

EXECUTIVE SUMMARY

Preparatory Study to establish the Ecodesign Working Plan 2015-2017 implementing Directive 2009/125/EC Task 3 Draft Final Report

The Preparatory study concluded that imaging equipment will not be part of Task 4 as the saving potential is too low.

Background

The Ecodesign Directive 2009/125/EC is the cornerstone of the EU's sustainable industrial policy, which aims at fostering an improved environmental performance of products in the internal market. It establishes a framework for the setting of eco-design requirements through Implementing Measures for energy-related products. The Ecodesign Directive serves the goals of climate policy, consumer protection, and free circulation of products at the same time.

According to Article 16, the Commission should establish Working Plans which determine the list of products for which a preparatory study shall be conducted during a given period and eventually Implementation Measures shall be adopted. So far, three subsequent phases of implementation have taken place:

- The transitional period (starting from 2005);
- The First Working Plan (2009-2011); and
- The Second Working Plan (2012-2014).

For the latter two Working plans, supporting studies have been conducted with the aim to identify priority products. The objective of the current project is to support the Commission in developing the next Working Plan (2015-2017) by:

- Developing a convincing classification of product groups; and
- Setting up an indicative list of priority product groups (indicative number of 20) for Ecodesign (and Energy Labelling) legislation, taking into account the criteria of Article 15 as well as existing Ecodesign Regulations and ongoing regulatory processes.

Conclusions

A binding implementing measure instead of the current Voluntary Agreement would have both advantages and disadvantage.

Advantages of mandatory Ecodesign Regulation:

- Possibly, greater transparency of the process, particularly for equipment that uses the OM Energy Star method;
- Use phase energy saving potential beyond business as usual will be relatively small;
- All manufacturers would have to comply;
- The reassurance from market surveillance that data should be accurate;
- If energy labelling is adopted, users would be able to select the most energy efficient designs. This in turn would give an added incentive beyond that already achieved by Energy Star;
- Implementing measures could include obligations that encourage longer lifetimes which will reduce lifetime energy consumption as well as reducing the amounts of emissions and waste;
- Replacement cartridges could be included - There could be from obligations relating to consumables that are not covered by Energy Star.

Advantages of a VA:

- Over 90% of the market is already covered by the VA;
- Greater costs to Member States and the Commission for market surveillance;
- Any additional use phase primary energy saving is likely to be relatively small and the cost benefit to consumers between A and G will be very small;
- Additional measures on longer lifetimes and for cartridge reuse (e.g. as in the Nordic Swan standard) could in principle be implemented in a revision of the VA;
- Increased compliance costs for industry are likely to be passed on to users.

To ensure that items 4.4.1 and 4.4.2 of the VA are met, independent auditing of the VA would be needed in a similar way that market surveillance of ecodesign Regulations is carried out, instead of the current “inspection” approach. This would be aided if suitable print quality standards were available for both inkjet and laser imaging equipment as ecodesign impacts are reduced only if print quality is acceptable and paper wastage does not increase. Based on the input of stakeholders, existing print quality standards may not be adequate and so more suitable standards would be required.

Other recommendations include:

- Publication of page yield with all marketing information so that products can more easily be compared by potential purchasers;
- Provide users with better information on paper quality and the relevant standards that exist. This should reduce paper wastage from jams and reduce wear to moving parts;
- Cartridge remanufacturers complain that they are excluded from the VA. At present, the VA is only for imaging equipment, although the design of these products influences the design of cartridges which themselves are also energy related products. It would be impractical for cartridge remanufacturers to join the VA in its current form but if the EU wants to encourage more reuse of cartridges, then proactive measures would be needed such as are discussed here, i.e. more detailed print quality standards (that include all quality levels achieved by printers), fully independent auditors, ensure that no loopholes exist that prevent refilling and remanufacturing, etc. It is important however, that when encouraging cartridge reuse, it is essential to ensure that cartridge and print quality are acceptable so that there is no increase in paper waste because this can significantly exceed the environmental benefits of cartridge reuse.

The full report is available here:

http://www.eurovaprint.eu/fileadmin/eurovaprint_files/pdfs/Ecodesign_WP3_Task_3_Draft_Final_Report_17092014.pdf