

to the industry self-regulation proposal.

(2) Better explain the assumptions underlying the estimated impacts and strengthen the assessment of impacts on costs. To support the choice between the alternative options proposed, the report should attempt to quantify (aggregate) costs or better explain why this may not be possible. Given that cost savings for end-users are one of the specific objectives, the report should provide a stronger analysis of how this would be achieved. In so doing, the report should better explain, or qualify, the cost figures presented (e.g. 8€ savings for end-users vs. estimated costs of 40€ per unit) and clarify the assumptions on cost-induced price changes. The report should also clarify and better justify other key assumptions (sale trends, product innovation, energy prices, stringent eco-design requirements limiting innovation etc.). It should also briefly discuss whether or not changes in these assumptions would significantly affect results. Finally, the report should better explain the factors underlying the estimated effectiveness of labelling for game consoles since this could be seen as highly counter-intuitive given the marginal influence of energy efficiency in buyers' choices. The report should also assess whether there could be any significant indirect environmental impacts.

(3) Improve the comparison of the options. The report should align the content of the comparison table with the preceding impact analysis, particularly for the case of game consoles. Specifically it should explain why the medium term environmental impact of options 2 to 4 are considered equivalent and why the costs for the industry of labelling and self-regulation would be comparable. The efficiency ranking between options also needs to be better justified or modified (e. g. option 3 delivers the same as option 4 at a higher costs but is ranked as efficient; option 2 delivers less than option 4 at arguably the same cost but is ranked as more efficient).

(4) Further clarify what would constitute an acceptable voluntary agreement and how it would be agreed. Against the background of the current industry proposal, the envisaged launch of new game consoles in the near future, Annex VIII of the "Ecodesign" Directive and any other relevant guidance, the report should more clearly set out the changes required in the current industry self-regulation proposal and how these would be agreed.

(5) Better present stakeholder views. The report should better differentiate stakeholders' views and integrate them throughout the report. In particular, the report should include the views of Member States and consumers/consumers organisations and make them more visible throughout the report in relation to all key elements.

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

"IA studies" should be referred to as "preparatory studies" to avoid any confusion. Their executive summaries should be included in the annexes. The two-page summary should be integrated into the IA report directly after the table of contents. Template instructions should be removed.

(E) IAB scrutiny process

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|-------------------------|-----------------------------------|
| Reference number | 2012/ENTR/028 |
| External expertise used | No |
| Date of IAB meeting | Written procedure (24 April 2013) |