

# Evaluation of Energy Labelling Directive and certain aspects of the Ecodesign Directive

<b>General Questions</b>	
Location selection - Please select the country of your response -single choice reply-( <b>compulsory</b> )	Belgium
What is your affiliation? -single choice reply-( <b>compulsory</b> )	I work for an interest group
If other, please specify -open reply-( <b>optional</b> )	
Which geographic level do you represent? -single choice reply-( <b>optional</b> )	Regional
Please select type of interest group (only if you selected 'I work for an interest group' above) -multiple choices reply-( <b>optional</b> )	Environmental interest group
This survey personalises the questions you answer based on the affiliation you selected above. The purpose of this is to ask only the most appropriate questions and to restrict the time required to respond. If you are happy to answer all questions, noting that this will take longer, please check the following box: -single choice reply-( <b>optional</b> )	Yes, I would like to take the full survey
Contributions received to this consultation, together with the identity of the contributor may be published by the Commission, unless the contributor objects to the publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case, the publication may be published in anonymous form. The contributor may also object to the publication of his contribution, but should be aware that he may later be requested to provide justification in accordance with the exceptions provided under Regulation 1049/2001 regarding public access to European parliament, Council and Commission documents ( <a href="http://ec.europa.eu/transparency/access_documents/index_en.htm">http://ec.europa.eu/transparency/access_documents/index_en.htm</a> ). Do you object the publication of your personal data and/or your contribution?*( <b>compulsory</b> ) -multiple choices reply-( <b>compulsory</b> )	My contribution may be published
Please provide your contact details (Name/Organisation/Email) -open reply-( <b>optional</b> )	
Xhonneux Valérie / Inter-Environnement Wallonie /v.xhonneux@iew.be	
<b>General Questionnaire</b>	
<b>Energy Labelling &amp; Ecodesign</b>	
Ecodesign Directive -single choice reply-( <b>optional</b> )	No, it has been successful but there is missed potential

Energy Labelling Directive -single choice reply-(optional)	No, it has been successful but there is missed potential
Please explain your answer (note that you will have the chance to discuss the ambition shown by the Directives later in the questionnaire) -open reply-(optional)	
These Directives are indispensable to achieve the EU's environmental and energy goals. The environmental improvement and energy saving potentials of these two Directives is massive. However, decisions so far have been sub-optimal and a substantial part of the potentials remains untapped. For the Ecodesign Directive, delays in the regulatory process and lack of ambition are major causes. For the Energy Label, the inadequacy between labelling scales and state of the market as well as the 2010 decision to add more classes with plusses threaten the market transformation impact of the policy.	
Ecodesign Directive -single choice reply-(optional)	Yes
Energy Labelling Directive -single choice reply-(optional)	Yes
Please explain your answer -open reply-(optional)	
Changes to the Directives are necessary to improve the rulemaking principles, ambition, functioning and layout of the label.	
Ecodesign Directive -single choice reply-(optional)	Yes
Energy Labelling Directive -single choice reply-(optional)	Yes
Please explain your answer -open reply-(optional)	
The Directives are complementary to other product legislation, but the task sharing between EU environmental product policies could be better articulated and clarified to avoid duplications of consultation and the 'passing the buck' syndromes.	
<b>Energy Labelling Directive</b>	
Boilers and combi-boilers -single choice reply-(optional)	Yes
Water heaters and hot water storage appliances -single choice reply-(optional)	Yes
Televisions -single choice reply-(optional)	Yes
Room air conditioning appliances -single choice reply-(optional)	Yes
Domestic refrigerators and freezers -single choice reply-(optional)	Yes
Domestic washing machines -single choice reply-(optional)	Yes
Domestic dishwashers -single choice reply-(optional)	Yes
Domestic laundry dryers -single choice reply-(optional)	Yes
Vacuum cleaners -single choice reply-(optional)	Yes
Electrical lamps (part of 'electrical lamps and luminaires') -single	Yes

choice reply-(optional)	
Luminaires (part of ‘electrical lamps and luminaires’) -single choice reply-(optional)	Yes
Domestic ovens -single choice reply-(optional)	Yes
Please explain your answer -open reply-(optional)	
The Energy Label is covering products with high energy impact and significant improvement potentials.	
PCs and servers -single choice reply-(optional)	Yes, and should still be labelled
Imaging equipment -single choice reply-(optional)	Yes, and should still be labelled
External power supplies -single choice reply-(optional)	No, and still should not be labelled
Electric motors -single choice reply-(optional)	No, and still should not be labelled
Ventilation fans -single choice reply-(optional)	No, and still should not be labelled
Circulators in buildings -single choice reply-(optional)	Yes, and should still be labelled
Electric pumps -single choice reply-(optional)	No, and still should not be labelled
Complex set-top boxes -single choice reply-(optional)	Yes, and should still be labelled
Simple set-top boxes -single choice reply-(optional)	Yes, but labelling is no longer relevant
Motors and variable speed drives -single choice reply-(optional)	No, and still should not be labelled
Lighting installations -single choice reply-(optional)	Yes, and should still be labelled
Other (please specify) -single choice reply-(optional)	Yes, and should still be labelled
Please explain your answer -open reply-(optional)	
Consumer electronics and IT products should be energy labelled, considering their increasing energy consumption share, e.g. computers, servers, monitors, game consoles, media players, complex set top boxes, etc. Other products that should be labelled are commercial products such as supermarket fridges, vending machines, etc. The label could inform both the buyer and consumers in shops. For external power supplies and motors, an internationally-agreed rating system already exists that can be affixed on the product itself. Circulators used to be labelled and the labelling could be maintained. Simple set top boxes are a dying product.	
Overall, across all product groups -single choice reply-(optional)	Too low ambition
Boilers and combi-boilers -single choice reply-(optional)	Too low ambition
Water heaters and hot water storage appliances -single choice reply-(optional)	Too low ambition

Televisions -single choice reply-(optional)	Much too low ambition
Room air conditioning appliances -single choice reply-(optional)	Too low ambition
Domestic refrigerators and freezers -single choice reply-(optional)	Too low ambition
Domestic washing machines -single choice reply-(optional)	Much too low ambition
Domestic dishwashers -single choice reply-(optional)	Too low ambition
Domestic Laundry dryers -single choice reply-(optional)	Correct ambition
Vacuum cleaners -single choice reply-(optional)	Don't know
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Correct ambition
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Correct ambition
Domestic ovens -single choice reply-(optional)	Too low ambition
Please explain your answer -open reply-(optional)	
<p>Labels for heating products allow conventional fossil fuel products to get an A, which is confusing and insufficiently ambitious. The label for televisions has been quickly outpaced by market development. Classes that were planned for long-term (A+, A++) are in fact already populated. The label has been incorrectly set. The label for air-conditioners allows poorly efficient small mobile air-co to get a good rating (A or better). For the labels for fridges, dishwashers and washing machines, the initial principle of the A-G ranking has been largely corrupted, as the worst products on the market today get an A grade. This is confusing for consumers. In particular, the A+++ class for washing machine is already substantially populated.</p>	
Overall, across all product groups -single choice reply-(optional)	Don't know
Boilers and combi-boilers -single choice reply-(optional)	Effective
Water heaters and hot water storage appliances -single choice reply-(optional)	Effective
Televisions -single choice reply-(optional)	Effective
Room air conditioning appliances -single choice reply-(optional)	Don't know
Domestic refrigerators and freezers -single choice reply-(optional)	Don't know
Domestic washing machines -single choice reply-(optional)	Don't know
Domestic dishwashers -single choice reply-(optional)	Don't know
Domestic laundry dryers -single choice reply-(optional)	Effective

Vacuum cleaners -single choice reply-(optional)	Effective
Electrical lamps (part of 'electrical lamps and luminaires' -single choice reply-(optional)	Neutral
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Don't know
Domestic ovens -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
<p>For televisions, it is not obvious whether the energy label is the unique cause of the increase in energy efficiency over the recent years. For air-conditioners, the label is probably having an effect on the efficiency of split models, but it allows small mobile air-co to retain a good grade in comparison, which is detrimental to overall efficiency progress. For fridges, freezers, washing machines and dishwashers the label has had a significant impact in the past. Now that most products are in the A+, A++ and A+++ class, it is not clear whether the label still has a strong impact on the market. For lamps, the label has been relatively unsuccessful in the past to increase the market share of CFLs and LEDs. For ovens, the label (not updated in the last years) may not have any more impact on the market.</p>	
Overall, across all product groups -single choice reply-(optional)	Ineffective
Boilers and combi-boilers -single choice reply-(optional)	Neutral
Water heaters and hot water storage appliances -single choice reply-(optional)	Neutral
Televisions -single choice reply-(optional)	Ineffective
Room air conditioning appliances -single choice reply-(optional)	Ineffective
Domestic refrigerators and freezers -single choice reply-(optional)	Ineffective
Domestic washing machines -single choice reply-(optional)	Ineffective
Domestic dishwashers -single choice reply-(optional)	Ineffective
Domestic laundry dryers -single choice reply-(optional)	Ineffective
Vacuum cleaners -single choice reply-(optional)	Don't know
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Effective
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Don't know
Domestic ovens -single choice reply-(optional)	Effective
Please explain your answer -open reply-(optional)	
Classes of the EU energy label are mostly based on relative efficiency. Products are not ranked according to their absolute energy	

consumption. Sometimes the two may coincide, but most of the time an increase in average efficiency does not necessarily mean a decrease in average consumption if the size or functionality of the products placed on the market increase (as is the case for TVs, fridges, washing machines, laundry dryers).

Noise (for Washing Machines and Dishwashers) -single choice reply-(optional)	Don't know
Water use (for Washing Machines and Dishwashers) -single choice reply-(optional)	Don't know
Capacity/Size -single choice reply-(optional)	Don't know
Product specific output efficiency (for example spin drying efficiency class) -single choice reply-(optional)	Don't know
Please explain your answer, identifying particular product groups of concern -open reply-(optional)	
We are not aware of a robust evaluation of the impact on the market of secondary information on energy labels, such as noise or other parameters.	
Energy labelling currently focuses primarily on energy efficiency – as the rating and scale is based on an index of energy use per specific service/capacity unit, for example for televisions the power consumption per screen size expressed in W/dm <sup>2</sup> . Energy consumption is also currently displayed on labels as a numeric (X kWh/year) value. What should be the focus in future?  -single choice reply-(optional)	On both energy efficiency and energy consumption
Please explain your answer -open reply-(optional)	
The labels should still include information on both, but the prominence should shift from efficiency towards consumption. This would further encourage consumers to save energy. It would also be simpler and more consistent with what most consumers probably believe the energy label rating is informing about (i.e. actual energy consumption of the product and not just technical efficiency).	
How effective has energy labelling been in increasing the proportion of consumers that are informed about product energy use? -single choice reply-(optional)	Effective
Please explain your answer, identifying particular product groups of interest -open reply-(optional)	
In general, energy labels are raising awareness on energy aspects of products. The EU energy labels have probably been successful in informing consumers better. There seems to be a few exceptions, such as lamps (the energy label printed on the back of the packaging is probably overlooked by consumers).	
How effective has energy labelling been in leading to consumers taking greater account of energy use – as compared to price, size, design, functionality - in their product purchase decisions? -single choice reply-(optional)	Effective
Please explain your answer, identifying particular product groups of interest -open reply-(optional)	
Consumer polls show that consumers generally put energy use in the first priorities and criteria for buying appliances (such as fridges, washing machines, dryers). Energy labels have most probably contributed to this trend (as well as increasing energy prices). In other product categories, the situation is not so obvious yet (e.g. for consumer electronics, TVs, lamps).	
Consumers understand the current (A-G) + 3 (A+++, A++, A+)	Strongly disagree

class system -single choice reply-(optional)	
An A-G class scale is easier for consumers to understand than the A+++-D class scale -single choice reply-(optional)	Strongly agree
Current energy label classes provide a clear and useful differentiation of product energy efficiency -single choice reply-(optional)	Strongly disagree
Classes are coherent with Ecodesign minimum requirements -single choice reply-(optional)	Strongly disagree
The current classifications need to be changed -single choice reply-(optional)	Strongly agree
Consumers understand the seasonal and regional information provided in the energy label on air-conditioners -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
Consumers seem to be less influenced by the new classes with several plusses than by past scales from A to G. Particularly since there is probably a psychological instinct to believe that an A-grade is a good grade, while in the A+++-D classification the A class may be poor or even characterising the bottom of the market. An A-G scale is simpler , clearer and easier to explain. The current labels are not coherent with Ecodesign regulations: classes that are emptied of products by Ecodesign are still displayed on the scales. This is a significant bias in consumer information. Consumers should know where the bottom of the market lies (especially if it is at the A class level)	
Adding further + classes, for example A++++ -single choice reply-(optional)	Strongly disagree
Re-setting all classes to an A-G scale -single choice reply-(optional)	Agree
Re-setting all classes to an A-G scale with an overlap in the market between old 'A' and new 'A' label -single choice reply-(optional)	Don't know
Re-setting all classes to an A-G scale with a dated (year) reference on the label -single choice reply-(optional)	Agree
Re-setting all classes to a 1-7 scale that takes over from A-G, in order to avoid overlap in the market between 'new' and 'old' A classes if the A-G scale was retained but rescaled -single choice reply-(optional)	Disagree
Introducing an A-'X' label with less than 7 classes -single choice reply-(optional)	Disagree
Introducing a dynamic class rating system, which automatically adjusts over time -single choice reply-(optional)	Strongly agree
Moving to an open ended scale -single choice reply-(optional)	Disagree

Removing or indicating on the label the energy classes that are empty of products -single choice reply-(optional)	Strongly agree
The steps of the scale should be allowed to disregard life cycle cost savings to the consumer, meaning that a product with a better label class would be certain to save energy in the use phase, but could be so expensive to buy that it would not bring overall cost savings -single choice reply-(optional)	Strongly agree
Removing the entire energy labelling system -single choice reply-(optional)	Don't know
Other, please specify -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Adding more classes with plusses seems ludicrous. A recalibration appears inevitable. On top of that, a better system needs to be found to ensure that future labels avoid the shortcomings of the past and remain as much as possible up-to-date and consistent with the state of the market and technological development. Preference should be given to a system ensuring some continuity (i.e. keeping the letter classification and colour code from green to red) and limiting the need to reclassify too often (i.e. by setting a scale whose top does not need to be altered frequently and finding ways of showing to consumers the best and worst performers on the market).	
Overall, across all product groups -single choice reply-(optional)	Positive
Boilers and combi-boilers -single choice reply-(optional)	Positive
Water heaters and hot water storage appliances -single choice reply-(optional)	Positive
Televisions -single choice reply-(optional)	Neutral or no impact
Room air conditioning appliances -single choice reply-(optional)	Positive
Domestic refrigerators and freezers -single choice reply-(optional)	Very positive
Domestic washing machines -single choice reply-(optional)	Very positive
Domestic dishwashers -single choice reply-(optional)	Very positive
Domestic laundry dryers -single choice reply-(optional)	Very positive
Vacuum cleaners -single choice reply-(optional)	Positive
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Positive
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Neutral or no impact



Domestic ovens -single choice reply-(optional)	Positive
Please explain your answer -open reply-(optional)	
The Energy Label is stimulating the sales of innovative products that EU manufacturers are placing on the market. By discouraging the purchase of low-quality low-efficiency products (often manufactured outside the EU) they reinforce the market positions of EU producers.	
Overall, across all product groups -single choice reply-(optional)	Don't know
Boilers and combi-boilers -single choice reply-(optional)	Negative
Water heaters and hot water storage appliances -single choice reply-(optional)	Negative
Televisions -single choice reply-(optional)	Don't know
Room air conditioning appliances -single choice reply-(optional)	Don't know
Domestic refrigerators and freezers -single choice reply-(optional)	Don't know
Domestic washing machines -single choice reply-(optional)	Don't know
Domestic dishwashers -single choice reply-(optional)	Don't know
Domestic laundry dryers -single choice reply-(optional)	Don't know
Vacuum cleaners -single choice reply-(optional)	Don't know
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Very positive
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Don't know
Domestic ovens -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
A positive impact may be expected on lamps, because some SMEs are emerging in the area of efficient lamps (LEDs), while it was more difficult for an SME to be active in the traditional lightbulb market. A negative impact may be triggered in the area of heating equipment, because the stimulation of more efficient boilers and water heaters will favour sophisticated products that require a higher technological profile. Small producers and installers who can't follow this path may experience difficulties. For the rest, it is difficult to provide an opinion, as no evaluation has been made to date on this topic.	
Overall, across all product groups -single choice reply-(optional)	Don't know
Boilers and combi-boilers	Don't know

-single choice reply-(optional)	
Water heaters and hot water storage appliances -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Don't know
Room air conditioning appliances -single choice reply-(optional)	Don't know
Domestic refrigerators and freezers -single choice reply-(optional)	Don't know
Domestic washing machines -single choice reply-(optional)	Don't know
Domestic dishwashers -single choice reply-(optional)	Don't know
Domestic laundry dryers -single choice reply-(optional)	Don't know
Vacuum cleaners -single choice reply-(optional)	Don't know
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Don't know
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Don't know
Domestic ovens -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
Overall, across all product groups -single choice reply-(optional)	Positive
Boilers and combi-boilers -single choice reply-(optional)	Don't know
Water heaters and hot water storage appliances -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Neutral or no impact
Room air conditioning appliances -single choice reply-(optional)	Positive
Domestic refrigerators and freezers -single choice reply-(optional)	Very positive
Domestic washing machines -single choice reply-(optional)	Very positive
Domestic dishwashers	Very positive

-single choice reply-(optional)	
Domestic laundry dryers -single choice reply-(optional)	Very positive
Vacuum cleaners -single choice reply-(optional)	Don't know
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Positive
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Don't know
Domestic ovens -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
Energy labels stimulate manufacturers to place more efficient products on the market and consumers to purchase them. Efficiency is often linked to innovation. So the labels have certainly had a positive impact on innovation in the EU. For boilers, water heaters, vacuum cleaners and luminaires it is too early to say though, since the labels have not entered into force yet.	
Overall, across all product groups -single choice reply-(optional)	Prices have not been impacted
Boilers and combi-boilers -single choice reply-(optional)	Prices are higher
Water heaters and hot water storage appliances -single choice reply-(optional)	Prices are higher
Televisions -single choice reply-(optional)	Prices have not been impacted
Room air conditioning appliances -single choice reply-(optional)	Prices have not been impacted
Domestic refrigerators and freezers -single choice reply-(optional)	Prices have not been impacted
Domestic washing machines -single choice reply-(optional)	Prices have not been impacted
Domestic dishwashers -single choice reply-(optional)	Prices have not been impacted
Domestic laundry dryers -single choice reply-(optional)	Prices are lower
Vacuum cleaners -single choice reply-(optional)	Don't know
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Prices are higher
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Don't know
Domestic ovens -single choice reply-(optional)	Prices have not been impacted

Please explain your answer

-open reply-(optional)

Many studies in the world have shown that in the last decades, products have become more energy efficient while prices have generally declined steadily. Policies such as labels and Ecodesign do not seem to disrupt the average price decline trends. Energy Labelling may have an impact in segmenting the distribution of prices on the market (i.e. top class products can be sold with a premium, while bottom classes are cheaper). However, this does not affect the trends for the market average. There might be a few exceptions though: - For heating equipment (boilers and water heaters), the promotion of more efficient solutions (renewables, hybrid systems) may eventually entail an increase in upfront costs, especially in terms of installation. - In the lighting sector, energy efficient lamps (CFLs, LEDs,) are more expensive than incandescent, although their lifetime is much higher - By contrast, the addition of new energy classes on top of A for laundry dryers has had an influence in driving the price of heat pump driers down and reducing the gap between conventional and heat pump models.

Overall, across all product groups -single choice reply-(optional)	Neither agree nor disagree
Boilers and combi-boilers -single choice reply-(optional)	Don't know
Water heaters and hot water storage appliances -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Disagree
Room air conditioning appliances -single choice reply-(optional)	Agree
Domestic refrigerators and freezers -single choice reply-(optional)	Agree
Domestic washing machines -single choice reply-(optional)	Agree
Domestic dishwashers -single choice reply-(optional)	Agree
Domestic laundry dryers -single choice reply-(optional)	Agree
Vacuum cleaners -single choice reply-(optional)	Don't know
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Neither agree nor disagree
Luminaires (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Don't know
Domestic ovens -single choice reply-(optional)	Neither agree nor disagree

Please explain your answer

-open reply-(optional)

For some product groups (mostly white appliances), Energy Labelling has segmented the distribution of prices on the market and top class products are usually sold with a premium. In other cases (consumer electronics and IT equipment) there doesn't seem to be a correlation between product prices and energy efficiency. This means that there is no clear premium policy. For boilers, water heaters, vacuum cleaners and luminaires, it is too early to assess.

For you, or your organisation, do you think that the benefits of	Yes, high overall benefits
--	----------------------------

<p>mandatory energy labels outweigh their costs?</p> <p>-single choice reply-(optional)</p>	
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>For NGOs, Energy Labelling has high benefits: it contributes to environmental and energy saving objectives, informs consumers on energy issues and energy saving (highly complementary to NGO awareness raising and information campaigns), and supports the development of NGO tools and campaigns (such as the Topten guide <a href="http://www.topten.eu">www.topten.eu</a> that uses Energy Labelling information to rank products on the market).</p>	
<p>For EU society as a whole, do you think that the benefits of mandatory energy labels outweigh their costs?</p> <p>-single choice reply-(optional)</p>	<p>Yes, high overall benefits</p>
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>Energy Labelling is an extremely cost-effective policy for society. The implementation costs are limited, while the benefits for EU citizens and the environment through energy savings are very high.</p>	
<p>Should there be a legal provision, like for ecodesign, for voluntary initiatives on energy labelling, considering the administrative burden for the Commission and member state market surveillance costs?</p> <p>-single choice reply-(optional)</p>	<p>No</p>
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>The potential proliferation of voluntary labels is not desirable. Voluntary labels may confuse consumers, be unfair or biased, and in any case some market surveillance will be indispensable to avoid free riders. There are no benefits compared to mandatory labelling. Note: we deplore the use of the term "administrative burden" in the formulation of the question. Implementing EU policies is not a "burden" for the Commission, it is its primary role and it is something positive for EU society.</p>	
<p>The product groupings for the label should be broader and not so technology specific, for example a label on refrigerators should cover all types of refrigerators without variation in label class ambition levels by individual technology type (refrigerator with fresh-food storing compartment, refrigerator-chiller, refrigerator with 1/2/3-star compartments, refrigerator-freezer etc.)</p> <p>-single choice reply-(optional)</p>	<p>Agree</p>
<p>The information on the label is accurate and reliable</p> <p>-single choice reply-(optional)</p>	<p>Neither agree nor disagree</p>
<p>The information reflects real-life use of the product</p> <p>-single choice reply-(optional)</p>	<p>Neither agree nor disagree</p>
<p>Energy labels are usually displayed in appropriate places in retail stores and showrooms</p> <p>-single choice reply-(optional)</p>	<p>Neither agree nor disagree</p>
<p>Energy labelling for distance selling (e.g. selling via internet) should be improved</p> <p>-single choice reply-(optional)</p>	<p>Strongly agree</p>
<p>It would make sense to allow for the use of QR-codes (see figure) in the label in order to display information about the</p>	<p>Strongly agree</p>

product on the consumers' smartphones or on smart meters.  -single choice reply-(optional)	
Energy labelling has led to lower production costs for manufacturers -single choice reply-(optional)	Don't know
Energy labelling has led to improved profit margins on regulated products -single choice reply-(optional)	Don't know
Energy labelling has unduly restricted the range of products on the market -single choice reply-(optional)	Strongly disagree
Consumers prefer products with better label classes because they are interested in life cycle cost savings. It matters much less to them that a good label class also means a product which is better for the environment -single choice reply-(optional)	Strongly disagree
Please explain your answer -open reply-(optional)	
<p>In order to allow transparent and fair comparability between products, energy labelling ratings should avoid as much as possible "correction factors", allowances, sub-categories and exceptions. In particular, for multi-energy product groups, primary energy labels should be favoured. - At the moment, it is not possible to say that the information on the label is always accurate and reliable, due to the shortcomings of the classification (classes with too many pluses, empty classes at the bottom, etc.) and insufficient market surveillance. - Information on the label does not always reflect real-life use of the products. Metrics and measurement methods tend to take more and more into account real-life use (e.g. washing machines) but progress is still possible - Energy labels are not always displayed correctly in shops. While it is generally acceptable for white goods, the situation is still bad for other product groups (e.g. televisions) - On-line shops still rarely display the full energy label, they only display partial or no information on the energy performance. - Energy Labelling does not ban products from the market, so it has definitely not had any negative impact on the range of products on the market. - A part of the consumers may be primarily interested in cost/price aspects, however the public awareness on energy and environmental issues is now widespread and most consumers know that saving energy is also good for the environment.</p>	
Other environmental aspects (e.g. CO2 emissions) -single choice reply-(optional)	Yes, as a piece of information additional to the label class scale
Whole product life cycle energy consumption -single choice reply-(optional)	Yes, as a piece of information additional to the label class scale
Whole product life cycle resource efficiency -single choice reply-(optional)	Yes, as a piece of information additional to the label class scale
Annual running costs (the costs of operating the product) -single choice reply-(optional)	No, but the information should be available on product fiches, QR codes or other mechanisms
Expected product life -single choice reply-(optional)	Yes, as a piece of information additional to the label class scale

Other, please add: -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
Some parameters related to resource efficiency could be added to the label, such as the product lifetime, its recyclability / reparability performance and the presence of some critical / toxic components (e.g. mercury, high GWP refrigerants...). - If robust methodologies are available, the indication of life-cycle energy and resource consumption is also to be investigated - As regards CO2, emission factors differ strongly from one country to another and displaying a unique figure on the label would probably be controversial and difficult to enforce. A solution through smartphone applets or other mechanisms could allow sufficient flexibility for national or regional differentiation. - The same applies for annual running costs, due to differences in energy tariffs	
Two separate labels should exist, one for energy consumption and the second one for other environmental aspects -single choice reply-(optional)	Disagree
One single label should exist, including both energy consumption and other significant environmental aspects -single choice reply-(optional)	Agree
Information on other environmental impacts should be provided on mandatory basis -single choice reply-(optional)	Agree
Information on other environmental impacts should be provided on voluntary basis -single choice reply-(optional)	Strongly disagree
Information on other environmental impacts should be provided in absolute terms (not in comparison with a benchmark or an index value) -single choice reply-(optional)	Neither agree nor disagree
Please explain your answer -open reply-(optional)	
A proliferation of labels should be avoided as much as possible. Consumers don't have time to look at a wide range of labels. The information on other environmental impacts may sometimes be more relevant if expressed in absolute terms, sometimes it is clearer to provide a score, sometimes the best way is to express the performance against a benchmark or reference. This needs to be investigated on a case by case basis.	
Adding information on other environmental aspects -single choice reply-(optional)	Very positive
Adding information on annual running costs (the costs of operating the product) -single choice reply-(optional)	Positive
Adding information focussed on business - to- business customers -single choice reply-(optional)	Don't know
Providing fiches online on a mandatory basis on all labelled products -single choice reply-(optional)	Very positive
Providing fiches online on a mandatory basis on selected products that are not labelled -single choice reply-(optional)	Very positive
Providing fiches as QR (bar) codes to labels to enable consumers to quickly access more detailed information on their smartphones (see	Very positive

<p>picture)</p> <p>-single choice reply-(optional)</p>	
<p>Removing the requirement for product fiches</p> <p>-single choice reply-(optional)</p>	<p>Very negative</p>
<p>Other, please insert:</p> <p>-single choice reply-(optional)</p>	
<p>Please explain your answer</p> <p>-open reply-(optional)</p> <p>Product fiches are very useful complements to energy labels. They provide more details on the product performance, helps understanding and verifying the calculation of the energy class. Product fiches should be standardised, dematerialised and centralised by manufacturers in an on-line database, so that market surveillance bodies can better plan their verification campaigns, decision-makers and stakeholders can better monitor products on the market and make statistical analysis. This would be helpful for countless applications, in particular speeding up the review and revision of Energy Labelling and Ecodesign measures.</p>	
<p>Energy use by appliances is determined partly by consumer behaviour. For example, frequent opening of a fridge will lead to an increased energy use, regardless of the energy label. A smart appliance could provide feedback to the user, after observing the user's behaviour with the appliance in the user's home, as to how his behaviour affects the energy performance of the appliance. Would you welcome the introduction of such an advanced and IT-supported form of energy labelling?</p> <p>-single choice reply-(optional)</p>	<p>Yes</p>
<p>Please explain your answer and provide further innovative ideas</p> <p>-open reply-(optional)</p> <p>There are several ways in which Energy Labelling could benefit from IT. An electronic label could be more easily and quickly updated, adjusted to national or regional conditions. It could show best and worst performers on the market or in a particular shop. The label could become more individualised: it could show the best products according to specific user needs or usage patterns (provided through a form or based on observed feed-back).</p>	
<p>Have the energy labels been enforceable? If not sufficiently or not at all, what could be done to improve enforcement of energy labels?</p> <p>-single choice reply-(optional)</p>	<p>No, not sufficiently</p>
<p>Please explain your answer</p> <p>-open reply-(optional)</p> <p>Energy labels are based on metrics and calculation methodologies that are clear and verifiable. However, some improvements are possible: - Calculation methodologies and formulas should be simplified (with limited number of sub-categories, parameters, factors and allowances) to reduce the risk of errors and limit the cost of testing and verification for market surveillance authorities - Harmonised measurement standards used for testing products should be more swiftly developed and updated by EU standardisation organisations - More verification and testing activities should be carried out by official authorities and other stakeholders - Salespersons should be better trained to display the label properly and inform consumers at the point of sale - Sanctions for free riders should be substantially reinforced and harmonised at EU level</p>	
<p>An EU-Wide market surveillance authority covering the internal market</p> <p>-single choice reply-(optional)</p>	<p>Don't know</p>



An EU-wide mandatory product database -single choice reply-(optional)	Very effective
An EU-wide transparent complaint procedure -single choice reply-(optional)	Very effective
MS-based transparent complaint procedure -single choice reply-(optional)	Very effective
Other, please describe: -single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
An EU-wide market surveillance authority could only be a relevant option if it has sufficient resources and inspectors to carry out the tasks. An alternative option would be to create an EU agency for market surveillance that would centralise data, cooperate with the 28 Member State authorities and encourage them to increase their level of activity where needed. An EU-wide product database would be very useful not only for enforcement purposes but also for market monitoring and support to policy formulation.	
Overall, across all product groups -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Yes, and this results in products with significantly lower energy efficiency being sold
Room air conditioning appliances -single choice reply-(optional)	Yes, and this results in products with significantly lower energy efficiency being sold
Domestic refrigerators and freezers -single choice reply-(optional)	Don't know
Domestic washing machines -single choice reply-(optional)	Don't know
Domestic dishwashers -single choice reply-(optional)	Don't know
Domestic laundry dryers -single choice reply-(optional)	Don't know
Electrical lamps (part of 'electrical lamps and luminaires') -single choice reply-(optional)	Yes, and this results in products with significantly lower energy efficiency being sold
Please explain your answer -open reply-(optional)	
There is insufficient research on non-compliance in the EU and the impact on energy savings. As a large proportion of televisions and air-conditioners is incorrectly or not labelled, it can be expected that the negative impact is high. In the lighting sector, it has been proven that a large part of halogen-based lamps were abusively labelled: by applying tolerances in an illegal way, these products were labelled C instead of D. This may have influenced consumer perception.	
<b>Ecodesign Directive</b>	
Boilers and combi-boilers -single choice reply-(optional)	Yes
Water heaters and hot water storage appliances	Yes

-single choice reply-(optional)	
PCs and servers -single choice reply-(optional)	Yes
Televisions -single choice reply-(optional)	Yes
Stand-by and off-mode losses of EuPs -single choice reply-(optional)	Yes
External power supplies -single choice reply-(optional)	Yes
Tertiary lighting -single choice reply-(optional)	Yes
Room air conditioning appliances -single choice reply-(optional)	Yes
Electric motors -single choice reply-(optional)	Yes
Ventilation fans -single choice reply-(optional)	Yes
Circulators in buildings -single choice reply-(optional)	Yes
Domestic refrigerators and freezers -single choice reply-(optional)	Yes
Domestic washing machines -single choice reply-(optional)	Yes
Domestic dishwashers -single choice reply-(optional)	Yes
Laundry dryers -single choice reply-(optional)	Yes
Vacuum cleaners -single choice reply-(optional)	Yes
Simple set-top boxes -single choice reply-(optional)	Yes
Non-directional lighting -single choice reply-(optional)	Yes
Directional lighting -single choice reply-(optional)	Yes
Water pumps -single choice reply-(optional)	Yes
Complex set-top boxes (voluntary agreement) -single choice reply-(optional)	Yes
Imaging equipment (voluntary agreement) -single choice reply-(optional)	Yes
Please explain your answer	

-open reply-(optional)	
The Ecodesign Directive has a robust way of selecting the products to be covered by implementing measures	
Overall, across all product groups -single choice reply-(optional)	Too low ambition
Boilers and combi-boilers -single choice reply-(optional)	Correct ambition
Water heaters and hot water storage appliances -single choice reply-(optional)	Too low ambition
PCs and servers -single choice reply-(optional)	Too low ambition
Televisions -single choice reply-(optional)	Much too low ambition
Standby and off-mode losses of EuPs -single choice reply-(optional)	Correct ambition
External power supplies -single choice reply-(optional)	Correct ambition
Tertiary lighting -single choice reply-(optional)	Too low ambition
Room air conditioning appliances -single choice reply-(optional)	Too low ambition
Electric motors -single choice reply-(optional)	Correct ambition
Ventilation fans -single choice reply-(optional)	Much too low ambition
Circulators in buildings -single choice reply-(optional)	Correct ambition
Domestic refrigerators and freezers -single choice reply-(optional)	Too low ambition
Domestic washing machines -single choice reply-(optional)	Too low ambition
Domestic dishwashers -single choice reply-(optional)	Too low ambition
Laundry dryers -single choice reply-(optional)	Much too low ambition
Vacuum cleaners -single choice reply-(optional)	Correct ambition
Simple set-top boxes -single choice reply-(optional)	Correct ambition
Non-directional lighting -single choice reply-(optional)	Too low ambition
Directional lighting -single choice reply-(optional)	Too low ambition

<p>Water pumps</p> <p>-single choice reply-(optional)</p>	<p>Too low ambition</p>
<p>Complex set-top boxes (voluntary agreement)</p> <p>-single choice reply-(optional)</p>	<p>Much too low ambition</p>
<p>Imaging equipment (voluntary agreement)</p> <p>-single choice reply-(optional)</p>	<p>Too low ambition</p>
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>Several studies have evaluated the pertinence of the level of requirements for adopted implementing measures. On energy use the ambition has often been too low , especially taking into account the long delays for adoption and implementation. Opportunities have also been missed to set requirements on other important environmental aspects. More precisely: - Water heaters: inefficient electric storage heaters are still authorised - PCs: no requirements on resource use, embedded energy, toxics... - TVs: very low ambition on energy use; nothing on other aspects - Lighting: halogen lamps left on the market - Air-conditioners: inefficient single ducts left on the market - Ventilation fans: poor ambition and too many sub-categories created - White appliances: requirements based on too old data - Laundry dryers: conventional inefficient technologies left on the market - Water pumps: low ambition (especially at tier 1) - Complex set top boxes: too generous allowances for additional functions - Imaging equipment: not sufficiently ambitious on energy efficiency</p>	
<p>Requirements on energy use in Ecodesign implementing measures and voluntary agreements are based primarily on energy efficiency - the energy use per specific service/capacity unit, for example for televisions the power consumption per screen size expressed in W/dm<sup>2</sup>, rather than on the absolute energy consumption. What should be the basis of such requirements in implementing measures and voluntary agreements in the future?</p> <p>-single choice reply-(optional)</p>	<p>On both energy efficiency and energy consumption</p>
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>More prominence should be given to absolute energy consumption. Requirements on energy efficiency could for example be curved / progressive so that it is more difficult for bigger/larger products to comply.</p>	
<p>The Ecodesign implementing measures adopted so far focus primarily on the impacts in the use phase of a product, which is in most energy-using products responsible for the largest share of the overall impact. Does the Ecodesign Directive or its implementation need to be changed to more proportionately address impacts in other life-cycle phases (including production and disposal) other than the use phase? If yes, how should it be changed? If no, why not?</p> <p>-single choice reply-(optional)</p>	<p>Yes</p>
<p>Please explain your answer</p> <p>-open reply-(optional)</p>	
<p>The Directive already insists on covering all significant environmental aspects of products over their life-cycle. But the only quantitative criterion (i.e. the minimum life-cycle cost objective) relates to energy in the use phase. As a consequence, the Ecodesign methodology and subsequent regulatory steps are unbalanced and focusing primarily on energy use aspects. A solution would be to rebalance the rulemaking principles by introducing quantitative criteria on other aspects (e.g. on critical resource content).</p>	
<p>Overall, across all product groups</p> <p>-single choice reply-(optional)</p>	<p>Positive</p>

PCs and servers -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Don't know
Standby and off-mode losses of EuPs -single choice reply-(optional)	Neutral or no impact
External power supplies -single choice reply-(optional)	Positive
Tertiary lighting -single choice reply-(optional)	Positive
Room air conditioning appliances -single choice reply-(optional)	Positive
Electric motors -single choice reply-(optional)	Positive
Ventilation fans -single choice reply-(optional)	Don't know
Circulators in buildings -single choice reply-(optional)	Very positive
Domestic refrigerators and freezers -single choice reply-(optional)	Positive
Domestic washing machines -single choice reply-(optional)	Positive
Domestic dishwashers -single choice reply-(optional)	Positive
Laundry dryers -single choice reply-(optional)	Positive
Simple set-top boxes -single choice reply-(optional)	Don't know
Non-directional lighting -single choice reply-(optional)	Positive
Directional lighting -single choice reply-(optional)	Positive
Imaging equipment -single choice reply-(optional)	Don't know
Complex set-top boxes -single choice reply-(optional)	Don't know

Please explain your answer

-open reply-(optional)

Ecodesign is banning from the market products with poor environmental performance. It is affecting primarily low cost manufacturers and reinforcing the position of EU manufacturers, that are usually more advanced and able to product high performing products. In addition, Ecodesign accelerates the uptake and mass production of technologies contributing to energy efficiency. This generates economies of scale and cost reductions that benefit EU manufacturers.

Overall, across all product groups -single choice reply-(optional)	Don't know
PCs and servers -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Neutral or no impact
Standby and off-mode losses of EuPs -single choice reply-(optional)	Don't know
External power supplies -single choice reply-(optional)	Don't know
Tertiary lighting -single choice reply-(optional)	Positive
Room air conditioning appliances -single choice reply-(optional)	Don't know
Electric motors -single choice reply-(optional)	Don't know
Ventilation fans -single choice reply-(optional)	Don't know
Circulators in buildings -single choice reply-(optional)	Negative
Domestic refrigerators and freezers -single choice reply-(optional)	Don't know
Domestic washing machines -single choice reply-(optional)	Don't know
Domestic dishwashers -single choice reply-(optional)	Don't know
Laundry dryers -single choice reply-(optional)	Don't know
Simple set-top boxes -single choice reply-(optional)	Don't know
Non-directional lighting -single choice reply-(optional)	Positive
Directional lighting -single choice reply-(optional)	Positive
Imaging equipment -single choice reply-(optional)	Don't know
Complex set-top boxes -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
In general, measures for lighting stimulating the development of more efficient technologies (such as LEDs) are a clear opportunity for	

the creation of SMEs in the sector (because room is made for a wider variety of highly innovative products). One example where SMEs may have been negatively affected is circulators. Ecodesign requirements for these products are rather reinforcing the position of big players able to innovate and mass produce efficient products. For the rest, there is insufficient data available to assess the exact impact of Ecodesign measures.

Overall, across all product groups -single choice reply-(optional)	Don't know
PCs and servers -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Don't know
Standby and off-mode losses of EuPs -single choice reply-(optional)	Don't know
External power supplies -single choice reply-(optional)	Don't know
Tertiary lighting -single choice reply-(optional)	Don't know
Room air conditioning appliances -single choice reply-(optional)	Don't know
Electric motors -single choice reply-(optional)	Don't know
Ventilation fans -single choice reply-(optional)	Don't know
Circulators in buildings -single choice reply-(optional)	Don't know
Domestic refrigerators and freezers -single choice reply-(optional)	Don't know
Domestic washing machines -single choice reply-(optional)	Don't know
Domestic dishwashers -single choice reply-(optional)	Don't know
Laundry dryers -single choice reply-(optional)	Don't know
Simple set-top boxes -single choice reply-(optional)	Don't know
Non-directional lighting -single choice reply-(optional)	Don't know
Directional lighting -single choice reply-(optional)	Don't know
Imaging equipment -single choice reply-(optional)	Don't know
Complex set-top boxes -single choice reply-(optional)	Don't know

Please explain your answer -open reply-(optional)	
Overall, across all product groups -single choice reply-(optional)	Positive
Boilers and combi-boilers -single choice reply-(optional)	Don't know
Water heaters and hot water storage appliances -single choice reply-(optional)	Don't know
PCs and servers -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Neutral or no impact
Standby and off-mode losses of EuPs -single choice reply-(optional)	Positive
External power supplies -single choice reply-(optional)	Positive
Tertiary lighting -single choice reply-(optional)	Positive
Room air conditioning appliances -single choice reply-(optional)	Neutral or no impact
Electric motors -single choice reply-(optional)	Positive
Ventilation fans -single choice reply-(optional)	Don't know
Circulators in buildings -single choice reply-(optional)	Very positive
Domestic refrigerators and freezers -single choice reply-(optional)	Don't know
Domestic washing machines -single choice reply-(optional)	Don't know
Domestic dishwashers -single choice reply-(optional)	Don't know
Laundry dryers -single choice reply-(optional)	Neutral or no impact
Vacuum cleaners -single choice reply-(optional)	Don't know
Simple set-top boxes -single choice reply-(optional)	Don't know
Non-directional lighting -single choice reply-(optional)	Positive



Directional lighting -single choice reply-(optional)	Positive
Imaging equipment -single choice reply-(optional)	Don't know
Complex set-top boxes -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
Overall, across all product groups -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Prices have not been impacted
Standby and off-mode losses of EuPs -single choice reply-(optional)	Prices have not been impacted
External power supplies -single choice reply-(optional)	Don't know
Tertiary lighting -single choice reply-(optional)	Don't know
Room air conditioning appliances -single choice reply-(optional)	Don't know
Electric motors -single choice reply-(optional)	Don't know
Ventilation fans -single choice reply-(optional)	Don't know
Circulators in buildings -single choice reply-(optional)	Prices are higher
Domestic refrigerators and freezers -single choice reply-(optional)	Prices have not been impacted
Domestic washing machines -single choice reply-(optional)	Prices have not been impacted
Domestic dishwashers -single choice reply-(optional)	Prices have not been impacted
Laundry dryers -single choice reply-(optional)	Prices have not been impacted
Simple set-top boxes -single choice reply-(optional)	Prices have not been impacted
Non-directional lighting -single choice reply-(optional)	Prices are higher
Directional lighting -single choice reply-(optional)	Don't know

Imaging equipment -single choice reply-(optional)	Don't know
Complex set-top boxes -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
<p>Many studies in the world have shown that in the last decades, products have become more energy efficient while prices have generally declined steadily. Policies such as Ecodesign do not seem to disrupt the average price decline trends. As Ecodesign prohibits low performing products – that can also be low cost products – a slight price increase at the bottom of the market may eventually be triggered. However, this is usually only temporary. One exception might be lighting, in which the discrete technologies on the market have different price levels. But they also have different attributes and lifetimes, so a direct comparison is not meaningful. The price of standard circulators may also have increased following the entry into force of Ecodesign requirements (to be checked though).</p>	
For you, or your organisation, do you think that the benefits of the Ecodesign regulations and voluntary agreements outweigh their costs? -single choice reply-(optional)	Yes, high overall benefits
Please explain your answer -open reply-(optional)	
<p>For NGOs, Ecodesign has high benefits: it contributes to environmental and energy saving objectives and supports sustainable consumption. Information requirements in Ecodesign measures can also support the development of NGO tools and campaigns (such as the Topten guide <a href="http://www.topten.eu">www.topten.eu</a> that uses technical information to rank products on the market).</p>	
For EU society as a whole, do you think that the benefits of Ecodesign regulations and voluntary agreements outweigh their costs? -single choice reply-(optional)	Yes, high overall benefits
Please explain your answer -open reply-(optional)	
<p>Ecodesign is a very cost-effective policy for society. The benefits for EU citizens and the environment through energy savings are quantifiable and very high. This has already been demonstrated in previous evaluation studies in the EU and in other economies.</p>	
Should the possibility of laying down Ecodesign requirements in voluntary agreements – rather than mandatory requirements – be maintained? -single choice reply-(optional)	No
Please explain your answer -open reply-(optional)	
<p>Go beyond the Least Life Cycle Cost Approach (LLCC) when setting minimum requirements, i.e. to aim for a staged approach towards the highest feasible energy efficiency level while at the same time ensuring that the life cycle costs of products are not getting higher for the consumer compared to the base case (considering also what room this would leave to energy labelling). The revised Methodology for Ecodesign of Energy-related Products (MEErP) already refers to this efficiency point as “Break Even Point“.</p>	
Go beyond the Least Life Cycle Cost Approach (LLCC) when setting minimum requirements, i.e. to aim for a staged approach towards the highest feasible energy efficiency level while at the same time ensuring that the life cycle costs of products are not getting higher for the consumer compared to the base case (considering also what room this would leave to energy labelling). The revised Methodology for Ecodesign of Energy-related Products (MEErP) already refers to this efficiency point as “Break Even Point“. -single choice reply-(optional)	Strongly agree
Involve a check on what would it mean to go beyond LLCC by	Strongly agree

identifying the “Break Even Point” in the preparatory studies. -single choice reply-(optional)	
Strive for more ambitious requirements not by going beyond LLCC cost but rather to make life cycle cost calculations more realistic by applying “learning curves” (consideration of decreasing production costs over time) -single choice reply-(optional)	Strongly agree
Keep the present practice of life cycle calculation -single choice reply-(optional)	Strongly disagree
Give benchmarks a more powerful role as targets. They should serve as starting point for setting new MEPS at the time of revision, while still respecting the rules of Article 15 of the Ecodesign Directive -single choice reply-(optional)	Agree
Identify reference levels for best not yet available technology in preparatory studies and use it to predefine future energy efficiency classes in Energy Label. -single choice reply-(optional)	Strongly agree
Please explain your answer -open reply-(optional)	
The Ecodesign rulemaking and methodology should both: - Use learning curves to make more realistic cost estimates and LLCC calculations - Open up the possibility for setting requirements beyond the LLCC point (i.e. in between the LLCC and Break Even Point) In most cases, this should already lead to considering levels of requirements close to the benchmark levels. Better identification of best not yet available technologies is a must, in order to prepare the ground for further Ecodesign and potentially Energy Labelling steps.	
Which other changes would you suggest and why? -open reply-(optional)	
Life-cycle cost calculations used in Ecodesign could more systematically include “societal costs” (i.e. monetised impacts of pollution and other impacts of using energy)	
Overall, across all product groups -single choice reply-(optional)	Don't know
Televisions -single choice reply-(optional)	Don't know
Standby and off-mode losses of EuPs -single choice reply-(optional)	Don't know
External power supplies -single choice reply-(optional)	Don't know
Tertiary lighting -single choice reply-(optional)	Don't know
Room air conditioning appliances -single choice reply-(optional)	Don't know
Electric motors -single choice reply-(optional)	Don't know
Ventilation fans -single choice reply-(optional)	Don't know
Circulators in buildings -single choice reply-(optional)	Don't know

Domestic refrigerators and freezers -single choice reply-(optional)	Don't know
Domestic washing machines -single choice reply-(optional)	Don't know
Domestic dishwashers -single choice reply-(optional)	Don't know
Laundry dryer -single choice reply-(optional)	Don't know
Simple set-top boxes -single choice reply-(optional)	Don't know
Directional lighting -single choice reply-(optional)	Don't know
Imaging equipment -single choice reply-(optional)	Don't know
Complex set-top boxes -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
The non-compliance problem in Ecodesign is clearly underresearched. There is no robust assessment and evaluation of the extent and impact of non compliance. This is in relation to the current insufficient level of market surveillance by Member States	
Ecodesign has led to lower production costs for manufacturers -single choice reply-(optional)	Don't know
Ecodesign has led to improved profit margins on regulated products -single choice reply-(optional)	Don't know
The Ecodesign regulations unduly restricted the range of products on the market -single choice reply-(optional)	Strongly disagree
Please explain your answer -open reply-(optional)	
There is no sign that Ecodesign regulations would have unduly restricted the range of products on the market. Even for lightbulbs, the ban of incandescent lightbulbs has had a stimulating effect and now more technologies and product types are available on the market.	
<b>Rulemaking Procedures</b>	
Ecodesign working plan -single choice reply-(optional)	Neutral
Preparatory study -single choice reply-(optional)	Ineffective
Consultation forum -single choice reply-(optional)	Effective
Impact assessment and draft regulation -single choice reply-(optional)	Ineffective
Member State expert group on labelling -single choice reply-(optional)	Neutral

Regulatory Committee vote -single choice reply-(optional)	Effective
WTO notification process -single choice reply-(optional)	Neutral
Scrutiny/Objection by European Parliament and Council -single choice reply-(optional)	Neutral
Please explain your answer -open reply-(optional)	
Working Plans have been elaborated with sufficient evidence-base and consultations, but have been published with long delays - Some preparatory studies have been of good quality, but in other cases there have been important problems with data quality, insufficiently deep analysis of improvement options or too superficial policy recommendations - Impact assessment studies sometimes seem to be biased documents just aiming at supporting already made decisions on the level of requirements. The analysis and justification has sometimes been rudimentary	
Ecodesign -single choice reply-(optional)	No
Energy Labelling -single choice reply-(optional)	Yes
Please explain your answer -open reply-(optional)	
The procedure for Delegated Acts is less transparent and robust than for Ecodesign measures. An identical and joint process (i.e. a vote by Member States on both the Ecodesign and Energy Labels ) would be a more logical and clear approach.	
Ecodesign -single choice reply-(optional)	No
Energy Labelling -single choice reply-(optional)	No
Please explain your answer -open reply-(optional)	
No change in the framework, no loss in the effectiveness of the implementation and taking into account the number of energy-related products already covered and to be covered? -single choice reply-(optional)	
The scope was extended to non-energy-related products and means of transport -single choice reply-(optional)	Increase
Environmental impacts other than resource use were shown in the label, and ecodesign shifted focus to production phase impacts? -single choice reply-(optional)	Remain about the same
Please explain your answer -open reply-(optional)	
Note: we deplore the use of the term “administrative burden” in the formulation of the question. Implementing EU policies is not a “burden” for the Commission, it is its primary duty and it is something positive for EU society.	
How could the administrative burden of the Commission in developing implementing measures and delegated acts be decreased so as to allow a faster development and review of measures and acts? -multiple choices reply-(optional)	by introducing a fast track method for reviewing existing measures, where the level of the revised requirements would be determined in a partly

automatic procedure based on technological progress achieved in the meantime - by shortening the adoption procedure through carrying out certain consultations in parallel - by other means, namely: [please describe]

Please explain your answer -open reply-(optional)

The fast track approach would require to set up a robust and systematic market monitoring instrument. This is not the case yet. Other solutions to speed up and streamline the implementation process: Include a more engaging implementation calendar, deadlines and milestones in the Working Plans Set maximum durations for the different steps of the implementation process. In case of overshooting, the Commission would have to send a justification to the European Council and Parliament. Develop templates and guidelines for drafting measures and requirements Create harmonised feedback forms for consultations

Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities and ensure reliability of the Energy Label?

-single choice reply-(optional)

Yes

Please explain your answer -open reply-(optional)

Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities on Ecodesign Directive?

-single choice reply-(optional)

Yes

Please explain your answer -open reply-(optional)

Have appropriate and effective mechanisms for cooperation in market surveillance between administrations been established for Energy Labelling and Ecodesign Directives?

-single choice reply-(optional)

No

Please explain your answer -open reply-(optional)

The launch of the Ecopliant project is a progress. However, it does not involve all 28 Member State authorities. There is still insufficient exchange and centralisation of test data, and insufficient harmonisation of the approaches and sanctions. Besides, a mechanism should be put in place to ensure that when a product is proven to be non-compliant in one country, it is removed from the market in the 27 other Member States as well.

Do Member States provide sufficient resources for national market surveillance activities for Energy Labelling and Ecodesign?

-single choice reply-(optional)

No

Please explain your answer -open reply-(optional)

The lack of resources and activities in most Member States has been documented in several studies already.

Should the Commission or other EU bodies be more involved to ensure enforcement activities for the Energy Labelling and Ecodesign Directives, considering for example the EU product notification

Yes

<p>system in place under the cosmetic products regulation (2009/1223/EC, Article 13) or in form of an EU-wide complaint system or other? -single choice reply-(optional)</p>	
<p>Who should be involved and what role could they play? -open reply-(optional)</p>	
<p>According to the new EU market surveillance regulation, Member States are supposed to make more use of tools such as the centralised database ICSMS to report on their enforcement activities. More controls of the use should be carried out. The European Commission could play a larger role in centralising and stimulating market surveillance activities. Besides, the Commission could publish an annual report on compliance to Ecodesign and Energy Labelling, and set up a specialised reference laboratory to test products and train national laboratories on how to test products. Other stakeholders – such as NGOs – could be more involved in chasing and naming &amp; shaming free riders. Market surveillance authorities should put in place tools to consider the contributions and complaints of civil society stakeholders (NGOs, manufacturers, etc.)</p>	
<p>Should the Energy Labelling Directive be changed to include a conformity assessment procedure (like the Ecodesign Directive has)? -single choice reply-(optional)</p>	<p>Yes</p>
<p>Please explain your answer -open reply-(optional)</p>	
<p>Attempts at aligning the Ecodesign and Energy Labelling Directives and improving the consistency between both can only be positive.</p>	
<p>Is the conformity assessment procedure in the Ecodesign Directive appropriate? -single choice reply-(optional)</p>	
<p>Please explain your answer -open reply-(optional)</p>	
<p>It is in general appropriate, although it could be reinforced in several ways: manufacturers should be instructed to make the EC declaration of conformity available not only to market surveillance authorities, but also to any other civil society stakeholder on demand. A registration system could be put in place to ensure that products placed on the market can be tracked and their declaration of conformity and technical fiche is available in a centralised database. This would greatly facilitate the identification of equivalent products and enforcement activities.</p>	
<p>What else could be improved with regard to market surveillance? -open reply-(optional)</p>	
<p>See previous answers.</p>	
<p>Have effective harmonised energy performance testing standards been developed for the product groups regulated under the Energy Labelling and Ecodesign Directives? -single choice reply-(optional)</p>	<p>No</p>
<p>Please explain your answer -open reply-(optional)</p>	
<p>The preparation of harmonised measurement standards between 2008 and 2012 has been characterised by substantial delays. For several Ecodesign regulations, requirements have entered into force without the corresponding harmonised standard being available. Responsibilities are split between the European Commission (which has mandated the standards too late) and CEN/CENELEC (which have not reacted sufficiently adequately to the mandates). This hampers the credibility of the policy and the possibility for manufacturers and market surveillance authorities to be clear about conformity. The adoption of the Ecodesign horizontal mandate M/495 is a potential step in the right direction, although it should cover Energy Labelling as well and be applied seriously (e.g. through an acceleration of the standard development lead time).</p>	
<p><b>Scope Expansion</b></p>	
<p>Should the scope of the Energy Labelling Directive be expanded to non ErP (non Energy related Products – which are products that do not influence energy consumption during use, but have other environmental impacts due e.g. to their manufacturing, such as foodstuffs, clothing and furniture)?</p>	<p>Yes</p>

-single choice reply-(optional)	
Please explain your answer -open reply-(optional)	
There is potential benefit in expanding progressively the scope to new product categories, provided the European Commission and Member States put sufficient resources in it. The expansion could start realistically by those product categories that have been identified as best candidates in the 2012 evaluation study on the Ecodesign Directive: detergents & cleaners, furniture, clothes & mattresses, toys.	
Should the scope of the Ecodesign Directive be expanded to non ErP (non Energy related Products)? -single choice reply-(optional)	Yes
Please explain your answer -open reply-(optional)	
There is potential benefit in expanding progressively the scope to new product categories, provided the European Commission and Member States put sufficient resources in it. The expansion could start realistically by those product categories that have been identified as best candidates in the 2012 evaluation study on the Ecodesign Directive: detergents & cleaners, furniture, clothes & mattresses, toys.	
Should the scope of the Energy Labelling Directive and the Ecodesign Directive be limited to energy/resource use in the use phase, while a set of other legal instruments applying to other significant environmental aspects (e.g. material efficiency, pollution) is adopted? -single choice reply-(optional)	Don't know
Please explain your answer -open reply-(optional)	
The answer depends on the quality of the overall policy set-up. The Ecodesign Directive could be restricted to energy in the use phase if and only if relevant legal instruments are developed to cover the other environmental aspects. So far, there has been a 'passing the buck' syndrome between the Ecodesign, RoHS and WEEE Directives, leading to some missed opportunities to cover non-energy aspects of energy-related products. The task sharing and interaction between these instruments should be clarified, and the evidence-base and decision process eventually better mutualised.	
Should the Energy Labelling Directive's scope be extended to cover buildings, technical building systems and other systems, thus ensuring uniform EU rules for the labelling of such systems, instead of the current approach where Member States set the labelling rules in the national transposition of the Energy Performance of Buildings Directive and in other national legislation? -single choice reply-(optional)	Yes
Please explain your answer -open reply-(optional)	
It would seem logical to ensure a greater uniformity of all the energy labels used in the EU (labels for energy-related products, tyres, cars and buildings). In addition, labels to cover systems (such as the dealer label for boilers) could be investigated in areas where significant savings can be achieved from better systems or installations: heating/cooling systems, motor/pump systems, lighting installations, IT networks.	
Do you see opportunities for synergies between all or part of the EU legislation relevant to product groups? For example: merging all required documents and information into a single form, or merging certain Directives into one (Ecodesign, Energy Star, Energy labelling, and Tyre labelling) -single choice reply-(optional)	Yes
Please explain your answer, with reference to the specific changes and their feasibility	



-open reply-(optional)

Greater synergy and interplay could be facilitated by merging some policy processes that address the same product groups (such as Ecodesign, Energy Labelling, Energy Star). Better coordination and consistency could also be ensured between the requirement levels set in Ecodesign, Energy Labelling, Eco-Label and Green Public Procurement.

## Closing

If you would like to leave any further comments on Energy Labelling or Ecodesign, please use the following space -open reply-(optional)

Are you happy to be contacted by the evaluation study team for an in-depth interview to follow-up on this survey and to discuss these questions and related issues in more detail? If so, please provide your telephone number and e-mail. -open reply-(optional)