

Evaluation of the Ecodesign Directive
Online survey questionnaire – Stakeholders

DG Enterprise and Industry of the European Commission has requested the Centre for Strategy and Evaluation Services and our partners Oxford Research to carry out an independent evaluation of the Ecodesign Directive (2009/125/EC).

The evaluation is expected to assess the effectiveness and utility of the Directive, identify existing barriers and obstacles and provide recommendations to contribute to a review and, if appropriate, revision of the Directive. It will also examine the appropriateness of extending the scope of the Directive beyond energy related products.

The success of the evaluation is dependent upon the information and feedback that we receive from all actors involved, including the stakeholders representing industry, consumers and environmental groups.

Any information provided is confidential. The results presented to the European Commission will be aggregated and individual enterprises will not be identifiable. CSES aims to comply with the Data Protection Directive (95/46/EC), as implemented in the UK where we are based, under the Data Protection Act 1998. We also comply with EC Regulation No 45/2001 concerning the protection of individuals with regard to the processing of personal data by EU institutions.

However, for the purposes of the study we will need to make reference to the sources of data presented related to general – not firm specific - developments in the market. Please indicate in the relevant question whether the source should be treated as confidential wherever applicable.

Introduction

1. Please indicate the name of your organisation [European Association of Crafts and Small and Medium-Sized Enterprises \(UEAPME\)](#)
2. What type of organisation do you represent?

European industry association	<input checked="" type="checkbox"/>
National industry association	<input type="checkbox"/>
Environmental group	<input type="checkbox"/>
Consumers group	<input type="checkbox"/>
Member state authority/organisation	
Individual manufacturer/importer of product(s) already covered by an implementing measure	<input type="checkbox"/>
Individual manufacturer/importer of product(s) not currently covered by an implementing measure	<input type="checkbox"/>
Eco-design expert/consultant	<input type="checkbox"/>
Other, please specify	<input type="checkbox"/>

3. With which of the products already covered by implementing measures do you have experience of as a manufacturer/importer or as other types of stakeholder involved in the development of the respective implementing measure (state more than one if applicable)?

Standby and off-mode losses of EuPs	<input type="checkbox"/>
Simple set-top boxes	<input type="checkbox"/>
Domestic lighting (general lighting equipment)	<input type="checkbox"/>

Tertiary Lighting	<input type="checkbox"/>
Battery chargers and external power supplies,	<input type="checkbox"/>
Domestic refrigerators and freezers,	<input type="checkbox"/>
Electric motors 1–150 kW,	<input type="checkbox"/>
Televisions,	<input type="checkbox"/>
Circulators in buildings	<input type="checkbox"/>
Domestic dishwashers	<input type="checkbox"/>
Domestic washing machines	<input type="checkbox"/>
Other, please specify	<input type="checkbox"/>

4. Please indicate any other categories of energy-using products not currently covered by implementing measures you have experience of, as a manufacturer/importer or as a stakeholder

Ventilation fans	<input type="checkbox"/>
Water heaters	<input type="checkbox"/>
PCs and computer monitors	<input type="checkbox"/>
Electric pumps	<input type="checkbox"/>
Room air conditioning appliances	<input type="checkbox"/>
Boilers and combi-boilers	<input type="checkbox"/>
Complex set-top boxes	<input type="checkbox"/>
Imaging equipment	<input type="checkbox"/>
Medical imaging equipment	<input type="checkbox"/>
Commercial refrigerators and freezers	<input type="checkbox"/>
Laundry driers	<input type="checkbox"/>
Vacuum cleaners	<input type="checkbox"/>
Directional lighting	<input type="checkbox"/>
Refrigerating and freezing equipment	<input type="checkbox"/>
Distribution and power transformers	<input type="checkbox"/>
Sound and imaging equipment	<input type="checkbox"/>
Solid fuel small combustion installations	<input type="checkbox"/>
Machine tools	<input type="checkbox"/>
Local room heating products	<input type="checkbox"/>
Central heating products (other than CHP)	<input type="checkbox"/>
Domestic and commercial ovens	<input type="checkbox"/>
Domestic and commercial hobs and grills	<input type="checkbox"/>
Professional wet appliances and dryers	<input type="checkbox"/>
Non-tertiary coffee machines	<input type="checkbox"/>
Networked standby losses	<input type="checkbox"/>
Industrial ovens	<input type="checkbox"/>
Tertiary Air Conditioning	<input type="checkbox"/>
Other, please specify	

Relevance

5. In your view, how does the Directive fulfil its role within the context of the Action Plan for sustainable consumption and production (SCP) and sustainable industrial policy (SIP) (COM(2008) 397) ?Please explain

The SCP/SIP Action Plan is a good framework for such a Directive since the Eco-design's aim is to increase the environmental performance of products and thus have more sustainable products on the market.

6. Based on the experience so far, how does the Directive relate to and interface with other Community environmental (e.g. WEEE, RoHS, REACH, F-Gas Directive) and health and safety regulations (e.g. Low Voltage Directive, EMC Directive, Machinery Directive, Construction Products Directive) ? Are there any problematic areas? Please explain

With regards to construction products, SMEs encounter difficulties in complying with the requirements of different pieces of legislation such as Energy labelling, Construction Products Directive and the Eco-Design Directive. For instance, a window must bear the CE-marking according to the Construction Products Directive. In addition to this, the energy labelling and Eco-design will respectively bring to further labelling and implementing measures for one window.

This may give rise to different certificates and labels to be obtained for the same product in different ways and with several different interventions by notified bodies and certification centres which make the fulfilment of these criteria burdensome and very expensive because of testing and third-party approval.

7. In your view, how effectively does the Directive complement other relevant policy instruments (Energy Label, Eco-label and Green Public Procurement)? Are there any problems? Is it possible to streamline the product related policy instruments? Please explain

Following on what has been stated above, it must be mentioned that there is a great lack of coherence among these instruments. For instance, the procedures for setting the criteria for GPP or the implementing measures of Eco-Design are not yet aligned.

A good way to streamline the product related policy instruments would be to work towards a method of self-certification, which has somewhat been achieved for the CE marking in the recently adopted Construction Product Regulation, which allows self-certification and the provision of simplified technical documentation for certain small production series and for micro-enterprises.

Efficiency and Implementation Procedures

8. How adequate do you consider the procedures set by the Directive for identifying products with significant impact and improvement potential to be?

	No opinion/Do not know	Completely inadequate	Rather inadequate	Neither adequate nor inadequate	Adequate	Very Adequate
Working plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Preparatory studies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Consultation forum	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9. Are there any parts of the procedure that you consider inadequate or problematic? What are the problems/issues (of the specific parts or in general)? Please explain

UEAPME believes that an example of formal or fake consultation of SME organisations is clearly happening at the moment. In this case, very technical and long documents in English are sent by the Commission to the members of the Consultation Forum with very short deadlines to reply. The level of technical skills to react to these documents is such that only the manufacturers of the products concerned by the consultation or independent external technicians with expertise in the given field are able to understand the documents and provide their feedback. It is clear that because of time constraints and language problems, it is impossible for small manufacturers to react directly.

10. Have you experienced any problems relating to participation in the various phases of the process of developing one or more implementing measures? Do you have the necessary resources available for effective participation? Please explain

It is very difficult to find the above-mentioned technical expertise inside SME organisations. The only solution is therefore for SME organisations to pay for external experts to assess the documentation received and provide their feedback. Resources are not always available since the budget of SMEs branch organisations is rather limited and such level of expertise is normally very expensive. The result is that often no response is provided to Consultation documents leaving free rein to industry organisations representing big manufacturing companies. The consequences are obvious since the interests are in most of cases opposed.

11. How adequate do you consider the criteria set in Article 15.2 of the Directive (volume of sales/trade, environmental impacts, improvement potential, etc.) for identifying products with significant impact and improvement potential.

No opinion/Do not know	Completely inadequate	Rather inadequate	Neither adequate nor inadequate	Adequate	Very Adequate
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

12. If you consider that any of the criteria are inadequate, please explain below. Please indicate what, if any, changes you consider as possible/necessary?

With regards to the criterion of the volume of sales/trade requiring an indicative volume of 200,000 units a year, UEAPME believes that crafted and non serial products should be excluded. Such products do not fall within the scope of the volume of sales. They are produced in small quantities and thus sold in small quantities.

Furthermore, it is very difficult to assess and measure the significant potential for improvement in terms of its environmental impact.

With regards to the criterion on a significant environmental impact, it is important to link it to the quantities placed on the market. As stated above, non-serial products are placed on the market in very small quantities and thus have a very low environmental impact. Concrete data is difficult to find on this particular point. Moreover, organisations representing craft manufacturers lack of expertise and resources to assess the environmental impact of the products.

external power supplies,						
Domestic refrigerators and freezers,	<input type="checkbox"/>					
Electric motors 1–150 kW,	<input type="checkbox"/>					
Televisions,	<input type="checkbox"/>					
Domestic dishwashers	<input type="checkbox"/>					
Domestic washing machines	<input type="checkbox"/>					

18. What, if any, are the issues/problems related to the requirements set? Which products do they concern? How appropriate is the tiered approach of strengthening the minimum requirements adopted for some products and periodically reviewing the measures? Please explain

Role of standards

19. Based on your experience, to what extent have technical standards contributed to the successful implementation of the Directive to date? Please explain

20. Are there specific problems related to the development and use of technical standards? Are there any gaps in the development of standards in relation to any of the products covered? Please explain

21. How does the experience from the Eco-design Directive compare with that of other New Approach directives in relation to the use of standards?

22. In your view would it be possible and adequate to rely on the use of harmonised standards on the basis of generic requirements instead of developing specific requirements for each product category?

Voluntary agreements

23. Has your organisation been involved in the development of voluntary agreements concerning any of the following products?

Complex set-top boxes	<input type="checkbox"/>
Imaging equipment	<input type="checkbox"/>
Machine tools	<input type="checkbox"/>
Medical imaging equipment	<input type="checkbox"/>
Other, please specify	<input type="checkbox"/>

24. How adequate do you consider the use of voluntary agreements?

No opinion/Do not know	Completely inadequate	Rather inadequate	Neither adequate nor inadequate	Adequate	Very Adequate
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

25. What, if any, has been is your experience with the development of voluntary agreements so far? What, if any, have been the issues/problems in relation to specific products? What are the success factors?

Costs of the implementation of the Directive

26. What are the main types of administrative costs? Please provide any data available on costs and/or indicate the full time equivalent of employees dedicated :

SMEs face high costs to receive the specific technical advice. Once they have it, they have to adapt their production processes to the requirements of the Eco-Design implementing measures, which entail other high costs. It has to be reminded that a life cycle approach aimed at saving resources is a revolution in the way SMEs operate.

27. How do the administrative costs related to compliance with implementing measures of the Eco-Design Directive compare to the costs arising from other environmental legislation you have experience with?

No opinion/Do not know	Very limited	Limited	Average	High	Very high
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact on innovation

28. Based on your experience, how important has been the implementation of the Directive and the respective implementing measures as an incentive for the development of innovation activities in firms?

No opinion/Do not know	Unimportant	Little importance	Moderately important	Important	Very important
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

29. Please provide any additional information on the role (positive or negative) of the Ecodesign Directive or specific implementing measures in the development of innovation in firms:

Innovation in SMEs should be promoted through setting up the right framework conditions, projects, cooperation with research centres, incentives such as tax cuts, etc. Innovation cannot be imposed through legislative measures.

30. What, if any, has been the role of the advanced benchmarks provided in the implementing measures in the development of innovation in firms?

The impact on the development of innovation has been very limited so far.

Impact on third countries

31. Based on your experience, has the Directive had any impact so far on the industry and the markets of energy-using products in third countries? What has this been? Has it contributed towards a global harmonisation of products? Please provide any supporting evidence:

32. Are you familiar with other similar energy policies in third countries outside the EU? If so, what do you consider as their relative strengths and weaknesses? How do their results compare with the Eco-design Directive?

Market surveillance

33. Based on your experience, how effective is market surveillance by Member States authorities across the EU?

No opinion/Do not know	Very ineffective	Ineffective	Neither effective nor ineffective	Effective	Very effective
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

34. Based on your experience, is the application of the Directive uniform across the EU?

YES	NO
<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please explain providing specific examples if available

35. What, if any, are the problems related to the surveillance of the market? What are their effects on the operation of the Internal Market? Please explain

36. Based on your experience are there any products on the market that do not comply with the requirements of the Directive and the implementing measures? If so, to what extent?

37. Based on your experience, what is the level of information available to support the interpretation of and compliance with implementing measures?

No opinion/Do not know	Very limited	Limited	Average	High	Very high
<input type="checkbox"/>					

Effectiveness

38. Do you have any evidence/data/studies concerning the developments in the markets of one or more of those Energy Using products for which implementing measures have already been adopted? Please provide information including the evolution of the volumes of sales, prices of products, availability and variety of products. Please provide any such information in the box below or send any supportive document to Ecodesign.evaluation@cses.co.uk

Note: Please present information classifying products according to the different energy-efficiency or other environmental impact categories/classes as set in the relevant implementing measures.

39. Do you have any evidence/data/studies available concerning the developments in the level of total energy consumption, resources uses or other environmental impacts (e.g. emissions, hazardous substances) related to one or more of those Energy Using products for which implementing measures have already been adopted? Please provide any such information below or send any supportive document to Ecodesign.evaluation@cses.co.uk

40. Based on your experience, how have the implementing measures affected the choice of products on the market?

	Led to an increased range of better performing products	Led to a reduced range of better performing products	Led to a reduction of the functionalities of available products	Led to the increase in the prices of products	Did not substantially affect the range of products in the market
Standby and off-mode losses of EuPs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Simple set-top boxes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domestic lighting (general lighting equipment)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tertiary Lighting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Battery chargers and external power supplies,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domestic refrigerators and freezers,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electric motors 1–150 kW,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Televisions,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domestic dishwashers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domestic washing machines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

41. Do you have any evidence of the effect of the Directive on the costs of production, prices and profit margins for firms? Please provide any information below or send any supportive documents to Ecodesign.evaluation@cses.co.uk

42. Based on your experience, have there been any particular effects of the Directive on SMEs? What are they?

As mentioned under question 26, SMEs face high costs to adapt their products to the implementing measures of the Eco-Design. In these tough economic times, the effort SMEs must go through can have dramatic consequences and can put many of them out of business. In order to prevent this SMEs need a smooth transition to the new methods of manufacturing products foreseen by Eco-Design as well as by other recent EU programmes and strategies aimed at a more rational use of resources. This smooth transition can only be the result of the favourable framework that the EU Commission should set up to allow SMEs to take up the challenge of a resource-efficient economy and to reap its potential, as stated in the Review of the Small Business Act for Europe released in February. This framework should be based on the application of the “Think Small First” principle envisaged by the SBA. First of all, this means designing legislation keeping in mind SMEs, instead of making exemptions for them or excluding them. Secondly adaptation measures such as fiscal incentives, information campaigns, training of employees,

etc. will also be necessary if we want SMEs to comply with the new requirements and remain on the market.

Moreover, SMEs are highly skeptical about the system approach. A system approach will favour standard solutions (and system manufacturers) over individualized / targeted solutions, although the latter might energy-wise be preferable.

Problems could also arise in application of systems in crafts enterprises. Particularly in small enterprises, processes and machinery are not “standard”. In some cases, this might simply be due to the fact a workshop is situated in the inner city, with little space and that for this reason installations and processes have to be adapted. In another case, a baker intended to make his bakery CO2-neutral. He had the new heating and cooling system construed for his needs, given that they had to fit in the existing building.

43. Based on your experience, have there been any particular effects of the Directive on importers of products from non-EU countries? What are they?

44. In your view, what have been the overall effects of the Directive and the relevant implementing measures on the competitiveness of the European industry until now?

	Do not know	Not possible to tell at this point	No effect	Very negative	Negative	Neutral	Positive	Very positive
Standby and off-mode losses of EuPs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Simple set-top boxes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domestic lighting (general lighting equipment)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tertiary Lighting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Battery chargers and external power supplies,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domestic refrigerators and freezers,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Electric motors 1–150 kW,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Televisions,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domestic dishwashers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Domestic washing machines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Utility of the Directive

45. Based on the experience to this point, what do you think is the contribution of the Eco-design Directive in the following key objectives of the EU policy?

	Not applicable	Do not know	Unimportant	Little importance	Moderately important	Important	Very important
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	Not applicable	Do not know	Unimportant	Little importance	Moderately important	Important	Very important
Achieve greenhouse gas emissions reduction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Achieve a high level of protection of environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
competitiveness of EU industry	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Creation of a harmonized market and avoid fragmentation of the market	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increase the security of energy supply and reduce import dependency	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

46. In your view, could the results achieved – or expected to be achieved – by the Eco-design have been realised with EU legislation through national regulation, voluntary agreements or other existing EU or national regulatory instruments and policy tools? Please explain

For instance, the Environmental Product Declaration (EPD) is a standardized (ISO 14025/TR) and LCA based tool to communicate the environmental performance of a product or system, and is applicable worldwide for all interested companies and organizations. This declaration would be sufficient.

With regards to construction products, please refer to the answer on question 6.

47. Are there any other issues you would like to raise concerning the implementation of the Directive to this point? Please state

Extension of the Directive

48. Do you consider it appropriate to extend the Directive to cover non-energy related products and modes of transport?

	Non-energy related products	Modes of transport
YES	<input type="checkbox"/>	<input type="checkbox"/>
NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
No opinion/Do not know	<input type="checkbox"/>	<input type="checkbox"/>

49. What are in your view the reasons for extending/not extending the Directive?

It is premature to extend the scope of the Directive to cover non-energy related products or modes of transport. The current Directive 2009/125/EC has not been implemented consistently across the EU. It is better to understand first the effects of the current Directive and once an assessment has been made, consider a possible extension of the scope. SMEs need time to adapt and extending the scope so quickly would have a negative impact on SMEs.

50. Are there any non-energy related product categories that you would propose should be covered or excluded from the Directive? What is the reason? Do you have supporting data/information? What type of eco-design requirements could be applied to the products you listed? Please provide any such information below or send any supportive documents to Ecodesign.evaluation@cses.co.uk

Closing section

51. Would you like to be contacted by CSES for additional discussions in relation to the answers provided in the survey? If so, please provide the appropriate contact details.

Name	
Position in the organisations	
E-mail	
Phone number	