



Mr Stefan Moser
Head of Unit
DG ENER B3
European Commission
Rue de Mot 24, 1040 Brussels

Brussels, 31 March 2021

Subject: Interservice-Consultation Working Documents

Dear Mr Moser,

Over the past years, Industry, NGOs and Member States, stakeholders of the Ecodesign and Energy Labelling Consultation Forum (EELCF), have worked together with the European Commission to develop an ambitious regulatory framework for dozens of energy-related products. While reaching consensus has not always been easy, 15 years after the adoption of the first Ecodesign Directive, Europe can be proud of the existing legislative framework that has inspired policymakers around the world.

This success is also a result of the open and constructive exchange of information between all involved stakeholders – Member States, NGOs, Industry, and others – which has allowed avoiding roadblocks that in the early days caused endless debates, which delayed major files for years.

The Commission has been the main driver for the current working environment – whether through informal activities such as the famous 'Ecodesign Drinks', or through more institutional channels aimed to facilitate mutual understanding. One important example in that sense is the involvement of EELCF members during the Commission's Interservice Consultation (ISC).

The ISC phase is indeed the only moment in which the Commission can receive a last round of comments and has the possibility to address any outstanding issues related to rules, which will ultimately affect millions of EU products and citizens life. Over the past years, we have witnessed numerous occasions in which, thanks to this informal consultation process, members of the EELCF have been able to flag risks or spot errors that could be corrected before the WTO scrutiny phase. We are sure the Commission can recall many examples. This prevented other WTO members from raising objections and requesting last-minute changes to a consolidated text, which could have brought about delays to the overall legislative process.

So far, by sharing the ISC Working Documents, the Commission has sent a clear message of trust and transparency that has given many EELCF members the sense of belonging to a system that works openly and effectively for the good of all Europeans, whether citizens, business or environmental advocates.

This is why we invite the Commission to continue its well-established tradition of informally sharing ISC Working Documents with the members of the Consultation Forum.

We thank you in advance for your consideration.

Yours sincerely,



Paolo Falcioni, Director General
APPLiA



Cecilia Bonefeld-Dahl, Director General
DIGITALEUROPE



Federica Sabbati, Secretary General
EHI



Thomas Nowak, Secretary General
EHPA



Andrea Voigt, Director General
EPEE



Peter Hug, Managing Director
eu.bac



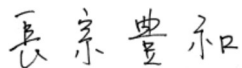
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EUnited



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