

# Evaluation of Energy Labelling Directive and certain aspects of the Ecodesign Directive

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While you are encouraged to answer all the questions offered, you may choose to answer only those questions that you consider relevant. For questions you find difficult to answer you may tick the box 'Don't know'

Questions marked with an asterisk \* require an answer to be given.

## General Questions

Location selection - Please select the country of your response \*

NL

What is your affiliation?

Government body

Which geographic level do you represent?

EU Member state

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## General Questionnaire

### Energy Labelling & Ecodesign

1. Overall, do you think that the Energy Labelling and Ecodesign Directives have achieved energy savings consistent with economic technical potential (potential savings that are technologically possible at reasonable cost)?

a: Yes, it has exceeded the potential

b: Yes, it has met the potential

c: No, it has been successful but there is missed potential

d: No, there is significant missed potential

e: Don't know

Ecodesign Directive: **c**

Energy Labelling Directive: **c**

*Please explain your answer* (note that you will have the chance to discuss the ambition shown by the Directives later in the questionnaire)

This question contains two variables that are difficult to assess: the energy savings and the technical economical potential. Therefore the answer to this question is based upon expert opinion only.

2. Do you think that the Energy Labelling and Ecodesign Directives need to be changed to achieve energy savings that are closer to the full economic technical potential?

Yes

No

Don't know

Ecodesign Directive: **Y**

Energy Labelling Directive: **Y**

*Please explain your answer*

Both Ecodesign and Energy Labelling Directives could be more forward looking, stimulating more innovation and should take into account the relationship between price and time.

Market Surveillance Authorities cannot operate successfully due to the factor of restrictions in available resources and very complicated measurement methods. The costs of compliance checks (one sample primarily and three additional samples if the first fails) are out of proportion if compared to other directives. Retributions for compliance checks if it showed that the first sample fails are deemed to be unavoidable to create a success factor for MSA.

3. Are the Energy Labelling and Ecodesign Directives coherent (contradictory, mutually supportive) with other EU policies and objectives?

Yes

No

Don't know

Ecodesign Directive: **Y**

Energy Labelling Directive: **Y**

*Please explain your answer*

Yes, in general. For specific products and situations this might be different.

In order to contribute to success and diminish complexity for both Directives it is advised to use the same requirements and test methods wherever possible.

## Energy Labelling Directive

4. Energy Labels are currently (or soon to be) mandatory for the following range of product groups. For each of the following product groups, please indicate if these were the most appropriate product groups to select for Energy Labelling.

Yes  
No  
Don't know

	Yes	No	Don't know
Boilers and combi-boilers	X		
Water heaters and hot water storage appliances	X		
Televisions	X		
Room air conditioning appliances	X		
Domestic refrigerators and freezers	X		
Domestic washing machines	X		
Domestic dishwashers	X		
Domestic laundry dryers	X		
Vacuum cleaners	X		
Electrical lamps (part of 'electrical lamps and luminaires')	X		
Luminaires (part of 'electrical lamps and luminaires')			X
Domestic ovens	X		

*Please explain your answer*

Difficult to answer this question, since the energy label has a history. The product groups indicated with Yes certainly are appropriate product groups to select.

The luminaires label is not a real luminaires label that provides information on the energy efficiency of the luminaire; it is more a compatibility label.

5. In retrospect, which other product groups (if any) should have been labelled:

a: Yes, and should still be labelled  
b: Yes, but labelling is no longer relevant  
c: No, but should now be labelled  
d: No, and still should not be labelled  
e: Don't know

	a	b	c	d	e
PCs and servers				X	
Imaging equipment				X	
External power supplies				X	
Electric motors	X				
Ventilation fans	X				
Circulators in buildings	X				
Electric pumps	X				
Complex set-top boxes				X	
Simple set-top boxes				X	
Motors and variable speed drives	X				
Lighting installations					X
Other (please specify)					

*Please explain your answer*

The answer is based on the assumption that energy labelling can also be useful for commercial and industrial products.

Furthermore, for PCs and servers an endorsement label is most suitable; and such a label already exists: the Energy Star label.

6. Has the correct level of ambition in product energy efficiency classification been set for the mandatory energy labels for the following product groups, taking into account economic technical potential, innovation and market developments?

- a: Much too high ambition
- b: Too high ambition
- c: Correct ambition
- d: Too low ambition
- e: Much too low ambition
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups				X		
Boilers and combi-boilers			X			
Water heaters and hot water storage appliances			X			
Televisions					X	
Room air conditioning appliances				X		
Domestic refrigerators and freezers				X		
Domestic washing machines				X		
Domestic dishwashers				X		
Domestic Laundry dryers				X		
Vacuum cleaners			X			
Electrical lamps (part of 'electrical lamps and luminaires')				X		
Luminaires (part of 'electrical lamps and luminaires')						X
Domestic ovens				X		

*Please explain your answer*

The energy label for luminaires does not have an ambition level.

7. How effective are the EU energy labels, or are they expected to be, in improving the energy efficiency (energy use per specific service/capacity unit, for example X kWh/standard wash cycle) of new products placed on the market in the following product groups?

- a: Very effective
- b: Effective
- c: Neutral
- d: Ineffective
- e: Very ineffective
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups		X				
Boilers and combi-boilers						X
Water heaters and hot water storage appliances						X
Televisions		X				
Room air conditioning appliances						
Domestic refrigerators and freezers	X					
Domestic washing machines	X					
Domestic dishwashers	X					
Domestic Laundry dryers		X				
Vacuum cleaners						X
Electrical lamps (part of 'electrical lamps and luminaires')			X			
Luminaires (part of 'electrical lamps and luminaires')						X
Domestic ovens		X				

*Please explain your answer*

Based on earlier (general) evaluations of the energy label and – specific for NL – data on market penetration of most efficient appliances (attached).

For several labels no experience, because label is not yet in operation.

8. How effective are the EU energy labels, or are they expected to be, in reducing the energy consumption of new products placed on the market in the following product groups?

- a: Very effective
- b: Effective
- c: Neutral
- d: Ineffective
- e: Very ineffective
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups						
Boilers and combi-boilers						X
Water heaters and hot water storage appliances						X
Televisions			X			
Room air conditioning appliances						X
Domestic refrigerators and freezers		X				
Domestic washing machines		X				
Domestic dishwashers		X				
Domestic Laundry dryers		X				
Vacuum cleaners						X
Electrical lamps (part of 'electrical lamps and luminaires')						X
Luminaires (part of 'electrical lamps and luminaires')						
Domestic ovens						X

*Please explain your answer*

The answer depends on whether the absolute energy consumption is related to the efficiency. Energy labels that focus on energy efficiency do not reduce energy consumption per se because energy consumption also depends on the use of the product and product characteristics like size and features. Example: a large refrigerator having energy class A+++ may consume more than a small refrigerator of energy class A+. If the trend is towards larger products then energy consumption might not or to a lesser extent decrease, even if the efficiency increases.

9. Some labels also provide information on other product- specific parameters. Please rate the overall effectiveness of energy labels in improving the following parameters for new products:

- a: Very effective
- b: Effective
- c: Neutral
- d: Ineffective
- e: Very ineffective
- f: Don't know

	a	b	c	d	e	f
Noise (for Washing Machines and Dishwashers)						X
Water use (for Washing Machines and Dishwashers)						X
Capacity/Size						X
Product specific output efficiency (for example spin drying efficiency class)						X

*Please explain your answer, identifying particular product groups of concern*

No data available on this subject.

10. Energy labelling currently focuses primarily on energy efficiency – as the rating and scale is based on an index of energy use per specific service/capacity unit, for example for televisions the power consumption per screen size expressed in W/dm<sup>2</sup>. Energy consumption is also currently displayed on labels as a numeric (X kWh/year) value. What should be the focus in future?

- Only on energy efficiency
- Mainly on energy efficiency (existing focus)
- On both energy efficiency and energy consumption**

Mainly on energy consumption  
 Only on energy consumption  
 Other: please specify  
 Don't know

*Please explain your answer*

As an addition to the answer given: the labelling scale for a single product should be based on one parameter, i.e. either on energy efficiency or on energy consumption.

11. How effective has energy labelling been in increasing the proportion of consumers that are informed about product energy use?

Very effective  
**Effective**  
 Neutral  
 Ineffective  
 Very ineffective  
 Don't know

*Please explain your answer, identifying particular product groups of interest*

In general energy labelling has increased consumer awareness about energy efficiency. Since the main message of the energy labels, the A-G scale, is about energy efficiency, it is difficult to assess how effective the energy label has been in increasing the proportion of consumers that are informed about product energy use.

12. How effective has energy labelling been in leading to consumers taking greater account of energy use – as compared to price, size, design, functionality - in their product purchase decisions?

Very effective  
 Effective  
 Neutral  
 Ineffective  
 Very ineffective  
**Don't know**

*Please explain your answer, identifying particular product groups of interest*

No data available on this specific comparison.

13. What do you think of the following statements regarding the effectiveness of the scale of the EU energy label:

a: Strongly agree  
 b: Agree  
 c: Neither agree nor disagree  
 d: Strongly disagree  
 e: Don't know

	a	b	c	d	e
Consumers understand the current (A-G) + 3 (A+++, A++, A+) class system		X			
An A-G class scale is easier for consumers to understand than the A+++-D class scale			X		
Current energy label classes provide a clear and useful differentiation of product energy efficiency		X			
Classes are coherent with Ecodesign minimum requirements					
The current classifications need to be changed	X				
Consumers understand the seasonal and regional information provided in the energy label on air-conditioners					X

*Please explain your answer*

First note that the “disagree” option is missing in the scale. This would have been the answer for the statement “Classes are coherent with Ecodesign minimum efficiency requirements”.

Regarding the second statement: it is probably not the degree of understanding that is different, but the consequences drawn from this understanding. Consumers understand that A+++ is more efficient than

A++ just as A is more efficient than B, but they think the difference between A+++ and A++ is smaller than between A and B.

14. What do you think of the following potential improvement options for the current A-G, A+++ , scales of the energy labels:

- a: Strongly agree
- b: Agree
- c: Neither agree nor disagree
- d: Disagree
- e: Strongly disagree
- f: Don't know

	a	b	c	d	e	f
Adding further + classes, for example A++++					X	
Re-setting all classes to an A-G scale		X				
Re-setting all classes to an A-G scale with an overlap in the market between old 'A' and new 'A' label					X	
Re-setting all classes to an A-G scale with a dated (year) reference on the label		X				
Re-setting all classes to a 1-7 scale that takes over from A-G, in order to avoid overlap in the market between 'new' and 'old' A classes if the A-G scale was retained but rescaled					X	
Introducing an A-'X' label with less than 7 classes		X				
Introducing a dynamic class rating system, which automatically adjusts over time			X			
Moving to an open ended scale					X	
Removing or indicating on the label the energy classes that are empty of products				X		
The steps of the scale should be allowed to disregard life cycle cost savings to the consumer, meaning that a product with a better label class would be certain to save energy in the use phase, but could be so expensive to buy that it would not bring overall cost savings		X				
Removing the entire energy labelling system					X	

Other, please specify

*Please explain your answer*

The energy label needs to be consistent. The Netherlands are in favor of an energy label that clearly indicates the most efficient or least energy using products (i.e. without A+, A++ and A+++); possibly A-G including rescaling, but the Netherlands are open to other solutions that have broad support.

15. What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU manufacturers in the following product groups:

- a: Very positive
- b: Positive
- c: Neutral or no impact
- d: Negative
- e: Very negative
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups		X				
Boilers and combi-boilers						
Water heaters and hot water storage appliances						
Televisions						
Room air conditioning appliances						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						

Domestic Laundry dryers						
Vacuum cleaners						
Electrical lamps (part of 'electrical lamps and luminaires')						
Luminaires (part of 'electrical lamps and luminaires')						
Domestic ovens						

*Please explain your answer*

The answer is based on anecdotal feedback from manufacturers.

16. What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU SME (Small and Medium Enterprises, firms with less than 250 employees and turnover <50million euros/annum) manufacturers in the following product groups

- a: Very positive
- b: Positive
- c: Neutral or no impact
- d: Negative
- e: Very negative
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups						X
Boilers and combi-boilers						
Water heaters and hot water storage appliances						
Televisions						
Room air conditioning appliances						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						
Domestic Laundry dryers						
Vacuum cleaners						
Electrical lamps (part of 'electrical lamps and luminaires')						
Luminaires (part of 'electrical lamps and luminaires')						
Domestic ovens						

*Please explain your answer*

17. What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU importers in the following product groups:

- a: Very positive
- b: Positive
- c: Neutral or no impact
- d: Negative
- e: Very negative
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups						X
Boilers and combi-boilers						
Water heaters and hot water storage appliances						
Televisions						
Room air conditioning appliances						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						
Domestic Laundry dryers						
Vacuum cleaners						
Electrical lamps (part of 'electrical lamps and luminaires')						



Luminaires (part of 'electrical lamps and luminaires')						
Domestic ovens						

Please explain your answer

18. To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Energy Labelling had on innovation

- a: Very positive
- b: Positive
- c: Neutral or no impact
- d: Negative
- e: Very negative
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups		X				
Boilers and combi-boilers						
Water heaters and hot water storage appliances						
Televisions						
Room air conditioning appliances						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						
Domestic Laundry dryers						
Vacuum cleaners						
Electrical lamps (part of 'electrical lamps and luminaires')						
Luminaires (part of 'electrical lamps and luminaires')						
Domestic ovens						

Please explain your answer

The answer is based on anecdotally feedback from manufacturers.

19. How has the Energy Labelling Directive affected, or is expected to affect, the prices of the following regulated products, compared to how they might otherwise have been?

- a: Prices are much higher
- b: Prices are higher
- c: Prices have not been impacted
- d: Prices are lower
- e: Prices are much lower
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups						X
Boilers and combi-boilers						
Water heaters and hot water storage appliances						
Televisions						
Room air conditioning appliances						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						
Domestic Laundry dryers						
Vacuum cleaners						
Electrical lamps (part of 'electrical lamps and luminaires')						
Luminaires (part of 'electrical lamps and luminaires')						
Domestic ovens						

Please explain your answer

There is no way to tell this without making a number of bold assumptions, because there is no parallel situation without energy labels. In general research shows that the impact on prices of minimum efficiency performance standards (MEPS) is non-existent or minimal; see e.g. Ellis (2006), Dale et al. (2009).

20. To what extent do you agree or disagree 'that a higher energy label class ranking results, or will result, in a price premium for better performing products':

- a: Strongly agree
- b: Agree
- c: Neither agree nor disagree
- d: Disagree
- e: Strongly disagree
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups		X				
Boilers and combi-boilers						
Water heaters and hot water storage appliances						
Televisions						
Room air conditioning appliances						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						
Domestic Laundry dryers						
Vacuum cleaners						
Electrical lamps (part of 'electrical lamps and luminaires')						
Luminaires (part of 'electrical lamps and luminaires')						
Domestic ovens						

*Please explain your answer*

The price premium only holds for the products with the highest energy label class and for a limited time, see e.g. Siderius (2013a).

Note that for televisions (and other electronic products) in general there is no relation between price and efficiency, i.e. observed relations are spurious relations because performance is a confounding factor. For these products a price premium is asked for new, high performing products (e.g. larger, thinner screens) that are also more efficient.

Further note that the question assumes a relation between energy label class and performance of the product.

21. For you, or your organisation, do you think that the benefits of mandatory energy labels outweigh their costs?

**Yes, high overall benefits**

Yes, low overall benefits

Benefits and costs about the same

No, benefits are less than costs

No, costs are significantly higher than benefits

Don't know

*Please explain your answer*

Otherwise we probably would have set up a national labelling scheme.

22. For EU society as a whole, do you think that the benefits of mandatory energy labels outweigh their costs?

**Yes, high overall benefits**

Yes, low overall benefits

Benefits and costs about the same

No, benefits are less than costs

No, costs are significantly higher than benefits

Don't know

*Please explain your answer*

Energy labels increase transparency in the market, thus resulting in a level playing field for competition on energy efficiency which stimulates innovation and reduces prices.

23. Should there be a legal provision, like for ecodesign, for voluntary initiatives on energy labelling, considering the administrative burden for the Commission and member state market surveillance costs?

Yes

**No**

Don't know

*Please explain your answer*

The effect of labelling is based on 100% coverage. A voluntary initiative can not achieve that. Moreover a voluntary initiative does not make market surveillance superfluous.

24. To what extent do you agree or disagree with the following statements about the energy label:

a: Strongly agree

b: Agree

c: Neither agree nor disagree

d: Disagree

e: Strongly disagree

f: Don't know

	<b>a</b>	<b>b</b>	<b>c</b>	<b>d</b>	<b>e</b>	<b>f</b>
The product groupings for the label should be broader and not so technology specific, for example a label on refrigerators should cover all types of refrigerators without variation in label class ambition levels by individual technology type (refrigerator with fresh-food storing compartment, refrigerator-chiller, refrigerator with 1/2/3-star compartments, refrigerator-freezer etc.)		X				
The information on the label is accurate and reliable			X			
The information reflects real-life use of the product			X			
Energy labels are usually displayed in appropriate places in retail stores and showrooms		X				
Energy labelling for distance selling (e.g. selling via internet) should be improved	X					
It would make sense to allow for the use of QR-codes (see figure) in the label in order to display information about the product on the consumers' smartphones or on smart meters.		X				
Energy labelling has led to lower production costs for manufacturers			X			
Energy labelling has led to improved profit margins on regulated products			X			
Energy labelling has unduly restricted the range of products on the market				X		
Consumers prefer products with better label classes because they are interested in life cycle cost savings. It matters much less to them that a good label class also means a product which is better for the environment			X			

*Please explain your answer*

Please note that an omnibus regulation improving energy labelling for selling via the internet is being processed.

Energy labels provide the possibility for manufacturers to compete (also) on efficiency and not only on price and performance. Manufacturers can ask a price premium for products with the highest energy class on the market.

25. For Energy Labelling, should additional information be displayed on the label on:

a: Yes, and it should form part of the scoring for the product's label class

b: Yes, as a piece of information additional to the label class scale

c: No

d: No, but the information should be available on product fiches, QR codes or other mechanisms

e: Don't know

	a	b	c	d	e
Other environmental aspects (e.g. CO2 emissions)				X	
Whole product life cycle energy consumption				X	
Whole product life cycle resource efficiency				X	
Annual running costs (the costs of operating the product)				X	
Expected product life				X	

Other, please add:

*Please explain your answer*

For the time being, the energy label should be an energy label and not an environmental label.

26. To what extent do you agree or disagree with the following statements on the inclusion of additional information on the energy label:

a: Strongly agree

b: Agree

c: Neither agree nor disagree

d: Disagree

e: Strongly disagree

f: Don't know

	a	b	c	d	e	f
Two separate labels should exist, one for energy consumption and the second one for other environmental aspects					X	
One single label should exist, including both energy consumption and other significant environmental aspects				X		
Information on other environmental impacts should be provided on mandatory basis		X				
Information on other environmental impacts should be provided on voluntary basis					X	
Information on other environmental impacts should be provided in absolute terms (not in comparison with a benchmark or an index value)						X

*Please explain your answer*

The answers provided assume that the question is related to a *mandatory* label (energy and/or environmental). To have two separate mandatory labels, one for energy consumption and the second one for other environmental aspects could be confusing. The current situation already covers the combination of a (voluntary) ecolabel and a (mandatory) energy label for several products.

27. Some products that are labelled are required to have fiches. Fiches are technical information presented within any product brochures accompanying the labelled product and provide standard information on specific parameters relating to the product (e.g. annual water consumption for dishwashers). What do you think of the following changes to fiches?

a: Very positive

b: Positive

c: Neutral

d: Negative

e: Very negative

f: Don't know

	<b>a</b>	<b>b</b>	<b>c</b>	<b>d</b>	<b>e</b>	<b>f</b>
Adding information on other environmental aspects			X			
Adding information on annual running costs (the costs of operating the product)					X	
Adding information focussed on business - to- business customers		X				
Providing fiches online on a mandatory basis on all labelled products	X					
Providing fiches online on a mandatory basis on selected products that are not labelled	X					
Providing fiches as QR (bar) codes to labels to enable consumers to quickly access more detailed information on their smartphones (see picture)		X				
Removing the requirement for product fiches					X	

Other, please insert:

*Please explain your answer*

Note that some of the options are in fact ecodesign information requirements, e.g. providing fiches online on a mandatory basis on selected products that are not labelled.

Information on running costs is only useful if this can be adapted to local and actual circumstances, i.e. can vary with energy prices in time and place. So this is not useful on a static fiche, but can be useful on a website.

28. Energy use by appliances is determined partly by consumer behaviour. For example, frequent opening of a fridge will lead to an increased energy use, regardless of the energy label. A smart appliance could provide feedback to the user, after observing the user's behaviour with the appliance in the user's home, as to how his behaviour affects the energy performance of the appliance. Would you welcome the introduction of such an advanced and IT-supported form of energy labelling?

Yes

No

**Don't know**

*Please explain your answer and provide further innovative ideas*

It is unclear what the feedback to the use has to do with the energy label which is information to be used before buying (and using) the product. Indeed there are suggestions – see e.g. presentation of Alan Meier – to let the energy label class of a product depend on the actual consumption in the field but this is different from providing information on the real energy consumption of products to the user.

29. Have the energy labels been enforceable? If not sufficiently or not at all, what could be done to improve enforcement of energy labels?

Yes, very much so

**Yes, to some extent**

No, not sufficiently

No, not at all

Don't know

*Please explain your answer*

Enforcement is to some extent effective, however the rates of non-compliance are too high. Improvement of EU wide provided information to (all) economic operators and underlining the importance can contribute to a higher rate of compliance. The non-compliance of the information on labels give a considerable profit for the manufacturer or EU-importer. Enforcement only slightly hinders and the unlawful economic profit will not be a part of punishment. Overall there are no imprinting effects to the companies who do not comply. Normally this would be a matter for member states, however it is felt that improvement only can be achieved if the Commission strongly support this and similar provisions are enforced in all member states. The Ecodesign and Labelling Directive are in the market considered more as soft law if compared to consumer safety Directives.

30. How effective do you think the following options for improving enforcement would be?

a: Very effective

- b: Effective
- c: Not very effective
- d: Not effective at all
- e: Don't know

	a	b	c	d	e
An EU-Wide market surveillance authority covering the internal market		X			
An EU-wide mandatory product database	X				
An EU-wide transparent complaint procedure		X			
MS-based transparent complaint procedure			X		
Other, please describe: Possibility for third party certification	X				

*Please explain your answer*

Possibility for third party certification. An EU-wide mandatory product database for MSA available only could improve enforcement considerably.

31. Are incorrectly or non-labelled products a significant problem, i.e. large numbers of these products are sold, in the following product groups covered by labelling requirements?

- a: Yes, and this results in products with significantly lower energy efficiency being sold
- b: Yes, but the impact on new product energy efficiency is low
- c: No
- d: Don't know

	a	b	c	d
Overall, across all product groups				
Televisions			X	
Room air conditioning appliances				X
Domestic refrigerators and freezers	X			
Domestic washing machines		X		
Domestic dishwashers		X		
Domestic laundry dryers	X			
Electrical lamps (part of 'electrical lamps and luminaires')			X	

*Please explain your answer*

Based on MSA information on considered non-compliances

## Ecodesign Directive

32. Ecodesign implementing measures or voluntary agreements have been developed or are being developed for the following range of product groups. For each of the following product groups, please indicate if these were the most appropriate product groups to be selected.

Yes

No

Don't know

	Yes	No	Don't know
Boilers and combi-boilers	X		
Water heaters and hot water storage appliances	X		
PCs and servers	X		
Televisions	X		
Stand-by and off-mode losses of EuPs	X		
External power supplies	X		
Tertiary lighting	X		
Room air conditioning appliances	X		
Electric motors	X		
Ventilation fans	X		
Circulators in buildings	X		
Domestic refrigerators and freezers	X		
Domestic washing machines	X		
Domestic dishwashers	X		
Domestic laundry dryers	X		
Vacuum cleaners	X		
Simple set-top boxes	X		
Non-directional lighting	X		
Directional lighting	X		
Water pumps	X		
Complex set-top boxes (voluntary agreement)	X		
Imaging equipment (voluntary agreement)	X		

*Please explain your answer*

The choice of these products is based on assessment in the working plan. Furthermore, for many products the ecodesign minimum requirements are complementing the energy label: the energy label stimulates the development of more efficient products whereas the ecodesign requirements cut off the least efficient products from the market.

33. Has the correct level of ambition in minimum ecodesign requirements been set for implementing measures and voluntary agreements for the following product groups, taking into account economic technical potential, innovation and market developments?

a: Much too high ambition

b: Too high ambition

c: Correct ambition

d: Too low ambition

e: Much too low ambition

f: Don't know

	a	b	c	d	e	f
Overall, across all product groups				X		
Boilers and combi-boilers			X			
Water heaters and hot water storage appliances				X		
PCs and servers				X		
Televisions				X		

Stand-by and off-mode losses of EuPs			X			
External power supplies				X		
Tertiary lighting				X		
Room air conditioning appliances				X		
Electric motors				X		
Ventilation fans				X		
Circulators in buildings			X			
Domestic refrigerators and freezers				X		
Domestic washing machines				X		
Domestic dishwashers				X		
Domestic laundry dryers				X		
Vacuum cleaners				X		
Simple set-top boxes			X			
Non-directional lighting				X		
Directional lighting				X		
Water pumps				X		
Complex set-top boxes (voluntary agreement)				X		
Imaging equipment (voluntary agreement)				X		

*Please explain your answer*

Ambition means taking into account both level and timing. For many products ambitions on timing and/or level were lower compared to the first proposals.

34. Requirements on energy use in Ecodesign implementing measures and voluntary agreements are based primarily on energy efficiency - the energy use per specific service/capacity unit, for example for televisions the power consumption per screen size expressed in W/dm<sup>2</sup>, rather than on the absolute energy consumption. What should be the basis of such requirements in implementing measures and voluntary agreements in the future?

Only on energy efficiency

Mainly on energy efficiency

**On both energy efficiency and energy consumption**

Mainly on energy consumption

Only on energy consumption

Others: please specify

Don't know

*Please explain your answer*

35. The Ecodesign implementing measures adopted so far focus primarily on the impacts in the use phase of a product, which is in most energy-using products responsible for the largest share of the overall impact. Does the Ecodesign Directive or its implementation need to be changed to more proportionately address impacts in other life-cycle phases (including production and disposal) other than the use phase? If yes, how should it be changed? If no, why not?

Yes

**No**

Don't know

*Please explain your answer*

In principle Ecodesign addresses significant environmental aspects in all phases of the product life. For energy using products in a first step it is indeed likely that the energy consumption and other impacts in the use phase are dominant. However, when these impacts have been reduced in the next step necessarily other impacts will become significant. Wellknown examples of energy using products where other impacts than energy consumption are significant are mobile phones and notebooks. In principle the methodology is equipped to deal with other aspects than energy, however there may be other issues (measurability, enforceability) that need to be resolved.

36. To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU manufacturers:



- a: Very positive
- b: Positive
- c: Neutral or no impact
- d: Negative
- e: Very negative
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups		X				
PCs and servers						
Televisions						
Stand-by and off-mode losses of EuPs						
External power supplies						
Tertiary lighting						
Room air conditioning appliances						
Electric motors						
Ventilation fans						
Circulators in buildings						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						
Domestic laundry dryers						
Simple set-top boxes						
Non-directional lighting						
Directional lighting						
Imaging equipment (voluntary agreement)						
Complex set-top boxes (voluntary agreement)						

*Please explain your answer*

Based on anecdotally information from manufacturers.

37. To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU SME (Small and Medium Enterprises, firms with less than 250 employees and turnover <50million euros/annum) manufacturers:

- a: Very positive
- b: Positive
- c: Neutral or no impact
- d: Negative
- e: Very negative
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups						X
PCs and servers						
Televisions						
Stand-by and off-mode losses of EuPs						
External power supplies						
Tertiary lighting						
Room air conditioning appliances						
Electric motors						
Ventilation fans						
Circulators in buildings						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						
Domestic laundry dryers						
Simple set-top boxes						
Non-directional lighting						

Directional lighting						
Imaging equipment (voluntary agreement)						
Complex set-top boxes (voluntary agreement)						

Please explain your answer

38. To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU importers:

- a: Very positive
- b: Positive
- c: Neutral or no impact
- d: Negative
- e: Very negative
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups						X
PCs and servers						
Televisions						
Stand-by and off-mode losses of EuPs						
External power supplies						
Tertiary lighting						
Room air conditioning appliances						
Electric motors						
Ventilation fans						
Circulators in buildings						
Domestic refrigerators and freezers						
Domestic washing machines						
Domestic dishwashers						
Domestic laundry dryers						
Simple set-top boxes						
Non-directional lighting						
Directional lighting						
Imaging equipment (voluntary agreement)						
Complex set-top boxes (voluntary agreement)						

Please explain your answer

39. To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on innovation:

- a: Very positive
- b: Positive
- c: Neutral or no impact
- d: Negative
- e: Very negative
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups			X			
Boilers and combi-boilers			X			
Water heaters and hot water storage appliances			X			
PCs and servers			X			
Televisions			X			
Stand-by and off-mode losses of EuPs		X				
External power supplies			X			
Tertiary lighting			X			

Room air conditioning appliances			X			
Electric motors			X			
Ventilation fans			X			
Circulators in buildings		X				
Domestic refrigerators and freezers			X			
Domestic washing machines			X			
Domestic dishwashers			X			
Domestic laundry dryers			X			
Vacuum cleaners			X			
Simple set-top boxes		X				
Non-directional lighting			X			
Directional lighting			X			
Water pumps			X			
Complex set-top boxes (voluntary agreement)			X			
Imaging equipment (voluntary agreement)			X			

*Please explain your answer*

Based on anecdotal information from manufacturers.

40. How has the Ecodesign Directive affected the prices of the following regulated product groups, compared to how they might otherwise have been?

- a: Prices are much higher
- b: Prices are higher
- c: Prices have not been impacted
- d: Prices are lower
- e: Prices are much lower
- f: Don't know

	a	b	c	d	e	f
Overall, across all product groups			X			
PCs and servers			X			
Televisions			X			
Stand-by and off-mode losses of EuPs			X			
External power supplies			X			
Tertiary lighting			X			
Room air conditioning appliances			X			
Electric motors			X			
Ventilation fans			X			
Circulators in buildings			X			
Domestic refrigerators and freezers			X			
Domestic washing machines			X			
Domestic dishwashers			X			
Domestic laundry dryers			X			
Simple set-top boxes			X			
Non-directional lighting			X			
Directional lighting			X			
Imaging equipment (voluntary agreement)			X			
Complex set-top boxes (voluntary agreement)			X			

*Please explain your answer*

No specific data is available, but in general research shows that the impact on prices of minimum efficiency performance standards is non-existent or minimal (see also answer to question 19).

41. For you, or your organisation, do you think that the benefits of the Ecodesign regulations and voluntary agreements outweigh their costs?

**Yes, high overall benefits**

Yes, low overall benefits

Benefits and costs about the same

No, benefits are less than costs  
 No, costs are significantly higher than benefits  
 Don't know

*Please explain your answer*

No need for national regulation, level playing field for business.

42. For EU society as a whole, do you think that the benefits of Ecodesign regulations and voluntary agreements outweigh their costs?

**Yes, high overall benefits**

Yes, low overall benefits Benefits and costs about the same

No, benefits are less than costs

No, costs are significantly higher than benefits

Don't know

*Please explain your answer*

Level playing field (internal market), energy savings.

43. Should the possibility of laying down Ecodesign requirements in voluntary agreements – rather than mandatory requirements – be maintained?

Yes, and these should continue to be prioritised over mandatory regulations

**Yes, but these should not be prioritised over mandatory regulations**

No

Don't know

*Please explain your answer*

Experience shows that voluntary agreements are not faster than implementing measures but can be more flexible.

44. To what extent do you agree or disagree with the following potential changes to the method of setting specific minimum requirements in the Ecodesign Directive?

a: Strongly agree

b: Agree

c: Neither agree nor disagree

d: Disagree

e: Strongly disagree

f: Don't know

	<b>a</b>	<b>b</b>	<b>c</b>	<b>d</b>	<b>e</b>	<b>f</b>
Go beyond the Least Life Cycle Cost Approach (LLCC) when setting minimum requirements, i.e. to aim for a staged approach towards the highest feasible energy efficiency level while at the same time ensuring that the life cycle costs of products are not getting higher for the consumer compared to the base case (considering also what room this would leave to energy labelling). The revised Methodology for Ecodesign of Energy-related Products (MEErP) already refers to this efficiency point as "Break Even Point".	X					
Involve a check on what would it mean to go beyond LLCC by identifying the "Break Even Point" in the preparatory studies.	X					
Strive for more ambitious requirements not by going beyond LLCC cost but rather to make life cycle cost calculations more realistic by applying "learning curves" (consideration of decreasing production costs over time)	X					
Keep the present practice of life cycle calculation			X			
Give benchmarks a more powerful role as targets. They should serve as starting point for setting new MEPS at the time of revision, while still respecting the rules of Article 15 of the Ecodesign Directive		X				
Identify reference levels for best not yet available technology in preparatory studies and use it to predefine future energy		X				

efficiency classes in Energy Label.						
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*Please explain your answer*

Regarding learning curves, see Siderius (2013a).

*Which other changes would you suggest and why?*

For electronic products LCC can not be used to guide ecodesign efficiency/energy requirements because there is no relation between efficiency and price. However, products with higher performance tend to be more efficient and have a higher price which decreases (quickly) in time. An alternative to the LLC is to take the price decrease into account when determining the timing of the requirements.

45. Are products that are non-compliant with Ecodesign requirements a problem, i.e. large numbers of these are sold in the following regulated product groups?

a: Yes, and this results in products that perform significantly below the minimum requirements reaching the market

b: Yes, but the impact on the average energy efficiency of new products on sale is low

c: No

d: Don't know

	a	b	c	d
Overall, across all product groups		X		
PCs and servers				X
Televisions		X		
Stand-by and off-mode losses of EuPs		X		
External power supplies		X		
Tertiary lighting		X		
Room air conditioning appliances				X
Electric motors				X
Ventilation fans				X
Circulators in buildings				X
Domestic refrigerators and freezers		X		
Domestic washing machines		X		
Domestic dishwashers		X		
Domestic laundry dryers		X		
Simple set-top boxes		X		
Non-directional lighting		X		
Directional lighting				X
Imaging equipment (voluntary agreement)		X		
Complex set-top boxes (voluntary agreement)		X		

*Please explain your answer*

Often there is a non compliance situation only because of a non compliant situation of the documents that don't meet the requirements . Then the impact on the average energy efficiency of new products on sale is low so answer b is applicable.

46. To what extent do you agree or disagree with the following statements about Ecodesign:

a: Strongly agree

b: Agree

c: Neither agree nor disagree

d: Disagree

e: Strongly disagree

f: Don't know

	a	b	c	d	e	f
Ecodesign has led to lower production costs for manufacturers						X
Ecodesign has led to improved profit margins on regulated products						X
The Ecodesign regulations unduly restricted the range of products on the market					X	

*Please explain your answer*

## Rulemaking Procedures

47. Please rate the effectiveness of the following phases in the legislative procedure for laying down Energy Labelling and Ecodesign requirements for products? Effectiveness in the procedure relates to achieving useful results in a timely manner.

- a: Very effective
- b: Effective
- c: Neutral
- d: Ineffective
- e: Very ineffective
- f: Don't know

	a	b	c	d	e	f
Ecodesign working plan			X			
Preparatory study		X				
Consultation forum		X				
Impact assessment and draft regulation						
Member State expert group on labelling		X				
Regulatory Committee vote	X					
WTO notification process			X			
Scrutiny/Objection by European Parliament and Council		X				

*Please explain your answer*

Regarding impact assessment and draft regulation: draft regulation is useful, impact assessment not because this is not available before the publication of the measure in the OJ.

48. Does the involvement of Member State authorities need to be changed in the preparatory and adoption process of delegated acts and implementing measures for Ecodesign and Energy Labelling in order to ensure their views are taken into account, their rights respected and their administrative burden is reduced to the necessary minimum? If yes, how?

- Yes
- No
- Don't know

Ecodesign: No  
Energy Labelling: yes

*Please explain your answer*

Reintroduce the Regulatory Committee for energy labelling, keep the Regulatory Committee for ecodesign. The Regulatory Committee increases the transparency of the procedure, ensures involvement of Member State expertise and co-responsibility for the regulations and decreases the possibilities for single issue lobbying.

49. Does the involvement of stakeholders (industry, retailers/distributors, environmental and consumer organisations) need to be changed in the preparatory and adoption process of delegated acts and implementing measures for Ecodesign and Energy Labelling in order to ensure their views are taken into account, their rights respected and their administrative burden is reduced to the necessary minimum? If yes, how?

- Yes
- No
- Don't know

Ecodesign: No  
Energy Labelling: No

*Please explain your answer*

50. How will the administrative burden for the European Commission to implement Ecodesign and the Energy Label change in the future, assuming:

- a: Large increase
- b: Increase
- c: Remain about the same
- d: Decrease
- e: Large decrease
- f: Don't know

	a	b	c	d	e	f
No change in the framework, no loss in the effectiveness of the implementation and taking into account the number of energy-related products already covered and to be covered?						
The scope was extended to non-energy-related products and means of transport		X				
Environmental impacts other than resource use were shown in the label, and ecodesign shifted focus to production phase impacts?						

*Please explain your answer*

The actual burden would depend on the actual number of products for which preparation for a measure is started.

51. How could the administrative burden of the Commission in developing implementing measures and delegated acts be decreased so as to allow a faster development and review of measures and acts?

By introducing a fast track method for reviewing existing measures, where the level of the revised requirements would be determined in a partly automatic procedure based on technological progress achieved in the meantime

By shortening the adoption procedure through carrying out certain consultations in parallel

By other means, namely: [please describe]

*Please explain your answer*

This all depends on the type of products, for suggestions see Siderius (2013).

52. Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities and ensure reliability of the Energy Label?

Yes

No

Don't know

*Please explain your answer*

Seen the proposed improvements it can be considered that the actual provisions need to be improved. Only if retribution rules are implemented (if necessary based on obligations if the product showed to be non-compliant). However this will solve only partly the high costs for MSA due to the system of retesting as required by the Directive.

53. Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities on Ecodesign Directive?

Yes

No

Don't know

*Please explain your answer*

There are a lot of improvements in it.

An important point is that also for data of products with no high risk like in Ecodesign, there are clear agreements about which data exchange system has to be used. Now there is still too much unclearness about the systems like RAPEX, ICSMS and how and when to use them.



In general competence and powers are ok but because of the high costs of the market surveillance (testing!), cooperation ,exchange of information and use foreign data is important. It is necessary that the Commission takes more action to achieve that every country is active in a certain level and participates in the process of cooperation. Market surveillance on Ecodesign is an European issue that only will be successful if all countries give their support on it.

54. Have appropriate and effective mechanisms for cooperation in market surveillance between administrations been established for Energy Labelling and Ecodesign Directives?

Yes

**No**

Don't know

*Please explain your answer*

In general the cooperation is only starting up, if it exists at all. No mechanisms other than the AdCo have been established. In relation to AdCo's already longer existing there seems room for considerable improvement. There are some activities like the project Ecopliant, that aims to develop guidelines for a better implementation of the Ecodesign directive, but the participants here are the countries that are already active and it is difficult to get connection about the results of the project with the countries that still have to start or are still at a low level with the implementation. The role of the Commission in the ADCO, to stimulate participation and contribution of all Member States, could be stronger.

55. Do Member States provide sufficient resources for national market surveillance activities for Energy Labelling and Ecodesign?

Yes

**No**

*Please explain your answer*

Too many Member States do not carry out any market surveillance activities. Intensify the cooperation in the implementation, this can give some reduction of the high costs of the market surveillance activities. In addition the costs for MSA are compared very high for testing products, so that only a few samples out of the whole market are tested.

56. Should the Commission or other EU bodies be more involved to ensure enforcement activities for the Energy Labelling and Ecodesign Directives, considering for example the EU product notification system in place under the cosmetic products regulation (2009/1223/EC, Article 13) or in form of an EU-wide complaint system or other?

Yes

No

*Who should be involved and what role could they play?*

Especially improvement in cooperation (e.g. via a organisation similar as Prosafe) might be possible. Other ways of cooperation are possible to achieve similar effects. Commission could provide the platform and provide improved enforcement possibilities.

57. Should the Energy Labelling Directive be changed to include a conformity assessment procedure (like the Ecodesign Directive has)?

Yes

No

Don't know

*Please explain your answer*

Yes, because in practice the aspects included in the energy labels are also regulated in ecodesign; therefore the conformity assessment procedure should be the same.

A "simple" solution would be to merge the Ecodesign and the Energy label directive and thereby to keep the system of the Ecodesign Directive, including a conformity assessment procedure.

58. Is the conformity assessment procedure in the Ecodesign Directive appropriate?

Yes

No

Don't know

*Please explain your answer*

But the option of third party certification should be more easy to use, e.g. not only direct safety aspects should be a criterion but also substantial energy savings (per product) and long term health issues (emissions).

59. What else could be improved with regard to market surveillance?

It could be effective and efficient thinking about how to organize the market surveillance of a Ecodesign regulation at the moment that it is coming into force. You could organize a testing programme initiated and (partly) financed by the Commission with participation of some countries. This gives in a short period and in an efficient way a picture of the situation as regards the conformity with the requirements. The outcoming data can be used by all countries to take action against the manufacturer/ importer ( or economic operator) in their country. This could result in an decisive approach, in more cooperation and especially in giving some help in solving the current problem of insufficient recourses in several countries for e.g. testing.

Another option would be to organise a conference; e.g. one day MSA (market surveillance authorities) and other stakeholders, one day EcoDesign and one day Energy labelling or as an alternative a two days combined EcoDesign and Labelling meeting between MSA and Commission. During this meeting all existing questions, encountered problems and ideas should be discussed and evaluated. An agenda should be carefully be prepared for such an event.

A firm position from Commission to position these Directives in relation to product safety directives could position enforcement in a correct way.

Some further suggestion are:

- Improve coordination between enforcement authorities (that perform testing, market checks)
- For products that are found non compliant, manufacturers should in any case pay the testing costs

60. Have effective harmonised energy performance testing standards been developed for the product groups regulated under the Energy Labelling and Ecodesign Directives?

**Yes**

No

Don't know

*Please explain your answer*

Harmonised standards are very helpful and are even considerate necessary before implementing a measure in order to prevent discussions on testing methods.

However this system give raise to problems too. Because standards are drafted in a public environment and influence of Authorities and consumer representatives is very restricted, ensurance of preventing faults, mistakes or unbalanced decisions is not guaranteed. Even if such incidents occur, there is not foreseen in an appropriate process for (immediate) correction.

Some noted incidents concerned designing on the test requirements of a standard in such a way that the objectives of the measures are not followed.

## Scope Expansion

61. Should the scope of the Energy Labelling Directive be expanded to non ErP (non Energy related Products – which are products that do not influence energy consumption during use, but have other environmental impacts due e.g. to their manufacturing, such as foodstuffs, clothing and furniture)?

Yes

**No**

Don't know

*Please explain your answer*

Not in this revision. But experience should be gained with regulation of other environmental aspects.

62. Should the scope of the Ecodesign Directive be expanded to non ErP (non Energy related Products)?

**Yes**

No

Don't know

*Please explain your answer*

Condition for regulating specific non ErPs is that measurement methods are available and that in practice effective enforcement is possible.

63. Should the scope of the Energy Labelling Directive and the Ecodesign Directive be limited to energy/resource use in the use phase, while a set of other legal instruments applying to other significant environmental aspects (e.g. material efficiency, pollution) is adopted?

Yes

**No**

Don't know

*Please explain your answer*

The Ecodesign Directive is well suited to deal with all environmental aspects.

64. Should the Energy Labelling Directive's scope be extended to cover buildings, technical building systems and other systems, thus ensuring uniform EU rules for the labelling of such systems, instead of the current approach where Member States set the labelling rules in the national transposition of the Energy Performance of Buildings Directive and in other national legislation?

Yes

**No**

Don't know

*Please explain your answer*

65. Do you see opportunities for synergies between all or part of the EU legislation relevant to product groups? For example: merging all required documents and information into a single form, or merging certain Directives into one (Ecodesign, Energy Star, Energy labelling, and Tyre labelling)

**Yes**

No

Don't know

*Please explain your answer, with reference to the specific changes and their feasibility*

Merging the Ecodesign and Energy labelling Directives and having one regulation for both ecodesign requirements and energy labels for a product would provide practical advantages because it is ensured that definitions, measurement methods etc. are exactly the same (and need to be provided only once). Energy Star is different because it is a voluntary label and tied to an agreement with the US. To include tyre labelling would not be necessary.

## Closing

If you would like to leave any further comments on Energy Labelling or Ecodesign, please use the following space.

It showed that the inappropriate incorporation of using tolerances of the directive in the design was a problem. It would be helpful if such cases are solved on a shorter notice. To simplify the rules for non-compliance (testing and re-testing) could improve enforcement considerably.

#### References

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Are you happy to be contacted by the evaluation study team for an in-depth interview to follow-up on this survey and to discuss these questions and related issues in more detail? If so, please provide your telephone number and e-mail.

Yes

**Once you have reviewed your answers please press the 'SUBMIT' button. Note that the system will take some time to upload your submission. During this time please do not close this window or press the 'back' button on your browser.**