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Evaluation of the Ecodesign Directive (2009/125/EC) First Findings Report

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Summary

SUMMARY

A. Introduction

The objective of the First Findings Report is to present the initial analysis of the evidence collected during the field work conducted by CSES and its partners in the evaluation study of the Ecodesign Directive (2009/125/EC). It is also intended to serve as the reference document for the discussion during the second stakeholders' meeting that is planned to take place on 5th October 2011.

B. Methodology of the evaluation

The methodology chosen to evaluate the Ecodesign Directive is based on the key evaluation issues, which include the relevance, coherence, effectiveness, efficiency, utility, sustainability and European added value of the Directive and its Implementing Measures. A description of the Directive's Intervention Logic illustrated the expected linkages between the identified needs and broader policy goals and the more specific operational objectives of the Directive (the methodology for setting requirements, the mechanisms for ensuring conformity) the Implementing Measures themselves and the actions on the ground of the key actors.

Research tools

An important part of the analysis is based on the feedback provided by stakeholders in a variety of ways: through an online survey launched at the beginning of April 2011, a parallel interview programme and Stakeholder Meetings. During the first stakeholders meeting, on 10th May 2011, stakeholders provided valuable feedback and information. An important function of the second Stakeholder Meeting will be to validate the observations of stakeholders set out in the Report.

C. Effectiveness of the Ecodesign Directive and Implementing Measures

Analysis of evidence in relation to Energy using Products covered by Implementing Measures

This report presents a detailed review of product groups covered by the Directive based on the evidence in relation to the 11 Implementing Measures in force by the end of 2010. The work conducted so far has focused on defining the baseline and the possible benchmarks against which to assess the progress that has been made. The table below presents the findings.

Table 1. EuPs products covered by Implementing Measures - Findings.

Product group (date IM into force)	Provisions and anticipated effects	Main findings so far
Standby and off-mode of EuPs (Dec-2008)	The requirements coming into force in January 2010; not be fully implemented until 2013. Annual energy savings in 2020: 35 TWh. Accumulated electricity savings by 2020: 194 TWh	Limited quantitative data cannot document a direct link between the IM and energy efficiency improvements. Qualitative data indicate increased awareness and accelerated efforts to increase efficiency
Circulators in buildings (July 2009)	First requirements will enter in force Jan- 2013, second in Aug-2015 and third Aug-2020 and will also apply to glandless circulators in newly installed heat generators or solar stations. Annual energy savings in 2020: 26.6 TWh. Accumulated electricity savings by 2020: n.d.	Improvement of energy efficiency with strong trend from C and D to A and B already in place prior to IM. Ecodesign discussions pushed for a voluntary agreement that pushed energy efficiency but not considered effective enough Planned shift from fixed speed to variable speed circulators will increase energy efficiency further.

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Product group (date IM into force)	Provisions and anticipated effects	Main findings so far
Televisions (July 2009)	First requirements introduced Aug-2010. A-G energy labelling scheme to be introduced in 2012. Annual energy savings in 2020: 28 TWh Accumulated electricity savings by 2020: 83 TWh	Significant improvement in energy efficiency per TV set has been followed in 2010 by reduced total energy consumption indicating correlation. Data available do not provide evidence of causal relation
Domestic refrigerators and freezers (July - 2009)	First stage in July 2010, Second 2012, Third 2014 Annual energy savings in 2020: 4 TWh Accumulated electricity savings by 2020: 12 TWh	Label A and A+ class product dominate the market ; Improvements probably predate IM ; No available data to assess correlation to Ecodesign or preparatory studies
Simple set top boxes (Feb 2010)	First stage Feb-2010, Second Feb -2012 Annual energy savings in 2020: 9 TWh Accumulated electricity savings by 2020: 47 TWh	Very limited data available to assess the effectiveness. The market for SSTBs is expected to peak between 2012 and 2016.
Domestic lighting (March 2009)	Six stages running from 2009 to 2016. Removal of most incandescent lamps by 2009 Annual energy savings in 2020: 87 TWh Accumulated electricity savings by 2020: 399 TWh	Indications of change that can be attributed to the IM. Direct impact on incandescent lamps had a significant market share now phased out. No information on other groups.
Battery chargers and external power supplies (April 2009)	First stage : Oct-2009, Second : Oct-2010. Annual energy savings in 2020: 9 TWh Accumulated electricity savings by 2020: no data	No data available on the effect of the Directive available.
Tertiary lightning (March 2009)	Requirements in three stages – 2010, 2012, 2017 Annual energy savings in 2020: 38.1 TWh Accumulated electricity savings until 2020: 193 TWh	No data available to assess effectiveness at this point
Electric motors 1–150 kW (July 2009)	Three stages: First June-2011. Second and third stages 2015 and 2017. Annual energy savings in 2020: 135 TWh Accumulated electricity savings until 2020: 657 TWh	No data available to assess effectiveness at this point - Energy efficiency of motors improved over time but no data after 2006. Shift from fixed speed to variable speed motors expected to improve energy efficiency
Domestic washing machines (Dec-2010)	First stage: Dec- 2011. Second: Dec-2013 Annual energy savings in 2020: 1.2 TWh Accumulated electricity savings until 2020: n.d.	Shift to more efficient products already happening. No data available at this stage to assess effect of the measure.
Domestic Dishwashers (Dec-2010)	5 stages - First stage: December 2011 last Dec-2016. Annual energy savings in 2020: 1.7-2 TWh; Accumulated electricity savings until 2020: 9TWh	Shift to more efficient products already happening. No data available at this stage to assess effect of the measure

Comparison with policies in third countries

The evaluation team has not yet conducted a systematic assessment of third country policies, but it is known that more than seventy-five countries use some form of standards and labelling programme to improve equipment efficiency outcomes. Experts have pointed out that there are small differences in the structure and relative effectiveness of these tools and most other schemes are characterised by a concentration on energy efficiency rather than a broader range of environmental objectives.

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Evidence of rebound effect

Partly due to the limited evidence on the impact of Implementing Measures at this point, the analysis of the data did not find evidence of an overall rebound effect. However there have been two cases identified related to lighting products.

Impacts on the market and industry

The feedback from stakeholders indicates that it is too early to assess the effects of the Directive on aspects such as: production costs, prices or profit margins for firms. There are very limited data available to assess industry compliance costs. In relation to prices, based on the data provided in the survey feedback, limited evidence suggests that prices of EuPs have decreased or remained stable. The study has not identified any evidence of adverse effects on importers. There are certain comments suggesting difficulty for non-EU producers and their importers in following the requirements and procedures of the Directive, but these are not seen to be different from those applying for European firms.

Impact on innovation

The responses of stakeholder suggest a generally positive role for the Directive as an incentive for innovation. The main contribution of the Directive and the relevant Implementing Measures is that they provide the necessary framework conditions, a clear timetable and legal certainty and this all supports the operation of a competitive market and favours the development of innovation.

However, the delays in the development of the Implementing Measures for some products can cause long periods of uncertainty and, in some cases, delays in investment in new technologies. More important though, there is criticism coming from certain stakeholder groups that the requirements are not ambitious enough and, with the delays in the development of the Measures, do not take into account current technological developments.

There are diverging views on the extent that the Directive should aim beyond the elimination of the least efficient products and the adoption of already existing technologies. The Energy Labelling Directive, the European and the national eco-label schemes and other market-pull tools are considered to be more relevant in that respect. Developments in product technologies are seen to be a result of energy labelling rather than the Ecodesign measures.

Role of advanced benchmarks

The evidence available suggests that, with very few exceptions, the advanced benchmarks defined in the Implementing Measures are not yet used by authorities to set performance standards in public procurement. Their role in setting a longer term perspective appears to be rather limited.

Impact on the competitiveness of European industry

Overall, the data available do not allow for any definite conclusions on the impact of the Directive and the Implementing Measures on the competitiveness of industry. Other factors, including normal market pressures for more efficient products and the emergence of new technologies, are seen to have a more prominent role.

Global impacts

There is no evidence available at this stage that would confirm effects from the Directive on third countries, even though a number of manufacturers have indicated that they have tried to 'impose' European standards on other markets. What can be substantiated is the tendency for regulators in a number of third countries to adopt minimum energy performance standards where, in certain cases, the Ecodesign approach has served as a benchmark.

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D. Efficiency, Implementation procedures and market surveillance

Process for determining the products to be covered by the Directive

The on-line survey of stakeholders provided some initial evidence on a series of matters relating the question of the effectiveness and efficiency of the procedures associated with the Directive. In relation to the question on the adequacy of the criteria set by the Directive for the identification and coverage of significant environmental parameters, 52% considered them adequate or very adequate while around 20% considered them inadequate. The general framework, its objectives and its processes are thought to have been well formulated and operate well as far as they go. But, the individual comments suggest certain problems with the actual use of the criteria. In practice the selection process is unclear and there are issues with the use of PRODCOM-. The definition of the product scope is an issue and also the changes that are evident over the period from the Working Plan to the determination of the final product requirements. In relation to the environmental parameters, there is criticism - that needs clarification - that the focus tends to be only on energy consumption during the use phase, to the neglect of other environmental considerations. Overall, however, a number of stakeholders believe that the legislative approach under the Directive is bringing results more quickly than 'ordinary' approaches. An important issue remains the argument for a systems or performance-based approach. In this context, certain products have already been included in other pieces of regulation, such as the Energy Performance of Buildings Directive, which are thought to be more favourable to the concept of overall system performance.

The Development of Implementing Measures

According to the information provided, from the remaining products in the initial list, 9 remain in the consultation phase, where a preparatory study has been completed but no working document has been published. For one product in the list (complex set-top boxes) a voluntary agreement has been accepted¹. The extent of resources available to the Commission clearly poses a major constraint at various points in the implementation of the Directive.

Working Plan

The process of determining the requirements is thought to be too long. Furthermore, a number of stakeholders remark that as the programme of the Working Plan is followed through, it is increasingly moving into markets where there are more suppliers and where more of these are SMEs. More extensive work at the Working Plan and Preparatory Study stage could save resources for all concerned at later stages. The expansion of the Working Plan to cover energy related products before the corresponding methodology has been adopted is problematic.

Preparatory Studies

There should be a more rigorous check that the selection criteria specified in the Directive relate to the specific products considered in the Preparatory Studies, as well as the product groups considered in the Working Plan. Ecodesign Directive requirements should always remain technology neutral in order not to promote one technology against another and inhibit innovation. Lack of financial and human resources and of detailed technical expertise to follow-up and carry out the studies are real challenges that hamper the delivery of robust studies. Larger studies should be organised or groups of studies, involving experts that are really familiar with each of the products under consideration.

Consultation Forum

Some question the way that representation at the Consultation Forum is determined. The Consultation Forum focuses on the content of Implementing Measures, and does not consider such questions as

¹ http://www.eceee.org/Eco_design/products/complex_set_top_boxes/Recommendations_Feb2011

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whether a regulation is necessary at all. There is usually very little time to react when the final proposal is presented.

Regulatory Committee & the Final Provisions of the Implementing Measures

The way the impact assessment is conducted is not transparent and impact assessments should feature much earlier in the process and accompany each stage. There was also an appeal for better information provision.

The MEEuP methodology

The MEEuP methodology is based on a life cycle approach aiming to assess the broad range of environmental impacts of products in the different phases of the products' life cycle and has been built with a clear focus on energy using products.

Despite criticism from a group of stakeholders of some details of the MEEuP methodology, the overall picture is that the MEEuP has served well the development of the relevant requirements in relation to the EuPs. The main criticism made by some stakeholders is that it cannot adequately handle other environmental aspects besides energy and that it tends to put greater weight on the use phase but it is generally recognised that, as far as EuPs are concerned, energy use is indeed the key environmental aspect. Despite deviations from a more thorough LCA approach, the MEEuP is considered practical and there was no evidence provided that the use of the MEEuP has led to any missed opportunities in relation to key environmental impacts. A review of the methodology is currently ongoing aiming to introduce changes necessary to fit better to the characteristics and needs of energy-related products.

Products and Product Systems

The comments received have mainly highlighted the problems faced by producers with existing or future Regulations, rather than suggesting any potential resolution, other than the need to look at systems such as buildings rather than individual products. Reliance on the Energy Performance in Buildings Directive has been suggested in the case of construction materials, but there have also been remarks about problems with this approach arising from differences in implementation across the EU. Conclusions arising from the work on the revision of the MEEuP methodology are going to be an important contribution (to be made available before next Stakeholders Meeting).

Conformity assessment and role of standards

The feedback provided by stakeholders indicates that there are problems arising from ambiguities in relation to some requirements in Implementing Measures, especially when it is not possible to refer to an existing standard. Some suggest a solution in making the Ecodesign Directive closer to the processes used for new Approach Directives, with a greater use of standards. Most stakeholders believe that there are important gaps in most categories of product (nearly all with the exception of motors, fans) and that the standards development process is quite slow. The transitional arrangements that have been used on a number of occasions have been helpful but not ideal and cannot replace standards. The process of standards development needs to start earlier be better integrated with preparatory studies. There is a need for greater coordination of the standardisation bodies with the IEC, where the international standards are developed. The assessment of environmental (or wider sustainability) characteristics of products is missing in the development of the technical standards.

Market surveillance and enforcement of the Directive

Generally, it is clear from the response to the survey and from a range of interviews that most stakeholders believe that there is a compliance problem. Many refer to anecdotal evidence that suggests that there are non-compliant goods on the market, especially as imports from outside of the EU. The feedback provided in the consultation on the Action Plan on Energy Efficiency in 2009 had suggested that market surveillance in

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some Member States is a significant weakness and this earlier observation was supported by the evidence from the stakeholders' survey. Studies cited in the report, including, for instance, recent work by the UK's National Measurement Office, support the view that although the situation may be improving, there are still problems in compliance with Ecodesign and energy labelling requirements. The Stakeholder Meeting, interviews and written comments in the survey all indicate a general agreement that still more could be done to improve surveillance and enforcement, without necessarily involving significant additional expenditure. Suggestions for improvements include registration, sharing investigation results, establishing information requirements and penalties for non-compliance, engagement of industry and consumers and facilitating compliance. Some of the suggested developments are already under way through the ADCO and through other initiatives.

Costs of compliance for enterprises

Compliance with the Directive and its requirements gives rise to costs for enterprises. A first type of cost arises from the need for investments in technology and the redesigning of production processes, in order to achieve compliance. In addition to production costs, the implementation of the Directive leads to administrative costs for firms and the costs of participating in the processes leading up to a decision on the nature and scope of the Implementing Measures. Most impact assessment studies referred to 'no significant administrative costs in the order of several thousand Euros'. The survey responses have provided rather limited information concerning the specific nature and extent of actual costs incurred.

The suitability of the procedures for SMEs

Costs of compliance can be much more significant for SMEs in that they represent a much higher proportion of turnover. There are also other aspects of the implementation of the Directive that particularly affect SMEs and more SMEs are becoming involved as the programme of the Working Plan moves into markets where they have a larger presence.

Role of Voluntary Agreements

So far there is no experience from the actual use of Voluntary Agreements although proposals for four products categories; complex set top boxes (CSTBs), imaging equipment, machine tools and medical imaging equipment, are in different stages of the process². Stakeholders' views differ concerning the adequacy of Voluntary Agreements in achieving the objectives of the Directive and, as it is suggested, they are appropriate only in the case of sectors and categories of products where the industry can bring together the main actors involved and guarantee large market coverage. The main issues concern the capacity of industry to monitor compliance but also a general view that they tend not be ambitious enough. On the other hand the flexibility provided, the potential time and cost savings for their development in comparison to Implementing Measures and the market monitoring structure created are the main possible advantages.

Overall cost and efficiency considerations

It has not been one of the primary objectives in this evaluation exercise to undertake a systematic analysis of the respective costs associated with the Directive, but the opportunity has been taken to gather what evidence is readily available on these fundamental issues. Provisional estimates of the cost to the Commission of implementing the Directive over the period up to the current year are at € 24.6 million, including the costs involved in the Directive's initial adoption. This is a relatively modest cost. The costs to the Member States for the period 2006-2011 are estimated to be around € 86.6 million - an average of just under € 3.2 million per Member State. The total cost per year to both Commission and Member States - on average over the five year period - is around € 19 million. It is hoped that it will be possible to obtain more

² http://www.eceee.org/Eco_design/process/Voluntary_Agreements/

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information about the costs to enterprises before the next report. Estimates of the costs to business associations and NGOs are also relatively sketchy at the moment and are likely to remain so.

It is not possible to conduct a detailed benefit analysis but according to a study by Ökopol, savings resulting from the Directive are expected to reach a total of €127 billion in 2020, or €90 billion in the case that prices remain at 2005 levels. So, although the data currently available do not allow for a straightforward assessment of the cost- effectiveness of the Directive, it is clear that the anticipated energy and cost savings arising from the Directive are of a different order from the costs involved.

E. Utility of the Directive and European added value

In relation to the issue of the harmonisation of the market, it is clear that the Ecodesign Directive and the development of Implementing Measures in the form EU-wide Regulations have helped to avoid fragmentation of the market for the EuPs already covered. The key concern is market surveillance and the enforcement of the Directive where failings undermine the effective operation of the market. Among the stakeholders there is strong support for the contribution of the Directive to the goal of the reduction of greenhouse gas emissions but less unanimity on how this goal is best achieved. In relation to the overall European added value of the Directive, there is wide acceptance of the need for EU-wide measures in the form of Regulations under the Ecodesign framework, as it is clear that national measures could not bring the same results and would probably distort the market. There is however less acceptance of the added-value of developing EU-wide regulatory measures in the case of energy-related products that, according to some industry representatives, are already covered by other regulations.

F. Assessment of the feasibility of extending Ecodesign Directive to non-energy related products

A distinct part of the evaluation is the assessment of the feasibility of extending the Directive to non-energy products and means of transport. The aim is to examine the appropriateness of using the Ecodesign Directive beyond the current coverage of ErPs to include non-energy related products, while being aware that the Directive requires an assessment of the operation of the current arrangements before any extension is considered. Following an initial review of market data and available environmental information 5 product categories were selected for the conduct of in depth case studies representing broader product groups:

1. Agricultural products: Sausages and other prepared products
2. Consumer products: Clothing
3. Housing products: Floor coverings
4. Consumer/housing/industrial: All purpose cleaners and hand dish wash detergents
5. Means of transport: Passenger cars

The case studies analysed available information on the markets of the specific products, the environmental impacts and the life cycle stages they pass through and attempted to assess the appropriateness and feasibility of developing Ecodesign requirements. Alternative policy options were also considered. The conclusions of the case studies will be used, together with other available information, to assess the appropriateness of extending the Ecodesign Directive to each of the broader product groups represented by the five products.

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Table 2. Non-energy related products – case studies

Case Study	Market info	Main environmental aspects and key life cycle stages identified	Assessment of appropriateness of eco-design requirements
Sausages and other processed meat products	Total size of the processed meat EU market (2010) : 13 million tonnes ; total value of 66.3 billion Euros.	Initial life cycle stages (Raw materials production -livestock breeding) are the most important stage in the product life cycle in relation to most environmental aspects. Energy use related to different stages of the life cycle including the production phase, distribution/retail and the use phase. Consumer habits (efficient cooking and the use of the energy efficient freezers and ovens) can affect the overall amount of energy and water used. Solid waste from packaging and food waste resulting from the use phase is also an important issue.	Ecodesign approach does not appear to be an appropriate tool to address important aspects of sausages and processed meat products. Product requirements cannot be expected to have an impact on the initial stage of the life cycle. Establishment and enforcement of standards is considered difficult although not impossible Alternative tools (e.g. production rather than product focused regulations, financial instruments such as the Common Agricultural policy, consumer information) could be more effective
Clothing (jeans and leather)	European textiles and leather sector turnover: €200 billion. Clothing represents 10-15% of the entire leather sector's turnover (approximately EUR 7 billion).	Most important stages for cotton jeans - Initial stage (cotton production) for water consumption and aquatic eco-toxicity - Use phase related to is energy consumption, human toxicity and household waste. Most important for leather jacket : -tanning process significant for all impacts. -Wastewater generation and its contamination is an issue for all of these phases. -Pre-slaughter phase (livestock production) also important in a number of aspects	Setting Ecodesign requirements appears inappropriate in the case of natural material Difficult to affect environmental impact through eco-design requirements Greater impacts expected from input or process focused requirements, not product-focused. Use-phase impacts depend on consumer behaviour (difficult to address with product requirements) and use of complementary products (e.g. washing machines).
All purpose cleaners and hand detergents (wipes, spray, liquid)	Household market for all-purpose cleaners (2009): €5.2 billion. Professional sector: €2.4 billion, 14million tones of all-purpose cleaners and detergents were produced in Europe in 2010 Estimate a total volume of 3.5-4.5 billion kilograms sold Market shares (UK, 2009) :Liquid :45% - Spray : 35%, Wipes:	-Wipes : production phase (manufacturing and packaging) most important for most aspects except waste and photochemical smog Liquid: Use phase most important including energy and water use that are determined by consumer behavior Spray : Production and use phase important for different aspects Production phase is related primarily to human toxicity (contact with chemicals in the production), energy use and climate change and air acidification.	Feasible to use Ecodesign approach to cover cleaners and hand dish wash detergents for household and industrial use Key areas: resources use (material, energy, water) linked to production and use of these products. Toxicity issues already within the scope of large number of regulations Ecolabel requirements and industry standards cover some of the issues - useful starting point. Voluntary Agreement within or outside the context of the Ecodesign Directive on the basis of existing Sustainable Charter a possible

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Case Study	Market info	Main environmental aspects and key life cycle stages identified	Assessment of appropriateness of eco-design requirements
	10%		effective alternative
Floor Coverings (ceramic, carpet wood, linoleum, laminate)	<p>Ceramic tiles market (2006): 1 billion Euros. Carpet market (2006): 1.125 million meters per year with a total value of 5.541 billion Euros. Wood floorings (2006) 143 million square meters and a value of 2.748 billion Euros. PVC coverings :337 million square meters and 1.7 billion Euros. Linoleum coverings (2006): 43 million square meters with a value of 394 million Euros. Laminate (including flooring) (2006): 25 million square meters and 5.375 million Euros</p>	<p>Ceramic- Production stage the most critical (The most important impact categories for ceramic tiles are climate change, human toxicity and acidification), Carpet- Climate change and energy consumption are two important impact categories.(limited information available) Wood- Land use an important issue Production process ('laying', 'surface finishing', 'refurbishment') is the key life cycle stages for most environmental impact categories . Linoleum- Production of raw material is the key stage (ecotoxicity, acidification and oxidant formation) Vinyl (laminated)- Production of PVC and incineration at the end-of-life the key life cycle stages.</p>	<p>Ecodesign does not appear appropriate for bio-based products with little level of processing between the raw material and the final use. Most impact categories are related to pre-design stages, before the time raw resources are transformed into the inputs and level of impact from setting requirement most probably limited. Issues with linseed, wool, and wood-based products would be more appropriately regulated using standards that are specific to natural fibers.</p>
Case Study 5: Passenger cars	<p>New cars sold (2010): 13,360,599. Production in Europe (2009) 13,948,124 Total car fleet (excluding BG, RO, MT and CY) in 2008: 223 million Average car age of 8.2 years.</p>	<p>Use phase -well to tank (gas/diesel production) and tank to wheel (driving) - is important in relation to most environmental aspects Car production related mainly with resources use and waste creation and toxicity aspects</p>	<p>Feasible to use eco-design requirements to address environmental aspects related to passenger cars However, almost all relevant areas are already under scope of existing regulation. - While their effectiveness is not yet known there is a danger of double regulation. The weight of cars (related to resources use) is a possible area - market forces already push in this direction</p>

Emerging findings

On the basis of the analysis from the case studies and the input from stakeholders there seems to be limited support for the extension of the Directive. For certain categories of products, food products, clothing and other products with limited level of processing there are strong doubts about whether product design requirements can have an effect on the key environmental impacts associated with these products. Furthermore, it is unclear how easy it can be to monitor and enforce such requirements. Process related regulations focusing on the initial stages of the life cycle appear to be more meaningful. For other groups of products, like means of transport, certain categories of chemicals or housing products there appears to be greater scope for the use of eco-design requirements, either within the context of the Ecodesign

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Directive or using other legislative frameworks. However, the extension of the Directive should not lead to double regulation and this appears to be a possibility for most of the aspects related to passenger cars.

From the technical point of view there appears to be a need for changes to the current MEEuP methodology to accommodate the characteristics of non-energy related products. However, this cannot be considered as an obstacle. It is within the scope of the Directive and development of the methodology takes place as part of the developing work programme.

In relation to impacts on the existing Directive, there are concerns raised by a large number of stakeholders that, unless significant additional resources are dedicated to the process, a possible extension may work against the operation of the current Directive. The Directive envisaged that an assessment of the operation of existing provisions should take place before any possible extension. The evaluation has identified a number of issues that need to be addressed and any wide ranging extension may be premature.

E. Next steps

For the assessment of the Directive as a whole, the current report has set out a number of positions derived from stakeholder comments that need to be questioned and validated, if they are to form part of the eventual conclusions of the evaluation. To facilitate this process, a series of questions to stakeholders appear at various points in the report, with a view to stimulating further feedback at the second Stakeholder Meeting.

In relation to the question of the extension of the Directive the results of the five case studies, the feedback from the Commission services and stakeholders and further analysis will be used to assess the feasibility of developing eco-design requirements for the wider range of product categories under the five product groups and reach final conclusions on the feasibility and appropriateness of extending the Ecodesign Directive.

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