



20 January 2009

Re: BUSINESSEUROPE position on the eco-design directive in view of ENVI exchange of views on 21 January 2009 (Csibi report)

Dear Member of the ENVI Committee,

The so-called 20-20-20 targets is the key EU's policy objective. Of the three goals, only the energy-efficiency goal provides direct synergies for all the three challenges we face: climate protection, energy security and competitiveness. In that respect, an extension of the eco-design directive (COM 2008-399) to energy-related products is an important step to further improve our energy efficiency in the households sector, where the savings potential is biggest.

The proposal to extend the scope of this directive beyond energy-related products is a matter of great concern for European companies. BUSINESSEUROPE would like to draw the attention of the Committee to the following:

- Lack of evidence on its workability and effectiveness: the eco-design directive has been in place since 2005 only and there are as yet no experience and consistent data on its workability and effectiveness. Therefore, this legislative instrument must be deployed cautiously, in the absence of evidence of its effectiveness. Any extension must also be subject to careful product-based impact assessments.
- Disproportionate costs: setting minimum eco-design standards for all manufactured goods would create an enormous bureaucracy and a lot of uncertainty for European companies. We are strongly concerned that the benefits to the environment will not be proportionate to the cost for industry and public authorities.
- Loss of consumer relevance and benefits: extension of the scope beyond energy related products would remove the proven beneficial focus of the current eco-design directive. A focus on energy would result in readily demonstrable benefits of direct relevance to consumers, i.e. savings on energy costs combined with reducing greenhouse gas emissions. This would help to strengthen recognition of the eco-design concept by consumers and therefore help with "marketing" of the scheme.
- Contradiction with other legislation: extension of the scope to all products will increase the risks of overlap, duplication or inconsistent approaches vis-à-vis other legislation.

We trust that you will give due consideration to this issue of concern and remain at your disposal if you would like to exchange views.

Yours sincerely,

Daniel Cloquet
Director of Industrial Affairs