



EUROPEAN COMMISSION  
Impact Assessment Board

Brussels,  
D(2010)

21 MAI 2010

## Opinion

### Title

**Impact Assessment on a Commission Regulation implementing Directive 2009/125/EC with regard to eco-design requirements for computers, servers and displays**

**(draft version of 27 April 2010)**

### **(A) Context**

The proposed eco-design implementing regulation is based on the Directive 2009/125/EC of the European Parliament and of the Council establishing a framework for the Commission to set eco-design requirements for energy-related products.

The Directive establishes both conditions for when a product/group of products should be covered by an implementing measure, such as sales volume and potential for improvement, as well as sets out a number of conditions that an implementing measure needs to take into account, such as product functionality or impact on business competitiveness.

### **(B) Overall assessment**

**Given the fact that 70% of the equipment is expected to conform to the desired standards in the business as usual scenario, the impact assessment needs to demonstrate more clearly the value added of adopting regulatory standards for computers and displays. The costs and benefits of the proposed measure should be presented more rigorously and transparently, and should be complemented by a fuller discussion of the expected impacts on SMEs. The report should discuss in more depth why self-regulation, or a labelling option for displays only, are not considered to be feasible.**

**The IAB invites DG ENER to resubmit a new version of the IA report, on which the IAB will issue a new opinion.**

### **(C) Main recommendations for improvements**

**(1) The impact assessment needs to demonstrate better the value added of a regulatory measure setting minimum standards for computers and displays. Given the fact that 70% of the equipment to be covered is expected to conform to the desired**

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standards without any new policy initiative, the value added of a regulatory measure needs to be established more clearly. Possible benefits in terms of electricity savings or avoided CO<sub>2</sub> emissions should be compared to the business as usual scenario that takes into account existing measures and voluntary initiatives, rather than to a scenario which assumes no policy at all. The impact assessment should include a fuller analysis of the market, with a more detailed description of the type of producers which already meet the desired standards (distinguishing between large manufacturers and SMEs).

**(2) The IA should examine a broader range of policy options.** The IA should analyse more fully the option of self-regulation, and explain why it is not considered to be feasible. The IA should also consider an option of adopting an EU (A-G) label for displays that would be in line with the eco-design product requirements for TVs. Additionally, the IA should make clear in the main body of the text which equipment is covered by which option (thin clients, workstations, small-scale servers and servers), and provide information about ongoing work, e.g. on servers, and possible further policy initiatives for this sector. The IA should also explain how the minimum requirements will be updated over time, given the high innovation rate in the sector.

**(3) The IA needs to present the results of the cost-benefit analysis with greater clarity.** The report should explain more clearly how the range established for the potential energy efficiency improvement (30-50%) relates to the least cost life cycle approach set out in the Directive, and how in turn this is linked to the ambition levels presented under the policy sub-options. The IA should also provide information on how energy efficiency requirements foreseen for this implementing measure correspond to the Energy Star (4.0, 5.0) requirements and Eco-label standards.

**(4) The IA should provide more analysis of potential impacts on small and medium sized enterprises.** The report should clarify whether the proposed measures will have any significant impact on the current market structure, and on the competitiveness of SMEs.

#### **(D) Procedure and presentation**

The presentation of the options should be more succinct, and the elements of assessment (such as Tables 1, 2 and 3) should be moved to and consolidated with the section on the analysis of impacts. The IA should include a summary table, in which all quantified impacts are presented side by side, and compared to business as usual scenario rather than to the no-policy scenario as is currently the case.

#### **(E) IAB scrutiny process**

Reference number	2010/ENER+/004 (catalogue)
External expertise used	No
Date of IAB meeting	19 May 2010