



EUROPEAN COMMISSION
Impact Assessment Board

Brussels,
D(2012)

Opinion

Title **DG ENER - Impact Assessment for Eco-design requirements for vacuum cleaners**

(draft version of 21 February 2012)

(A) Context

This implementing measure on eco-design of vacuum cleaners (VCs) is one of the priorities of the Action Plan on Energy Efficiency. The proposed implementing measure is based on Directive 2009/125/EC of the European Parliament and of the Council establishing a framework for the Commission, assisted by a regulatory committee to set Ecodesign requirements for energy-related products. An energy-related product, or a group of energy-related products, shall be covered by Ecodesign implementing measures, or by self-regulation (cf. criteria in Article 17), if the products represent significant sales volumes, while having a significant environmental impact and significant improvement potential (Article 15). The structure and content of an Ecodesign implementing measure is required to follow the provisions of the Ecodesign Directive (Annex VII). This impact assessment covers a proposal for ecodesign measures for vacuum cleaners.

(B) Overall assessment

The report needs to be strengthened in several important respects. First, it should better describe the existing market structure and product ranges clearly identifying upfront the vacuum cleaner categories that come within the scope of the initiative. Second, it should better explain why the environmental impacts and potential improvements for vacuum cleaners are significant enough to justify EU level intervention. Third, the report should provide further evidence for the claimed potential internal market distortions. Fourth, it should clarify the ambition of the proposed requirements particularly in comparison to the existing third country Minimum Energy Performance Standards (MEPS). Fifth, the report should more clearly explain the impact on industry competitiveness and on consumers and should include more information about how the proposed new requirements would affect third countries and on the EU's WTO obligations. Finally, the report should integrate the different views of stakeholders throughout the text.

In its written communication with the Board DG ENER accepted to revise the report in line with the recommendations of this opinion.

(C) Main recommendations for improvements

(1) Improve the problem definition. The report should provide a clearer overview in a more reader-friendly manner of the current market structure for vacuum cleaners and a market breakdown by class of energy efficiency, showing which are covered by the proposed measures. In relation to environmental impacts and potential improvements for vacuum cleaners it should demonstrate more clearly and in a more structured manner, how these criteria are met in this case and the thresholds used for determining whether vacuum cleaners should be the subject of eco-design measures. The report should address more convincingly why the problems cited, such as lack of information/awareness, affordability, will not be addressed over time by the market itself. While lack of information is cited as one of the two key problems, the report should provide more concrete evidence to support this contention (e.g. consumer surveys, consultation results). The report should also better explain why previous voluntary measures such as the EU Ecolabel scheme were not successful. It should clarify to what extent the observed shortening of technical product life for vacuum cleaners is part of the problems to be addressed in the context of this initiative.

(2) Strengthen description of options. The report should better explain why options 1, and 2 (no action, self regulation) have been discarded. Option 3 (labeling only) should be assessed at least in a qualitative manner. The significance and mechanics of the tiered implementation approach should be better explained indicating clearly to which aspects of the proposed measures this applies. The level of ambition of the options should be clarified. For example, the report should clarify what share of existing products would de facto be banned by them. It should also better explain the relative stringency of the proposed measures compared to third countries' requirements.

(3) Improve the assessment of impacts. The report should assess the impact on administrative burden including the costs for enterprises to amend the information put on the labelling and the setting up of product information websites. The report should better explain how the costs and benefits (reduced CO₂, reduced energy consumption, increased affordability, etc.) associated with each of the options are calculated. It should also better present the impacts in terms of current vacuum cleaner models which may have to be removed from the market as a consequence of the imposition of new requirements, including the impact on consumers (existing stocks, lack of low price alternatives) and industry players including SMEs (manufacturers, retailers etc.). The report should also include a more detailed overview of the role of third countries: both major export and import destinations should be specified, and a more explicit and comprehensive comparison between the proposed EU requirements and those existing in these countries, and the impact of policy options on exports and imports should be given. The potential impact on competitiveness of EU industry sectors should be assessed in greater depth. An assessment of the effect on the EU's WTO obligations should be included.

(4) Be more specific on the evaluation arrangements and the results of the stakeholder consultation. The arrangements for monitoring and evaluation should be fully elaborated and the report should clarify what indicators will be used to measure progress in implementation of the proposed measures. The different stakeholder views should be integrated more systematically throughout the report.

Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.

(D) Procedure and presentation

An additional effort should be made to make the text more accessible to a non-expert reader. A list explaining abbreviations and frequently used technical terms could facilitate understanding. Some sections of the text should be re-written in plainer language. The Executive Summary should be revised in line with the requirements of the Impact Assessment Guidelines.

(E) IAB scrutiny process

Reference number	ENER 2011/ENER/015
External expertise used	No
Date of IAB meeting	14 March 2012 (Written Procedure)