

Günter Verheugen  
Vice-President of the European Commission  
200, rue de la Loi  
B-1049 Brussels

12 March 2008

***Re: Eco-design of products***

Dear Vice-President,

As stated in BUSINESSEUROPE's position paper dated 13 December 2007 (attached), European industries believe that introducing an EU legislative framework should not be the priority route for enhancing eco-design of products. Our view is that eco-design should be left to industry and driven by market forces.

During your intervention at the European Business Summit (21-22 February 2008), you raised the option of an extension of the Energy-using Products (EuP) Directive to other products.

It is the common view of European industries that a re-opening of the EuP Directive or an amendment to extend its scope to non-energy-using products is not at all the appropriate option for the way forward. This would overlook the fact that other products than energy-using products may have different product characteristics, which are not accommodated in the EuP Directive today. In addition, re-opening the directive to take up such differences would disrupt its ongoing implementation process and leave affected industries legally uncertain and undermine their willingness to engage proactively in its implementation. This cannot be beneficial for the environment or the realisation of the EU's energy and climate change policy objectives.

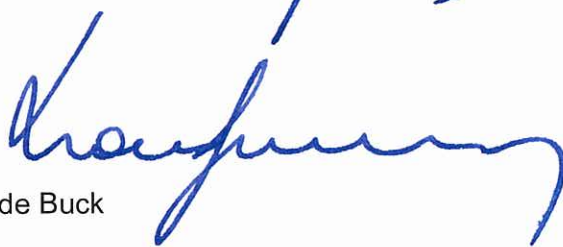
While reluctant to endorse more product legislation, if an impact assessment shows that it can make a cost-efficient and effective contribution to enhancing eco-design, we believe that the Commission should take the approach of separate instruments from the EuP Directive addressing products other than energy-using products where relevant and appropriate. Knowing that different products and sectors face different sustainability challenges, European industries see such a sectoral approach as the more adequate option.



BUSINESSEUROPE encourages DG Enterprise and Industry to play the lead role in this process that would lead to further consistency, and BUSINESSEUROPE would be very happy to facilitate this process.

I remain at your disposal if you have any questions on the above, or require any further information.

Yours sincerely,

*Best regards*  


Philippe de Buck

Encl.: 1