1st stakeholder meeting

"Technical assistance study for the assessment of the feasibility of using "points system" methods in the implementation of Ecodesign Directive (2009/125/EC)"

Brussels, 30/06/2016, 10.00-17.30h

Participants

The Commission:

- Michael Bennett (DG GROW);
- Davide Polverini (DG GROW);

Project team:

- Paul Waide (WSE);
- Clemens Rohde (Fraunhofer);
- Omar Amara (VITO);
- Jonathan Wood (Tenvic/VMAS);

Stakeholders:

- Floris Akkerman (BAM);
- Sten Hakan Almström (Electrolux);
- Stephane Arditi (EEB);
- Erich Arens (Kannegiesser);
- Els Baert (Daikin Europe);
- Thomas Ebert (Apple);
- Chloe Fayole (ecostandard);
- Sylvie Feindt (DIGITALEUROPE).
- Filip Geerts (CECIMO);
- Francesca Hugony (ENEA);
- Dorothea Kadenbach (HKI);
- Rainer Kalamajka (Miele);
- Kaisa-Reeta Koskinen (Energiavirasto);
- Pieter-Paul Laenen (Hewlett-Packard Europe, EPE)
- Sigrid Linher (Orgalime);
- Andrei Litiu (EUBAC);
- Carlos Lopes (Energimyndigheten);
- Aline Maigret (BEUC);
- Félix Mailleux (CECED);
- Irina Messerschmidt (VDMA);
- Maurizio Orlandi (Epta Refrigeration);
- Martial Patra (Schneider Electric);
- Fanny Rateau (EHI);
- Ralf Reines (VDW);
- Edward Michael Rimmer (DECC UK);
- Jethro Schiansky (Vorwerk);

- Pierluigi Schiesaro (Arneg);
- Francesco Scuderi (Eurovent);
- Mihai Scumpieru (Mitsubishi Electric Europe, MEE);
- Hans-Paul Siderius (RVO);
- Kamila Slupek (CECIMO);
- Bram Soenen (Ministry of Environment – Belgium);
- Bryan Whittaker (BT connect);
- Edouard Toulouse (Independent consultant);
- Carina Wiik (Teknologiateollisuus);
- Roland Ullmann (Siemens);

Agenda

1. Welcome
2. Introduction to the study and its background by Michael Bennett (MB) (EC, DG GROW)
3. Presentation of draft findings – initial Task 2 report (Consortium VITO - Waide Strategic Efficiency Ltd, Viegand & Maagøe, Fraunhofer ISI, VHK) by Paul Waide (PW) of WSE, UK.
4. Analysis, discussion and exchange on "Points Systems" studied (all)
5. Results of questionnaire of Member States regarding potential for "Points Systems" uses in Ecodesign (Consortium members), presentation by Paul Waide
6. Information on planned Case Studies
7. Next steps
8. AOB

Actions

Project team:

- Post the Member State Survey online;
- Make available the slides of this meeting on the website.

Stakeholders:

- Provide comments on the draft Task 2 report.

1 Welcome

Welcome by DG GROW.

2 Introduction to the study and its background by Michael Bennett (MB) (EC, DG GROW)

Michael Bennett (MB), DG GROW, requests that the participants provide comments on the draft Task 2 report.

3 Presentation of draft findings – initial Task 2 report (Consortium VITO - Waide Strategic Efficiency Ltd, Viegand & Maagøe, Fraunhofer ISI, VHK) by Paul Waide (PW) of WSE, UK

See slides 1st stakeholder meeting

4 Analysis, discussion and exchange on "Points Systems" studied

MB stressed the fact that the goal of the project is to arrive to a single points system approach. Several options will be tested during the conduct of the case studies.
MB asked the audience to share their experiences with different points systems, and the difficulties to implement them.

Els Baert (EB), EPEE indicates that in the case of the energy label for heating systems, it is too soon to provide feedback and there is a lack of reported experience from installers. It was a very long process to develop the factors used in the scheme and the EC simplified the system which means that the reality may not be captured.
She added that points systems remain a good tool to motivate market actors.

Fanny Rateau (FR), EHI stressed that it is difficult to retrieve data and feedback, especially from SMEs.

Rainer Kalamajka (RK), Miele indicated that the points system should have a weighting system, to give priority, for instance, to hygienic aspects for products meant for use in the medical sector.

Hans-Paul Siderius (HPS), RVO stressed the difficulties in obtaining a single score through weighting, as classifying impacts based on their importance (e.g. climate change vs. toxicity) is almost impossible. He recommended that the current study should focus firstly on measuring points via defined characteristics, and secondly (if needed) a weighting system, taking as inspiration the points system methods presented.

Bram Soenen (BS), Belgian Ministry of Environment agrees with HPS. There is a lot of discussion on the weighting systems. If we want results from the study, it might be best to focus on 2-3 aspects, e.g. material efficiency and energy efficiency. In addition, will the results of this study address new product groups or will it address ongoing product groups e.g. windows?

MB stressed that the points system to be developed should be applicable to revisions and new products. We can look at the MEErP and thus not only look to energy efficiency but take some of the trade-offs with resource efficiency into account.

Erich Arens (EA), Kannegiesser, DE and CEN TC 214 (laundry machines) suggested defining clear limits of systems to be evaluated by the points system, as installation and commissioning are often

part of the product. Reduction of industrial energy intensity has to take account of activity. Installing and commissioning is part of the service, and of the product to be supplied. Installation is a cost factor

MB: In B2B goods the total costs of ownership are formally taken into account much more. For B2C domestic appliances we attempt to make calculations on the Least Life Cycle Costs (LLCC) curve, based on findings from the Tasks of the Preparatory Studies, which is in effect a format of "total cost of ownership". However, where it differs often from B2B considerations is that in B2C there is not normally a widely-accepted formula for "total cost of ownership" per product group.

Edouard Toulouse (ET), ECOS indicated some methodologies in the list are very far away from potential implementation in ecodesign, like the ones based on financial flows. Some others are not points systems per se, such as the EU Ecolabel. And then there are others that could have been, e.g. the eu.bac energy label for building automation systems, which is fully based on a system of points. The assessment of the capacity to be implemented is too light in the current version of the report, especially on the legal aspects. In addition you don't distinguish between voluntary agreements and regulations. If you design a methodology you have to investigate if you can use it in a regulation or voluntary agreement.

Sten Almström (SA), Electrolux and CENELEC indicates that lifetime of a product is an important criterion to make a trade-off with reparability: repairing old products will not give the same performance as new ones (cf. LED televisions).

PW adds that anticipation of new technologies is needed in the development of the points system.

Kamila Slupek (KS), CECIMO makes suggestions for the report. She suggests to group the different methods that have been presented per product or per process; and to eliminate some of them. She reminds the project team that the points system developed for machine tools has never been tested on real products – it was compiled solely for consideration at the 2014 Consultation Forum on machine tools and welding equipment. For machine tools, the Task 2 report should also be updated with respect to the ongoing ISO standardisation work re. energy efficiency in machine tools.

One system that is missing in the report is Blue competence, the points system for corporate responsibility, as raised by Irina Messerschmidt (IM), VDMA. However, KS argues that corporate responsibility has no direct link to products.

Ralf Reines (RR), VDW and ISO TC 39 WG12 states that the report should be aligned with the presentation made during the stakeholder meeting.
Regarding the presentation of the standard developed by TC 39, he also requests some deletion of sentences in the report: "the standard allows the use of inappropriate values from literature" and about reproducibility "the methodology is rather vague".
ISO TC 39 WG12 is asked to follow-up by PW.

Martial Patra (MP), Schneider Electric, FR and chairman of CEN CENELEC ecodesign coordination stresses that the scope of the points system should be better defined.
He also refers to the more generic standard EN 50598 that has been defined and that can be used for drafting a standard for any application.

Floris Akkerman (FA), BAM states that a points system applicable to complex multi-functional products will be difficult to reach since defining a proper weighting system will be difficult.

Dorothea Kadenback (DK), HHI, adds that the points system may not be applicable to some products as priorities in B2B and B2C are different (e.g., functionality vs energy efficiency).

Els Baert (EB), Daikin Europe, mentions that regarding Heating, Ventilation, Air Conditioning and Refrigeration (HVACR), the interactions of ecodesign with other areas of legislation is interesting and important, e.g., EPBD, F-Gas discussions, the JRC study regarding buildings, etc. She cautions that a useful points system needs to be measurable, and verifiable via market surveillance.

SA indicates that numerous tests would need to be performed by the companies may be expected when laws resulting from the points system enforce them. The design of a points system should consider this aspect, and thus be careful when segmenting the application of the points system into the different uses of a product (e.g., regarding the number of modes to be tested, and associated combinations).

Carlos Lopes (CL), SE encourages the points system initiative as it gives an opportunity to make regulations on products which are not yet regulated, and may also facilitate how we might address material efficiency and resource efficiency in greater depth in EU ecodesign policy measures.

Rainer Kalamajka (RK), Miele, also supports the adoption of an innovative approach regarding points systems and ecodesign.

RR emphasises that the stakeholder consultation is meant to help in developing the best possible points system by first discussing the outcomes of the exploratory study.

5 Results of questionnaire of Member States regarding potential for "Points Systems" use in Ecodesign (Consortium members), presentation by Paul Waide

Filip Geerts (FG), CECIMO says that the first question to consider is whether a points system is the right approach to adopt.

MB says that whether or not a point system is the right approach is the whole purpose of exploring these ideas further. In the answers from the Member States you can see a number of responses regarding how these elements can be used. You may have a mixture of classic requirements and then overlaid on those, you get more points if you exceed the classic requirements (e.g. material efficiency). With this we want to open the box of ecodesign for products.

Thomas Ebert (TE), Apple states that if the goal is the comparability of products, then a points system is needed.

ET noticed that the trend is that most products become more and more complex, become smarter, and can optimize energy use. We face more challenges. Ecodesign has had various ways of reacting, e.g. correction factors, bonuses, getting an additional class on an energy label or showing something additional on an energy label. What is missing in this study is that all this is not yet assessed. This has not been done anywhere else, to date. To answer the first question: "What criteria should be used?" - that will depend on the theme. You have to look at the different options on the table and then assess which one is best. It will probably differ from product to product.

MB explains that a points system is aimed to provide a tool for manufacturers (compliance with regulations, improvement measures) and also consumers (comparison of products).

Sigrid Linher (SL), Orgalime, mentions that in the forthcoming revision(s) of the Ecodesign "MEErP" methodology, there might be potential for mutual interaction with a points system approach.

Mihai Scumpieru (MS), MEE states that complex systems are already captured by ecodesign in e.g. lot 1, 2, 22, 12 which capture very complex products. If the aim is to go one step behind or beyond the MEPS values in ecodesign, then we enter the realm of the EU Ecolabel and GPP.

MB agrees that the philosophy is a bit like energy labelling. However, with ecodesign we manage only a small corner. For the 95% you can't manage, we can put something approximate.

Pieter-Paul Laenen (PPL), HPE refers to the American system EPEAT and TE explains it. It is a US EPA environmental performance points system for electronic equipment. It is comparable to the EU Ecolabel and Blaue Engel (DE). It sets minimum standards and then gives Bronze, Silver, Gold ratings at the product level.

According to BS, a points system is inappropriate for products with several components assembled together and with different functionalities (example of heat recovery of hot water from bathrooms or windows). There is the possibility to label either each component, or the entire system.

PPL comments that a points system will need viable and strong requirements. It has to be verifiable.

CL states that there is no need to solely consider complex products in using a points system - it can also work for simple products. But the issue may remain complex (e.g. material efficiency). Dismantlability, origin of materials, recycled-content can be aspects the points system can address. In the example of the local space heaters Energy Label, there is a possibility of significant emissions when using these products, but the label presently only provides information on energy performance. However, it would be preferable if consumers could use ecodesign and Energy Labelling to choose low-emission heating systems. Also, points could be given for longer lifetime (guarantees) when addressing material efficiency. Another example is in the battery for mobile phones: removable batteries are equivalent to a long-life guarantee for non-removable batteries.

According to RR, a reliable database is required to assign points, to establish the points system. If no good database is available, a good points system is not relevant. He refers to the existing points system for machine tools.

PW summarises the discussion. There is a need of evidence behind the points system to justify the points being given.

Jethro Schiansky (JS), Vorverk indicates that products are increasingly multi-functional and ever more sophisticated so why not apply ecodesign requirements to functions and not to a product class? Each time a new function is added to the product, the requirements are checked. In his opinion, some kind of points system is necessary when products are multi-functional and diverse.

CL stressed that with a points system, comparison will be inevitable, both in B2B and B2C.

RK points out that if you only give a single score, it will be too simple (for a complex product). For B2B communication, the results require explanation, but they would enable end-users to usefully differentiate levels of product performance.

Erich Arens (EA), Kannegiesser, points out that there might be an issue with intellectual property rights (IPR). For customised products, the end-customer might not want to undergo an assessment process.

In reply, PW mentions that supply chain requirements by clients from providers, proven via Environmental Management Systems (EMSs), have been successful without compromising IPR.

FR points out that Ecodesign measures should be verifiable, define minimum criteria, and not be merely a marketing tool. They need to fulfil market surveillance criteria.

IM (VDMA) comments that different uses of the same products are not comparable.

CL says that currently points systems for simple products already exist. He gives the example of an electric heater and a ventilation unit. "Points" (i.e., a bonus "correction factor") are given for products incorporating a remote control, a programmable timer, etc. These are bonuses given within the remit of a single criterion (i.e., energy efficiency).

Should we go for a single or multiple criteria assessment (see question on slides 3 – discussion points).

ET explains that Ecodesign in fact means minimum requirements. A single score point systems would introduce some flexibility, as a product can be bad in some impact categories but this can be compensated for in other categories. If there is an agreed methodology for weighting we can apply it in the points system.

PW answers that in principle a points system can set a minimum requirement on each criteria as well as setting a minimum overall score to respect.

BS states that the BE ministry of environment is in favour of single criteria for energy and material efficiency. If you have the two requirements next to each other you cannot misinterpret.

PW asks: if there is a trade-off between energy efficiency and material efficiency (e.g. copper in transformers), is this a situation where you want to use a points system?

BS answers, yes, it can promote new material-efficient products.

IM explains that case studies will help the project team to define what is the right points system approach. Case studies will give you a view on which criteria make sense. Focusing on material efficiency is not possible now as the mandate with regards to material efficiency (standardisation Mandate) will be finalised by 2019. You cannot write something like this down in the points system, we have to wait for the mandate.

HPS mentions that this study should not focus on how you can combine different environmental impacts. The issue in this study is how you can deal with complex products. His suggestion is to take one parameter like energy efficiency and then check if the points system could be a solution via which minimum requirements could be set. Machine tools are an excellent example.

Should a points approach be used to help inform a decision making process for complex products (decision tree approach)? (slide 4) and in which stage of the process (slide 6)?

Floris Akkerman (FA) mentions that this is something that can be part of a preparatory study task 7. Here a simple ecodesign requirement could be compared with a points system. He is not in favour of using a points system within the preparatory study to rate the options as this raises complexity.

PW asks if it would be helpful if this study were to propose guidelines to "govern" when it would develop a points system approach, rather than e.g. an energy efficiency requirement, and in which step of the preparatory study this might best occur?

It was agreed by one of the stakeholders that this decision aid tree has to be developed during the preparatory study, and not at the stage of the Consultation Forum, as by then it would be too late.

Should a points system approach be used to help derive specific ecodesign requirements, generic ecodesign requirements or other type of Ecodesign requirements?

ET points out that generic ecodesign requirements are not quantified and therefore you cannot have a generic requirement based on a points system.

Another stakeholder points out that there is a separate annex on generic ecodesign requirements, a manufacturer has to prove that his design is better than the design put forward, so it is certainly quantifiable. A third type of requirement is not possible.

A stakeholder says that a points system is a way of combining generic and specific requirements by combining the points.

HPS suggests checking the Ecodesign Directive for the definition of "specific" and "generic" is advised, before further use of the wording.

6. Information on planned Case Studies

MB explained that a decision had been made to conduct case studies on machine tools and on data storage devices.

7. Next steps

The study will conclude at the end of February 2017.
A 2nd (and last) stakeholder consultation meeting is planned after sharing the draft report for Task 4 (on the case studies), i.e. before the end of 2016 (November or December).
Drafts will be shared on the website and stakeholders will be notified via email.
Stakeholders are invited to provide feedback on the draft report for Task 2 before mid-July.
Work to prepare Task 4 (case studies) is planned to begin in August. It is stressed that case studies are meant for, and will focus on, clarifying the design of a points system.

8. AOB

MP stated that CEN CENELEC will share this work on their website to provide more feedback on the Task 2 report.