


Evaluation of Ecodesign Directive

3rd Stakeholder meeting

18 January 2012

Session 3 – Assessment of feasibility and appropriateness of extending the Ecodesign Directive to non-energy related products and means of transport



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Objectives

- ❖ **Is an EU Directive setting eco-design requirements an appropriate policy tool to fulfil the policy objectives of SCP/SIP for non-energy related products?**
- ❖ **Are the current provisions and mechanisms of the Ecodesign Directive adequate for extension? What changes are necessary? Are they feasible?**
- ❖ **Which, if any, broad categories of non-energy related products and means of transport should be considered as having greater priority in the case of a possible extension of the Ecodesign Directive?**

Approach

- ❖ **Selected five products representative of broader product groups**
 - agro-food, consumer products, housing/construction, industrial, means of transport
- ❖ **Considered appropriateness on the basis of Article 15 criteria:**
 - market size, environmental impact over life cycle, improvement potential
 - existing relevant legislation and other policy tools
 - feasibility, effectiveness, costs or other issues from introduction of Ecodesign requirements
 - Comparison against alternative tools
- ❖ **Focus on lessons learned**
- ❖ **Identified general issues from a possible extension**
 - Contribution to SCP/SIP policy
 - Issues in relation to the implementation of current Ecodesign Directive
- ❖ **Used lessons learned to consider a broader list of products and develop a priority list in the event of an extension**

Limitations

- ❖ Limited time & resources for a thorough assessment – especially in relation to the priority list of products
- ❖ No capacity for proper life cycle analysis - reliance on available data/information and small number of interviews
- ❖ Variation among products – extrapolation from case studies to product groups not always possible/appropriate
- ❖ Proposed priority list of products should not be considered as a proposal to include the specific products in the Ecodesign Directive – this can only be a result of a long process including a Working Plan
- ❖ The focus is on lessons learned in relation to an extension, identification of possible issues and constraints to assess feasibility of extension

Case studies

1. **Food and beverages : Sausages and processed meat**
2. **Consumer products (durable) : Clothing (jeans and leather jackets)**
3. **Housing products: Floor coverings**
4. **Industrial/consumer (non-durable) : All purpose cleaners and hand dish wash detergents**
5. **Means of transport: Passenger cars**

Case study 1 : Sausages and processed meat

❖ **Market size and structure**

- Volume : 13 billion kgs/year ; Value: €66billion
- Low market concentration ; high share of small producers-artisanal production

❖ **Environmental impact**

- Significant: 1-1.5% of total consumer products impact in most environmental aspects (EIPRO study)
- Key LC stage: Raw material production (feedstuff/livestock breeding)
- Other: production (packaging, water, energy), use (cooking, refrigeration)

❖ **Existing legislation and standards**

- Rather limited coverage of initial stages (mainly through CAP), organic meat regulation
- Grenelle initiative in France for mandatory labelling seems the most advanced
- Voluntary schemes on good agriculture practices, chain of custody schemes and voluntary labelling and green supply chain initiatives
- No EU Eco-label : feasibility study considered it rather difficult for most categories food and drinks products

Case study 1: Sausages and processed meat

❖ Ecodesign requirements considered

- Ecological profile on the basis of primary or secondary data – comparison with benchmarks
- Requirements on meat production on the basis of good agriculture practice or requirement on use of organic meat
- Recyclability requirements for packaging

❖ Alternative tools

- BaU scenario : industry initiatives, chain of custody schemes, labelling requirements, production related regulation and CAP requirements
- Mandatory labelling
- Single voluntary initiative
- Financial (price mechanisms/taxes, grants)

Case study 1: Sausages and processed meat

❖ Effectiveness of eco-design requirements

- Potentially high only if raw material production stage properly addressed
- Depends on capacity to influence this stage for the use of agriculture management practices ; introduce green supply chain requirements
- Production stage (energy, water, emissions) under existing legislation (IED)
- Limited expected impact in relation to use phase (consumer behaviour)







❖ Feasibility

- Important constraints : absence of widely accepted methodology and standards to measure and compare life cycle performance of products – greater robustness/acceptance required in case of mandatory regulation that controls access to market – significant additional work required
- Reliance on documentation (declarations/certificates) to prove compliance with requirements for livestock production possible but can be complex with high administrative costs – for SMEs and for authorities (difficult monitoring)








❖ Impact on existing Ecodesign Directive

- Changes to the MEERP (EcoReport) : requires changes in relation to allocation, land use issues and more data – considered feasible/possible







Sausages and processed meat

Criterion	Description	Met?
Market size and structure	Volume : 13 billion kgs/year ; Value: €66billion Low market concentration ; high share of small producers and artisanal production	
Environmental impact	Significant: 1-1.5% of total product impact in most environmental aspects Key LC stages: Raw material production (feedstuff/livestock breeding) Others: use (cooking/refrigeration), production (packaging, water, energy)	
Existing legislation and standards	Rather limited coverage of initial stages (mainly CAP) A number of good agriculture practice, chain of custody schemes and voluntary labelling and green supply chain initiatives	
Improvement potential	Theoretically high: Depends on capacity to influence raw materials production stage through supply chain requirements and use of agriculture management practices Limited potential in relation to production and use phase	
Feasibility	Limited: No broadly accepted methodology for LCA to support the setting of minimum requirements or ecological profile – work in progress Necessary reliance of self declarations and documentation can be complex, with high costs for firms and for monitoring/enforceability	
Impact on Directive	Changes to MEERP required - issues of allocation, land use Not considered an obstacle	










Clothing (Jeans and leather jacket)

Criterion	Description	Met?
Market size and structure	389 billion pairs of jeans ; 27-41 billion leather jackets Low market concentration : 177,000 firms – mainly SMEs	
Environmental impacts	Significant: 2-10% of total impact in most environmental aspects (EIPRO) Raw material production : Cotton production (water use, fertilisers) /animal breeding (leather) Processing: jeans production (water), tanning (water, waste, chemicals) Use stage: washing (energy and water)	
Existing legislation and standards	Raw material stage only partly covered (CAP) Production covered by IED and other (no info on effectiveness) Use phase mainly covered by EuPs requirements Voluntary schemes, retailer-led green supply chain, labels Eco-label on jeans (not leather)	
Improvement potential	Potentially high if raw material production stage is properly addressed Depends on capacity to influence through supply chain requirements Limited scope for production stage - Limited impact in relation to use phase (consumer behaviour)	
Feasibility	Potential challenges: Reliance on documentation (declarations/certificates) for conformity can be complex with high admin. costs – particularly for SMEs Difficult monitoring/enforcement Issues with measurements/standards in the case of leather (not for jeans) VAs could also be considered but most probably would not be effective due to dominant share of small firms and complicated supply chain	 
Impact on Directive	Changes to the MEERP (EcoReport) : feasible but requires changes in relation to allocation, land use issues and additional data	







All purpose cleaners and hand dish wash detergents

Criterion	Description	Met?
Market size and structure	Household: 2.5 bln kgs, €5.2 billion ; Industrial: 1.3 bln kgs, €2.4 billion Moderate market concentration : 130-140 firms control 80-90% of market	
Environmental impact	Moderately high: 0.2-0.6% of total impact of consumer products Varies depending on type (wipe, liquid, spray) Toxicity of substances : production and use stages Use phase: water and energy use, VOCs and hazardous & non-hazardous waste Industrial products : Different concentrations and toxic profile, greater capacity to control exposure and minimize waste, water and energy use	
Existing legislation and standards	Toxicity aspects under REACH and Detergents Regulations (effective?) Resources depletion, energy, water mainly covered by voluntary mechanisms Eco-labels on most categories AISE sustainable charter with coverage of product performance	
Improvement potential	Significant in the case of consumer products for resource efficiency, water and energy use, recyclability - Issue of influence on consumer behaviour Rather limited scope in relation to toxicity - under existing legislation (REACH) <u>Less scope in the case of industrial products</u> Existing VA – particularly within Ecodesign context – can bring similar results	
Feasibility	No apparent obstacles for implementation identified – measurement methods and standards available No expected difficulties in monitoring/testing (on product) VAs maybe more flexible-less costly for industry	
Impact on Directive	MEErP (EcoReport) : changes in relation to toxicity aspects needed – feasible	

Floor coverings

Criterion	Description	Met?
Market size and structure	Hard floor: 1.6 bln m2 , €11.7 bln ; Soft floor: >1.2 Bln m2,> €14 bln kgs Market concentration varies by product (high: carpets, others less concentrated)	
Environmental impact	No data on share in total environmental impacts of products Impacts vary based on impact profile Key LC stages : Raw material extraction and production for soft ; production for hard covering and use most important stages - vary by type of product	 
Existing legislation and standards	Building and construction legislations (e.g. Regulation 305/2011 on construction products) cover the lifecycle and are linked to standardisation processes Use phase also covered by voluntary building standards (CEN) Eco-label for most types of materials (hard covering only) and voluntary labeling specific to each material	
Improvement potential	Vary by product - Overall, expected to reinforce current market trends Potential impact in use phase - reduce fragmentation of existing framework Potential impact on supply chain especially for the bio-based flooring Significant variation across flooring types – some are essentially raw materials while others are processed.	 
Feasibility	Reliance on documentation/declaration for conformity possibly problematic but sector appears more prepared - significant experience and level of development and use of standards (still issues/debates on existing LCA approaches)	 
Impact on Directive	Changes to the MEErP (EcoReport) : requires significant changes, still possible	

Passenger cars

Criterion	Description	Met?
Market size and structure	13 million cars/years High level of concentration : 10 firms control 94% of the market	
Environmental impact	High share of passenger cars in all environmental aspects Raw material , production and use stages the most important	
Existing legislation and standards	Existing legislation covers almost all key environmental aspects (effectiveness?)	
Improvement potential	Theoretically high but limited expected added-value due to existing legislation (unless requirements would replace them)	
Feasibility	No apparent feasibility issues - standards and measurement methods exist	
Impact on Directive	Changes/additions to MEErP (EcoReport) may be required to cater for additional substances and processes – not considered an obstacle	

Lessons learned (I)

- ❖ In contrast to EuPs (and ErPs) the environmental aspects related to most non-ErPs are often related to initial life cycle stages
- ❖ Improvement potential significant if requirements address the inputs and processes used and aim at greening of supply chain
- ❖ Different approach to the one followed for EuPs for conformity and monitoring
 - Rely much more on self declarations, certificates or other documentation
- ❖ **Significant practical implications in terms of feasibility**
 - Complex supply chains, higher administrative burden
 - Most often difficult monitoring, danger of high level of non-compliance
- ❖ **Existing LCA still problematic for developing requirements for some non-ErPs**
 - Work in progress in a number of cases but practical experience is rather limited
 - Its use for controlling access to EU market may be more contentious than in case of voluntary initiatives or labelling

Lessons learned (II)

- ❖ **Presence of Eco-labels often an indication of improvement potential and possibility of setting requirements**
 - But there are different feasibility thresholds in the case of mandatory requirements
 - Often rely on documentation/certificates - Costs can be quite high and possibly not acceptable by industry if they apply for the whole range of products
- ❖ **Coverage by legislation is mixed**
 - Production stage most often covered, raw materials extraction less so
 - No information on effectiveness
- ❖ **In the case of industrial products potential may be reduced due to increased capacity and incentive of users to control impacts**
- ❖ **VAs or industry standards often provide a more feasible alternative to achieve at least part of improvements**
 - But low market concentration in many areas may not support their use

Added value of Ecodesign in relation to SCP/SIP

- ❖ **Non-ErPs and Means of Transport represent important part of total environmental impact of products**
- ❖ **Ecodesign Directive can be useful in addressing market failures in relation to environmental impacts of those products**
- ❖ **Eco-design requirements can contribute to the greening of supply chains and production of many non-ErPs – impact varies by product**
- ❖ **Extension of Ecodesign Directive can provide the context and a toolbox to be considered on a product-by-product basis**
- ❖ **But it is not the only possible approach**
 - Eco-design type requirements not relevant for all products and types of impacts (e.g. consumer behaviour) – information provision, pricing, labelling may be more appropriate
 - Individual tools may also be used outside Ecodesign Directive if considered appropriate/relevant?

Issues concerning the extension of Ecodesign (I)

❖ Extension can be considered as premature

- Limited experience on effectiveness and efficiency of IMs under Ecodesign Directive framework
- Focus so far on IMs, limited experience from VAs, no use of ecological profile provisions, no experience from review process

❖ Question of availability of resources

- Worries on thinning of resources with a negative impact on addressing backlog of EuPs
- Additional stakeholders and MS authorities will have to be involved
- Is it realistic to expect that necessary additional resources will be allocated by the Commission and Member States?

❖ Missing methodologies and standards for a number of products

- Problematic for the development of requirements and implementation
- Is it necessary to be in place before the extension?
- Existing work can possibly lead to accepted approaches/standards by the time IMs are considered

Issues concerning the extension of Ecodesign (II)

❖ **Appropriateness of MEErP methodology**

- Current form (mainly referring to EcoReport) may not be appropriate for non-ErPs
- Changes will be clearly required in relation to a number of issues
- However, no obstacle in introduce appropriate changes to MEErP or use of other methodology

❖ **Absence of political targets on a number of environmental aspects relevant for non-ErPs**

- Experience from EuPs suggests that their presence in relation to energy efficiency is important in identifying priorities
- But, are political targets necessary for an extension decision? Can they come after an extension?
- Already progress in relation to resource efficiency (Commission Roadmap)

❖ **Overall support by stakeholders on extension is unclear**

- Industry representatives generally against
- MSs and civic society appear to have mixed views

Identification of priority list of products for extension

❖ **Criteria used (Article 15)**

- Market size
- Significance of environmental impacts (EIPRO study)
- Improvement potential (presence of eco-labels as indication)
- Presence/overlap of relevant legislation
- Initial assessment of feasibility of implementation and enforceability on the basis of lessons learned
- Other possible impacts/considerations

❖ **Preliminary assessment on the basis of available information**

❖ **Balance among different criteria not always straightforward – level of priority indicated is subject to revision**

Priority list (provisional)

❖ High/medium-high priority

- Consumers chemicals : Detergents and sanitary products
- Household and office furniture
- Mattresses and bedsprings

❖ Medium priority

- Most categories of foods and drinks
- Apparel, footwear, leather products and textiles
- Toys
- Personal care chemicals
- Construction and industrial chemicals (paints, glues, adhesives etc., industrial cleaners, lubricants)
- Floor coverings
- Hand tools
- Boats and aircrafts

❖ Low priority

- Pharmaceuticals/drugs
- Houseware (cutlery, tableware etc.)
- Most means of transport (except boats and aircrafts)

High/Medium-high priority products

❖ Consumer chemicals : detergents & sanitary products

- Significant market size and environmental impacts
- Toxicity issues covered by legislation but scope for most other aspects
- No apparent feasibility issues
- Alternative option of VAs within Ecodesign framework

❖ Household and office furniture

- High market size and high share in total environmental impacts - Varying impact depending on material used in specific product
- For most sub-categories improvement potential if focus on initial stages
- Presence of Eco-label indicates feasibility although possible administrative and cost issues – significant experience with chain of custody schemes
- Generic requirements (Ecological profile) more feasible

❖ Mattresses and bedsprings

- Significant market size although moderate environmental impact
- Existing eco-labels indicating improvement potential
- Potential for generic ecological profile and/or durability and recyclability
- No apparent feasibility issues

Conclusion – Appropriateness and feasibility of extension

- ❖ **Small number of non-ErPs that appear as high potential/priority products that could easily be covered under the current context**
- ❖ **Feasibility issues for important number of non-ErPs, limited improvement potential for others, existing legislation for most Means of Transport**
- ❖ **Additional preparatory work (methodologies, standards) required for most categories – there is already work in progress but seems not to be ready to use at this stage**
- ❖ **Limited experience with important aspects/tools of Ecodesign Directive (e.g. generic requirements, VAs) that may be more appropriate for non-ErPs**
- ❖ **Impacts on competitiveness of industry and markets are not possible to assess**

Conclusion – Appropriateness and feasibility of extension

- ❖ **Extension decision at this point seems to be more a matter of political than of technical judgment**
- ❖ **In favour:**
 - It can provide a relevant toolbox to be used if considered appropriate for SCP/SIP
 - Message of the direction of future legislation
 - Extension by itself does not imply immediate action - Theoretically possible even in the absence of methodologies and standards
- ❖ **Against:**
 - Does entail danger for loss of momentum for current Ecodesign and also depends on willingness/capacity to commit additional resources
 - Extension without a necessary firm basis (methodology/standards) and experience may create higher level of uncertainty
 - Could be seen as going against a principle of evidence based policy (experience of the applicability of certain tools)



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Thank you for your attention!

Questions, Comments?



Case study 2 : Clothing (jeans and leather jacket)

❖ Market size and structure

- 389 billion pairs of jeans ; 27-41 billion leather jackets
- Low market concentration : 177,000 firms – mainly SMEs

❖ Environmental impact

- Significant: 2-10% of total impact of consumer products in most environmental aspects (EIPRO studies)
- Key LC stages:
 - Raw material: Cotton production (water use, fertilisers) /animal breeding
 - Processing: jeans production (water), tanning of leather (water, waste, chemicals)
 - Use stage: washing (energy and water)

❖ Existing legislation and standards

- Raw material stage only partly covered (CAP)
- Production covered by IED and other (no info on effectiveness)
- Use phase mainly covered by EuPs requirements
- Voluntary schemes, retailer-led green supply chain, labels
- Eco-label on jeans (not leather)
- Work on ecological footprint

Case study 2 : Clothing (jeans and leather jacket)

❖ Ecodesign requirements considered

- Ecological profile on the basis of primary or secondary data – comparison with benchmarks
- Requirement on use of organic cotton or other similar good practice scheme
- Requirements for certification with standards in relation to production process

❖ Alternative approaches

- BaU scenario : industry initiatives, chain of custody schemes, labelling requirements, production related regulation and stricter CAP requirements
- Mandatory labelling
- Voluntary initiative
- Financial tools

Case study 2 : Clothing (jeans and leather jacket)

❖ Effectiveness

- Potentially high if raw material production stage is properly addressed
- Depends on capacity to influence raw materials production stage through supply chain requirements and use of agriculture management practices
- Limited scope for production stage - under existing legislation (IED)
- Limited impact in relation to use phase – determined by consumer behaviour

❖ Feasibility

- Reliance on documentation (declarations/certificates) to prove compliance with requirements can be complex with high administrative costs – particularly for SMEs and for authorities (difficult monitoring)
- No substantial problems for measurement/standards in the case of jeans (Eco-labels) – different in the case of leather
- Voluntary based initiatives could achieve similar impact but also difficult due to dominant share of small firms and complicated supply chain

❖ Impact on existing Ecodesign Directive

- *Changes to the MEERP (EcoReport) : feasible but requires changes in relation to allocation, land use issues and additional data*

Case study 3 : All purpose cleaners

❖ **Market size and structure**

- Household: 2.5 bln kgs, €5.2 billion ; Industrial: 1.3 bln kgs, €2.4 billion
- Moderate market concentration : 130-140 firms control 80-90% of market

❖ **Environmental impacts**

- 0.2-0.6% of total impact of consumer products (EIPRO studies)
- Toxicity : production and use stages
- Use phase: water and energy use (role of consumer behaviour), VOCs and hazardous and non-hazardous waste
- Variation depending on type (wipe, liquid, spray)
- Industrial: Different concentrations and toxic profile, greater capacity to control exposure and minimize waste, water and energy use

❖ **Existing legislation and standards**

- Toxicity aspects under REACH Regulation (effective? – too early to tell)
- Resources depletion, energy, water mainly covered by voluntary mechanisms
- Eco-labels on most categories
- AISE sustainable charter with focus on product performance – high levels of participation

Case study 3 : All purpose cleaners

❖ Ecodesign requirements considered

- Ecological profile on the basis of primary or secondary data – comparison with benchmarks
- General performance levels and in relation to the cold water
- Dosage management
- Requirement on inactive agents
- Requirements on packaging weight – recyclability

❖ Alternative approaches

- BaU scenario : existing voluntary initiatives, labelling requirements, chemicals regulation
- Mandatory labelling
- Voluntary initiative in the context of Ecodesign
- Financial tools (e.g. Public procurement)
- Multi-stakeholder agreements

Case study 3 : All purpose cleaners

❖ Effectiveness

- Expected to be rather significant in relation to consumer products for resource efficiency, water and energy use, recyclability
- Questions of influence on consumer behaviour
- Rather limited scope in relation to toxicity - under existing legislation (REACH)
- Less scope expected in the case of industrial products
- Existing VA – particularly within Ecodesign context – can bring similar results
- Public procurement possibly effective for parts of industrial sector

❖ Feasibility

- No significant difficulties in implementation identified – measurement methods and standards available
- Not expected difficulties in monitoring/testing (on product)
- VAs maybe more flexible-less costly for industry

❖ Impact on existing Ecodesign Directive

- Changes to the MEERP (EcoReport) : requires changes in relation to toxicity aspects – feasible

Case study 5 : Passenger cars

❖ **Market size and structure**

- 13 million/year
- High level of market concentration : 10 producers 94% of market

❖ **Environmental impacts**

- High : 10-20% of total impact of consumer products (EIPRO studies)
- Use phase is (Well-to Tank and Tank to Wheel) is key life cycle stage in relation to most environmental aspects
- Raw materials extraction and production also important for certain aspects (e.g. resource repletion)

❖ **Existing legislation and standards**

- Almost all aspects under scope of existing legislation (effectiveness?)
- Most producers use LCA in some form

Case study 5 : Passenger cars

❖ Ecodesign requirements considered

- Ecological profile on the basis of primary or secondary data – comparison with benchmarks
- Reduction of weight
- Fuel efficiency, use of biofuels
- Recyclability and level of recycled material
- Efficiency of air-conditioning

❖ Alternative approaches

- BaU scenario : existing legislation and labelling schemes for cars and tyres
- Mandatory labelling
- Voluntary initiative in the context of Ecodesign
- Financial tools

Case study 5 : Passenger cars

❖ Effectiveness

- Limited added value given the existing legislation
- Potential in relation to car weight requirements but safety trade-offs
- Enforcement of existing legislation possibly more effective

❖ Feasibility

- No significant difficulties in implementation and enforceability
- Standards and measurement methods exist

❖ Impact on existing Ecodesign Directive

- Changes to the MEERP (EcoReport) : changes required – feasible

Case study 4 : Floor coverings

❖ **Market size and structure**

- Hard floor: 1.6 bln m² , €11.7 bln ; Soft floor: >1.2 Bln m², > €14 bln kgs
- Market concentration : varies depending on product (high: carpets, others less concentrated)

❖ **Environmental impacts**

- No data on share in total environmental impacts of products
- Raw material extraction and production for soft ; production for hard covering and use most important stages - vary by type of product

❖ **Existing legislation and standards**

- Building and construction regulations cover the lifecycle (Regulation (EU) N. 305/2011) and is linked to standardization
- Use phase covered by building standards – voluntary and required under European and Member State regulations
- Variation across materials - Eco-label for most types of materials (hard covering only) and voluntary labeling specific to each material

Case study 4 : Floor coverings

❖ Ecodesign requirements considered

- Ecological profile on the basis of primary or secondary data – comparison with benchmarks
- Material requirements – sustainably sourced materials
- Requirements on toxicity of chemicals used and indoor air quality
- Installation standards on complementary products (fasteners/sealants/cleaners)
- Requirements on waste - production and recyclability or end-of-life requirements

❖ Alternative approaches

- BaU scenario : existing market trends and standards
- Mandatory labelling
- Voluntary initiative in the context of Ecodesign
- Financial tools

Case study 4 : Floor coverings

❖ Effectiveness

- Expected to reinforce and accelerate current market trends
- Potential impact is high for the construction phase - reduce fragmentation and leverage the various frameworks in place
- Potential to impact supply chain – especially relevant for bio-based flooring
- Significant variation across flooring types – some are essentially raw materials while others are processed. Impacts would therefore vary based on the impact profile

❖ Feasibility

- Constraints based on the current state of measurement frameworks - would require the development of an improved and standardized LCA tool and resolution of system boundaries and functional unit issues
- Would need to avoid conflict or overlap with existing regulations

❖ Impact on existing Ecodesign Directive

- Changes to the MEErP (EcoReport) : requires changes in relation to toxicity aspects – feasible, but would require additional changes to existing LCA

Medium priority (I)

❖ Food products

- All products have very significant environmental impact and market size
- Ecodesign requirements will need to focus on initial stages (raw material production) to bring improvements
- But, important feasibility issues in terms of setting and implementing requirements at this stage – significant costs and difficulties expected
- Overall, due to implementation issues foods and drinks seem a medium priority product group
- Possible exceptions (but still not high priority):
 - Bottled and canned soft drinks, Beers and spirits, Confectionary
 - higher level of processing: focus on energy, water, waste that are under direct control of manufacturer
 - high market concentration : greater capacity of large actors to implement Ecodesign requirements, easier implementation in supply chain – potential for VAs

Medium priority (II)

❖ Apparel, footwear and textiles

- Significant impacts and improvement potential
- Feasibility/implementation issues
- Existing relevant legislation covering important aspects

❖ Toys

- High market size but moderate-low environmental impact
- Existing eco-labels indicating improvement potential
- Requirements in relation to materials used and recyclability
- No obvious feasibility issues

❖ Personal care chemicals

- Significant market size and moderate share environmental impacts
- Eco-labels exist for many of sub-categories indicating improvement potential
- But important role of consumer behaviour
- No apparent feasibility issues
- Toxicity issues covered by legislation but other aspects not

Medium priority (III)

❖ Housing chemical (paints and varnishes)

- Important market size but small share in terms of environmental impacts
- Existing Eco-labels indicate improvement potential
- Toxicity issues covered by legislation but potential for performance - durability requirements and general ecological profile
- No significant feasibility issues

❖ Floor coverings

- Important market size and relative important environmental impacts
- Eco-labels indicating potential for improvement
- Existing standards and initiatives – danger of overlap
- Possible feasibility issues in relation to documentation/certification for initial life cycle stages

Medium priority (IV)

❖ Industrial chemicals (cleaners, paints and varnishes, lubricants)

- Significant market size but low share in terms of environmental impacts
- Reduced improvement potential in relation to similar consumer chemicals
- Possible to set Ecodesign requirements besides toxicity
- No apparent feasibility issues

❖ Hand tools

- Significant market size but low share in terms of environmental impacts
- Improvement potential in relation to raw materials selection, durability and recyclability
- No apparent feasibility issues

❖ Boats and airplanes

- Significant market size and moderate share in total environmental impact
- Energy efficiency already covered by EU and/or international legislation
- Potential for Eco-design requirements on recyclability, resource efficiency, ecological profile
- No apparent feasibility issues but international character/use may make enforceability difficult and have negative impacts on industry, different in the case of inflatable vessels/speed boats

Low priority (I)

❖ **Drugs and plant protection**

- Properties of raw materials key for efficacy
- Limited scope for impact through design

❖ **Houseware products**

- Significant market size and environmental impacts
- Important role of raw material subject to consumer taste and functionality

❖ **Passengers cars, vans/trucks, motorcycles**

- Large market size and high environmental impact
- No feasibility issues
- But limited improvement potential since most are already covered by legislation

❖ **Trains**

- Very small number of products and moderate share in total impacts