



EUROPEAN COMMISSION
Impact Assessment Board

Brussels,
D(2012)

Opinion

Title **DG ENER - Impact Assessment on a proposal for a Commission Regulation implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to Ecodesign requirements for domestic cooking appliances (hobs, ovens and range hoods)**
(draft version of 21 November 2012)*

(A) Context

Domestic cooking appliances (range hoods and electric and gas hobs and ovens) are mass market energy related products covered by the Ecodesign Directive 2009/125/EC and the Energy Labelling Directive 2010/30/EC. The Directives lay down a framework for the Commission (for ecodesign assisted by a Regulatory Committee) to set eco-design and energy labelling requirements for energy-related products. These measures are an important instrument for the policy objectives under the Resource-efficient Europe - Flagship Initiative and the Energy 2020 strategy paper. In the Commission's Energy Efficiency Plan 2011 ecodesign measures and energy labelling play an important role. Domestic appliances, including cooking appliances, are listed as priority products in Directive 2009/125/EC. The product scope would address the most important categories in terms of sales and environmental impact.

(B) Overall assessment

The report should be improved in a number of respects. Firstly, it should better clarify the scope of this initiative and describe the market structure and market players for domestic cooking appliances, including the role of SMEs. Secondly, the report should present a more specific and operational set of policy objectives and define appropriate progress indicators. It should then present a clearer intervention logic by linking the revised objectives more closely to identified problems and options. Thirdly, the report should better describe the content and practical implementation of each policy option. It should better explain why most of the options were discarded without further analysis. Fourthly, the report should provide a better assessment of the impacts on market players (e.g. arising from product removal), consumers/retail prices, sector competitiveness, administrative burden and SMEs/ micro-enterprises (including retailers). It should better summarise the economic, environmental and social impacts and compare the options in terms of effectiveness, efficiency and coherence.

In their written communication with the Board DG ENER accepted to amend the report along the lines of these recommendations.

* Note that this opinion concerns a draft impact assessment report which may differ from the one adopted

(C) Main recommendations for improvements

(1) Clarify the scope and describe the market structure. The report should clarify the scope of the proposal and explain why certain products are excluded. It should provide a more detailed description of the market structure and market players for domestic cooking appliances, including manufacturers, retailers and suppliers. It should provide a clear profile of the SMEs operating within the sector (number/proportion and their role within the market). The report should also present a breakdown of energy performance per device class and use this information to show the proportion of products which would be removed from the market.

(2) Better define objectives and progress indicators. The report should elaborate specific and operational objectives describing in more detail what is intended to be achieved by this particular initiative, for example, including target ranges for energy savings and related CO₂ emission reductions. It should also provide a clear timeline for achieving these objectives. The report should clarify what indicators will be used to measure progress in the implementation of the proposed measures. It should link the revised objectives more closely to identified problems (market and regulatory failures), options and corresponding monitoring indicators to establish a fully coherent intervention logic.

(3) Better present the options. The report should describe in greater detail and in more operational terms the content and practical implementation of each policy option. It should clarify exact requirements and mechanics of the tiered implementation approach. The report should better explain why most of the options were discarded without further analysis. Furthermore, the choice and the level of ambition of the sub-options should be made clearer, for instance, by providing a share or type of products that would be de facto banned.

(4) Better assess impacts upon SMEs, consumers, sector competitiveness and administrative burden. The report should explicitly assess if ecodesign implementing measures under each (sub-) option meet the requirements in Article 15 of the Ecodesign Directive. It should assess the impacts of some of the discarded options (in particular, eco-design only and energy labelling only) and describe their impacts in terms of energy consumption and related CO₂ emissions. The report should analyse in more detail the impact on consumers, in particular with regard to consumer prices and explain to what extent these can be off-set by expected energy savings. It should strengthen the analysis of impacts on industry competitiveness, or at least indicate how the missing data to allow quantitative analysis will be collected for the future review of these measures. The report should assess the administrative burden related to the introduction of a label and the cost of testing (as opposed to compliance costs) coming from the proposed measures. It should deepen the analysis of impacts of the proposed measures on SMEs and micro-enterprises, describe in detail the views of SMEs expressed during the stakeholder consultation and if needed analyse options with mitigating measures. The report should assess the relationship between the impacts of the various options and other climate change policies. It should clarify the data sources and collection methodology, as well as underlying assumptions and uncertainties. Finally, the report should better summarise the economic, environmental and social impacts and compare the options in terms of effectiveness, efficiency and coherence.

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

The report should provide a list of abbreviations and explain key specialist terms in the text in order to make it more accessible for the reader. It should clearly distinguish between presentation of objectives, description of options and assessment of impacts in the text. The executive summary should be revised in order to meet the standards required in the IA Guidelines.

(E) IAB scrutiny process

Reference number	2013/ENER/007
External expertise used	No
Date of IAB meeting	18 December 2012 (Written Procedure)