

ANEC Comment on the European Commission Draft Mandate to CEN/CENELEC/ETSI for Programming of Standardisation Work in the Field of Eco-Design of Energy-Using-Products

On 1 August 2003, the European Commission adopted a framework Directive for the setting of eco-design requirements for energy-using products (EuP). This directive, which was presented as paving the way for the development of eco-design requirements on a product-specific basis, is the outcome of the merger at the end of 2002 of DG Enterprise's proposals for a EEE (eco-design for Electrical & Electronic Equipment) Directive and DG Transport and Energy's proposals for an EER (Energy Efficiency Requirements) Directive. At the end of 2003, the European Commission presented a draft mandate to CEN/CENELEC/ETSI for the programming of standardisation work in the field of eco-design of energy-using products.

The draft mandate states that the standards to be developed under the EUP mandate should help the manufacturer to comply with the requirements of the future implementing measures, to be proposed by the Commission after the adoption of the framework directive.

ANEC disagrees with this European Commission mandate because the EUP Directive is conceived as a framework directive, which does not automatically apply to a certain product group. It applies only to those aspects of an energy-using product for which implementing measures have been adopted. Hence, it does not make sense to ask CEN/CENELEC/ETSI to consider, for example, methods for the measurement of energy consumption if they are not told for which product group these methods should apply.

ANEC calls upon the European Commission to first agree on the product groups to be covered and the specific eco-design requirements they need to comply with under the directive before giving a programming mandate to the European standards organisations. Otherwise the European standards bodies would have to, as in our example, consider the establishment of standards on methods for energy consumption for all (!) products, which, however, is not feasible.

To conclude, ANEC is convinced that it is premature to issue a mandate as long as the political decision making – in this case the adoption of the directive on EUP and its implementing measures– has not been finalised.