

Recent European Commission updates

Discussion on material efficiencies, MEERp and FAQ professional refrigeration

On 16 May 2018, the European Commission provided the draft minutes of three Consultation Forum meetings (lighting, washing machines, dishwashers) held in December 2017. Among the relevant abstracts are enclosed: General and the discussion on material efficiency. Of note too is the updated FAQ on professional refrigeration.

Updated FAQ on professional refrigeration

This April 2018 FAQ list is intended to be used only for facilitating the implementation of Regulation (EU) 2015/1095 on Ecodesign requirements for professional refrigerated storage cabinets, blast cabinets, condensing units and process chillers for and Regulation (EU) 2015/1094 on energy labelling for refrigerated storage cabinets.

The FAQ only reflects the opinion of the Commission services and is not legally binding.

The FAQ can be found on:

https://ec.europa.eu/energy/sites/ener/files/guidelines_2018_refrigerated_storage.pdf

Abstract Ecodesign Consultation Forum on lighting, 17 December 2017, Washing machines, 18 December 2017, Dishwashers, 19 December 2017

These three draft minutes contain the following elements of note:

3. State of play concerning the Combined Ecodesign and Energy Labelling Consultation Forum

The chair explained that in accordance with the new energy labelling framework regulation, a consultation forum for energy labelling needs to be set up, to be combined with that for Ecodesign. The aim is to launch the call for interest for this combined consultation forum in the first quarter of 2019. Existing members of the consultation forum (except for the Member States) need to reapply for membership.

Lighting - 6. AOB

The Commission Services replied that there might be a meeting on computers. For EPREL, meetings for each of the three main user groups (i.e. suppliers, market surveillance authorities and public) are scheduled for March 2018.

Washing machines and dishwashers - 7. /9. Conclusions

The Commission thanked participants for their contributions and explained that the next steps would include the drafting of an amending regulation, the usual steps of inter-service consultation and WTO notification and that it would be working to submit its Impact Assessment to the Regulatory Scrutiny Board in May 2018, with a view to having the amending regulation included for discussion at a Regulatory Committee and Expert Group meeting in October 2018, and in the overall Ecodesign/Energy Labelling 'package' for adoption by the College by the end of 2018.

Key discussion issues on the horizontal point on Material efficiency on Ecodesign and Energy Label Regulations

Held on the Afternoon 19 December – Consultation Forum Dishwashers

Attendance

- **Commission:** DG ENER C3, DG GROW C1, ENVI B1, DG JRC B5
- **Member States:** AT, BE, BG, CH, CZ, DE, DK, ES, FI, FR, HU, IE, IT, LT, NL, PL, SE, UK
- **Associations:** ANEC/BEUC, CECED, CLASP, CLC/TC 59X, ECOS, Eurocommerce FEICA, Independent Retail Europe, Orgalime, Topten

Presentation on the Progress of Material Efficiency Standardisation work

The main points of the work scope and its progress were presented (See Annex 1).

Questions/ Discussion

BE asked if a better scoring can be achieved in the standard for recyclability of plastics due to their marking. **WG5** Convenor answered that marking is not included in the scoring but is included in the qualitative assessment. The practicability of marking plastics is a product-specific decision.

Additionally, **BE** reflected that, for metals, a certain level of recycled content is already included in the standards, and that the EU's Plastics Strategy is working in this direction. **BE** asked if the outcomes of the Plastics Strategy could be integrated in the standard later, or in any other tool. **FEAD** supported the idea of including the content of the Plastics Strategy in the standards.

IT supported manufacturers' charging for, and insisting on attendance of, training courses for independent repairers. **IT** acknowledged the cost of training courses, and the modalities of the qualifications given by manufacturers, based on the number of training courses attended. **WG3** Convenor responded that if independent repairers were to undertake, and pay for, all the training courses of all the brands (as demanded by some manufacturers), they would not be able to undertake many repairs, because they would spend most of their time and financial resources on training. **RREUSE** agreed and clarified that the training courses offered by manufacturers were not tailored to the competence of the repairers (either pre- or post-course), nor to the magnitude of the fee. Rather, it is sometimes used as an access fee to repair certain brands (e.g., courses on certain 'error message' codes and their remedy, etc). **RREUSE** welcomed the current discussion, and emphasised that these obstacles presently exist, exert pressure on independent repairs and should be addressed. **RREUSE** was supportive of the Commission's proposals on these points, as drafted in current draft proposals for the Ecodesign and Energy Labelling of the Washing Machines/Washer-dryers and Dishwashers product groups. **RREUSE** pointed out that the main obstacles for independent repairers are the lack of access to spare parts and to repair information, including on quick disassembly (as slower disassembly means higher labour costs). Individual product category requirements can catalyse the development of horizontal requirements.

CEN-CENELEC acknowledged that uncertainties should be discussed in the standardisation group before being introduced in regulations and commented that clarifications are needed on the definition of durability. **CEN-CENELEC** expert argued that 'durability', according to the body of standards, is based on the function and time over which a product provides its function. For example, in dishwashers, 'durability' might mean that each dishwasher has to deliver a good cleaning performance, and/ or fulfil the energy consumption required when placed on the market, and/ or fulfil the Ecodesign requirements. These distinctions are important, because for the time being, a product should fulfil the requirements at the moment it is placed on the market. However, this is not the same as fulfilling these requirements over its entire lifetime. If functionality is retained as criteria, it has to be defined for each specific appliance.

BE and **DE** encouraged the Commission to follow up the mandate on horizontal material efficiency by mandates on product specific standards, and to not delay product-specific standards due to a lack of horizontal standards (although coherency should be ensured, where possible).

The **Chair** concluded that there was a general acceptance of 'material efficiency' elements in the draft implementing measures regarding Washing Machines/ Washer-Dryers and Dishwashers and that this consensus might be used for other products groups. Secondly, stakeholders acknowledged that there was a need to finalise the work on so-called 'horizontal standardisation requests'; and thirdly, that there was an opportunity for a set of product requirements to be incorporated into the material efficiency standards. He thanked the presenters for the work done.

Presentation on the state-of-play regarding the reparability scoring study

The Commission services presented the main aspects of this recently launched study, which can be summarised as follows:

- A system for assessing products reparability will be conceptualised: first in general then applied to specific product groups
- The different aspects of repair will be considered for consolidation is a single score and presented in a labelling format
- The labelling format will then be tested with consumer groups

PT welcomed the proposal of a scoring system and asked if it is planned to be used in B2C products or B2B products. The **Commission** replied that the tool is developed primarily with a B2C scope

NL welcomed the idea and recommended that the study procedure be conducted along the lines of a typical Ecodesign Preparatory Study, with collaboration and input from a broad group of stakeholders. The **Commission** confirmed that the project will follow this procedure and clarified that the idea had been presented by some manufacturers during the Washing Machine Review Study, and was considered relevant for study for more product groups.

IT recommended that the study be informed by the work being carried out by the standardisation groups, as presented today. IT feared that the timing of the study, as presented, could be tight. The **Commission** confirmed that the study will have a practical approach to make the best of resources available. One year was considered sufficient to conceptualise the system and investigate consumers understanding and feedback of methods being explored. However, arriving to actual proposals on horizontal or vertical measures will take longer.

ANEC welcomed the proposal and asked why the scoring system was not being applied in other policy tools, whether there was the possibility of looking at other formats than a scoring system, and whether it would include a reference to the price. This last question was related to the issue of high repair costs, which are known to dissuade consumers from repairing repairable appliances, and instead opting to replace them. The **Commission** replied that potential resource efficiency requirements can be covered by several policy tools, of which the 'Energy Label' is only one. Also, future investigations into durability are being considered, but for the moment addressing reparability was considered to be more urgent. Other ongoing studies address socio-economic aspects of reparability and consumer behaviour, and it is hoped that these studies will also provide useful insights.

BE commented that Ecodesign and Energy Labelling are policy tools restricted to energy-related products and not to areas such as transport, textiles or packaging. BE noted that there is a Benelux

study (to be made available in English) on a methodology for reparability that will be shared with the Commission. BE asked if there was an impact assessment, or cost comparison, on the cost of product repair versus the cost of replacement, from the consumer perspective. The **Commission** replied that presently, in the study discussed, the focus will be on energy-related products. However, nothing prevents the use of this study in other areas.

Presentation on the MEErP Methodology revision

The Commission services presented the main aspects to be considered (summarised in Annex 2).

DE commented that the current MEErP methodology does not properly address fast-moving products, such as smart phones. **DE** enquired if the MEErP method would be revised to address these types of products. The **Commission** replied that a Task Force, in which seven DGs are participating, has been established to examine these types of products. For the time being, the MEErP revision preparatory study will be launched in 2018, and the outcome will be presented in due course to all stakeholders.

BE commented that the trade-off between replacing or repairing products have economic and environmental aspects, and that both should be considered. **BE** highlighted the tool of social life cycle assessment (SLCA) and asked if it could be incorporated into a methodology. **BE** also remarked that, currently, manufacturers have to make an effort to increase product recyclability, with consumers paying and recyclers, end-of-life processors, and dealers receiving most of the benefits. **BE** requested that extended producer responsibility be used in the scope of any revisions to the MEErP method. **PT** enquired about the suggested tool-box for Circular Economy applications in Ecodesign, Energy Labelling and related product policy. The **Commission** clarified that the tool-box is empty for the time being, and that efforts will be made over the coming months in order to fill in the box with new tools and newly-available methods on which stakeholders have been consulted, including the so-far proposed requirements on specific products, the reparability scoring, the task force outcomes, and the MEErP upgrade or extension. **ECOS** welcomed these initiatives and committed to fully engage in them in 2018. **ECOS** asked if fast-moving-products, as well as base stations, gateways and mobile phones would be included in this revision.

NL mentioned an IEA technology collaboration programme on energy efficiency in electrical and electronic equipment (EEEE) that, among other issues, compares different policies and their effectiveness. It could be an option within this remit to organise a conference or seminar in 1-1.5 years on reparability, with an international audience and participation, similar to one hosted by the Commission in 2013.

ANEC pointed out that the treatment of material efficiency in product requirements is being performed differently, and has a different focus, depending on the authors of each of the recent Preparatory Studies. The Commission should harmonise both the methodologies where possible, as well as the procedures that the authors follow to implement this methodology.

ANNEX 1

Presentation on the Progress of Material Efficiency Standardisation work

Work of Joint Technical Committee 10 (JTC10)

The Convenor of JTC10 Working Group 5, representing the convenor of JTC10, presented the main points of the work scope and its progress:

- Scope:

- 1. Extension of product lifetime (durability, repair and remanufacturing)
- 2. Reuse of product for the same function (facilitation of repair/ easy removal of components/ treatment at End of Life (EoL))
- 3. Reuse of components/ materials elsewhere (e.g., incorporation of reused materials into other products, identification and extraction of Critical Raw Materials, assessment of reused materials)
- To fulfil the European Commission's end-2015 Horizontal Standardisation Request M/ 543, the work is undertaken by a Joint Technical Committee (electrical and non-electrical) at CEN-CENELEC.
- Verification issues regarding 'material efficiency' require discussion.
- The next Plenary Meeting of Joint TC10 will take place on 31 January 2018.

Other main points:

- Overall deliverables cover two Technical Reports (TRs) on definitions, a TR on guidance regarding the use of horizontal standards for specific products and other non-normative TRs on state-of-the-art practices.
- Other deliverables are EN standards and consist of:
 - A general method for durability
 - General methods on the ability to remanufacture
 - General methods on the ability to repair, reuse and upgrade
 - Assessing recyclability and recoverability
 - Assessing the proportion of recycled material
 - Assessing the amount of Critical Raw Materials
 - An overall standard on how to communicate the outcomes of the other standards
- Uncertainties and material tolerances have not yet been discussed in the standardisation groups. Should these aspects need to be included in the regulations, discussions on these points will be needed.

Work of JTC10 Working Group 2 on Durability

There are two key aspects regarding 'durability':

- Physical capability of 'durability' – e.g. corrosion
- Effects of (non)maintenance and use

Durability is related to repair (i.e., if repairs are made, they prolong the lifetime of the product, and hence its durability).

Another aspect is the identification of 'critical components', although the first priority should be on the entire product. However, as treating the 'entire product' is often difficult, a critical component approach may yield more results, more rapidly.

State-of-play: A second 'Secretary Enquiry' is being held to resolve all the outstanding issues being discussed within this broad-ranging WG, for which over 500 comments have been received.

Work of JTC10 Working Group 3 on Reparability

WG3 covers:

- Reparability

- Reusability
- Upgradeability

The general remit of the WG is to investigate the ability to undertake the three above aspects ('RRU') in products.

Out of scope of WG: Industrial goods and remanufacturing.

Next meeting: 29-30 January at CEN-CENELEC's CCMC HQ.

Estimated forward planning:

- Public enquiry re. WG3's findings: April 2018
- Publication of work: March 2019

Work of JTC10 Working Group 5 on Recyclability

WG5 deals with Recyclability/Recoverability and Recycled Content. For recyclability, the WG5 Convenor explained that they are considering both quantitative and qualitative assessment methodologies, which may take into account real life recycling efficiencies to differing degrees.

For recycled content, he explained that they are working on an overall methodology, as well as on specific guidelines per material type – plastics, metals, glass. The main challenge is verifiability because no physical tests available.

Two of the deliverables in the new series of proposed standards will be dealing with these aspects.

ANNEX 2

Presentation on the MEERP Methodology revision

The Commission will launch a study to evaluate how to introduce a more systematic assessment of material efficiency repair in MEERP, without overburdening the process.

The idea is to examine systematically how the LLCC approach can be used, not only in the field of energy (as reflected directly in 'use-phase' and energy bills of consumers), but also regarding other dimensions. The aim is to define the willingness-to-pay of consumers and the LLCC regarding elements such as durability, availability of spares, or easiness of repair and maintenance.

Some ecodesign criteria related to WEEE compliance, or software updates and compatibility should in principle not create any conflict with energy efficiency goals. However, the study shall explore how MEERP could systematically identify trade-offs on areas such as deciding when energy-saving potentials do not justify an extension of the lifetime of a product.

The procedure for this revision will follow the one that was performed for the present version of MEERP, with consensus being sought during the duration of the study.

Recommended Actions

The related Product Groups would do well to consider the developments and consider participation into the webinar on 29 and 30 May 2018.

Those stakeholders who have not yet registered will need to do so to access the on-line consultation via BATIS. Guidance on how to use BATIS is provided here. If you have any queries about how to use BATIS please contact the helpdesk at: JRC-IPTS-PRODUCT-BUREAU@ec.europa.eu

Related documents and links

All related documents and articles can be found in the respective sections in the side bar on the right.

- https://ec.europa.eu/energy/sites/ener/files/guidelines_2018_refrigerated_storage.pdf