

Minutes of the

Review of the Energy Labelling and Ecodesign Directives

Third Stakeholder Meeting – Day 1, 18 February 2014

Centre Borschette, Room 0A - Rue Froissart 36, 1040 Brussels

11.00 - 11.15	Introduction European Commission
11.15 - 12.00	Energy savings and market effects <i>Heleen Groenenberg (Ecofys)</i>
12.00 - 12.45	Relation of Energy Labelling and Ecodesign with other policies <i>Edith Molenbroek (Ecofys)</i>
12.45 - 14.00	Lunch
14.00 - 15.00	Potential scope expansion to non-energy related products and means of transport <i>João Fong (ISR – University of Coimbra)</i>
15.00 - 15.45	Appropriateness of the energy label (except the method to update existing energy label scales to reflect technological progress of the labelled products) <i>Sophie Attali (SOWATT) / Paul Waide (WSE)</i>
15.45 - 16.15	Break
16.15 - 17.00	Rulemaking processes <i>Edith Molenbroek (Ecofys)</i>
17.00 - 17.45	Implementation and market surveillance <i>Juraj Krivošik (SEVEN)</i>
17.45 - 18.00	Wrap-up and closure

Please note: despite the use of the 'we' form in the minutes the stakeholder comments are not meant to be exact quotes, but a reflection of what was said.

Energy savings and market effects

Heleen Groenenberg (Ecofys)

Marianne Norman (Norwegian Ministry of Petroleum and Energy)

(about the primary energy factor) A lot of attention was put into whether this PEF should be calculated at national or European level. Consultants should pay more attention to the fact that most of the respondents are against the use of the primary energy factor. The relevant issue is whether PEF should be used at all and not whether it should be national or European. The option of separate Ecodesign requirements for different energy carriers should be explored more thoroughly in the report.

Requirements that are strict enough for some energy carriers e.g. gas would result in too stringent requirements for electric appliances. Regulation for water heaters would result in banning electric appliances. For example, for water heaters, requirements for up to 60% are set and it is not possible to achieve for electric appliances (they can go only up to 40%) so it means they will be banned, i.e. it is a discrimination.

Milena Presutto (ENEA, Italy)

Italy is against the PEF as it favours actual consumption separating products depending on type of fuels, although in some very specific cases the PEF could be used. A case by case analysis has to be done in order to justify the use of primary energy within labelling.

Third bullet Slide14: it should rather be "make the process as long as necessary so that we have an efficient regulation, well implemented". The study is approaching the problem in the wrong order and mixes causes and objectives.

Trends towards larger products are a problem but should be tackled carefully: people may buy 2 small products that may consume more in the end. Hence we need a case-by-case approach depending on products.

Elke Dünhoff (Verbraucherzentrale Rheinland-Pfalz, Germany)

About methodology: The survey (sample) is not representative. If you look at numbers manufacturers and retailers are over represented. More than 60% come from Industry groups. We want the position of consumers to be better shown. We would like to cluster answers by stakeholder groups to show the views of consumer groups as detailed as possible.

Floris Akkerman (BAM Federal Institute for Materials Research and Testing, Germany)

We strongly support a Primary Energy Factor (for whole Europe). Since we have a EU electricity network/grid (of which development is encouraged), we have unavoidable cross border exchange of electricity and products, therefore this issue is not national anymore. The argument of energy mix is "an argument from the past" because certificates of origin can be exchanged.

Relation of Energy Labelling and Ecodesign with other policies

Edith Molenbroek (Ecofys)

Bernard Gilmont (European Aluminum Association)

Construction product regulation (CPR): today, no minimum values are required but Art 3, para 3 allows the EC to set threshold values. So it is a matter of implementation of existing regulation (no change is actually required).

Edouard Toulouse (ECOS)

Some MS are critical on the conflict between Ecodesign requirements and EPBD requirements. Please check this and be more cautious about your conclusions.

Hans Paul Siderius (Netherlands Enterprise Agency)

Issue relation and ED, ELD and EED: The current situation would discourage MS to be active in several fields. If the savings under ED and ELD directives counted towards the EE targets, countries would be more willing to set more ambitious requirements under ED and ELD because it would help them reach national targets.

NL is in favour of merging the two directives (ED and ELD) and using comitology for both. Merging the directives is not a goal as such. The underlying issue is to simplify things for industry, surveillance agencies, etc. The scopes for ED and EL are identical (since the latest revision). Ideally we would have a single measure per product (not sure whether this is legally possible).

Larger merger, I would be cautious. EPBD and EED are more generic directives, not focused on products. Ecolabel is a voluntary instrument. So in conclusion the natural candidates for a merger are EL and ED.

Milena Presutto (ENEA, Italy)

Slide 21: construction products: the study should investigate if under ED or other regulation, should the EC decide on minimum requirements. But is this policy of minimum requirements the best policy (whatever the product/system)? CPR is a typical example where you should build on for assessing if a product requires or not a minimum requirement and / or a label. How do we decide on that?

Slide19: ED and ELD implementation is not fully aligned and this brings empty classes on the label: it is not a missed alignment happened by chance or by mistake; it was a precise political decision on purpose. The misalignment is because of a political issue of delegated acts and regulatory committee (not to be discussed in the framework of this study).

The report says the process is too slow, but the more you merge policies, the more the process will be long. So we need a balance between the length on the process and policy alignments: in practice, what can be done and what are the recommendations of the consultants (the report is too generic)?

Mike Walker (DEFRA, UK)

When you speak of alignment, in which way should we align?

Edith Molenbroek (ECOFYS)

Next session on rules process will tackle this, but this is why we say a merger should be based on practical issues.

Carlos Lopes (Swedish Energy Agency)

Comment on the interaction between policies: More focus should be put on how ED and ELD help to comply with other policies. Example: (REACH regulation) it is very difficult to know what are the hazardous substances in e.g. a vacuum cleaner. ED and ELD could include information requirements for these hazardous substances. We could use ED and EL for this purpose.

Sylvie Feindt (Digitaleurope)

On the merge of directives: Merging is not really possible, or a modular approach is needed because labels are made for consumers and can't apply to all products (how can you deal with stand-by, or B2B products...).

Edith Molenbroek (ECOFYS)

Not all products would need to be labelled.

Sylvie Feindt (Digitaleurope)

The merging with voluntary schemes e.g. Ecolabel – agree with Hans-Paul- would be very challenging. Ecodesign and ROHS merge would result in doubling the time to develop an implementing measure. The success of ED comes from the fact that it is very focused on energy. Information requirements are nice but there are a lot of question marks: who is going to use this information, are they really consulted, etc.

Milena Presutto (ENEA, Italy)

Building on the comment from Swedish Energy Agency: using ED as a tool to oblige stakeholders to declare any information on products, will make the work of Member State Agencies even more complex (if it is mandatory, we should discuss it has to be verified or not by MSA). Is the requirement to provide information (with no need to make any verification on the single declared value or information), or make sure the information is correct (i.e verification of each declared value or information)– is there a point to have the former without the latter but can we really implement the latter?

Carlos Lopes (Swedish Energy Agency)

According to the Swedish chemical agency, the obligation for market surveillance of substances is under REACH, and this obligation is already there. The only obligation under Ecodesign would be that the information is there, that would be the only additional market surveillance aspect under ED.

Stephane Arditi (European Environmental Bureau)

I understand the concern on market surveillance, however I think we should avoid a-priori exclusion of ideas like the ones proposed by Sweden. These could help transparency. The current weaknesses can be improved, so let's not assume that it will not work. If the additional information is already required under other legislation no additional further surveillance body is needed.

Anne-Claire Rasselet (ORGALIME)

We need more information on "product passports" because we don't see the difference with the already existing tools.

Coherence is capital because when designing a new product, manufacturers have to look at many regulations (in only one moment). We would like a common understanding that there are interlinks and may be some compromises are needed. Two examples: the use of certain refrigeration substances affects energy consumption of air conditioning equipment. Same for copper use for motors... We need a holistic view and a clear statement of the priorities based on where the potential savings are.

Regarding Sweden's suggestion, REACH is already there (Art 33 is already there to provide information) and the WEEE Directive as well. So different piece of legislation should not be targeting the same objective.

Integrated work plan between ED and ELD: Seems an attractive option but we need to think how to deal with B2B equipment.

Elke Dünnhoff (Verbraucherzentrale Rheinland-Pfalz, Germany)

Harmonisation of Ecolabel and energy label: you suggest that Ecolabel should be only for the best classes, however a small B TV can be better than an A+++ so please take absolute consumption into account.

Ines Oehme – (Federal Environmental Energy - UBA, Germany)

There are too many different information requirements between ED and ELD, between products, for the fiche and on-line, for technical documentation, etc. so we support the idea of one document only and suggest the consultants elaborate on this.

Potential scope expansion to non-energy related products and means of transport

João Fong (ISR – University of Coimbra)

Stamatis Divos (ECOS)

No need to rush to regulate these products but Green NGOs do not want an a priori exclusion. There are different stages suitable to address the need (or not) to cover these new products. It should be the role of the various stages of the work plan to assess if we want (or not) to regulate these products. So the revision should not exclude these possibilities to choose. For example, food products would be difficult (to test and implement) but other product groups such as shoes, detergent, furniture, etc. could be good candidates (even to assess embedded energy). The CSES study has addressed this, and the present report should refer to it in this part.

Hans Paul Siderius (Netherlands Enterprise Agency)

The current analysis is too narrow and I agree with ECOS that it is narrower than the CSES study. The current analytical framework is used to assess the feasibility of extending the scope whereas it is clear that this very methodology needs to be improved in order to cover non-energy related products. Given this analytical framework, the conclusion may be that there is no use to extend the scope. This is too short and the report should raise the issue as the CSES study did, i.e. paying attention to what instruments are needed to have good policies and measures on non-energy aspects (of course, not everything is to be solved by ED and ELD). Second route: what needs to be developed to achieve these goals. Both are missing in the current analysis/report and the result is too restrictive.

I fully agree with ECOS, we should not rush into a long list of products that could be covered by ED and ELD. We already have a lot of on energy aspects that need to be tackled in the products on our existing list (it would be better to further improve the current methodology)

Mitsubishi Electric Europe B.V.

B2B products: we don't like the conclusion that they could be labelled, especially for highly customised products (such as escalators). The big appliances (e.g. air conditioners) are already covered by ED, so what would be the benefit of having a label (since the report say there is an untapped potential)?

Joao Fong (ISR University of Coimbra)

There already exist regulations including labelling in Germany or from ISO.

Laura Spengler (Oekopol GmbH, Germany)

Support ECOS and NL.1) The methodologies are not a reason not to expand the scope, 2) I disagree with the report conclusion saying that as long as the methodology is not adapted, we can't extend the scope. There is time to improve the methodology.

Joao Fong (ISR University of Coimbra)

We are not saying the problem is the methodology but that, at this time, it would be difficult because we first need to improve the methodology. Also we say the scope could be extended.

Mike Walker (DEFRA, UK)

There is still a huge amount of untapped potential with energy related products but if we look at non energy products, it will dilute our activity and what we are trying to achieve.

Carlos Lopes (Swedish Energy Agency)

The major impact is not only in the use phase (contrarily to what is said in the report). For these products, we need to develop the methodology with more data. It's a wrong signal to the Commission because resources should be put on developing methodologies. The issue is not so much the scope of this directive. We may want to use the same approach for non-energy related products, but it could be done within or outside the ED Directive.

Milena Presutto (ENEA, Italy)

Agreed with UK. There is a lack of added value and it is extremely premature to extend the scope of the Directive. My fear is that we lose the capability of the ECOREPORT tool by extending it. It's acceptable to open to non-energy related parameters, although again the actual added value should be assessed for energy products but not to non-energy related products.

Laurent Zibell (IndustryAll European Trade Union)

We support certification and standardisation schemes because they shift competition from price to quality. Regarding the extension to B2B products, we should consider the number of homogeneous products produced; if they are customised, there is no need for a label, but if there are millions of products, there is no reason not to have labels.

Extending the scope is difficult to ensure value added across the chain but environment and social issues could be integrated as energy is. The way the products are manufactured is extremely important (working condition and environmental impact of product manufacturing are important).

Pernille Schiellerup (CLASP)

I congratulate the consultancy team, because a lot of elements are clearly communicated in the report. There is an amount of encouragement and an amount of "déjà vu" in the last 15 to 20 years.

When the report speaks of increasing the level of ambition: we know this is an effective set of instruments, however, the pace and the level of compliance should make us stop for a while and reflect on whether the framework is really delivering or whether now is a good moment to strategically think of issues that we are discussing for the last 20 years.

The team should more systematically look at the diagnosis and see that data quality and analysis come back very often, as well as the issue of evidence base – across the piece not just in the context of compliance or in the context of the preparatory study. We would have a better chance of solving the problem of lack of adequate data and analysis.

The team should also look at the issue of compliance more systematically: many studies have commented on what is needed to improve it – with long lists of recommendations, but now we need a strategic thinking on the acceptable level of compliance in Europe, link that to the level of monitoring and verification, think about who should do what. Think about the constraints we are aware of and propose a set of options for the future.

Hans Paul Siderius (Netherlands Enterprise Agency)

On B2B products: 1. The 'difficulty' of the product is not necessarily a reason not to label a B2B product. I have not seen a product for which ED requirement can be set and then it would be "too difficult" to have a label for (other reasons are possible not to have a label, but not the difficulty of the product). 2. Also in the B2B market labels can boost innovation and market transformation. Not all industrial buyers are experts on the products they buy. So we need to look on a case-by-case basis (but not exclude a priori). They are already in the scope (it is rather a discussion on the work plan and we could start with one or two, not immediately a lot of them).

Anne-Claire Rasselet (ORGALIME)

- 1. We would prefer focusing on the current scope of the directive. We are only half way through in the amount of products that are supposed to be labelled.*
- 2. We need more evidence to justify the expansion to non-energy parameters.*
- 3. Market surveillance would be more complex if the directive's scope is expanded.*

Ines Oehme – (Federal Environmental Energy - UBA, Germany)

For some B2B products, it would be helpful to introduce an energy classification on the nameplate - as for the motors (i.e. it does not need to be a label).

Matteo Rambaldi, CECED (Domestic appliance industry)

1. On the scope, no problem for CECED but the Ecodesign is not adapted to products that don't consume any energy because ED relies on LCC analysis, return on investment etc. – so there needs to be an expense, i.e. ED cannot cover non-energy related products.

2. With regards to the level of ambition: it would be very risky to go beyond the Least LCC point – this has been already discussed by stakeholders and agreed on the methodology. Now LLCC is criticised but it is logical that there is a phase out of products on the market before the date of the phase out. If industry is supportive of these tools it is because we had a winning deal – and the LLCC is a value that should not be changed. It would be a risk to change towards the Equal LCC (some consumers may never recuperate their investment). So be careful with being more ambitious.

Appropriateness of the energy label

(except the method to update existing energy label scales to reflect technological progress of the labelled products)

Sophie Attali (SOWATT) / Paul Waide (WSE)

Francisco Zuloaga (independent consultant)

Comment on displaying electricity costs: Not only people will find it difficult to understand but also difficult to implement because of different electricity prices.

Mike Walker (DEFRA, UK)

Running costs: tests are currently being done in the UK and show that this triggers people to buying more expensive and more efficient products.

Edouard Toulouse (independent consultant)

Two contradictions found in the report:

- 1. Contradiction on empty classes on top of the scale*
- 2. Energy consumption vs. energy efficiency*

Monika Mireles Serrano (IKEA)

The bigger the amount of information you give to consumers the bigger the risk of consumers being lost. So adding more scales could be risky.

Electronic displays in the shop could save costs in printing labels...etc. However this should follow clear guidelines in terms of where to show it, etc.

Juergen Sturm (Lighting Europe)

About the proposed "compressed" version of the label: it is not clear to us whether people will identify/relate this to the energy label.

Liz Laine (Consumer Futures)

Important to consider running costs.

The presence of two scales is very confusing for consumers.

Els Baert (Daikin Europe)

We need to be careful when we step away from LLC.

Consumption vs efficiency: proposals are today to add consumption on the label for all products, however, for heating and cooling products efficiency is a better number to use, as consumption can be misleading.

Language: the proposal is that we should use words on the label, but this creates problems with logistics and making 28 different labels is difficult to handle unless it is possible to provide them via internet.

Milena Presutto (ENEA, Italy)

General comment: We are analysing the new label layout before we know the revision of the labelling scheme. We should first set the scheme (and related elements such as the background calculations, elements to be indicated, etc) and then analyse which label layout(s) will fit better to the scheme.

Angeliki Malizou (European consumer organisations ANEC and BEUC):

We have doubts about the understanding of a "compressed"/simplified version of the label. For example, under the current labelling format consumers could find it hard to intuitively grasp how well the product ranks as the lower and upper limits of the energy label are not always the same among the different product groups. Also, it should be investigated to what extent consumers understand the indication of energy consumption and whether for certain product groups it would be more relevant and understandable to indicate the value as a "per cycle" rather than a "per annum" value. Additionally, the understanding of the Latin term "per annum" must be evaluated. A consumer survey among 1006 German consumers revealed that more than 70% did not understand correctly (or did not understand at all) the meaning of "per annum" on the energy label.

(reference to consumer survey Energieverbrauchskennzeichnung von elektrischen Geräten – Ergebnisse des zweiten Marktchecks im Dezember 2012 und einer Verbraucherbefragung, Elke Dünnhoff, Katrin Negatsch, Carmen Strüh- 06.05.2013)

Rulemaking processes

Edith Molenbroek (Ecofys)

Dirk Van Orshoven (Independent energy engineer, Belgium)

On the LLCC approach: The least costs differ in the private perspective and the social perspective. The current approach does not guarantee least costs for society. For instance if we look at this from the point of view of EU commitments in terms of climate change, energy savings and production of renewable energy. As a citizen, it may be a little more expensive for my product, but I could save money on my contribution to support renewable energy. So we should look at the society's costs, not only the consumer's (who is also a citizen). So we don't necessarily need an optimised LLCC.

Kamila Slupek (CECIMO)

On voluntary agreements (slide 67): We would like to see that VA are kept as a policy option. We would like to see the finalisation of the guidelines. It seems that VA will be more and more difficult to develop, unfortunately, so we would like to call not to make them unnecessarily too difficult, because otherwise no one will want to make them.

Fanny Rateau EHI (European Heating Industry)

On benchmarks (slide 65): For heating products benchmarks differ from one building to another. Consumption is very dependent on factors such as behaviour, type of household, climate, etc... so we find benchmarks difficult to implement for heating products.

Edith Molenbroek (ECOFYS)

EM: We see Benchmarks as one tool in a tool box, but it obviously depends on products.

Jeremy Tait (independent consultant, UK)

On registration (database of products). This would help addressing some of the challenges identified in this study.

The Commission could help by establishing the data structure and protocols. In addition if this is an open framework this could lead to a lot of additional information from e.g. manufacturers. It

could aid surveillance authorities. The report should underline this opportunity because there are enormous potentials here.

Pernille Schiellerup (CLASP)

Revision of existing measures: in the future, revisions will become even more important than new measures. The report should explore more how such revision should happen because there is no such explicit route to revise a measure. The team could look at (e.g. make scenarios) how the different elements interconnects, e.g. not so good data means more difficult to do fast track revision of existing measure, which is one of the way to handle the revision, which connects to "Lisbonisation": if we regard the evidence base available (also from the Member States), reducing the role of the member states is likely to reduce the capacity to bring resources to this field and we would see a potential decrease of the quality of the available data. We have already seen one Member State with a major activity (if not the most active MS) in this area already downscale its activities - This is a loss.

Stamatis Sivitos (ECOS)

Agrees with CLASP and would add that we need more indication on the nature and extent of the preparatory study, for revisions, for the current omnibus review. We don't know how the Commission will proceed with these.

Milena Presutto (ENEA, Italy)

1) Participation of MSA to standardisation process: not a good idea because they are not experts of technical products (but of national market surveillance). We don't need more stress on standardisation (they won't be better with the participation of MSA).

2) Guidelines: the report suggests guidelines but who is supposed to develop them: The Commission, the MS, the study team? I invite the consultancy team to write the guidelines or at least a list of principles to be then enlarged to a Guideline.

3) Slide 65 on the ambition of requirements: we are already setting tiers to compensate the fact that the regulating process of is not fast enough. If we make a mistake in Tier 3, we won't be able to avoid market disruption (it's not easy to make a balance with future social economic, employment risks, etc.). We see this already with Tier 6 in Lighting (the EC can't recognise they've made a mistake but faces the problem that there is no product in this Tier). It's not so easy to put into practice in real life.

Edith Molenbroek (ECOFYS)

I agree, this can't be done without market monitoring.

Jeremy Tait (independent consultant, UK)

Resources: there are not enough resources to satisfy everybody. So if we extend the scope it will increase the burden on resources. Again, we should focus on data from the start of the study – otherwise resources are badly invested. So a review mid-way through the preparatory study is a good idea. There could be separate contracts (one for data / one on how to regulate) to insure the work is done well.

Elke Dünnhoff (Verbraucherzentrale Rheinland-Pfalz, Germany)

It is a big challenge to assess how much energy is REALLY saved by these directives. If good data about products and markets is not available this is even more difficult. Data collection is crucial: we need more data in the future; otherwise you can't calculate the savings from ED and ELD.

Regarding VAs, they can be really difficult to deal with for consumers. For example the heat pumps have a voluntary label but the ED requirement is far stronger than the best class on the label (so we advise to look at the EEI, not at the class and tell them the label is not the best information they can get). This kind of situation should be avoided (this should be written in the guidelines).

Implementation and market surveillance

Juraj Krivošik (SEVEn)

Francisco Zuloaga (independent consultant)

We need some pressure on authorities for these recommendations to happen: I propose a kind of ranking of what the different MS are doing (media like this kind of information) and for some authority to identify non-compliant products that are being used by public authorities to underline this is public money badly spent.

Juraj Krivošik (SEVEn)

The route is to go towards more European cooperation to help countries that cannot be active

Floris Akkerman (BAM Federal Institute for Materials Research and Testing, Germany)

Reaction on ranking countries according to activities: no because otherwise manufacturers will use this to target countries with weak enforcement to market their products.

There is also a question on data: in the report, when there is no number, it does not mean there is no activity but rather no reported data (it can be that no non-compliant product was found). MSA generally overestimate the non-compliance rate because they focus on suspected products.

Juraj Krivošik (SEVEn)

The idea of a ranking for MS is not in the report! But it's good to encourage that more information be available. The report relies on interviews made from MS – and still comes from the 5 or 6 active countries.

Milena Presutto (ENEA, Italy)

Please distinguish market surveillance and conformity assessment: member states do market surveillance and may not make its results public e.g. because the test is not fully completed and there is a discussion with the manufacturer/importer or may not publish results following their internal laws which are difficult to change all in the same direction. Conformity assessment (i.e. compliance verification): could be done through co-funded projects / studies in which several products are assessed at European level (in a sense, it is public money given back to European consumers, would allow the EC to report to the parliament, and MS report to their own law makers)).

One of the recommendations is that raising available economic resources, or to promote more European cooperation will not necessarily lead to more effective or larger market surveillance actions, but if we could improve conformity assessment exercises and then coordinate the two efforts a better result could be achieved.

Juraj Krivošik (SEVEn)

Yes, but it would be good to have these kind of projects more systematic and standardised, so that we have the certainty that these projects will be undertaken regularly.

Andrea Voigt, EPEE

As an industry, we are concerned about all the issues you raised, including the risk of seeing the temptation to cheat increasing because the requirements are more and more challenging. The

issue of Market Surveillance is even more critical with complex products like chillers, because testing is more costly. How to make sure that there is consistent market surveillance everywhere?

We spoke with several MS authorities and we see a lot of discrepancies. We don't see how it could change in the near future whereas it should change. Therefore we are surprised that the report does not consider a European approach: it is worthwhile to think of such a European approach. We should not rule out a centralised European approach to Market Surveillance.

Regarding the third party verification: OK, but won't solve the problem because MSA activities are still absolutely needed.

Industry can play a role here. Industry also has an interest to comply and also to find those who do not comply. So maybe the third party verification could be explored, although it cannot be a replacement of market surveillance..

Juraj Krivošik (SEVEn)

Forcing authorities to adapt the results of other countries would be a first step to take action (I don't think we can force MS to implement controlling activities)

A move to a European level activity is something that all stakeholders seem to agree about.

ORGALIME

1) Please specify the proposal of the third party certification (already stated in ED in the modules).

Juraj Krivošik (SEVEn)

We recommend to keep it open as an option for specific product groups, and under specific conditions.

2) In the report it is said that there is a manufacturer obligation to finance MS under the WEEE Directive: this may be a misinterpretation. In WEEE manufacturers finance waste management and not MS.

Juraj Krivošik (SEVEn)

We mention this (financing of MS by manufacturers) as a last resort solution, as an exercise to keep in mind (not a requirement).

Elke Dünhoff (Verbraucherzentrale Rheinland-Pfalz, Germany)

Do you have any suggestion on how to control new products (heaters, package labelling...) because they go through craftsmen

Juraj Krivošik (SEVEn)

We only looked at the generic situation, not product per product. But these products will end-up being included in projects and activities at the European level.

Luigi Meli, independent expert

We saw today a number of points to which we answer "hopefully yes" (it is something to wish). Is the project team going to issue a summary of the relevant issues (the ones conditioning the others, the silver bullets)? Are we going to introduce a more strategic view or is it going to be implemented "somewhere else"?
