

**Present and future
implementation of the ErP
Directive in the Basque Country
and Spain:
some proposals from reality**
Ihobe contributions to the European Commission

September 2011



Present and future implementation of the ErP Directive in the Basque Country and Spain

1. INTRODUCTION

According to Article 21 of the Ecodesign Directive 2009/125/EC [1], the Commission is required to assess the effectiveness of this Directive not later than 2012. This evaluation is being carried out for the European Commission (DG Enterprise and Industry) by CSES (the Centre for Strategy and Evaluation Services), with their partners Oxford Research. The study started in January 2011 and is expected to deliver final results in December 2011.

During the study, stakeholders will be invited to three meetings covering respectively the initial consideration of evidence, the First Findings and draft final report.

The first stakeholder meeting took place on May 10 with the participation of over 60 stakeholders representing Member States' authorities, industry, environmental and consumer groups and eco-design experts.

The Second Stakeholder Meeting on the Evaluation of the Ecodesign Directive is scheduled on October 5th, 2011 in Brussels. The objective of the second stakeholder meeting is to consider the First Findings and Recommendations Report and particularly to receive feedback on the Report from stakeholders. The meeting is expected to focus on the following issues:

- The Effectiveness of the Directive – impact on environment, industry and the market
- The Efficiency of Ecodesign Directive implementation and enforcement procedures
- The possible Extension of the Directive

This document summarises the contribution of Ihobe to this 2nd Stakeholder Meeting and its point of view about the present and future implementation of the ErP Directive in the Basque Country and Spain. It includes the following chapters:

- Chapter 2.- Expected impact of the ErP Directive in the Basque country and Spain
- Chapter 3.- How the enterprises see the ErP Directive and its relationship with eco-innovation
- Chapter 4.- ErP Directive implementation at companies' level
- Chapter 5.- Supporting activities carried out by Ihobe
- Chapter 6.- How to favour the implementation of the ErP Directive at European level
- Chapter 7.- Selected proposal of actions
- Chapter 8.- References

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2. EXPECTED IMPACT OF THE ErP DIRECTIVE IN THE BASQUE COUNTRY AND SPAIN

The Ecodesign Directive 2009/125/EC establishes a framework for the setting of ecodesign requirements for energy-related products.

According to the definition of Article 2: *‘Energy-related product’, (a ‘product’), means any good that has an impact on energy consumption during use which is placed on the market and/or put into service, and includes parts intended to be incorporated into energy-related products covered by this Directive which are placed on the market and/or put into service as individual parts for end-users and of which the environmental performance can be assessed independently;*

This definition includes a huge number of goods and it affects a lot of enterprises, most of them small and medium-sized enterprises (SMEs). The estimation of the number of companies that might be affected by ErP Directive in the Basque Country and Spain is difficult, due to this vast definition of “energy-related product”.

A first estimation can be done using the NACE code (Statistical Classification of Economic Activities in the European Community. In French: Nomenclature statistique des Activités économiques dans la Communauté Européenne). The following table (Table 1) shows the number of organisations that could be affected by the ErP Directive, considering some selected NACE codes and the data provided by the INE (National Statistics Institute - Spain)¹ and EUSTAT² (Basque Statistical Organisation)

It is needed to mention that this is not an exhaustive list because:

- other Energy-related Products can be manufactured under other NACE codes not indicated in this table
- not all the products manufactured under these NACE codes are energy-related products

Number of Organisations	Spain (2009)		Basque Country (2010)
	Less than 20 employees	20 or more employees	Total
Activity according to NACE 2009			
Energy-using Products (EuP), according to the amended DIRECTIVE 2005/32/EC			
C25.3 - Manufacture of steam generators, except central heating hot water boilers	29	25	9
C26.1 - Manufacture of electronic components and boards	294	84	68
C26.2 - Manufacture of computers and peripheral equipment	270	17	8
C26.3 - Manufacture of communication equipment	118	51	18

¹ <http://www.ine.es>

² <http://en.eustat.es>

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Number of Organisations	Spain (2009)		Basque Country (2010)
	Less than 20 employees	20 or more employees	Total
Activity according to NACE 2009			
C26.4 - Manufacture of consumer electronics	37	19	1
C26.5 - Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks	354	119	58
C26.6 - Manufacture of irradiation, electromedical and electrotherapeutic equipment			
C26.7 - Manufacture of optical instruments and photographic equipment	168	45	23
C26.8 - Manufacture of magnetic and optical media			
C27.1 - Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus	549	228	126
C27.4 - Manufacture of electric lighting equipment	428	106	41
C27.5 - Manufacture of domestic appliances	175	64	34
C27.2 - Manufacture of batteries and accumulators	219	102	102
C27.9 - Manufacture of other electrical equipment			
C28.4 - Manufacture of metal forming machinery and machine tools	366	106	167
Total	3007	966	655
Other Energy-related Products (according to the Directive 2009/125/EC)			
C16.2.2 - Manufacture of assembled parquet floors	5555	262	421
C16.2.3 - Manufacture of other builders' carpentry and joinery	413	305	6
C23.3 - Manufacture of clay building materials	12008	565	576
C25.1.2 - Manufacture of doors and windows of metal			
Total	17976	1132	1003

Table 1.- Number of organisations that could be affected by the ErP Directive in Spain and Basque Country

The following conclusions can be drawn from this table:

- In Spain, most of the organisations that could be affected by the Ecodesign Directive are Small-sized enterprises, with less than 20 employees (75% EuP & 94 % other ErP)
- The enlargement of the scope of the Directive has significantly increased the number of affected enterprises, specially in Spain (most of them associated to the building sector)
- The implementing measures published until now affect specially to the NACE codes C27.1, C27.4 and C27.5

For communication campaigns Ihobe has developed a list of selected companies affected by the ErP Directive in the Basque Country. This list includes 226 enterprises, from different sectors. The analysis of this list indicates that:

- About a 26% of these enterprises have less than 20 employees, a 39 % between 20 and 50 and a 35% more than 50 employees.
- The most significant NACE codes are C27.1 - Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus (about 22%) and C28.4 -

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Manufacture of metal forming machinery and machine tools (about 24%)

This statistics indicates that the implementation of the ErP Directive will have a significant impact on SMEs. However, in most of the cases, these enterprises do not have specialised or dedicated staff for environmental issues or legislation monitoring. The technical staff often has several roles inside the organisation (e.g. engineering, quality, etc.).

This is the reason why it should be improved the information that arrives to SMEs, and this information should be adapted to their specific characteristics. This point is also reflected at the ErP Directive text (introductory text):

(22) This Directive should also encourage the integration of ecodesign in small and medium-sized enterprises (SMEs) and very small firms. Such integration could be facilitated by wide availability of, and easy access to, information relating to the sustainability of their products.

(30) In respect of training and information on ecodesign for SMEs, it may be appropriate to consider accompanying activities.

These aspects are included in the Article 13.- Small and medium-sized enterprises of the Directive.

The existing European Commission websites about the ErP Directive (e.g. DG ENERGY: http://ec.europa.eu/energy/efficiency/ecodesign/eco_design_en.htm or DG ENTERPRISE: http://ec.europa.eu/enterprise/policies/sustainable-business/ecodesign/index_en.htm) do not fulfil these aspects, because they only inform about the legislative process but not how to implement this legislation at company level (specially at SMEs).

Other supporting EC websites, for example the Environmental Compliance Assistance Programme for SMEs (http://ec.europa.eu/environment/sme/programme/programme_en.htm) does not cover this issue with the needed detail.

They are some other websites at European level that deal with the ErP Directive, for example:

- <http://www.eup-network.de/home/>, maintained by Ökopol.
- <http://www.cfsd.org.uk/seeba/EuP/eup.htm>, maintained by The Centre for Sustainable Design

Other websites try to inform consumers and other stakeholders about the importance of setting ambitious requirements and they try to influence EC decisions, for example:

- <http://www.eupconsumer.eu/start.asp> (ErP Consumer Project website), supported by the

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European Consumer associations BEUC and ANEC, and Öko-Institut e.V.

- <http://www.coolproducts.eu/>. Campaign to set ambitious minimum requirements for energy efficiency and other environmental aspects of products sold in the European Union, supported by some NGOs (e.g. ECOS)

There are other websites also focused on consumers, trying to inform them about the most efficient products. This is the case, for example, of the website <http://www.topten.eu/>. It is a consumer-oriented online search tool, which presents the best appliances in various categories of products (i.e. cars, household, lamps, office equipment, consumer electronics and building components). It involves partners from different EU countries and has the support of the Intelligent Energy - Europe programme. The website in Spain is <http://www.eurotopten.es/>.

These websites are in line with the introduction of the ErP Directive: *(12) In order to maximise the environmental benefits from improved design, it may be necessary to inform consumers about the environmental characteristics and performance of energy-related products and to advise them on how to use products in a manner which is environmentally friendly.*

However, there are not specialised websites to inform enterprises (especially SMEs), how to implement this Directive, for example with Guidelines, cases studies, direct support, harmonised standards, certified laboratories, etc.

Ihobe has recently initiated this approach with a specific section about ErP Directive in its website and other activities inside the Eco-Efficiency Programme in Basque Companies 2010-2014 (www.ihobe.net).

3. HOW THE ENTERPRISES SEE THE ERP DIRECTIVE AND ITS RELATIONSHIP WITH ECO-INNOVATION

There are several studies that tried to analyse the level of knowledge that SMEs have about the ErP Directive, compared with other relevant legislation. Two of them are mainly focused on Basque Country enterprises. These studies are:

- Survey done by GAIA (<http://www.gaia.es/>), Industries Association of Electronic Technology and Information of the Basque Country, in 2007 [2]. The study is titled: "Estudio sobre la situación de la pyme en el País Vasco, con respecto al cumplimiento del Modelo RSC y su grado de implantación" It includes 20 in-deep interviews with relevant stakeholders and 125 phone interviews with SMEs affected by the Eco-design Directive.
- Survey done by the EU-funded project LiMaS (www.limas-eup.eu) -CIP-Eco-Innovation Programme- in 2010 [3]. The surveyed companies were 35 Spanish SMEs and 15 German

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SMEs affected by Eco-design Directive.

The main conclusions are highlighted hereafter:

- The **GAIA survey (2007)** shows that the Eco-design Directive is not known by SMEs. According to the survey, a 94.8% of SMEs with less than 50 employees do not know the Directive. This percentage is slightly lower for companies with more than 50 employees (90,4%). (Population: 137 enterprises affected by the Directive).
- Compared with other legislation (i.e. IPPC Directive concerning integrated pollution prevention and control), the 94.1 % of companies with less than 50 employees know this legislation (Population: 50 enterprises affected by IPPC Directive).
- According to this study, the 60.2 % of SMEs with less than 50 employees, do not have any resource allocated to environmental management. (Population: 133 enterprises)
- These results are similar to those obtained by the **LiMaS project**. In this case:
 - o Most of the companies with less than 50 employees do not have an Environmental Dept. (87%). Furthermore, in the 72% of the companies that have an Environmental Department, this department has further responsibilities beyond environmental issues (e.g. quality, health and safety, etc.)
 - o The 60% of the companies do not know the Eco-design Directive. On the opposite, the 58% know the IPPC Directive or the 54% know the VOC Directive on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations. In these cases, the companies are affected by ErP Directive but not by the other two Directives.

These studies reflect the need to reinforce the information that SMEs receive about the Eco-design Directive and the possible implications for their companies.

The **Industrial Eco-barometer of the Basque Country (2011)** [4] analysed how the Basque Country enterprises integrated the environmental issues in their business and the effects on their competitiveness. The study analyses three different group of enterprises with more than 10 employees: (1) Enterprises affected by IPPC Directive (population: 75 enterprises); (2) R+D+I enterprises (population: 81 enterprises) and (3) enterprises affected by the ErP Directive (population: 72 enterprises).

Related to the latest group, the conclusions that can be highlighted are:

- 60% of the ErP companies consider that the implementation of environmental measures

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will increase slightly or nothing their competitiveness. Compared with IPPC companies, this percentage is a 29%. This aspect can be related to the fact that 92% of ErP companies considers that their activities have a little or null environmental impact. Compared with IPPC companies, this percentage is 64%.

- For ErP companies, the environmental legislation, the cost reduction of raw material and energy and customers' demand are the three main factors that could increase their competitiveness by applying environmental measures. The relevance of environmental legislation decrease in companies with less than 50 employees.
- The 49% of ErP companies consider that in the three last years, the innovation of their products to reduce their environmental impact and resource consumption has a little or null relevance. Compared with IPPC companies, this percentage is 36%.
- The 61% of ErP companies consider that in the three last years, the environmental requirements from customers have increased slightly or nothing. Compared with IPPC companies, this percentage is 55%.
- For ErP companies, the three main barriers to implement environmental measures are:
 - o Absence of favourable conditions for financing cleaner technologies.
 - o Lack of environmental information and training of their employees (including legislation).
 - o Absence of consultancy and supporting services related to environmental issues.

These barriers are similar to those indicated at the Eurobarometer 315; Attitudes of European entrepreneurs towards eco-innovation (March 2011) [5]. The most significant barriers are related to economic and financial factors:

- the lack of funds within the enterprise
- uncertain demand from the market
- uncertain return on investment
- lack of external financing
- insufficient access to public subsidies and fiscal incentives
- technological capacities or strategic objectives and social and relational factors (e.g. lack of good business partners, limited access to external knowledge and the lack of collaboration with research) are seen as least serious.

In November 2010, Ihobe organised a Workshop [6] with enterprises to analyse the implications

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of the ErP Directive. About 35 persons from different companies attended to the event.

The main demands from the industrial sector to the administration, related to ErP Directive implementation were:

- A more active role in market surveillance. Manufacturers consider that it is crucial to allocate resources to market surveillance to ensure products' compliance with the EC regulations. This will guarantee that all manufacturers can compete with the same rules.
- Increase consumers' awareness about the existence of efficient products (beyond legal requirements), using a clear and standardised communication system for all the products, which should be easy to understand by the consumers. The existing mechanisms (e.g. energy-efficiency labelling - Directive 2010/30/EU [7]-) have some limitations, because they do not reflect in all the cases how far the product goes beyond legal compliance.
- Define mechanism or strategies to incentive the manufacturers, e.g. direct tax benefits to the manufacturer for placing on the market more efficient products (beyond ErP Directive requirements). At present, most of the incentives are focused on the consumer and not on the manufacturer.
- Promote the deployment of green public procurement as exemplary task and market driver, to encourage, compensate and reward the efforts of manufacturers in the field of eco-design and eco-efficiency.
- Increase the support to the manufacturer on its activities towards eco-efficiency, proposing clear methods, tools and guidelines. Usually the manufacturer is "lost" among the diversity of tools, methods, certifications, eco-labels and other recognition systems that exist nowadays.

As it was mentioned, one critical issue identified by the industry to guarantee the implementation of the ErP Directive is the adequate market surveillance to avoid the existence in the market of products not-compliance with the Directive.

At European Level, according to the "Business attitudes towards enforcement and redress in the internal market. Analytical report". November 2009 [8], "Less than a sixth (16%) of retailers said that consumer authorities had contacted them in the past two years in the framework of a general control concerning their national sales, and 13% mentioned such contacts in the framework of a specific control (*specific controls are carried out as a consequence of complaints or suspicions related to a particular trader or sector whereas general controls are carried out as part of the normal workplan of the enforcer*). The percentages for Spain are 23% and 20% respectively.

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According to the document of the Eco-design working group (CONAMA 2010) [9], in 2009 the number of domestic appliances that were analysed by the National Institute for Consumer protection in Spain, in collaboration with regional governments, was 174. In 8 Spanish regions this figure was zero. This seems insufficient to cover the increasing number of requirements for different product categories.

The following table (Table 2) summarises the control activities done in 2010 for market surveillance in the Basque Country (source: The National Institute for Consumer Protection.- <http://www.consumo-inc.es>).

	“Domestic appliances”		Total Products	
	Number	%	Number	%
Control activities	403		3842	
Positive (detected some deviations)	51	12,7%	829	21,6%
Negative	352	87,3%	3013	78,4%
Total Proceedings initiated	38		166	
Proceedings related to quality, normalisation & selling conditions	15	39,5%	74	44,6%

Table 2.- Market Surveillance activities in the Basque Country. 2010

The importance of the market surveillance is reflected in the introduction of the ErP Directive: *(29) Noting the importance of avoiding non-compliance, Member States should ensure that the necessary means are available for effective market surveillance.*

Other aspect that should be considered is how the results of this market surveillance are communicated to the different stakeholders. It should be increased the visibility of these activities (i.e. better knowledge of the activities done by the authorities) and their results (e.g. companies that failed to comply with ErP requirements).

4. ErP DIRECTIVE IMPLEMENTATION AT COMPANIES' LEVEL

The practical implementation of the ErP Directive at companies' level involves:

- Technical aspects, related to the technologies needed to comply with the implementing measures (e.g. energy efficiency of the product, etc.).
- Management aspects associated to the Conformity Assessment (e.g. Internal design

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control or Management system for assessing conformity) and how the needed information is generated, published and stored.

For the first point, the company needs the technical knowledge to redesign the product/processes in order to fulfil the implementing measures. This might imply the implementation of best available techniques in the market.

In big companies, this is not a major problem (from the technical point of view), because they usually have an engineering or research department, with people dedicated to these issues.

However, small enterprises do not have this staff or in some cases it is assigned to other roles in the company. Therefore, for this type of companies, it is more difficult to be updated about the latest technologies available in the market to improve their products. In most of the cases, they are supported by their suppliers, which inform them about the latest developments.

In this case, the major needs of SMEs are the following:

- Need of specialised advice and information about the best available techniques in the market, related to their products.
- Support to assess the real implications in their processes/products if these technologies are applied (e.g. needed investment, period of return, manufacturing changes, etc.).
- Financing sources to implement the best alternatives.
- Specialised support during the implementation process.

Related to management issues, the main aspects that can difficult the ErP Directive implementation in SMEs are summarised hereafter:

- In most of the cases, SMEs are not used to work with Environmental Management Systems (e.g. EMAS [10], ISO-14001 [11]) and they do not have dedicated staff for environmental issues. However, they have experience with Quality management due to customers' requirements.
- They are not used to assess the environmental performance of their products in a "systematic" way and they do not integrate the Eco-design in their products development process. The reason can be the lack of information about available tools (some of them for free) or about potential benefits of applying the Eco-design.
- Lack of knowledge about harmonised standards that should be used to assess the compliance with eco-design requirements. This is essential in establishing measuring and testing methods to guarantee this compliance, similar than customers' quality requirements.
- In most of the cases, they have to subcontract the needed tests for assessing the

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product's conformity to certified laboratories (i.e. additional cost).

In this case, the supporting activities to SMEs should be focused on:

- Promote the implementation of Environmental management systems (e.g. ISO-14006 [12]), if it is needed, simplified for SMEs needs (e.g. EMAS-easy³ or EKOSCAN⁴)
- Give direct support on best available techniques for each product/process type and how to implement them at company level
- Offer easy to use tools to asses their products' ecological profile (e.g. Eco-it⁴ or EuPeco-profiler⁵ tools)
- Supply information about the harmonised standards to be used and list of certified laboratories

5. SUPPORTING ACTIVITIES CARRIED OUT BY IHOBE

Ihobe has a long history supporting companies to implement the Eco-design in their business.

These activities started in 2000 with the publication of the "Practical guidebook on Ecodesign: Implementation operative in 7 steps". This guidebook provides criteria, as well as simple tools, for the Basque industries to implement the environmental factor into their products designing. The manual establishes 7 steps for the implementation of Ecodesign methodology resulting in low environmental impact products and services.



Since then, other supporting activities were carried out, focused on the following working lines. All this information is available at the Ihobe website (www.ihobe.net):

- Information/publications about the practical application of the Eco-design in different sectors.
 - o Guide books on ecodesign. Electric-Electronic (1) & (2).
 - o Guide books on ecodesign. Machine Tool.
 - o Guide books on ecodesign. Textile Industry (May 2010).
 - o Guide books on ecodesign. Urban Furniture.
 - o Guide books on ecodesign. Construction Material.



³ <http://www.emas-easy.eu/>

⁴ www.ihobe.net

⁵ www.limas-eup.eu

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- Guide books on ecodesign. Furniture.
- Guide books on ecodesign. Containers and Packing.
- Guide books on ecodesign. Automotive Components.
- Publications and tools for environmental assessment and management:
 - Life Cycle Assessment and Carbon Footprint: Two ways of measuring the environmental impact of a product.
 - Guidebook for the development of the ecodesign standard UNE 150301:2003 [13] (basis for ISO 14006).
 - Environmental labelling of the product: Guidebook of environmental criteria to improve the product.
 - ECO-it: It is a simple Eco-design software tool. It works by using ecological indicators that reflect the impact of a process or material on the environment by means of individual scores.
 - EKOSCAN Standard for environmental management (2004). This standard establishes the requirements to be met by organisations that wish to manage environmental improvement by using Ekoscan to obtain and gauge improvements in environmental performance. The requirements laid down in the standard apply to the implementation of environmental improvement management systems at organisations and to audits of requirements in that area.


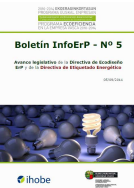


Since its implementation, more than 735 enterprises have improved its environmental performance using this standard and 249 of them have finally certified their environmental management system with this standard.

- Specific publications and services related to ErP Directive
 - Information and advise campaign for Basque companies affected by the ErP Ecodesign Directive - How does it affect my company's competitiveness?. 12 pages publication summarising the main aspects of the ErP Directive.
 - Basque companies anticipating the Ecodesign (ErP) Directive – Support and subventions. 8 pages publications summarising the different supports and subventions available to respond to the needs of the Basque companies affected by the Ecodesign Directive for Energy related Products (ErP).



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- Everything you should know about the EuP/ErP Directive: Practical guidebook on the legal requirements for the ecodesign of energy-related products. 124 pages publication with detailed information about the ErP Directive (e.g. implementing measures, product families with higher priority, preparatory studies, etc.).
 
- InfoErP website. It is a business information service on the ErP Ecodesign Directive - Energy related Products - where you can find all the current regulations, the state and progress of the European Commission work on this matter, as well as the latest news, updates and innovations.
 
- Ihobe-line. It provides Basque manufacturers from the electric-electronic (EE) sector and other energy-related products (ErP), a series of advice services related to the ErP Ecodesign Directive and products' environmentally and technologically improvement:
 - Resolve by telephone and free of charge all the companies' doubts about the ErP Ecodesign Directive.
 - Receive free and personalised advice in-company from a specialist to resolve in-situ (a maximum of 4 hours) all the company's doubts about the Directive on ErP Ecodesign.
 - Take part in the training modules for Transferring Advanced Knowledge or specialised Workshops on the ErP Ecodesign Directive and/or the Electric-Electronic Ecodesign

Despite the communication campaign done by Ihobe in February 2011 to promote these services (i.e. sent informative brochures about Ihobe-line services and ErP Directive to 226 companies by mail), the response from enterprises has been very limited.

In 2011, only 13 telephone services were requested by enterprises and zero "in-company" services. In 2010 (before the campaign) there were only 7 telephone requests.

This might suggest that companies are not aware about the ErP Directive or, if they are, they will wait until the publication of the regulations to start some action. The competitive advantage of being ahead of the implementing measures is not a clear argument for the enterprises.

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- Support to develop cases studies in the enterprises, including training sessions
 - o At present there are two operational Eco-Design Classrooms in the Basque Country (one in the Technical School of Engineering in Bilbao, set up in 2002, and another in the Polytechnic School in Mondragon, set up in 2004), aimed at establishing partnerships between the industrial sector and the university promoting environmental improvement and competitiveness in companies in the Basque Country.
 - o In the case studies of the Ecodesign Guide books, near to 45 companies have taken part, with significant environmental improvements (up to 30% in some cases).
- Official recognition of the most active companies on this field
 - o Environmental Excellence Case Studies. Public Recognition of Exemplariness. The aim of the Environmental Excellence Case Studies is to disseminate those experiences that, for their innovative nature and for their high transferability, deserve to be recognised publicly.
 - o Environmental Improvement of Products and Services (www.productosostenible.net).- It is an information tool for environmental improvement of products and services, which on the one hand offers the company the opportunity to raise awareness of the environmental improvements of their products to a large number of potential buyers and on the other hand it is an important source of information for environmentally-aware buyers. More than 680 products and brands are already featured on www.productosostenible.net. The products are grouped into 12 industrial sectors and 72 product categories, and there are also 43 different types of recognition. This site has the support of the United Nations Environment Programme (UNEP).
- Organization of Eco-design Congresses. Since May 2006 Ihobe has been organising industry meetings and promoting networking, in order to disseminate new initiatives/trends at European level. So far the following four meetings have been organized:
 - o 31 May 2006 – “Eco-design in the Basque Country. Improving environmental aspects of product: Certifiable UNE 150.301 Standard”
 - o 16 May 2007 – “II Forum on Environmental Product Innovation: How to anticipate new Eco-design requirements”.
 - o 26 November 2008 – “Environmental Product & Building Innovation. III Meeting on Eco-innovation in companies”.
 - o 22 April 2010 – “Environmental product & building Innovation 2010. IV Meeting

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on Eco-Innovation in Companies”.

- The next one will take place on November 9th 2011 – Bilbao Ecodesign Meeting

These meetings, which allow the exchange of experiences between the participating companies, welcome a large number of attendees. For example, at the one held in 2008, more than 350 attendees and 50 speakers took part.

- The Eco-Efficiency Programme in Basque Companies 2010-2014 is a pioneering initiative created to give an answer to the request made by companies in the Basque Autonomous Community in order to increase their competitiveness.



The final objective of the Eco-efficiency Programme is to make Basque companies be more sustainable, innovative and efficient, including environmental variables in their production processes, which will help companies to be more competitive in the market.

It focuses its work in competitiveness, innovation and the design of greener products and services; these objectives have been included in three main lines of action to support companies:

- Environmental leadership. Actions that will help companies from the Basque Autonomous Community that wish to be one step ahead of their customers' needs offering them new products, green buildings and services that will be recognised by the market.
- Clean technologies. Consulting for technical industries that seek to improve or innovate their processes to achieve a greater productivity and improve their environmental performance.
- SMEs in action. Consulting for SMEs and Micro-SMEs from the Basque Autonomous Community to use environmental aspects focused on saving costs and improving their products through reducing the use of raw materials and waste valorisation, this effort resulting in a great competitiveness.

Since it was launched, at the end of October 2010, nearly two hundred companies from the Basque Country, like Iberdrola, Gamesa Energía, Ormazabal Corporate Technology AIE, Grupo MCC, Vicinay Cadenas, LKS Ingeniería, Euskaltel and Irizar, among others, have joined the Eco-Efficiency in the Basque Companies 2010-2014 programme. Those companies are committed to efficiency, innovation and environmental sustainability by joining an initiative that will help them have a better performance, to grow and gain prestige.

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6. HOW TO FAVOUR THE IMPLEMENTATION OF THE ErP DIRECTIVE AT EUROPEAN LEVEL

Taking into account the previous findings and experiences, Ihobe considers that the following activities can favour and promote the current implementation of the ErP Directive at European Level:

Increase the knowledge of companies about ErP Directive:

- Develop an “official” EC website to support companies to implement the ErP Directive, translated to different EU languages. The existing “official” websites only inform about the legal requirements, etc. but not how to implement them or go beyond these requirements. This web site should include:
 - o Guidelines, case studies, tools, etc. (regularly updated). It is possible to take advantage of the work already done by other organisations
 - o List of standards and certified laboratories to verify the product conformity
 - o Training campaigns that should be personalized to the different company staff (e.g. purchasing, marketing , designers, etc.)
 - o Offer of “direct” services to help companies to implement the Directive (e.g. list of contact points at national/regional level).
- Promote Consortiums between the leading manufacturing companies to promote the Eco-design in the different sectors. The members should sign the compromise of trying to go beyond ErP Directive requirements and transfer these needs to their supply chain (e.g. environmental/technical specifications, etc.).

Reinforce market surveillance to guarantee the implementation of the Directive.

- Require periodic reports to the members’ states about the market surveillance actions carried out related to the ErP Directive and the resources allocated to these tasks. Publish comparative reports between members’ states, local governments, etc.
- Publish a list of companies/products that have not fulfilled the ErP requirements. This list can be used to take purchasing decisions (e.g. green procurement, products included in “renewal” programmes, comparative studies done by consumers associations, etc.)

Define better communication mechanisms with the potential customers, to identify which products go beyond legal requirements and their benefits

- Promote the collaboration with consumer associations to inform them about ErP Directive requirements, most efficient products, etc.
- Define agreements and training campaigns for retailers, because they are the final

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contact with the consumer and they can promote the most efficient products

- Include information about the total cost of ownership as another product characteristic (or a similar economic indicator), to facilitate the comparison between products

Increase the competitiveness of the companies that go beyond ErP Directive requirements

- Co-fund development projects to put on the market advanced products (higher performance than ErP Directive requirements). Depending on the achieved results this funding could be different (e.g. x% if it reduces the energy consumption in a y%)
- Reduce the taxes of the companies that put on the market products beyond ErP Directive (environmental benefits for all the society)
- Publish an “official” list of companies/products that go beyond the ErP requirements (certified by independent laboratories), including information about the distance to these requirements. It could be linked with the market surveillance activities
- Promote the implementation of Environmental management systems that incorporate eco-design (e.g. ISO-14006:2011), showing the competitiveness advantages of this implementation and successful cases at the ErP sector

The basic idea is to promote a new approach to companies, especially SMEs, based on the fact that the Eco-design Directive is not only a legal obligation but a competitive advantage (to be internalised by the company). Therefore, it is needed to show successful cases of companies (better if they are SMEs) that have obtained competitive advantages by going beyond the ErP Directive requirements.

7. SELECTED PROPOSAL OF ACTIONS

The following three actions have been selected as the most urgent to be implemented by the European Commission:

- Develop an “official” EC website to support companies to implement the ErP Directive, translated to different EU languages, including Guidelines, etc. (*Objective: Increase the knowledge of companies about ErP Directive*)
- Publish periodic reports about market surveillance activities of members states, local governments, etc. and make public the list of companies/products that have not fulfilled the ErP requirements (*Objective: Reinforce market surveillance*)
- Promote the implementation of Environmental management systems that incorporate eco-design (e.g. ISO-14006:2011), showing the competitiveness advantages of going beyond the ErP Directive requirements (public recognition of these companies) (*Objective: Increase companies’ competitiveness*)

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