
At the Consultation Forum held in Brussels on 20th January to discuss the draft Ecodesign Working Plan for 2012 – 2014, the European Commission requested that stakeholders and Member States put their comments in writing. Set out below are the UK delegation’s comments.

**General comments**

Firstly, we would like to thank the European Commission for putting forward an ambitious Ecodesign Working Plan for 2012 to 2014 and for opening up the discussion to the Consultation Forum.

We agree with the Commission’s views presented at the Consultation Forum on the challenges experienced under the Ecodesign Directive and with the proposed potential solutions. We believe that these issues should also be considered in the drafting of the Working Plan, so that we can avoid similar challenges and problems in the Ecodesign process for 2012 to 2014. The Working Plan would benefit from the inclusion of a paragraph on how these challenges will be addressed in the next two years, which will help explain how the Commission plans to implement this very ambitious proposal.

We also support the Commission’s proposal to set up a second ‘horizontal’ stakeholder meeting in March to further discuss these challenges and possible solutions. It is important that the Commission engage regularly with both Member States and stakeholders in order to keep everyone informed and up to date with progress on both horizontal issues and individual measures. This will ensure that all parties involved in Ecodesign and labelling can plan and resource appropriately.

**Timing**

While we welcome the ambition of the Working Plan, the Commission needs to first and foremost address the severe delays witnessed under the existing Working Plan. We are still awaiting draft proposals on certain products that we have been discussing since 2009.
The Working Plan should remain ambitious, but achievable targets need to be set in order to remain credible and feasible.

The Commission should set out a proposed timeline in the Working Plan, addressing each product area from preparatory study through to the possible adoption of the measures. This timeline can be amended as appropriate and shared with the Consultation Forum on a regular basis. We understand that the Commission is constantly affected by external factors that have an impact on these timelines, but it would nevertheless provide a stronger target for adoption and could help all stakeholders plan more effectively.

**Ranking of priority products**

We appreciate that the Commission has to take into account many different aspects (environmental, financial, political, resources etc) when deciding which products to put forward in the Working Plan. However, it is not entirely clear how the Commission has chosen the final list of products. A clear explanation of how this has been done should be included in the introductory text of the Working Plan.

**Taps and showerheads**

Furthermore, bearing in mind that taps and showerheads were the top ranked products in the Final Report of the Study on the Amended Ecodesign Working Plan under the Ecodesign Directive, the UK believes the Commission should reconsider excluding these products from the Working Plan.

The objective of the Working Plan is clear: it does not set out which products will result in Regulations - it outlines which product areas have sufficient impact on the environment and could be improved without being too economically burdensome to business, and therefore warrant consideration under a Preparatory Study. Once a Preparatory Study has been carried out, the Commission, industry and Member States can then discuss whether a Voluntary Agreement, a labelling scheme and/or Ecodesign requirements would best address the efficiency of taps and showerheads, or whether the product group should be dropped entirely.

Considering taps and showerheads were the top ranked products in the Report, they should at least be included as a priority product within the Working Plan, rather than being disregarded without explanation. We can then decide after further analysis and stakeholder feedback whether these products require an implementing measure.

In the UK, there is already an existing industry-led and government supported water efficiency label for similar products ([www.water-efficiencylabel.org.uk](http://www.water-efficiencylabel.org.uk)) which has been successful with industry and consumers.

**Lot 30 products**

As the Lot 30 scope hasn’t been completely defined yet, it seems reasonable to include HP motors < 200W into the Lot 30 scope.

For Blowers, Small fans <125W and High Temperature fans, we believe these products should be evaluated at the same time. It also seems that the new ISO12759 energy efficiency classification standard can be amended to include these three groups.
Revisions

It is not entirely clear in the Working Plan how revisions of current Ecodesign regulations will be carried out. This should be clarified further in the text so that stakeholders are aware what these revisions will or can include and how long they are expected to take.

Non-energy aspects

We encourage the Commission to consider other environmental aspects further and potentially at a horizontal level within the 2012 – 2014 Working Plan. Although most impacts are seen at the energy in use phase, it is important to take into account other environmental impacts, including: use of resources, such as water and critical raw materials; toxins; and other impacts during the whole life-cycle of the product, such as recyclability. If these aspects are clearly addressed in the Working Plan, it will be clear to stakeholders that they need to consider this in the manufacturing of their products, as it will be considered under Ecodesign in the next few years.

I hope these written comments help further explain the points raised by the UK at the Consultation Forum. We would also appreciate if the Commission could share the next version of the draft Working Plan as it is sent through to Inter-Service Consultation.

Please do not hesitate to contact me to discuss any of this or if you need me to provide further explanations.

Yours sincerely

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