

Implementation Experiences of the EcoDesign Directive

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5.10.2011

The Federation of Finnish
**Technology
Industries**

The Technology Industry – the Most Important Sector in Finland

- 60 % of total Finnish exports.
- 80 % of private-sector R&D investment.
- Almost 290 000 employed directly in the sector, a good 700 000 employed in total, equalling over one quarter of the entire Finnish labour force.
- The Federation of Finnish Technology Industries has some 1 600 member companies.



The Technology Industry in Finland

Electronics and Electrotechnical Industry

- Data communications equipment, instruments, electrical machinery
- Turnover (2010) 18.9 billion euros
- Personnel (30.6.2011) 54 000

Metals Industry

- Steel products, non-ferrous metals, castings
- Turnover (2010) 9.5 billion euros
- Personnel (30.6.2011) 17 000

Mechanical Engineering

- Machinery, metal products, vehicles
- Turnover (2010) 24.4 billion euros
- Personnel (30.6.2011) 125 000

Information Technology

- IT services, applications and programming
- Turnover (2010) 6.4 billion euros
- Personnel (30.6.2011) 48 000

Consulting Engineering

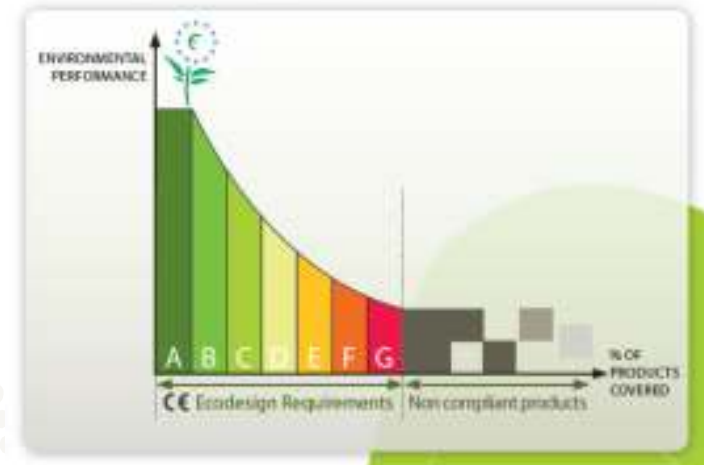
- Expertise in construction industry and infrastructure
- Turnover (2010) 4.7 billion euros
- Personnel (30.6.2011) 43 000

Impact on innovation

- Unclear or changing scope => very little or no action from industry
 - specially in studies with many different or complex products
- Long transition period => no motivation for innovation
- Measures for longer period => better target setting => action for innovation
 - this depends on design cycle of the product (ref. consumer electronics vs. machine tools)
 - establish a common process for the review procedure
- Complex products with different functions
 - Ecodesign directive does not drive innovation especially for complex and/or B2B products
 - several measures from different studies => contradictions in requirements and/or in timing => uncertainty for innovation => coordination needed!
- Lack of market surveillance => undermining innovativeness

Improvements for the IM process

- Greater effort on working plan and preparatory studies – especially on the scope issue
- Final draft regulation should also be sent to stakeholders => improve the quality of the measures and prevent essential (technical) mistakes.
 - the final regulation text should be more clear and leave no room for interpretation
- New Approach – requirements in IM and the assessment of conformity with standards => development of standards in parallel
- Time lines for preparatory study to regulation welcomed – avoid use of obsolete data
- Better coordination between different preparatory studies to avoid overlapping or conflicting requirements as well as synchronisation of requirements (ref. motors - fans)
 - a need of coordination between other initiatives such as Ecodesign, Energy labelling, GPP, Eco labelling, EPBD etc.
- Issued requirements => must be able to measure and monitor



Other comments

- Product identification criteria – not product group criteria (article 15)
- Improvement of stakeholder involvement and communication between the consultant and stakeholders
 - enough time for stakeholder comments needed
 - too complicated and time consuming questionnaires
- Better transparency of documents in the process (Impact Assessments?)
- Ecodesign directive is widely accepted – processes should be refined => more efficiency
 - Continue focusing on energy related products instead of extending the scope
 - For some functions – extension of the scope to systems (lighting, heating, ventilation) => saving potential beyond just regulating products
- The quality of the preparatory study depends on
 - the consortium of consultants
 - scope of the study – how well defined

Technology Is Everywhere



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