above six criteria sets will be minimised.

A particular flame retardant that has been problematic when creating criteria for the ecolabel in the past has been deca-BDE. Deca-BDE will not however, pose a problem for the chosen six products as in April 2008 a European court ruling quashed a decision to exempt the brominated flame retardant from a ban in electronics manufacture under the RoHS directive.

Possibly some CBs may have issues with the principle FR used in printed circuit boards – TBBPA presently subject to an EU Risk Assessment.

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Lamps, TVs and computers all use mercury where fluorescent technology is used. Here the issue is the strict limit likely to be required by CBs and the higher limit business would prefer as came to light during the current revision to the TV criteria.

All the products use electrical cabling most if not all of which uses a PVC sheath. Whilst there is a strong undercurrent of CB opposition to the use of PVC in ecolabelled products, to date the issue has been in the background only being aired at the EUEB for the revision of the computer ecolabels.

Experience suggests the TBBPA, mercury and PVC cable issues can be resolved by discussion at the AHWG and negotiation at the EUEB.

3.4 Recommendations

The purpose of phase 1 of this project was to investigate and determine whether work conducted in support of EuP studies could be used to inform the development of EU Ecolabel criteria. On completing this assessment we believe the Commission should progress the project to Phase 2.

Although issues were highlighted between the two policy instruments, these issues were not considered insuperable and were overshadowed by the positive similarities between what the EuP evidence base has and what the ecolabel evidence base requires.

From the results of the prioritisation matrix and qualitative checks, we recommend that the following six products be taken forward to phase 2:

1. Personal Computers – desktop and Computer Monitors
2. Personal Computers – laptops
3. Televisions
4. Domestic refrigeration
5. Imaging equipment: Copiers, faxes, printers, scanners, multifunctional devices
6. Office lighting & domestic lighting products

4 Next steps

If the project progresses to phase 2, then the next steps are:

- Develop guidance documents to ensure consistency in the development of the six product proposals.
- Invitation to the EUEB and other relevant stakeholders for AHWGs (Dates booked: 14th Oct (tbc), 15th Oct, 16th Oct, 17th Oct, 11th Nov (tbc), 12th Nov, 13th Nov)
- Develop criteria proposals and supporting documentation for six products groups and send to Commission for review six weeks before 1st AHWG meetings.
- Circulate proposals and documentation to the AHWGs four weeks ahead of the AHWG meeting.



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