



**Preparatory Study to establish the  
Ecodesign Working Plan 2015-2017  
implementing Directive 2009/125/EC**



**Second Stakeholder Meeting 29<sup>th</sup> October  
2014, Brussels**

Name	Organisation	Remarks
<b>Introduction by Marzena Rogalska, Head of unit of sustainable policy and construction, in charge of Ecodesign Directive with DG ENTR</b>		
<p>There has been miscommunication and many reactions raised, based on the misunderstanding that this study will become the next Ecodesign working plan itself.. I want to make clear that the presentation of the results is just a report, i.e. a piece of work commissioned by the European Commission – not more. The list in the report is the list in the report, not a draft Working Plan 2015-2017. The proposal of the EC will be based on the work, and combined with the proposals on the outstanding Ecodesign and Energy Labelling Directive reviews (first quarter of 2015).</p> <p>All the products in the report are products that represent marginal energy savings, as compared to what has been done before. So we consider it equally important to look to existing products (room for improvement) and new products (include additional products).</p>		
<b>Introduction by Corinna Fischer, Team leader</b>		
<p>I will not speak long, but only highlight the fact that we have a few untypical products for Ecodesign, for instance refrigerated containers. This is mainly due to marginal savings left. And again, in the end, this is a political decision that will be taken.</p> <p>We do not want to reopen the discussion on Tasks 1, 2 and 3, since we are at the stage of the draft final reports. The deadline for stakeholder comments started on October 16<sup>th</sup>; it is to end on November 12<sup>th</sup>. There is an extended period for signage displays (November 20<sup>th</sup>).</p>		

Name	Organisation	Remarks
Sylvie Feindt	Digital Europe	Task 3 report cannot stay on the web as it is as there are many mistakes <i>Answer Corinna Fischer: Report will still be revised and major mistakes can be pointed out to consultants with supporting evidence. Please contact us by email.</i>
<b>Presentation and discussion of changes to Task 1 and Task 2 reports</b>		
Carsten Wachholz	European Environmental Bureau (EEB)	We welcome that the exercise has been restructured, but we still think that the table can be improved by presenting ideas for information requirements in a separate table. This will allow for discussing more non-controversial issues separately. We will provide suggestions so that recommendations can be streamlined. We have to go deeper into the verification, but not in the WP (in preparatory studies).
Sylvie Feindt	Digital Europe	Battery Directive does require retractability of battery at end-of-life, especially if you combine it with Questions & Answers (Q&As): batteries already have to be easily and safely removable. So I would put a question mark that the requirement is not yet covered. <i>Answer of Corinna Fischer: It's not completely clear in the legislative text itself. And even if there is a requirement on removability, it takes too long for the recycler to be economically feasible. Eventually, it could be dealt by revising the battery directive or within Ecodesign.</i>
<b>Presentation and discussion of conclusions of Draft Final Task 3 report</b>		
Cesar Santos	DG ENTR	It is really important to get Task 3 right, as energy consumption is still a major concern for Ecodesign!
Fanny Rateau	EHI	Could you please tell more about swimming pool heaters? Will it be carried out on Task 4 report, what are the next steps? <i>Answer of Corinna Fischer: To be discussed with the Commission.</i>
Sylvie Feindt	Digital Europe	On Task 3 report, we are particularly unhappy with a number of PGs including base stations (savings for technology that will no longer exist) / smartphones (data input not taken into account) / wireless charges (revision of Regulation on External Power Supply, emerging technology) <i>Answer of Alexis Lemeillet: I will present base stations later, some comments have been received already, and</i>

Name	Organisation	Remarks
		<p><i>inputs are always welcome.</i></p> <p><i>Answer of Rasmus Priess: On smartphones, please specify what you are referring to precisely. On wireless chargers, of course we are aware of EPS Regulation; however, we deemed relevant to include wireless chargers in Task 4 for two main reasons:</i></p> <ul style="list-style-type: none"> <li><i>• Quick technological development; so consideration only in next EPS review might be too late;</i></li> <li><i>• In the review of EPS Regulation, there was only very rough information included on the product, yet we do see that wireless chargers for consumers are on the market, so it's worth studying them better.</i></li> </ul>
Alexandre Roesch	EPIA	<p>On PV inverters, it shall be noted that they provide services to grid and transmission system operators. A study shall analyse more carefully what services PV inverters provide. So from a system perspective, conversion efficiency is maybe not the right topic to tackle, as there are trade-offs between conversion efficiency and grid services, and the latter is currently more important. Moreover, the assumed 90% baseline conversion efficiency is much too low, so savings may be overestimated. Written comments to come.</p> <p><i>Answer of Rasmus Priess: Only a quick reply: thank you and welcome to additional comments. Grid services are an important issue, and it should be clear what relation there is between conversion efficiency. Also a 95% average conversion efficiency is the new baseline, assuming a 1% improvement potential.</i></p>
Tim Hamers	European association of the agricultural machinery industry (CEMA)	<p>Horizontal measures will be difficult to take on combustion engines in agricultural machinery, as they are all very different. This huge variety is already covered by emissions legislation. So horizontal measures may not be the right approach. Holistic approach would be better, as engine is only a piece of the machine which is a piece of the process.</p> <p><i>Answer of Corinna Fischer: Further input is welcome. There are Ecodesign requirements on electric motors, so it may make sense to look to combustion engines too.</i></p>
Leendert Jan de Olde	Philips	<p>Is it possible to ask questions later on specific product groups?</p> <p><i>Answer of Corinna Fischer: Yes! It's the good way to do.</i></p>
<b>Introduction to Draft Task 4 report</b>		

Name	Organisation	Remarks
Lars Koch	Orgalime	<p>Before we go into the product groups, I would like to deliver three core messages. (Reads prepared statement):</p> <ul style="list-style-type: none"> <li>• Remaining energy efficiency potentials: WP3 should in our view focus on consolidating the ongoing implementation work stemming from all Working Plans issued to date considering the level of implementation and enforcement practices in Member States;</li> <li>• Suggested new focus on resource efficiency parameters: The Ecodesign Directive pursues a holistic concept and as such it is fit to address any environmental parameter, including also substance aspects or end of life parameters. HOWEVER, we question that WP3 should really prioritise resource efficiency parameters at this stage; the draft study shows that there is a lack of data, a lack of methodology and that no scientific evidence has been brought so far regarding the significance of these parameters. Also, there is a lack of recognised standards. It is therefore too early to go into resource-related requirements.</li> <li>• Overall quality and focus of the draft report: The draft report is often based on data, which are not representative and not sufficiently scientifically based. This results in many simplistic assumptions being drawn.</li> </ul> <p><i>Answer of Cesar Santos: Your intervention is not the good way to proceed! Imagine if all stakeholders start reading three pages of text...</i></p>
Astrid Nève	CECED	Working Plan 3 should focus on identifying open Lots and existing product groups. Companies need time to comply with current measures and those being adopted, there should not be too many measures at the same time. There is general lack of data regarding test standards, and much data is non-representative data.
Sylvia Maurer	BEUC	The statements from the industry cannot remain without counterweight from consumer organisations. We all know that we can do much more than what we do today on energy and resource efficiency! We welcome covering resource issues (also in a supplementary report). We agree that there must be a balance between the revision of older lots and the coming up of newer PGs – this with keeping in mind the final goals of circular economy to be reached.
Fanny Rateau	EHI	Please consider Joint industry position of CEN / CENELEC on material efficiency (will be sent by email).

Name	Organisation	Remarks
Stamatis Sivitos	ECOS	We echo the comments from Sylvia Maurer. The material efficiency mandate received a lot of industry opposition on the meeting of the standardisation bureau. So finally, there is lack of standards, but if the standardisation bureau does not bring up the topic at the forefront, we cannot expect any progress to be made.
Niina Hakkarainen	Energy Authority Finland	The use of critical raw materials was not correctly understood in the report. The list was made to inform strategies to draft trade and mining policies, not for Ecodesign purposes. I will provide written comments on the topic. Moreover, I would like the study to explain the ranking + / ++ / +++.  <i>Answer of Corinna Fischer: The ranking is still a subjective assessment at the moment, but will specify the criteria in the final version.</i>
<b>PG n°1: Base stations</b>		
Sylvie Feindt	Digital Europe	A number of comments:  Provide rationale for +++ on regulatory coverage. You state correctly that there are already Directives in place, yet in the legend of the summary table it says that the more pluses, the better the suitability for Ecodesign or Energy Labelling. That means, the more regulatory coverage there is already, the more there should be?  How do you justify the assessment that there is low policy coverage?  Provide rationale for two pluses for recycling although there are already recycling targets and material is mainly metal.  Contradiction between pluses for RoHS and REACH in draft report and presentation slides.  Has our contact on broadband CoC been followed up with regard to market data?  <i>Answer of Benoît Tinetti: The pluses in the “other environmental impact” section do not yet consider policy coverage, only the environmental impact itself.</i>  <i>Answer of Corinna Fischer: Generally more pluses mean better suitability for Ecodesign and Energy Labelling. Therefore in the Policy coverage section, more pluses mean that there is little policy coverage for the aspect of energy efficiency.</i>

Name	Organisation	Remarks
Ove Persson	Ericsson	RoHS and REACH apply to base stations.
Laura Spengler	Oekopol	General comment on overview tables: It would be helpful to differentiate between Energy Label and Ecodesign.
Ove Persson	Ericsson	<p>Energy Efficiency Directive and Code of Conduct are sufficient for Energy Efficiency improvement</p> <p>It is difficult to estimate and compare power consumption of different base stations. In the past, they used to handle only one standard, now they have to handle several, therefore they are not comparable. Also, there are large differences in size and differences between indoor and outdoor applications. What is the definition of base station?</p> <p>No one can say what the network will look like in 2030.</p>
Tom Nickson	Toshiba	Diversity of base station, large masts to small substations. Unclear what is being covered. Will send coordinated written comments.
Leo Baumann	Nokia	<p>I would like to clarify that the company affected is called Nokia Networks. Regulatory measures are not worthwhile or feasible, they provide no value added and are even counterproductive. Energy efficiency and material efficiency are best achieved by market forces. Energy efficiency is a major feature that is being competed on. 5G will be 100-1000 times more efficient.</p> <p>Base stations are not a well-defined product group. They are not a piece of hardware.</p> <p>Ad recycling: Base stations are very valuable “waste”. 95% of the material is recycled. Material efficiency goes hand in hand with energy efficiency; materials are very expensive so there is an incentive not to dump them. Material efficiency also saves on transport and space for customers.</p> <p>Standard is available for testing, but test takes place on system level not on product level.</p>
Sylvia Maurer	ANEC / BEUC	<p>What reassurance can industry give that a voluntary measure will work on material efficiency? This is a clear case for market failure. See case of common standard for mobile chargers.</p> <p>Answer Nokia: This is a different case, as base stations are a B2B product. Energy efficiency is a very important criterion for our business customers (network operators).</p>

Ove Persson	Ericsson	Energy efficiency is high on our agenda. We are all evaluated on energy performance. Regulation on product level risks lock-in. Largest potential for improvement is on a network level.
Stavros Simitis	ECOS	A preparatory study could be conducted to confirm the claim made by industry that base stations are becoming more efficient. Comment on sentence on p.42 regarding the energy consumption of 4G and 5G (?)
<b>PG n°2: Gateways</b>		
Sylvie Feindt	Digital Europe	<p>Market split: Majority of gateways supplied by network operators (sold or leased), smaller share bought directly by consumers. Incentives are different. Would be good to distinguish between these, especially with regard to durability and EoL. If the operator takes back the gateway, the EoL impact is better.</p> <p>Cases on Netbox and Fritzbox: Producer of Fritzbox claims to be one of the two top producers in Europe. If it is used by the majority of operators, there may not be an issue as devices on European market are already very efficient. Find out market share of very efficient devices.</p> <p><i>Answer Alexis Lemeillet: Natural market improvement is taking place. Info on market share would be welcome.</i></p>
Stavros Simitis	ECOS	<p>We identified gateways on the French market with different power consumption, 11 W and 20 W =&gt; There is a very broad range. For Energy labelling, it is a chicken and egg discussion: It cannot be perceived as relevant by the customers if there is not a label (see case of TVs).</p> <p><i>Answer Benoit Tinetti: For those products provided by a provider, the customer does not have a choice. Only for consumer market a label could make sense</i></p> <p><i>Answer Ecos: Energy labelling would be an argument for providers to differentiate with competitors.</i></p>
Hans Paul Siderius	Netherlands Enterprise Agency	<p>Disagree with statement that Energy Labelling is not suitable to B2B communication. It provides excellent marketing opportunity to network operators to show that they sell "A-rated" products</p> <p><i>Answer Cesar Santos: Application of the Energy Label is normally independent of the distribution channels.</i></p>
Klaus Verschuere	Cisco	Code of Conduct applies also to Network operators, hence large share of devices should be covered. However we do not have an exact number.
Peter Gibson	Intel, DE	Service providers do already care about end of Life, as proven by your analysis. They will probably also care about energy efficiency. See for example the DT initiative, for every kWh produced they save 3 kWh on the

		network. CoC is already working, see drop in energy consumption in 2020. Difficult to forecast for 2030, so data for 2030 must be taken with care
<b>PG n°3 BACS</b>		
The PG is not presented, only short interventions are made.		
Severin Dahms	Gira	It is important that any certification is transparent and open to all manufacturers.
Stavros Simitis	ECOS	The voluntary energy label proposed by industry should be evaluated. Impact needs to be assessed. How easy is it to achieve? Potential confusion with energy label for heating products needs to be addressed.
<b>Intervention on signage displays</b>		
Cesar Santos	DG ENTR	Suggests to not open the discussion
Sylvie Feindt	DE	Overlaps with work we already do. Better to be regulated separately than to be included in Lot 5.
Tom Nickson	Toshiba	Would like to have a presentation and discussion <i>Answer Cesar Santos: At the end of the session, if time allows.</i>
<b>PG n°4 Mobile phones / Smartphones</b>		
Sandeep Rana	Samsung Electronics	I did not get your conclusion on durability: technical lifetime is not commercial lifetime, so how do you reach the conclusion? <i>Answer of Rasmus Priess: Active use time is the important topic; this is what is meant per durability.</i> <i>Answer of Corinna Fischer: The measures we suggest (software update; erasure / storage of data in order to support 2<sup>nd</sup> market) are designed to encourage a longer use time.</i> How would you define the active use time? <i>Answer of Rasmus Priess: We usually have more than one mobile phone at home, there may be second or third tier users. The use time is considered before the phone is replaced.</i>
Sylvie Feindt	Digital Europe	I agree that RoHS would be the most suitable place to introduce any requirement on hazardous substance. And



		<p>you are right that energy efficiency is not the major point.</p> <p>On durability, “active use time” is not the right term. It is questionable how this could be measured on a European scale because it introduces usage patterns / scenarios. I am not happy that my comments on use time have not been taken into consideration. You are relying on a press release from a non-publicly available BITKOM study, with a possible misinterpretation. The Commission has just published a study (June 2014), where smartphones appear not to be a suitable product group for lifetime expansion, as replacement is driven by new technology.</p> <p>The structure of the report shows many question marks and empty subjects – except for recommendations, which is not good practice!</p> <p>The issue of batteries is already covered in the Battery Directive.</p> <p>Also I would like to remind the difference between voluntary (label) and mandatory requirements (MEPS).</p> <p>Page 123: How can a requirement extend the economic lifetime?</p> <p>Upgradeability and erasure of data is possible, but represents a cost to the users.</p> <p>Finally, smartphones represent an extremely fast moving segment, so we’ll have to go for new data by the time the preparatory study is finished. There are endless discussions to be expected, for low gains (energy and material). No good cost-benefit relation. Smartphones is a hyper-mediated PG and therefore not a good product group for testing non-energy requirements.</p> <p>If you want to look at non-energy requirements, displays may be an option. A draft will be available next month.</p>
Angeliki Malizou	ANEC/BEUC	<p>We welcome the inclusion of mobile phones in the Working Plan. Please note that this is only a pre-screening so far. I read a press release from beginning of October that there are more active SIM cards than people over the world, so it would be weird to neglect this product group as it’s so popular amongst users.</p> <p>As far as use patterns are concerned, “fashion” is definitely not a generic reflex: some population groups of different age and economic background want long-lasting mobile phones, and do not want to constantly buy new ones. We had a check by our Italian member who sent consumers to shops wanting to have battery replaced and in all cases they were advised to buy a new phone.</p>
Carsten	EEB	<p>This product group is the most iconic on the Working Plan, but also the most relevant due to stock and sales –</p>

Wachholz		and there is evidence that there is a secondary and perhaps a third market. It is relevant to include smartphones from a resources perspective, so as to facilitate end-of-life treatment, passing on to another user, etc. Maybe it will not result in design requirements but it is worth going through a preparatory study and exploring all the options.
Hans-Paul Siderius	Netherlands Enterprise Agency	<p>Netherlands is one of the Member States that would like to have more attention paid to resource efficiency. You cannot throw any definitive conclusion on mobile phone, it's only a pre-screening so far. It will generate a lot of press, so that political consideration might be taken into account.</p> <p>More technically speaking, retracting the battery is worth looking at both with regard to end of life and reparability. It might also be worthwhile to do that in a horizontal way. The only general comment to make on a technical base is on battery. And if it is possible to secure / retrieve / erase data, even if this is a costly thing at the moment, then we could look at it. It should be inquired whether such a measure might make it more attractive to pass on products to second users.</p>
<b>PG n°5: Wireless chargers</b>		
Hans-Paul Siderius	Netherlands Enterprise Agency	I will take the opportunity of this product group to introduce another general aspect (beyond battery): namely the relation with the revision of current Regulation. While the consultants have explained wireless chargers were only mentioned marginally in the revision of EPS, I still believe that the best way would be to include them in the revision, because they are a form of EPS, so it's not useful to have two Regulations on the same product group. Contrary to the Code of Conduct on broadband equipment, the Code of Conduct on EPS is in sleep mode or even coma, following regulation in the EU and the US. To this extent, the discussion to treat it within the CoC may not be fruitful. Fast development is not necessarily a reason for not doing anything. Apple is going to deploy a wireless charger technology: so it is not a niche product or a product at early development stage! Functional requirements will not stifle innovation, and a preparatory study could be done within the framework of EPS.
Severin Dahms	Gira	It makes sense to cover wireless chargers within the review of Regulation on EPS. It is a new product group, but the charged products are the same. It should also be compared to conventional way of charging as it is less efficient than cable products.
Sylvie Feindt	Digital Europe	We would support the addition of wireless chargers to the review of Lot 7 – preferably in next revision. Even if done earlier, a full preparatory study is needed to better understand this product group.

Stamatis Sivos	ECOS	I would like to echo the comment of Hans-Paul. I don't have view on where it should be best treated. However, we would be concerned that the preparatory study could be postponed if it is linked too closely to the revision of EPS – we would like to have it as soon as possible (not that much dependent on parallel policy process).
<b>PG n°6: PV inverters</b>		
Alexandre Roesch	EPIA	<p>PV inverters, as I said this morning, do provide services to the grid, and this has an impact on the design of PV inverters. To this regard, it would be good to and reflect whether conversion efficiency should be the main parameter or if grid services are more important.</p> <p>Furthermore, I suggest extending the analysis of policy coverage. Look at network codes being developed by Euronetwork (?) Substances are better tackled by other Directives. It is true that PV inverters are excluded from RoHS; this was a compromise because of the benefits of RES. But this Directive would be the best means to tackle hazardous substances (if ever). PV inverters are included in the WEEE Directive.</p> <p>On noise, I am not sure it is the main issue. For industrial applications it does not make sense, only maybe for residential applications.</p> <p>Energy use during night time is linked to provision of grid services</p> <p>Finally, if photovoltaic is part of the new energy system tomorrow, the links with grids and other home appliances will get tighter, so that we need to have a wider debate on PV inverters in the context of “smart home”.</p>
Hans-Paul Siderius	Netherlands Enterprise Agency	<p>What is the difference between base stations / gateways and PV inverters regarding end-of-life? I understand there could be similar concern.</p> <p><i>Answer of Rasmus Priess: This is probably a valid assessment, which would need to be further investigated (especially on battery-related issues). There was not much evidence in any direction so far, but the general feeling is that indeed end-of-life may be an issue among PV inverter and we might come to similar conclusions.</i></p>
<b>PG n°7: Toasters</b>		
Jan Leendert	Philips	It doesn't make sense to combine the various sources. Penetration rates render other figures than Prodcum. Either some of the data is incorrect (penetration, sales, stock, energy consumption per cycle...) or all are correct, but pattern of use may be incorrect. 40 kWh annually would mean 40 hours usage per year. This would mean 5-6

		<p>pieces of toast per day. Our estimates are that 20 kWh would be heavy use, 15 kWh average. Either take the sales figures and the more realistic 15kWh/year, or take the stock and take 10kWh/year knowing that a large portion of toaster owners do not use their product frequently.</p> <p><i>Answer Alexis Lemeillet: These comments are on Task 3 and are a bit late. We used all available data. Regarding sales and stock we believe sales figures from Prodcum are not reliable. Stock is however more important. Stock estimates look reasonable. The 40 kWh estimate is the average of several studies. 35% energy efficiency improvement is deemed reasonable. I would like to hear the assumptions your calculation is based on, bilaterally.</i></p>
Mike Walker	UK	<p>I welcome the balance between old and new products. I feel we need to avoid toasters, hair dryers, hand dryers, lawn mowers because of political debate. Consider implications for uptake in the British press. Robust evidence is important.</p>
Keith Warren	EFCEM	<p>Are commercial toasters excluded?</p> <p><i>Answer Alexis Lemeillet: Not explicitly excluded but we do not have any data on them.</i></p>
<b>PG n°8: Hair dryers</b>		
Angeliki Malizou	ANEC / BEUC	<p>Specify whether you are talking about guarantee or warranty. Guarantee is for the retailer, warranty for the manufacturer. The Product Warranty (or Guarantee) Directive already provides for 2 years warranty or guarantee, I am not sure which.</p>
	Philips	<p>The assumed pattern of use seems relatively high. There is a saving possibility by using a different nozzle. However it would have significant consumer impact. There is a trade-off with noise and drying time.</p>
Judith Gieseler	BAM, Germany	<p>I am presenting the consolidated position for Germany. We are not generally opposing, but there is the question of sufficient improvement potential. 12 minutes usage per day sounds relatively high. Where is this data coming from? More conservative assumptions please.</p> <p><i>Answer Alexis Lemeillet: 70 kWh/a is average of many studies. If you have good data base for more conservative estimates, please come forward with it.</i></p>
Cesar Santos	DG ENTR	<p>I suggest running a sensitivity analysis.</p>

<b>PG n°9: Hand dryers</b>		
Cesar Santos	DG ENTR	One of the highest savings, elaborate on how robust this data is. Thinks it still requires some work.
Stavros Simitis	ECOS	Hygiene is an issue; maybe we can get inspiration from vacuum cleaners.
<b>PG n°10: Kettles</b>		
Angeliki Malizou	ANEC/BEUC	I wish to clarify that the Directive I mentioned is the Product Warranty Directive, and the obligation is on retailers. However it is difficult to enforce.
Leendert Jan de Olde	Philips	<p>I would like to challenge your model assumptions. I note that UK is quite crucial in your analysis, but is it representative for Europe? One kettle in six is sold in the UK, although the UK represents only 11% of Europe's population. Kettle sales in UK 3 are times higher than elsewhere.</p> <p>Furthermore, how often is the kettle indeed used? There are sources from the UK and Netherlands, both based on 1000 l water. The UK source refers to 1000 l boiling with an electric kettle (not indicating for what reason), the Dutch source states boiling 1000 l without stating how it is boiled. But the Dutch states for which purpose, and 35% is used for boiling vegetables/pasta. Likely this is the first indication for at least 35% overestimation when taking UK as representative. If we look at the other 65% for hot beverage, that mainly consist of tea and coffee. Please consider Economist data on tea and coffee consumption. You will see that Europe has rather a coffee culture, except for Ireland, the UK and Poland. Let's assume 650 litres in the Netherlands based on the above source, 25% of which is for tea, which means NL consumes only 20% as much tea as UK. Consider also tea and coffee sales: 0.7 kg tea in NL, 2.7 kg in UK. UK is therefore not representative for coffee culture countries. The rest of EU would only present 15% of the consumption and savings.</p> <p>Furthermore, there is no evidence on durability. Durability data from Germany (which is the biggest consumers market in the EU) does not suggest many early failures. What I know from the UK is the hard water quality facilitates lime scale build-up which accounts for early failures. So it is rather a maintenance issue, not a durability issue. Data from Which? suggests that in 70% the reason for failure was lime scale, in 22-23% it was leaking (which may also relate to lime scale). So data from Which seem to support the statement that kettle have a</p>

		limescale issue (maintenance issue) and not a durability issue. Saving potential is highly overestimated. With (above) common sense logic, I come up to a result of max 0.7 TWh potential savings but that is still an overestimation.
Angeliki Malizou	ANEC/BEUC	Which? data compiles over 7,500 responses of 7,500 people; according to them, there are problems in more than 50% of cases. Anecdotic evidence from this room is not helpful. At the stage of the Working Plan, there shall be no chapter on user pattern: the preparatory study is a much more appropriate place to discuss this.
Leendert Jan de Olde	Philips	Philips is definitely one company driving for energy and resource efficiency, so we would be prepared for Ecodesign requirements or Energy labelling – I would like only to stress that kettles are perhaps not the product group to start with. I am not worrying about kettles being regulated, only about the limited sources the Commission has and selecting product groups that do not have very large saving potential.
<b>PG n°11: Lifts</b>		
Sascha Schmier	VDMA	<p>There are good things in the report. The assumptions on energy savings are quite high though. The only reference is the E4 study. I know that is only reliable source; however E4 figures should be updated. A lot has been improved since 2010. The VDI 4707 standard gave a push to the market.</p> <p>Total market is far below 200,000 units. Most of the report refers to the existing installations, on which Ecodesign will probably not have much effect. Achievements so far were made without any regulation. TCO is a competition argument. Industry supports application of EPBD because the higher potential is in existing installations.</p> <p>There are no toxic substances in lift. Vibrations and noise are subject to competition, VDI is working on a measurement standard for noise; it also depends on the integration in the building. Oil leakage is unlikely to happen with traction lifts. Somewhat more in hydraulic lifts, but there should not be too much risk as there are qualified personnel working with it. I would assign rather one plus sign.</p> <p>97% of the mass are metals and can be recycled well. They are not always recycled, but ErP cannot influence that. Conclusion: EPBD might be the best option.</p>
Stavros Simitis	ECOS	We welcome the clarification with respect to savings potential. Revision of EPBD will take time, transposition also. Depending on savings potential, Ecodesign might be more appropriate. Even if lifts might be tailored, some

		generic requirements could address lifetime of motor or efficiency of lighting
Francesca Fazio	European Federation for Elevator Small and Medium Entreprises (EFESME)	We will provide comments on solutions for installed lifts, but also comments on methodology for calculation energy savings. VDI is a private guide, ISO standard is on its way, will be more appropriate. I would like to note that the Lifts Directive was just updated a few months ago.
<b>PG n°12: Signage displays</b>		
No presentation is made.		
Tom Nickson	Toshiba	There have been very good reasons to take signage displays out of scope of the Regulation on TV, since they are quite different from televisions and monitors. Most of Lot 5 could not be extended to signage. For instance, brightness of the displays is different. Also, there are durability and safety issues, and signage products are a system. Therefore, a full preparatory study would be needed. Written input will be provided. <i>Answer Corinna Fischer: Grateful for any specific input.</i>
<b>PG n°13: Free-standing hot vending machines</b>		
Stamatis Sivitos	ECOS	Do you have reflections with respect to consumables? I noted that some of the machines do not allow for the users to put their own recipients, so one generic requirement like a “no cup button” could indirectly improve the environmental performance of the product. <i>Answer of Benoît Tinetti: We have not gone through the consumables so far, but we may have a look into it.</i>
<b>PG n°14: High Pressure Cleaners</b>		
Charalambos Freed	EUnited Cleaning	The EN 1829 standard covers very high pressure cleaners that have been excluded from Task 3 and is therefore not applicable. Another standard already includes lifetime. With respect to water usage, it shall also be noted that high pressure cleaners are used intermittently, on average 2-10 minutes a week. Phthalates are not important either, because if you don't use it for a long time, they don't migrate.

		Emission of CO is at < 75 ppm, which is very low. Efficiency of burner is above 91%. Moreover, the Cleaning Burner Efficiency Labelling Scheme covers the environmental issues related to hot water HPC. I will send missing data anyway to the project team.
--	--	---

**Summary and next steps by Corinna Fischer**

Comment deadline 12<sup>th</sup> November, for signage displays 20<sup>th</sup> November. Draft report to Commission planned 10<sup>th</sup> December. Final report planned beginning of January.

**Closing words by Cesar Santos**

Thank you for your contributions and patience, this is important for the Commission to know where everyone stands.  
We are starting a new college / Commission next week, so there are many unknowns.