

## Background report II: Survey results

Evaluation of the Energy Labelling Directive  
and specific aspects of the Ecodesign Directive

ENER/C3/2012-523

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# 1 Introduction

## 1.1 Background

The European Commission has launched a review process to evaluate the effectiveness of the Energy Labelling Directive (2010/30/EU) as well as specific aspects of the Ecodesign Directive (2009/125/EC). The aim of this evaluation study is to compile, analyse and provide the Commission with all the information required for the review process and the possible revision of the directives to the extent this is justified.

As part of the review process an online consultation was published on the Your Voice website running from 30 August to 30 November 2013. Stakeholders had the opportunity to comment on the consultation questions between 27 June and 8 July 2013. This background report contains the results of this consultation. The consultation consisted of two versions:

- A long version targeted at all other stakeholders (public officials, industry representatives, NGOs, etc.). This version was available in English only, and included the possibility to also provide free text answers.
- A short version tailored at consumers and small- and- medium enterprises (individual retailers and manufacturers). This version was available in all EU languages and included multiple choice questions only.

Two additional questions of the consultation were published on ... December 2013. These regarded the use of primary energy factors in the EU Ecodesign and Energy Labelling regulatory framework. The responses to these questions are included in this report as well (section 3.4).

## 1.2 Careful interpretation of results

Statistics of the multiple choice answers to the long and short versions are presented in Annexes A and B of this report respectively. It must be stressed that these statistics should be interpreted with care for various reasons. Most importantly, **numbers do not necessarily provide a balanced representation of European stakeholders**. Some respondents represent large interests or interest groups, while others provided answers as an individual EU citizen and consumer or on behalf of a smaller entity. For this reason we have not presented pie charts presenting such breakdowns, as this might unduly suggest outcomes in one or the other direction. This report is useful to qualitatively compare positions of stakeholders, to the extent they expressed a position.

## 1.3 Report structure

The structure of this report has been aligned as much as possible with the structure of the main report. Questions from the long and short surveys are discussed at once under relevant headings. As a consequence the survey questions are presented in a different order than in the original survey. They are preceded by an A or a B (referring to the respective Annexes) and the original number in the survey. The two questions regarding the primary energy factor were numbered 46 and 47 and were added to Annex A.

## 2 Characterization respondents

### **AB 0** *Location selection – please select the country of your response (long and short surveys)*

#### *Long survey*

- 138 people responded to the long survey
- Most respondents are from Belgium (35), followed by Germany (32), Finland (11), France and United Kingdom (10)
- Other EU-countries are Austria, Czech Republic, Denmark, Italy, Malta, Netherlands, Poland, Portugal, Spain and Sweden
- 9 respondents are from non-EU countries

#### *Short survey*

- 197 people responded to the long survey
- Most respondents are from Germany (72), followed by France (43), Portugal (13) and Finland (11)
- Other EU-countries are Austria, Belgium, Bulgaria, Czech Republic, Estonia, Ireland, Italy, Latvia, Lithuania, Netherlands, Poland, Spain and Sweden. And united Kingdom
- 7 respondents are from non-EU countries

### **AB 0a** *In what function do you respond to this survey? (long and short surveys)*

**Table 1** Breakdown of respondents by function (long survey)

Stakeholder group	Nr. of respondents
Energy agency	6
Surveillance body	3
Government body other than energy agency or a surveillance body	11
Standardisation organisation	1
Test laboratory	2
Intergovernmental organisations (incl. multilateral banks)	2
individual manufacturer	16
individual retailer	4
research institute or consultancy	4
Other	18
Consumer interest group	9
Environmental interest group	13
Industry interest group (42)	42
Retailers' interest group (6)	6
Other interest group (1)	1

**Table 2 Breakdown of respondents by function (short survey)**

Stakeholder group	Nr. of respondents
Consumer	127
Individual retailer	40
Individual manufacturer	30

**A 0a11 Which geographic level do you represent? (long survey)**

In the long survey the respondents were asked what geographical level they represent. The following answers were given:

**Table 3 Breakdown of respondents by geographical level (long survey)**

Geographical level	Nr. of respondents
International	17
EU	36
EU Member State	66
EEA country	5
Other country	2
Regional	7
Local	1
Individual	1

**B XX\_intro Please specify the main product type that concerns your organisation's activities (short survey)**

Individual manufacturer were asked in the short survey which product groups they represent. The following answers were given:

**Table 4 Breakdown of individual manufacturers by product groups represented (short survey)**

Product groups	Nr. of respondents
Domestic lighting (general lighting equipment)	4
Domestic and commercial hobs and grills	2
Domestic dishwashers	1
Boilers and combiboilers	1
Domestic lighting (general lighting equipment); Directional lighting	5
Directional lighting	1
Tertiary Lighting; Directional lighting	1
Refrigerating and freezing equipment	2
Boilers and combiboilers; Water heaters	1
Machine tools	1
Commercial refrigerators and freezers	2
Local room heating products; Domestic and commercial ovens; Domestic and commercial hobs and grills	1
Non-tertiary coffee machines	1
Boilers and combiboilers; Water heaters; Room air conditioning appliances; Residential ventilation and kitchen hoods; Circulators in buildings; Central heating	1

Product groups	Nr. of respondents
products (other than CHP)	
Domestic refrigerators and freezers; Domestic washing machines; Domestic dishwashers; Laundry driers; Domestic and commercial ovens; Domestic and commercial hobs and grills	1
Water heaters; Room air conditioning appliances; Residential ventilation and kitchen hoods; Domestic lighting (general lighting equipment); Local room heating products	1
Other	3

## 3 Energy savings from Energy Labelling and Ecodesign

### 3.1 Introduction

**A 1a** ***Overall, do you think that the Energy Labelling and Ecodesign Directives have achieved energy savings consistent with economic technical potential (potential savings that are technologically possible at reasonable cost)? (long survey)***

For the Energy Labelling Directive most respondents believed that the Directive has been successful, but there is missed potential as well. This was the dominant answer for most stakeholder groups. A slightly smaller group, comprising in particular industry interest groups thinks that the ELD has met its potential, and a considerably smaller group believed there is significant missed potential. Even less people suggested that the ELD has exceeded its potential, or that there would be significant missed potential.

For the Ecodesign Directive, the majority of the respondents believed that the Directive has been successful, but there is missed potential as well. This was the dominant answer for most stakeholder groups. A smaller group, comprising in particular industry interest groups, believed that the ED has met its potential, and a slightly smaller group answered 'don't know'. Remarkably, the number of undecided answers in industry interest groups was considerably larger for Ecodesign than for Energy Labelling. Even less people suggested that the ED has exceeded its potential, or that there would be significant missed potential.

Free text answers to this question regarded many of the issues considered under this evaluation and are summarized in bullets below. Views on each of these issues are discussed in more detail under the respective headings in this report.

Many respondents felt that the ambition level of ED and ELD regulations is insufficient. Remarks included:

- *"Overall, [...] energy efficiency potentials are addressed [by Ecodesign requirements] in consistency with economic and technical potentials. However, the market has not sufficiently transformed yet. A positive answer to this question would therefore have needed a more rapid response of the market, i.e. from the consumer".*
- *ED requirements are not set at Least Life Cycle Costs, or learning curves are not considered, or procedures for life cycle cost calculations could be improved, benchmarks should focus on best available products*
- *It is in manufacturer's own interest to deliver functionality, productivity, reliability, efficiency and safety at a competitive price. ED requirements should take into account technological feasibility.*
- *Energy labelling classes are too generous*
- *ED implementing measures could have been more ambitious wrt ambition level and timing*
- *Actual energy savings ultimately depend on consumption patterns of end users.*



Some respondents also questioned the selection of products covered:

- *The selection of products covered is not appropriate. The exploitation of potential for savings is not well spread across product lots and technologies within them*

Regarding the scope of the Directives respondents argued inter alia:

- *ED/ELD could be extended to energy-producing products, especially renewable power generating devices (e.g. PV)*
- *A wider approach required, esp buildings and transport sectors*
- *Lifts should be included in Ecodesign, but not in Energy labelling*
- *Ecodesign has a narrow focus on energy efficiency. There is a lack of focus on other environmental aspects (resource efficiency, chemicals, reparability, recyclability, durability)*
- *It would be recommend to ensure stability of the system and acquiring experience rather than extending the scope of the Directives.*
- *It would be counterproductive to double regulate components and machines (as for machine tools and industrial furnaces)*
- *Impacts from controls (in buildings) will be greater than potential product savings, but are dealt with in a limited and ad-hoc way*
- *Energy efficiency in many cases relate to systems, not the [labelled] products (boilers, pumps, ventilators)*

Regarding coherence with other policies stakeholders noticed:

- *There are missed opportunities in aligning Energy Labelling and Ecodesign.*
- *Focus of the Directives is very much on the EU*

Regarding the appropriateness of the label some said:

- *Limits for the A label are not sufficiently ambitious. There is an inadequacy between labelling scales, and too many plusses have been added to the top label classes.*
- *The energy label is not clear. It is not clear what the best class is for each product. Yearly cost is not sufficiently relevant and adequate information*
- *The label focuses too much on energy efficiency instead of absolute energy savings*
- *The focus of the label should remain on consumer products. Professional clients are not influenced by a one-dimensional label on energy efficiency.*

Observations regarding the rulemaking process included:

- *There are delays in the regulatory process*
- *Data may be obsolete*
- *The rulemaking process is insufficiently dynamic, and a more progressive ramping up of requirements is required. This is partly driven by a lack of resources at EC and Member States*
- *Weakness of Ecodesign Directive is the priority it gives to voluntary agreements.*

Regarding implementation:

- *Market surveillance is limited.*

Several stakeholders used this questionnaire to comment on the measures for heaters / boilers:

- *For gas water heaters and electric water heaters the same Ecodesign requirements have been set, which implies very lenient requirements for gas water heaters. Energy Labelling should account for savings from both heating and electricity generation incl related synergies, e.g. primary energy savings achieved by micro CHPs.*
- *Ecodesign fails to cover gas burning for decoration which will have the effect of expanding this sector. ELD does not distinguish sufficiently between gas burners of different efficiencies (ranging from 50 to 85%).*
- *There is significant missed potential in combined heat and power generation.*
- *Efficiency requirements for electric boilers are very unambitious, and requirements to emissions do not apply. For gas boilers, minimum efficiency requirements are not an issue, as these are generally very efficient. The difficulty for these boilers however relates to meeting emission requirements, which can only be met by innovative and expensive high-quality boilers. This is unfair competition.*

**A 1b            *Do you think that the Energy Labelling and Ecodesign Directives need to be changed to achieve energy savings that are closer to the full economic technical potential? (long survey)***

For Energy Labelling the vast majority answered this question with yes. Industry interest groups turned out more undecided with almost equal numbers of yes, no and 'don't know' answers.

For Ecodesign the majority of positive answers was not as large as for Energy Labelling. Industry interest groups were not as convinced about the need for change as in the case of Energy Labelling.

Free text answers to this question regarded many of the issues considered under this evaluation and are summarized in bullets below. Views on each of these issues are discussed in more detail under the respective headings in this report.

General comments included:

- For Ecodesign main changes are to be achieved in the implementing measures (rather than in the framework itself). It is not necessary to change the Ecodesign, which in general aims for least life cycle costs. Problem is that implementing measures seldom achieve these.
- Pitching policies in line with other countries will achieve more through the subsequent coordination activities
- Both ED and ELD could be more forward-looking and stimulate innovation
- The provision on least life cycle costs in the Ecodesign Directive needs to change
- Lifts should be included in Ecodesign, not in Energy Labelling
- Current legal provisions for automobile vehicles are sufficient. There is no need to extend ED/ELD to cover these
- Least Life Cycle Cost relate to fossil fuel market prices, but should be evaluated at the cost of the most expensive form of large scale renewables cost instead
- Technological innovation is progressively reaching some limits, which complicates stepping up ambition levels

## Regarding scope

- More attention should be given to resource efficiency and waste management (production and disposal phase)
- ELD need to be developed rapidly for ErPs and Windows in particular
- Need for thorough review of how systems can be thoroughly integrated to realise full savings potential

## Regarding other policies

- For ELD alignment and coordination with Ecolabel and GPP instrument would be helpful
- Ensure coherence with other EU environmental legislation (e.g RoHS, REACH) which may increasingly interfere with EE requirements. Avoid overlap with other Directives

## Appropriateness label

- EL currently scaled to size or weight of the product. Good labels on oversized products.
- label layout need to be change
- Label should include energy consumption and cost during lifetime
- Focus of ELD has been too much on labelling requirements, whereas effectiveness of communication is key.
- Use final energy as energy consumption indicator on the label, more in line with info on energy bills
- ELD should be change, as it does not include a method to achieve full potential. A+++ requirement and timing should be considered.
- Less confusing energy label.
- Consider new technology, lie QR codes
- Frequent update of ambition, e.g. through a top-runer approach
- Improve functioning and layout of the label
- For energy labelling is important to maintain focus on consumer products. Labelling is not the most appropriate tool for providing product info for industrial products in B2B.

## Rulemaking process

- Improve rulemaking principles, and establish a quick and steady ED standard setting procedure
- Ensure better data to underpin rulemaking process
- Energy Labelling should give Member States more decision power. Role of Member States in the Regulatory Committee should be safeguarded under the Lisbon Treaty
- More resources should be made available at EC and Member States
- More implementing staff is needed. If this is not possible within the EC [DG Energy], the implementing authority could be transferred to e.g. JRC or EACI or a new dedicated agency.
- Voluntary agreements should be prohibited

## Regarding implementation

- Better market surveillance is needed.
- Implementation can be improved. Role of standardisation process is key.

Regarding heaters / boilers

- Where common energy criteria have been set for products using different energy sources (e.g. electricity and gas boilers) the full potential has not been achieved for the technology using gas. To achieve full potential separate ED requirements and separate energy labels criteria should be set. This can be done in the MEERP.
- ELD should treat higher efficiency of CHP more fairly
- The default Conversion coefficient of 2.5 discriminates against electric products. Thus citizens are miss-informed, and climate and energy policy is undermined by fostering a fossil-fuel lock-in.
- Provide uniform label for all products of the same type (e.g. all products providing heating services to end-users). Comparable and unique label (including info on real efficiency and costs) will stimulate end-user to purchase more efficient products both within the same product group and between the products offering similar services (e.g. heating).

**B x** ***To what extent do you agree or disagree with the following statements (short survey)***

For each of the statements below the number of undecided responses was very limited.

- *I/consumers know about Ecodesign*  
 Most respondents, including consumers, and small/medium retailers and manufacturers, either disagreed or strongly disagreed. A smaller group, in particular consumers, agreed or strongly agreed.
- *Minimum energy performance standards for products are a good thing*  
 The vast majority of respondents, mostly consumers, either agreed or strongly agreed.
- *Minimum energy standards should get stricter over time*  
 The vast majority of respondents, mostly consumers, either agreed or strongly agreed.
- *Minimum energy standards should be challenging for manufacturers to meet*  
 The answers to this question were more evenly distributed between strongly agree, agree, and disagree. The number of stakeholders strongly disagreeing was not as large as the number strongly agreeing.

### 3.2 Present scope and ambition level Ecodesign

**A 18** ***Ecodesign implementing measures or voluntary agreements have been developed or are being developed for the following range of product groups. For each of the following product groups, please indicate if these were the most appropriate product groups to be selected. (long survey)***

For each and every product group included in the survey the majority of respondents answered that the product was appropriately selected. There are some differences across products and stakeholder groups:

For the majority of product groups there is strong consensus (including industry groups and manufacturers) on the appropriateness of the product selection. These product groups are: water heaters, PCs and servers, room air conditioning appliances, electric motors, domestic refrigerators, washing machines, domestic dishwashers, laundry driers, vacuum cleaners, simple set-top boxes, non-directional lighting, directional lighting, and water pumps.

For some products there is consensus across most stakeholders except for industry groups and manufacturers, which either kept mixed views or answered 'do not know'. These products include: boilers, imaging equipment, complex set-top boxes, circulators in buildings and ventilation fans.

Several stakeholders provided a generally positive assessment of the product selection:

- *"All the mentioned product groups are relevant; however some of them have much larger saving potentials than others".*
- *"The Ecodesign Directive has a robust way of selecting the products to be covered by implementing measures".*
- *"The list of product groups described above is significant either for consumers as it represents the most common appliances met at a household or due to significant energy savings and potential for technological improvements".*

Some stakeholders challenged some elements of the selection methodology or proposed elements to take into account for future selections:

- *"Initially, mass consumer products were selected for implementing measures, which has in our view been most appropriate. Over the time, the focus has shifted towards professional equipment/capital goods, for which we challenge the appropriateness of selection".*
- *"Products that are used as components in other products should be excluded. - Adding additional lots to the process should be avoided. - The Directive has been extended to deal with the electrical equipment, but also the wider energy-using equipment and systems. This involves a significant risk that leads to too complex regulation and control of the appropriateness disappears".*
- *"Ecodesign measures can be applied to reach environmental and other policy goals in case the normal market does not provide a satisfying result. The procedure must be transparent and non-discriminatory. However, ecodesign measures must be implementable and should therefore be limited to identifiable products, not systems".*
- *"For the product groups that had been appropriate at the time when the measures were introduced, it should be assessed whether further pushing of technical limits still have significantly sufficient impact that justifies the effort of regulation".*

Some stakeholders expressed concerns about specific product groups:

- *"Water pumps are very difficult to enforce, as the producers don't understand the regulation and definitions. Products are not sold with the definitions used in the regulation"*
- *"Local space heaters are manufactured from a diverse range of technologies and fuel types. Ecodesign does not give sufficient regard to the different technologies. Seasonal efficiency is a nonsense as the heaters are not affected by seasonal conditions".*

**A 19** ***Has the correct level of ambition in minimum ecodesign requirements product energy efficiency classification been set for implementing measures and voluntary agreements for the following product groups, taking into account economic technical potential, innovation and market developments? (long survey)***

Overall, when asked across product groups the majority of respondents thought that the level of ambition was correct or too low. There are differences in opinion depending on the stakeholder group considered. Energy agencies, consumer groups, environmental NGOs and research institutions generally replied that the level of ambition was set too low. Respondents from industry groups thought either that the level of ambition was correct or answered 'I do not know'. Manufacturers showed mixed views.

The assessment on the level of ambition differs per product group:

- Most respondents thought that the level of ambition was correct for the following regulations: boilers, standby and of-mode losses, external power supplies, electric motors, circulators in buildings, vacuum cleaners and simple set-top boxes. Tertiary lighting and laundry dryers showed mixed results between correct and too low level of ambition.
- Most respondents thought that the level of ambition was too low for the following product groups: water heaters, PC's and servers, televisions, room air conditioning, domestic refrigerators, washing machines, dishwashers, non-directional lighting, directional lighting, water pumps and imaging equipment.
- Most respondents though that the level of ambition was much too low for the following product groups: ventilation fans and complex set-top boxes.

Several stakeholders made general assessments about the level of ambition across product groups and recommendations to set level of ambition in the future:

- *"Several studies have evaluated the pertinence of the level of requirements for adopted implementing measures. On energy use, the ambition has often been too low, especially taking into account the long delays for adoption and implementation".*
- *"Ambition means taking into account both level and timing. For many products ambitions on timing and/or level were lower compared to the first proposals".*
- *"Technical performance objectives must be increased over time and regularly updated, in a planned and foreseeable fashion, in order to drive further innovation and performance improvement over time. If the objectives remain stable for too long a period, there is no further incentive to improve performance once the goal has been reached".*
- *"In other jurisdictions there is now increasing reference to some of the societal aspects of energy savings, such as the shadow price of carbon which is included in the US (see Lane et al., 2013 for a review of different approaches)... It has not [been] taken into account how the cost of technology may develop over time.... Ambition is a function of the threshold of the requirement, but also when this is brought into force. ... [There is] a tendency for earlier tiers to act as warm up tiers for later tiers in the future. ... Later tiers of regulations may be regarded as less binding than in the past."*

Some stakeholders raised concerns about the level of ambition for B2B<sup>1</sup> products:

- *"B2B products have increasingly moved into the focus of ecodesign measures. Capital goods are long-term investments for their buyer, therefore, each product function is professionally assessed before the purchase [...] the ecodesign requirements should take into account what is technologically feasible (e.g. some products have varying operating points throughout their use phase, as a result it is difficult to apply the ecodesign approach based on specific ecodesign requirements) and avoid compromising technology neutrality. On reason for setting inadequate requirements can result from combining different types of products into one broad product group".*

Some stakeholders also made remarks about the levels of ambition for specific product groups:

- *"In some cases [the level of ambition] is too low, for instance for televisions, ventilator fans and complex set-top boxes. Regarding the water heaters and hot water storage tanks: The minimum energy efficiency requirements are too low for gas and liquid fuel water heaters and too high for conventional electric water heaters"*
- *"Laundry Dryers: We would have preferred that there is no review of more stringent requirements in 2017, but that the stronger requirements would have been already as mandatory decided".*
- *"The level set in ecodesign measures for boilers and water heaters is ambitious enough to achieve substantial energy savings and will require continued innovation efforts from the industry".*
- *"Several sources indicate that technological-economic evolution with respect to TVs has greatly outpaced ecodesign requirements".*
- *"There are still tumble driers with very high consumption (class B+C, 3,5-4kWh/circle) on the market. The new regulation in nov. 2013 will only forbid driers with class D".*

### 3.3 Voluntary agreements

#### **A 25            *Should the possibility of laying down Ecodesign requirements in voluntary agreements – rather than mandatory requirements – be maintained? (long survey)***

A slight majority of respondents thought that the possibility of laying down Ecodesign requirements in voluntary agreements should be maintained, however these should not be prioritised over mandatory regulations. Almost the same number of respondents thought that voluntary agreements should be eliminated as an option to lay down Ecodesign requirements. The smallest fraction corresponds to those favouring to maintain voluntary agreements as the default option.

There are clear differences in opinion across stakeholder groups. A majority among industry groups would prefer to keep voluntary agreements as the default option. Most manufacturers would like to keep the voluntary agreements, however not prioritised over mandatory regulations. Most consumer organisations would prefer to eliminate the voluntary agreement option.

In the rest of stakeholder groups opinions are divided between keeping the voluntary agreements without priority over mandatory regulations and eliminating the option.

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<sup>1</sup> Business to business

Most stakeholders presented arguments in favour of keeping voluntary agreements, however not as the default option:

- *"There are a few limited cases in which a voluntary approach may be relevant (e.g. to involve other actors such as service providers or when a product group is too complex for adopting an effective regulation). The voluntary option should not be systematically prioritised (as is the case today) but restricted to these few relevant cases. They could be listed in advance in the Ecodesign Working Plans".*
- *"Experience shows that voluntary agreements are not faster than implementing measures but can be more flexible".*
- *"The current VAs do not seem to be rigorous as regulations would have been. There is a place for them, but only if they deliver as well"*
- *"Voluntary measures can be applied when regulation (of significant environmental parameters or of parts of the market due to its structure) is not possible or when the improvement potential is very low. In other cases regulations should be prioritised".*
- *"Experience with setting ecodesign requirements so far suggests that VAs are only relevant in a few cases. The revision to the framework directive should integrate this by no longer making VAs the default option".*
- *"VA's have not proven more effective, quicker or better than regulations while creating more uncertainties. They should not be considered but in exceptional cases where regulation would not be possible (e.g very technical and tailored made products)"*

Many stakeholders argued against keeping the option of voluntary agreements in the following terms:

- *"The process of voluntary agreement is less transparent than regulation and the developed requirements are too short sighted and unambitious. Furthermore the approach does only require that 90 % of the product models placed on the market by each signatory shall comply. This leaves the consumer without any guarantee of the products energy efficiency".*
- *"Mandatory regulations give the best results because everybody has to follow. Moreover, the follow-up by the Member States is weaker for voluntary agreements and there is no true market surveillance".*
- *"Voluntary agreements do not ensure a proper level playing field among competitors because they are not enforced and do not cover the whole market".*
- *"The use of voluntary agreements is an insufficient, non-dynamic and inefficient way of enhancing the environmental performance of products. Such instruments lack transparency and balanced stakeholder participation. They should therefore only be eliminated as a possibility from the Ecodesign Directive. Besides, practical experience has not proven this option to be quicker nor more efficient".*

Some stakeholders argued in favour of keeping voluntary agreements as the default option:

- *"The toolbox of different instruments of the framework (legal requirements, voluntary agreements) gives the necessary flexibility for the broad scope of the Directive that covers products with highly variable characteristics, functions and challenges. Voluntary agreements can provide a more rapid and flexible answer to product performance challenges than regulation and should be maintained as the preferred route to legislation"*



- *"The case is generally made that self-regulation (rightly) shifts the administrative burden and cost of compliance from the public purse onto the obligated party, lowers the quantum of the cost of compliance, and in addition offers an opportunity to aim for product attributes "over and above" a business-as-usual position (ecolabels being an example) which, depending on the level of ambition, tends to set a ceiling for innovation under a mandatory regime. [...] So long as the Commission has introduced robust data gathering and reporting systems and keeps the effectiveness and efficacy of these agreements under regular review, we support their continuation under Directive 2009/156/EC in either its present or potentially amended form. Regulation can be invoked as a back-up if the evidence indicates that voluntary agreements are not delivering the objectives of the Directive".*
- *"Many of the product groups subject to implementing measures today were preceded by effective and successful voluntary agreements. This confirms the positive impact of voluntary agreements to drive a market change before legislation may come in place".*
- *"Once industry has fully understood the possibilities of these agreements and fully commit to this process, these agreements will have the possibility to be established faster and more tuned to consumer needs. This process should however be very closely observed by member states and the commission"*

### 3.4 Primary energy factor

A supplementary short survey of two questions was posted on 19 December 2014 to investigate the issue of the Primary Energy Factor and its use for Ecodesign and Energy Labelling. The questions have been numbered 42 to 47 to continue the numbering from the main consultation.

The respondents to the supplementary survey can be characterized as follows (see Table 5 and Table 6):

- 131 people responded to the supplementary survey;
- The largest number of respondents were from Germany (34), France (31) and Belgium (25), no other location had more than 10 respondents. 6 non-EU responses were received;
- Interest groups were the single largest respondent group (45), followed by individual manufacturers (35) and other (28);
- Responses were also received from energy agencies (10), research institutes/consultancies (9), government bodies (3), individual retailers (2) and surveillance bodies (1);
- Interest groups were split into industry (29), environment (8), consumer (5) and other (1).

**Table 5 Breakdown by country of respondents to the supplementary survey on the primary energy factor**

Country	Number of responses
Germany	34
France	31
Belgium	25
United Kingdom	8
Non EU 28	6
Denmark	5
Austria	3
Finland	3
Italy	3
Netherlands	3
Portugal	3
Spain	3
Bulgaria	1
Croatia	1
Greece	1
Sweden	1
<b>Total</b>	<b>131</b>

**Table 6: Breakdown by affiliation of respondents to the supplementary survey on the primary energy factor**

Affiliation	Number of responses
I work for an energy agency	10
I work for a surveillance body	1
I work for a government body other than an energy agency or a surveillance body	3
I work for a standardisation organisation	0
I work for a test laboratory	0
I work for an intergovernmental organisation (incl. multilateral banks)	0
I work for an interest group, of which:	43
<i>Consumer interest group</i>	5
<i>Environmental interest group</i>	8
<i>Industry interest group</i>	29
<i>Retailer interest group</i>	0
<i>Other interest group</i>	1
I work for an individual manufacturer	35
I work for an individual retailer	2
I work for a research institute or consultancy	9
Other, namely	28
<b>Total</b>	<b>131</b>

**A46** ***In principle, with the help of the primary energy factor, products having the same functionality but using either electricity or primary energy sources can be compared to each other in labelling, and / or be subject to minimum requirements in ecodesign resulting in equivalent primary energy use for a given functionality. In which cases is this approach applicable?***

In response to this question the following aggregate responses were received:

- *We have the following views: (93%)*
  - *Should be the rule (49%)*
  - *Should be applied on a case-by-case basis (13%)*
  - *Should not be applied (38%)*
- *The question is irrelevant to us, as all the products we produce/sell use one energy source. (6%)*
- *We do not know (<1%)*

*Note: the question was asked specifically for Ecodesign and Energy Labelling but the responses received were almost identical and are therefore the results above are presented in aggregate.*

These results suggest that almost half of all respondents with an opinion are in favour of using the primary energy factor (PEF) to enable products with the same functionality but different fuel sources to be compared. A further 13% are open to the idea on a case-by-case basis. A large minority of respondents are not in favour. This highlights some of the controversy and debate surrounding this issue.

Individual manufacturers were most strongly against the use of PEFs (80% of this group), while industry interest groups were evenly split across the three answer options, making this group the strongest in favour of case-by-case consideration. The other group also saw a large minority (39%) against the application of PEF. Almost all other respondent groups were strongly in favour of the PEF as the rule, or for case-by-case consideration.

Statements made to explain stakeholder views included:

*"The Energy Labelling and Ecodesign Directives aim to improve the energy efficiency of energy-related products and to encourage end-users to purchase energy-efficient products. Therefore, they should ensure that consumers get accurate comparative information about the performance of energy-using/energy-related products, .... To achieve this goal a common label for gas or electric appliances with equivalent functionality based on primary energy for ranking seems the most appropriate and efficient option. ... Comparability and technology neutrality are two pillars of the Energy Labelling and Ecodesign Directives, and therefore should not be undermined."*

*"Primary energy is the relevant parameter that characterises the environmental impact of a product during its use stage. Comparability across different fuels can only be achieved through comparing primary energy. The primary energy factor is indispensable to ensure that energy labels offer the fairest, most technology-neutral, informative and transparent information to consumers, when they want to compare products. In Ecodesign, the use of the primary energy factor guarantees that electrical products are not unduly promoted over other energy sources."*

*"Labelling: Only primary energy can enable a fair comparison between products using different energy sources; Ecodesign: Primary energy reference is the only way not to unfairly promote electric appliances"*

versus other energy carriers. In addition, only primary energy could serve as a reference if we start considering embedded energy in manufacturing stage (beyond use stage)”

“We are confident that the overarching goal both of the Ecodesign as well as of the Energy Labelling framework is the overall reduction of energy consumption. We are ascertained that the Energy Label must remain technologically neutral in order to provide consumers with transparent information and encourage them to switch towards more efficient technologies. ...We should not forget that the primary role of the Energy Label is to inform consumers and at the same time motivate them to switch to more efficient technologies with the overall goal,..., to reduce energy consumption. This can happen only if consumers are informed transparently. Having multiple labels for the same product group and not allowing a cross-technology comparison might ease the preparation of Energy Labelling measures but will seriously endanger the goal of this policy instrument.”

“Energy labelling and Ecodesign regulations have to focus only on the efficiency of appliances. Efficiency of the energy supply has not to be included in these regulation but has to be addressed in specific regulations. Energy labelling and Ecodesign regulation have to be based on final energy consumption because it is understandable by consumers (it is their energy bills).”

“Influencing consumer choice through the use of PEF will result in a permanent change in electricity demand in the long run. ... PEF based on historical electricity generation statistics (average generation mix), should not be used to compare the efficiency of products using different energy carriers, as it influences consumer behaviour in a way that is not consistent with EU long term climate and energy objectives. When EU policy, through the use of PEF, stimulates a shift from electricity to gas or other fossil energy carriers, it will be impossible to meet the long-term climate targets. ...Furthermore, energy efficiency is also best promoted through top-down policy measures. In order to promote energy efficiency in electricity generation, policy measures should be aimed at electricity generators directly. Implementing conversion factors in Ecodesign requirements and Energy Labelling will not create incentives for energy efficient electricity generation, ...”

“The label was intended as - and actually is - a tool for consumer to compare appliances when purchasing an appliance. We are very convinced that in the purchasing process the question gas or electric does not arise! It depends on the installation at home (gas or electric) Furthermore a label based on primary energy would confuse consumers. "Kwh" and electricity is something he is familiar with and kwh can be calculated directly in energy costs. Manufacturers are responsible of (and have influence on) the energy performance of their products - e.g. the electricity they consume. But they have no influence at all on the PE factor.”

**A47** ***Should the same average primary energy factor be applied to electricity-using products regardless where they are sold in the EU, or should the primary energy factor vary by Member State, to take into account the local energy mix? Note that the latter option would mean that ecodesign and labelling requirements would also vary by Member State.***

In response to this question the following aggregate responses were received:

- *The same primary energy factor should be applied to electricity-using products regardless where they are sold in the EU. (80%)*

- *The primary energy factor applied to electricity-using products should vary by Member State, to take into account the local energy mix. (14%)*
- *We do not know. (6%)*

These results show a large majority in favour of an EU-wide PEF factor rather than national factors. No group was significantly more in favour of a local PEF than the average.

Statements made to explain stakeholder views included:

"...It would be contrary to the principle of subsidiarity to define one factor per country for the eco-design & labelling directives. ..."

"Directive 2009/125/EC states "A coherent framework for the application of Community ecodesign requirements for energy-related products should be established with the aim of ensuring the free movement of those products which comply with such requirements and of improving their overall environmental impact. Such Community requirements should respect the principles of fair competition and international trade.". Primary energy factor differentiated by Member State is incompatible with the objectives of these directives and moreover, are inconsistent with the reality of the integrated power system at European level on legal, economic and technical basis..."

"...as the EU is a common market, allowing different primary energy factors can considerably increase complexity for market surveillance authorities- particularly taking into account online sales- and might result to confusion for consumers. ...."

"[implementing local PEFs] Creating enormous burden for market surveillance on minimum standards and for traders/manufacturers for issuing different labels in different countries and therefore weakens the impact of this policy tool."

"For Ecodesign, the use of a single average primary energy factor appears indispensable to ensure that the same rules apply everywhere on the EU common market. It would probably be contradictory to the common market rules and free circulation of goods, if Ecodesign requirements were different from one Member State to another. As for the Energy Label, in theory the use of Member State-specific primary energy factors would lead to more precise and tailored information to consumers. However, this would add burden to manufacturers and retailers, because the energy labels would differ from one Member State to another. This option could be investigated in the context of a dematerialisation of the Energy Label. If the label was displayed only through digital ways in physical and on-line shops, the information could be more flexible and adaptable to local conditions."

"Different labels for different member states are not practical. As the EU aims towards a common energy market, the differences among countries in electricity mix should decrease anyway. A pan-EU value also states that we consider the electricity production and its methods a shared responsibility of all member states."

"The primary energy factor is highly dependent on regional and national circumstances and rules and standards. A universal primary energy factor for the whole European Union would therefore not reflect reality and may yield wrong results. If a primary energy factor is being considered it must therefore take into account the local energy mix...."

## 4 Relation with other policies and scope expansion

### 4.1 Relation other policies

#### **A 1c** ***Are the Energy Labelling and Ecodesign Directives coherent (non-contradictory, mutually supportive) with other EU policies and objectives? (long survey)***

The quantitative results for this question are very similar for both Ecodesign and Labelling. About two thirds of all respondents think that the policies are coherent, a quarter thinks they are not, and a few respondents don't know. For Ecodesign, consumer NGOs are the only group that predominantly thinks that policies are not consistent, for labelling it is both consumer groups and retailer associations.

There have been slightly over 60 free text comments which boil down to about 45 different comments because several interest groups have submitted identical text. The issues of the comments are very varied. About one third of them states that the two Directives are generally coherent with each other and with other EU policies, sometimes specifying that they are coherent with environmental, product, or energy efficiency policies.

A few comments highlight that the policies are generally coherent but could be even better aligned. For example, the use of the Ecolabel as a benchmark is suggested, as well as a guidance document that highlights the respective application areas of the various policies and makes clear which ones are applicable in a given case. It is also mentioned the task sharing between different policies must be made clearer to achieve maximum impact and avoid the "passing the buck syndrome". One comment suggests a reporting requirement on the implementation on ED / ELD requirements in Member States, to be submitted together with other national reports for example under EED.

The rest of the comments states various incoherences with each other and other policies and sometimes gives suggestions to improve them. Incoherences are stated with policies as diverse as: the market surveillance regulation 765/2008, the energy roadmap, ETS, RES Directive, EED, EPBD, Ecolabel, RoHS, REACH, WEEE, the CPR, the Air Pollution Directive or the F-Gas regulation. Often, no reasons or specific examples are given, or the respondents just state an overlap of scope without any further elaboration so that it is impossible to identify where exactly the respondents see the conflict or incoherence. Where reasons are given, many of the reported conflicts relate to specific issues or products. Among them are:

- the use of the conversion factor: Its use in ED and ELD is seen as contradicting the goals of the energy roadmap, ETS, and RES directive because it gives a disadvantage to electricity-driven products which are seen as "clean" at least in countries with a high share of carbon-free electricity
- the calculation method for avoided electricity generation in micro CHP which is incoherent with the one proposed under EPBD and EED
- an issue with heat pumps: the pre-charge ban foreseen under the F-Gas regulation might make it difficult to fulfil Ecodesign requirements and achieve the envisaged energy efficiency class because of leakages and bad practice when filling on-site
- an issue with construction products which are seen as sufficiently covered by CPR and should not be addressed by any other legislation
- an incoherence of ED and ELD in the case of lifts (not specified)

- it is feared that Ecodesign requirements on large power transformers hurt (already low-carbon) power plants

A few arguments are more general:

- It is criticised that tiers of ED and ELD are not well aligned and that the lack of alignment in requirements leads to empty classes at the bottom
- One government body deplores that ED and ELD savings are not eligible for national savings targets under EED, therefore discouraging governments from supporting ED / EL measures
- A major array of comments deals with the EPBD. Several arguments are brought forward for its incoherence with ED / ELD, although most of them are not very specific, only stating that product and systems approach are conflicting or calculation methods are not aligned without specifying in which way. One more specific comment points to the incoherence of the label classes for the Buildings Certificates in some countries with the label classes of the Energy Label; the two should be aligned to have the same top class. Some feel that the Energy Labelling for boilers and heating systems is unnecessary because the buildings certificate already covers the most important impacts. But then another respondent points out that EPBD and ED / ELD complement each other well because ED / ELD mostly addresses retrofit while EPBD addresses new buildings.
- It is said that possible future material requirements under RoHS and REACH might conflict with the energy efficiency of products, although it is not specified in which way and no concrete examples are given.
- the calculation method for non-CO2 emissions under Ecodesign is found incompatible with the method under the Air Pollution Directive
- Some industry associations oppose possible future requirements on resource efficiency (reusability, dismantlability, recyclability) because these might lead to the ban of certain materials which in turn might hamper energy efficiency. However, no examples are given. It is pointed out that the correct implementation of the waste management requirements under WEEE should take precedence over new resource efficiency requirements which are not effective without an effective waste collection and treatment system.
- Also, a possible future integrated sustainability label is seen as harming the Energy Label

The table below gives an overview of the comments.

**Table 7** Overview of remarks to survey question: *Are the Energy Labelling and Ecodesign Directives coherent (non-contradictory, mutually supportive) with other EU policies and objectives?*

	Idea / Argument	Put forward by
Generally coherent	<b>generally coherent / complementary</b> (citing a number of different pieces of legislation ELD and ED are coherent with); providing, together with other policies, a good coverage of the life cycle. One respondent (env) gives a good overview of complementary scope, mechanisms, and objectives.	4 GB, 4 IM, 2 other, 2 env. 3 ind ass (4 identical)
	general coherent with <b>each other</b>	Other, 3 Ind Ass (4 identical)
	generally coherent with other <b>energy efficiency legislation</b>	EA
	generally coherent with other <b>product legislation</b>	EA, research, 2 other, 2 env (5 identical)
Generally coherent, but better alignment	coherent, but not yet designed to achieve maximum synergies with other energy, climate, and product policies, including resource efficiency	Other, 5 consumers (5 identical)
	Better alignment needed between <b>ED, ELD and Ecolabel</b> , for	5 Consumer (5 identical)

	Idea / Argument	Put forward by
needed	example using Ecolabel as a benchmark, and striving for continuous improvement of requirements, based on mandatory benchmarks.	
	“Improved transparency and coherence should be promoted in the interface between the <b>Ecodesign Directive and other policy tools including WEEE, RoHS and the Construction Products Regulation</b> . A practical guidance document should be developed that will clarify the respective areas of application of the different instruments and the possible synergies and overlaps and state in clear terms which policy tool should be given priority for addressing which areas.”.	Ind Ass
Not coherent with each other	ED and ELD not coherent because of empty classes	2 Consumer
	tiers of ED and ELD not always synchronized	Other, 3 ind ass (4 identical)
not coherent with some existing policies	<b>not always coherent with other environmental policy</b> ; task sharing should be clarified in order to avoid double consultation and “passing the buck”	2 EA, 1 RES, 3 other, 3 env, ind ass (6+2 identical)
	<b>ambiguity with Regulation 765/2008</b> , e.g. the role of economic operators is not found in ED or ELD	EA
	incoherent <b>definitions</b> in various Directives	SB
	use of <b>conversion factor</b> not coherent with Energy Roadmap, ETS, and RES Directive, as well as CO2 targets	GB, other, 2 ind ass
	not coherent with <b>EED</b> ; (a) savings under ED are not eligible in EED; therefore a MS increases their savings target by supporting ED (b) include primary energy savings achieved by micro-CHPs due to avoided electricity production in label, employing the substitution method. This would be consistent with the EC JRC ILCD Handbook, the EPBD and the EED, (c) while there are efficiency targets for products under Ecodesign, there are no such targets for MS under EED	GB,2 IM, ind ass (2 identical)
	not coherent with <b>Ecolabel</b> , can lead to double legislation	IO
	not coherent with <b>F-Gas regulation</b> , (a) can lead to double legislation (b) issue of the proposed pre-charge ban that could reduce heat pumps’ energy efficiency when filled on site, whereas the supplier is responsible to provide the printed energy label and reach the ecodesign requirements))	IO, 2 IM, in ind ass (2 identical)
	not coherent with <b>EPBD</b> , (a) can lead to double legislation. (b) include primary energy savings achieved by micro-CHPs due to avoided electricity production in label, employing the substitution method. This would be consistent with the EC JRC ILCD Handbook, the EPBD and the EED, (c) Ecodesign product fiche that could be taken as a basis for EPBD in EU Member States, (d) format of the label should be identical with format of building certificates (UK), (e) label for boilers and heating systems incoherent with EPBD (why?), (f) incoherence of system requirements and calculation method, (g) ELD duplicates the EPBD because the Buildings Certificate already addresses the most important impacts	IO, 2 IM, other, 2 consumer, 3 ind ass (2 identical on product fiche)



	Idea / Argument	Put forward by
	not coherent with <b>WEEE</b> ; (a) some material requirements might potentially interfere with WEEE (b) potential overlap because ED covers whole life cycle, WEEE only part of it	EA, IM, 2 Ind Ass
	not coherent with <b>RoHS (or REACH)</b> , (a) further substance restrictions might lead to loss of energy efficiency (but no example given) (b) some future material requirements might potentially interfere with RoHS	IM, other, 6 Ind Ass (4+4 identical)
	not coherent with <b>ETS</b> : if large power transformers are submitted to Ecodesign; this might have a negative effect on CO2 emissions of power plants, because very efficient plants might have to be stopped for a few months in order to change transformers.	Other
	Reporting on ED and ELD implementation should be integrated into mandatory national <b>reports within other climate and energy policies</b>	consumer
	Calculation methods (and requirements?) under ED not aligned with <b>air pollution directive</b> ; p.e. for local room heaters	2 env
	Criticising <b>overlaps</b> with a number of other policies (Ecolabel, foodstuff regulations, CPR, PEF) but without giving concrete examples	2 Ind Ass (2 identical)
not coherent for specific product groups	for <b>specific products</b> maybe not always	GB, other
	ED and ELD not coherent for <b>lifts</b> (no reason given)	IM
	Conflicts with <b>CPR</b> (but not specified why): (a) ED / ELD should not cover the same products as CPR does (b) CPR and EPBD should always be given precedence over framework directives	3 Ind Ass
not coherent with possible future policies	Conflict with possible future comprehensive <b>sustainability labeling</b>	3 retailers
	not coherent with certain possible future <b>resource efficiency requirements</b> such as recyclability, recoverability, dismantability or reusability, which might favor the use of certain raw materials over others, and thereby not only increase cost but also hamper energy efficiency (but no example given). Priority should be the better implementation of the recast WEEE, in order to improve actual collection and treatment.	Other, 2 Ind Ass (3 identical)

**A 11** *Should there be a legal provision, like for ecodesign, for voluntary initiatives on energy labelling, considering the administrative burden for the Commission and member state market surveillance costs? (long survey)*

More than two thirds of the respondents oppose this idea while only one sixth supports it and the rest is undecided. Surveillance bodies and test labs (representing only 2 respondents each) are the only groups that are unanimously in favour; all other groups are predominantly against. The share of “don’t know” answers is highest in industry associations, covering about one third of the respondents.

There are about 55 free text comments, of which slightly over forty are different (the rest are duplicates). The vast majority is against the use of voluntary labels. Some only generally point out that there are no benefits, voluntary labels are less efficient, or bad experience has been made. Others are more specific: The single most frequent argument is that market surveillance is definitely needed in any case, so voluntary labels would not spare authorities that burden. Also, it is put forward prominently that voluntary labels will confuse consumers, either because they are too similar to the official label (and can therefore be mixed up with it, undermining its credibility) or because they are too different, contributing to a confusing multitude of labels. It is also highlighted that voluntary labels would undermine a level playing field, because only the good scoring products would be labelled, and that consumers demand a back-up by authorities for labels to be credible. Further arguments are:

- voluntary labelling is costly, especially to SMEs
- with the EU Ecolabel, there already is a voluntary scheme
- also in Ecodesign, they are not very relevant
- the process is less democratic, stakeholder participation less broad.

There are only a handful of comments in favour and they are not very strong, mainly highlighting that not everything should be regulated and that voluntary labelling should remain a possibility. It is also said that it might save costs and increase accountability. Two respondents support the option for a voluntary label under conditions, namely that there is sufficient market coverage (clearly defined) and overlaps with other instruments such as Ecolabel is avoided. Finally, a related issue is brought forward by industry associations: the voluntary use of the mandatory label before its official introduction is an interesting option and the period where this is possible should be defined more clearly already in the respective regulation. Consumers, on the other hand, fear that this might cause confusion and wish to limit transition periods. The table below summarizes the arguments.

**Table 8 Overview of remarks to survey question: *Should there be a legal provision, like for ecodesign, for voluntary initiatives on energy labelling, considering the administrative burden for the Commission and member state market surveillance costs? (long survey)***

	Idea / Argument	Put forward by
against	<b>no benefits</b> of voluntary labels as compared to mandatory ones	EA, IM, Research, 2 other, 5 env (8 identical)
	Voluntary labels are <b>less efficient</b>	GB, Other, consumer, env (2 identical)
	Voluntary labels are a proven failure, <b>bad experience</b>	GB, consumer
	already <b>too many</b> voluntary schemes	2 others
	<b>market surveillance</b> must definitely be carried out, would therefore not suspend responsibilities of the state	3 EA, GB, 2 IM, Research, 3 Other, consumer, 5 env, ind ass (8 identical)
	voluntary labels <b>confuse consumers</b> , misleading voluntary labelling schemes looking similar to the EU-label should be avoided; on the other hand lots of different schemes make labels less readable	2 EA, 3 GB, Ind Retail, 2 Research, 4 other, consumer, 4 env (8 identical)
	voluntary labels may be <b>unfair or biased</b> ; important for <b>credibility</b> that labels are controlled by the state	EA, GB, Research, 3 Other, consumer, 4 env (2 +8 identical)
	might affect credibility of the mandatory scheme	env
	Effect of labeling depends on <b>100% market coverage</b> ; if it is	GB, other, 4 consumer, (4

	Idea / Argument	Put forward by
	voluntary, laggards will hide information;	identical)
	VA would be <b>less democratic</b> with less stakeholder participation	other, 3 consumer (4 identical)
	Voluntary labels would <b>counter a level playing field</b> . Also, voluntary use of additional classes in “tiered” labels must be more clearly regulated and transition period defined in advance	2 IM, 2 ind ass
	VAs might even be <b>more expensive</b> for manufacturers, too costly for SMEs	consumer, 2 ind ass (2 identical)
	There is already <b>EU Ecolabel</b> as a voluntary scheme	env
	Also in Ecodesign, <b>VAs are the exemption</b> , therefore the precedence of VAs should be removed	Other
in favor with conditions	There are <b>pros and cons</b> , should be made possible given there is <b>no overlap with other existing schemes</b> and coherence of tools is ensured	ind ass
	<b>provision on market coverage should be put more precisely</b> , it should not be possible that a small group launches their own labeling scheme	ind ass
in favor	there could be a need, choice of voluntary or mandatory should be always a <b>case-by-case analysis</b> ;	EA, 2 Ind ass (2 identical)
	<b>Not everything should be regulated</b>	SB, Ind Retail
	Voluntary initiatives might provide for more <b>accountability</b>	
	VAs might <b>save money</b> for the community	ind ass
other comments	not needed, but option to <b>use mandatory label in advance is interesting</b> . Enough time for the transition needed	2 ind ass (2 identical)

**AB 39 Do you see opportunities for synergies between all EU legislation relevant to product groups? For example: merging all required documents and information into a single form , or merging certain Directives into one (Ecodesign, Energy Star, Energy labelling, and Tyre labelling). (long and short surveys**

A little more than half of the respondents does see potential for synergies, while about a quarter does not see any, and another quarter doesn't know. Synergies are mostly seen by government bodies, surveillance bodies, environmental and consumer groups, and “other” respondents which do so with very few exceptions. Of the individual manufacturers, about half does not know while the other half (with one exception) also sees synergies. Industry associations are more sceptical: Half of them does not see any synergies, while a quarter does not know and only a quarter sees synergies.

Respondents have given about 60 free text comments<sup>2</sup>, which boil down to about 30 different comments, because various NGOs or national branches of industry umbrella organisations often submitted identical text. About half of the comments deal with the merging of ED and ELD (and sometimes also other pieces of legislation such as Energy Star). The opinions on this issue are split.

<sup>2</sup> not counting multiple identical comments by the same person

Some respondents support a merging of at least ED and ELD, basically on the grounds (a) that these Directives are closely related, (b) this would ensure that definitions, measurement methods etc. are exactly the same (and need to be provided only once), (c) this would reduce bureaucracy, (d) it might facilitate transposition into national law, and (e) it may make the decision processes more transparent. A few of them also suggest the integration of Energy Star or Tyre Labeling. Four respondents even support a more far-reaching merger: three suggest a merging of all product-related legislation (including energy, environment, health and safety issues) into a single product directive, so that all requirements for one product would be laid down in the same place. One respondent suggests a merging of all energy-efficiency related legislation (EPBD, ED, ELD, EED, and others) into a single “energy efficiency directive”. Those who oppose merging mainly do so on legal grounds. They point out, for example, that the Ecodesign Directive includes a conformity assessment and CE marking procedure while the Energy Labeling Directive does not, that the procedures are different (Implementing Measures vs. Delegated Acts) or the scope is not identical. It is also pointed out that the Energy Star, as a voluntary label, is conceptually different and builds on an agreement with the US programme. Support or opposition towards merging is basically not dependent on type of stakeholder.

Two exceptions to this are:

- that some industry associations specifically oppose the integration of “their” products (buildings, cars, tyres) into the ED / ELD framework, pointing out their differences,
- that a number of industry associations explicitly oppose the integration of the Ecolabel – it should in any case stay voluntary.

A second group of comments deals with creating better coherence between different legislations. Here, all types of stakeholders agree that better coherence is desirable. They highlight the following aspects:

- Common preparatory studies and / or consultation processes could be introduced for a number of instruments, including Ecolabel, WEEE, RoHs, F-Gas, IED, CPD, EPBD, Energy Star, in order to reduce double work. Also, revision cycles of different policies should be streamlined.
- Uniform procedures for assessment and verification on the one hand, and for documentation / information requirements on the other, should be introduced across a number of instruments. Respondents propose uniform product fiches and / or the integration of all required information in one document which would be ideally accessible via a QR code. One respondent suggests the introduction of a “product passport”. This is mainly a concern of industry, trying to reduce the administrative burden this way.
- A somewhat less far-reaching demand is to develop a consumer information framework that allows consumers to overview all regulation and information for each product, and create links between different types of information.
- Coherence: Better coordination and synergies are demanded between the criteria and requirement levels of different pieces of legislation (GPP, ED, ELD, Ecolabel). For example, the Ecolabel could be used as a benchmark for ED / ELD. This is mainly a demand of the environmental NGOs who also suggest that this combination should lead to a top runner approach.

The following table gives an overview of the free text comments.

**Table 9 Overview of remarks to survey question: Should there be a legal provision, like for ecodesign, for voluntary initiatives on energy labelling, considering the administrative burden for the Commission and member state market surveillance costs? (long survey)**

	Idea / argument	Put forward by
Pro mergers	<b>Merge Ecodesign and Energy Labeling</b> , as they are very closely related and / or because this (a) ensures that definitions, measurement methods etc. are exactly the same (and need to be provided only once), (b) reduces bureaucracy, (c) facilitates transposition into national law, (d) may make process more transparent	EA, Surv body, Gov body, 2 Ind Manuf, research, 3 buildings ass., 3 others, consumers, 3 env, 2 ind ass (3 + 6 + 2 identical)
	<b>Integrate also Energy Star</b>	Gov Body, research, 2 others (3 identical)
	<b>Include transport</b> and merge with cars and tyre labeling	Other, env
	<b>Ideally only one piece of legislation</b> for each product, including also health and safety; omnibus product directive, holistic approach per product	Ind Manuf. other, industry ass
	<b>One omnibus energy efficiency directive</b>	Other
Against mergers	<b>No merging of ED / ELD</b> as scope, impact assessment, objectives and also procedures (IMs / DAs) are different, or because ED requires CE marking and conformity assessment which is not the case for ELD	Ind Manuf, other, 4 industry ass. (5 identical)
	<b>Integration of Energy Star not feasible / practical</b>	Gov Body
	<b>No integration of tyre labeling</b> feasible / practical	Gov Body, Ind Manufact
	<b>No integration of Ecolabel</b> – should remain voluntary	Other, 4 industry (all identical)
	<b>No integration of buildings</b> – they are conceptually different from products	3 Buildings ass.(all identical)
Maybe mergers	Merging certain Directives could make sense, but we do not want sector-specific legislations to be absorbed by framework legislations.	Ind ass
	Merge to be considered on <b>case by case basis</b>	2 ind ass (identical)
Common unified procedures	<b>Common prep studies and / or political processes</b> for a number of instruments, including Ecolabel, WEEE, RoHs, F-Gas, IED, CPD, EPBD, Energy Star	2 EA
	<b>Uniform procedures for assessment</b> , documentation, verification, uniform product fiches, integration of all required information in one doc (ideally accessible via QR code) (without necessarily merging)	EA, Ind manuf, ind ass
	harmonised information, links between different types of information, and a framework allowing consumers to overview all regulation and information for each product.	env
Coherence and coordination	<b>Coherence:</b> Better coordination and synergies between requirement levels of different pieces of legislation (GPP, ED, ELD, Ecolabel); coherence in criteria and revision cycles; e.g. using Ecolabel as benchmark for ED / ELD.	EA, surv body, 2 research, 4 other, 4 consumer, 4 env, 5 industry (8 + 7 + 4 identical),
	Coordination should lead to a <b>top runner approach</b>	other, 4 consumer (5 identical)

	Idea / argument	Put forward by
no change	<b>no change necessary</b> , at least not yet, matter complicated enough	Gov Body, other
other ideas	<b>Product passport</b>	other
	Reliable and uniform methodology for <b>performance certificates in buildings</b>	consumers
	EPBD and ED complement each other well (for new buildings vs. retrofit)	env
	better distinction between B2B and B2C products	several industry (at least 5)

## 4.2 Scope expansion

**A 21** *The Ecodesign implementing measures adopted so far focus primarily on the impacts in the use phase of a product, which is in most energy-using products responsible for the largest share of the overall impact. Does the Ecodesign Directive or its implementation need to be changed to more proportionately address impacts in other life-cycle phases (i.e. including production and disposal) other than the use phase? If yes, how should it be changed? If no, why not? (long survey)*

The views are divided in this question: 40% of respondents agree that the Ecodesign Directive or its implementation need to be changed to more proportionately address impacts in other life-cycle phases and 49% of the respondents disagree that the Ecodesign Directive or its implementation need to be changed to more proportionately address impacts in other life-cycle phases. 11% indicated that they did not have an answer to this question.

It must be noted that roughly half of the respondents are industry groups or individual manufacturers most disagreement comes exactly from these groups. A varied group of stakeholders from Environmental groups, government bodies, research groups and other stakeholders groups agree that some change need to be done in the Ecodesign Directive.

In the free text answers we can distinguish two main stakeholder opinions

1. Groups that think that implementation of the Ecodesign Directive should be improved
2. Groups that think that Ecodesign Directive is appropriate

As stated above stakeholders that think that implementation of the Ecodesign Directive should be improved argued that Directive already covers all significant environmental aspects of products over their life-cycle however the application of the MEErP is often not fully used to its full potential due to lack of input data regarding environmental aspects. This is a problem that needs to be addressed as for a range of products (PCs and other IT and home electronics products) have their larger environmental impacts in the production and end of life phases. If it's possible to verify and measure these other impacts/parameters then they should be included. Some stakeholders thinks that the implementation of the Ecodesign Directive needs to be improved to establish the possibility to better address environmental impacts other than energy consumption in the use phase.

One stakeholder advocate a three-stranded approach to improve the Ecodesign implementation:

1. *"Introduce into the Ecodesign Directive hard targets for efficiency of resource use (percentage reduction in the total quantity of material per unit of production, percentage reduction in water and energy consumption per unit of production, minimum recycled content based on a producer's total inventory of input materials, rather than on a product-by-product basis);*
2. *Introduce into the Ecodesign Directive targets for product recyclability, reusability and reparability and supply appropriate information to actors downstream of the production point in the form of expanded product fiches, product data sheets or product passports;*
3. *Given the right product attributes, examine how appropriate end-of-life management can be strengthened and facilitated through supporting initiatives such as extended producer responsibility, targets for separate collection, targeted landfill restrictions, etc. The management and substitution of hazardous materials is adequately addressed by the RoHS Directive"*

Others (manly industry related), however, do not agree, arguing that the Ecodesign implementing measures should focus clearly on the main impact which is the use phase (is still the phase with the highest impact). And therefore other environmental effects are already sufficiently covered by Regulation (such as WEEE, ROHS, REACH,...) and by the effect that use of resource are constantly reduced because of cost reduction reasons. Therefore an extension of the scope to cover production and disposal phase would not be useful and additional parameters, could lead to overlap and misunderstandings with additional layers of complexity and administrative burden.

Observation: Many multiple answers, partly by the same people, partly under different flags; also national organisations using the same wording as their umbrella organisations.

**AB 36a**      ***Should the scope of the Energy Labelling Directive be expanded to non ErP (non Energy related Products – which are products that do not influence energy consumption during use, but have other environmental impacts due e.g. to their manufacturing, such as foodstuffs, clothing and furniture)? (long and short surveys)***

Almost 66% of respondents consider that the scope of the Energy Labelling Directive should not be expanded to non ErP. While 20% consider that Energy Labelling Directive should be expanded to non ErP. 14% did not know the answer.

It must be noted that roughly half of the respondents are industry groups or individual manufacturers most disagreement comes exactly from these groups. Also, respondents from standardisation organisations, testing laboratories, intergovernmental organisation and surveillance consider that Energy Labelling Directive should not be expanded to non ErP. None of the respondents from industry group and retail organisations says that Energy Labelling Directive should be expanded to non ErP. Only respondents from Energy agencies and environmental groups are more in favour of the scope expansion of Energy Labelling Directive to non ErP.

*In the following the free text clarifications made by the different stakeholder groups are summarised. The following comments have been made by different stakeholder types and appear to reflect broadly supported opinions:*

Arguments brought forward against Energy Labelling Directive expansion to non ErP can be broken down in several categories:

## No sense / absurd

- *Energy label for non-ErP sounds absurd, no in-use phase saving potential; would be an incoherent approach; trade barrier (industry association)*

## Necessity

- *No need; current scope sufficient, already huge;*
- *It will be more adequate to have one directive for energy related products and other regulatory initiatives for non-energy related products.*
- *other regulatory instruments already existing that are better adapted (e.g. EED, EPBD for buildings; EU Ecolabel; Dir on packaging waste, car legislation, CPD.)( consumer group, industry association);*

## Feasibility

- *enforcement issues; requirements in manufacturing phase difficult to verify (government body, ind. manufacturer; industry association)*
- *Priority setting in the face of limited resources: already too much work; rather focus on timely revision and effective market surveillance of existing regulations (government body ; intergovernmental organization, industry association)*
- *Lack of adapted methods: not suitable for other types of products; method not tailored to other life cycle stages; methods still under development (env group, industry association)*
- *diversity / heterogeneity of products (industry association)*
- *lack of harmonized standards (industry association)*

## Value added

- *Confusing the message: confusing the message of the label; not transparent; jeopardize credibility, already too many labels; message must be simple (surveillance body, research / consultancy, industry association, retailer association)*
- *Consumer benefits: intangible benefits (for consumers) (industry association)*
- *Other instruments better suitable: Recommendation to use other regulatory instruments that are better adapted (methods, surveillance techniques). E.g. Ecolabel, sector legislation. Or develop separate non-ErP directive (government body; industry group , retailer association)*
- *Ineffective :energy-producing products / building systems: installation / system is more relevant than individual product (individual manufacturer; industry association)*

Arguments brought forward in favour of Energy Labelling Directive expansion to non ErP included:

## Necessity

- *Environmental impact: environmental impact, would reduce footprints; target toxic chemicals and substances contained in consumer products. (environmental group)*
- *environmental impact (specific products):expand to energy-producing products, because their efficiency is very relevant (individual manufacturer)*



## Value added

- *Impact on consumer behaviour: Maybe consumers will be more careful in buying food from overseas.( individual retailer)*
- *Competitiveness: Would give a premium to energy- and resource-efficient manufacturing, and therefore to jobs located in Europe (industry association)*
- *There is potential benefit in expanding progressively the scope to new product categories, provided the European Commission and Member States put sufficient resources in it (energy agency).*

Some industry association and environmental groups have some concerns

- *Undecided: unclear; might not be best policy tool; consumer information campaigns suggested; too early to say;*
- *in principle in favor, but enough resources need to be devoted to it; too many products under one directive might pose (capacity) problems; already today coverage of non-energy aspects is problematic*

Detailed specified conditionalities and options

- *The expansion could start realistically by those product categories that have been identified as best candidates in the 2012 evaluation study on the Ecodesign Directive: detergents & cleaners, furniture, clothes & mattresses, toys. Reasons: important environmental impact, especially with respect to harmful substances; broad variation between products (consumer group, environmental groups)*
- *focus on products with highest impacts; label overall resource efficiency instead of many individual aspects (government body)*
- *not in this revision, but experience should be gained with regulation of other environmental aspects.( government agency)*
- *Should be investigated on the basis of the PEF-pilot phase.*

General observations: many multiple answers, partly by the same people, partly under different flags; also national organizations using the same wording as their umbrella organizations

In favor answers are mainly based on the environmental impact / improvement potential, without considering much feasibility or appropriateness of the instrument.

### **AB 36b      *Should the scope of the Ecodesign Directive be expanded to non ErP (non Energy related Products)? (long and short surveys)***

Almost 55% of respondents consider that the scope of the Ecodesign Directive should not be expanded to non ErP. While 30% consider that Ecodesign Directive should be expanded to non ErP. 15% did not know the answer.

It must be noted that roughly half of the respondents are industry groups or individual manufacturers most disagreement comes exactly from these groups. Also, respondents from standardisation organisations, testing laboratories, intergovernmental organisation and surveillance consider that Ecodesign Directive should not be expanded to non ErP. None of the respondents from industry group and retail organisations says that Ecodesign Directive should be expanded to non ErP. Consumer organisations, environmental groups and other stakeholder are more in favour of the scope expansion of the Ecodesign Directive to non ErP.

According to the free text answers, arguments brought forward for Ecodesign are broadly identical to those brought forward for Energy Labelling Directive, with a few exceptions:

Arguments "against" are weaker:

- *(of course) no reference to understandability / credibility or consumer benefit of the label*
- *one representative of an industry association and one anonymous note that expansion would make more sense for ED than ELD*

Arguments "for" brought forward by more stakeholders

- *consumer groups more active in this field (all with identical arguments, arguing that there are consumer-relevant impacts that should be regulated, esp. chemicals)*

However, also some new arguments "against" are brought forward

- *importance of stability; consider one product at a time with all its relevant impacts taken together, predictability, not too frequent reviews (remark CF: integrated approach contradicts "two directives" approach brought forward elsewhere)*
- *wider context of environmental and health legislation to be considered, not just products*
- *COM should do "fitness checks" and conduct thorough evaluations before proposing new measures such as the expansion of the scope of the Ecodesign Directive to non-ErP.*

Detailed specified conditionalities and options

- *Supported with conditionality: availability of "new and standardised assessment methodologies, new measurement and testing methods (measurability on final product), sectoral and product benchmarks, product declaration and certification schemes, procedures for implementation and enforcement, etc." (energy agency, anonymous)*
- *suggestion to cover furniture, clothes - but rather not chemicals such as detergents (research institute)*
- *Suggestion: "We [...] recommend that the Commission develop and commence a work programme for preparatory work on extension of the Ecodesign Directive to non ErPs, committing to a realistic timescale for its legislative progress commensurate with availability of resources. Clearing the present backlog of commitments should be the first priority of the Commission. In view of the existing and future workload, the Commission should explore ways in which the administrative processes and procedures can be streamlined and simplified, and prepare guidelines for the development of voluntary agreements."*

Observation: Many multiple answers, partly by the same people, partly under different flags; also national organizations using the same wording as their umbrella organizations.

**A 37**            ***Should the scope of the Energy Labelling Directive and the Ecodesign Directive be limited to energy/resource use in the use phase, while a set of other legal instruments applying to other significant environmental aspects (e.g. material efficiency, pollution) is adopted? (long survey)***

55% of the respondents, typically representing industry organisations and individual manufacturers are in favour that the scope of the Energy Labelling Directive and the Ecodesign Directive be limited to energy/resource use in the use phase with adoption of a set of other legal instruments applying to other significant environmental aspects.

45% of the respondents, typically representing testing laboratories, government bodies, consumer organisations and other stakeholders are not in favour of limitation of the scope. It must be noted that most of the respondents are industry interest groups and individual manufactures.

In the following the free text clarifications made by the different stakeholder groups are summarised. The following comments have been made by different stakeholder types:

Arguments in favour (Retailers' interest group and Industry interest group):

- *the most sensible approach to avoid duplication with other legal instruments;*
- *Both directives should focus on achieving energy savings.*
- *Expanding the scope beyond the use phase would overburden the mentioned Directives and render their implementation unfeasible*
- *Other legal instruments on environmental aspects do already exist (legislation on waste/water/air/chemicals...)*
- *It would upset the implementation for the existing scope.*
- *It will give rise to legal uncertainty and jeopardise the credibility of the instrument*
- *It would also contradict the EU's Industrial Policy objectives of providing regulatory predictability and stability.*
- *the two directives should be limited to energy & resource in the use phase, and particularly that a great improvement could be achieved by a labelling using final energy as energy consumption indicator*
- *As this is consumer information, it should be kept simple, and target the actual energy use.*

Some stakeholders are in favour for ELD but not for ED (Retailers' interest group and other stakeholders:

- *Energy labelling Yes. The scope of the energy labelling directive should be limited to the use phase. It is important that information on the label can be verified by the authorities and therefore the information should be related to the product and not to the manufacturing process.*
- *Ecodesign NO. Currently ecodesign is dealing with the total life cycle of the product and the most important environmental aspects. Until now most requirements are related to the energy consumption in the use phase. The scope of the ecodesign directive shall also in the future include the total life cycle of the product and other relevant aspects than energy.*
- *The energy label should focus on the energy/resource use in the use phase. It is not a suitable instrument to inform consumers about other environmental aspects.*

Arguments against (individual manufacturer, individual retailer and Industry interest group):

- *Focus should be energy consumption, from the end user's perspective*
- *The scope of the Energy Labelling Directive and the Ecodesign Directive should not be limited to energy/resource use in the use phase. They should be expanded to energy/resource use in the production phase.*
- *Add more elements to the Directive would only make it more difficult to be adopted also the label would have to change and then a few years later another revision would be needed when the other legal instruments are adopted*
- *Lot of administrative burdens would be created*

Challenges and concerns (energy agencies):

- *"For energy labelling it is mainly the use phase that is interesting, as it is an information tool targeting the consumer/buyer. For ecodesign, by definition all relevant aspects during the whole lifecycle, should be included. The analysis performed for each product or aspect should identify which aspects should be addressed, due to their potential to reduce environmental impact and the adequacy of the policy instrument (ecodesign or another instrument). This is a challenge as it requires the capacity of the commission and MS representatives to deal with non-energy issues and to articulate with other non-energy policies."*
- *The scope limitation of ELD and ED "depends on the quality of the overall policy set-up. The Ecodesign Directive could be restricted to energy in the use phase if and only if relevant legal instruments are developed to cover the other environmental aspects. So far, there has been a 'passing the buck' syndrome between the Ecodesign, RoHS and WEEE Directives, leading to some missed opportunities to cover non-energy aspects of energy-related products. The task sharing and interaction between these instruments should be clarified, and the evidence-base and decision process eventually better mutualised."*

One stakeholder suggested that *"all related legislation should be integrated into 1 single coherent, effective and efficient directive."*

Observation: Many multiple answers, partly by the same people, partly under different flags; also national organisations using the same wording as their umbrella organisations.

**A 38**      ***Should the Energy Labelling Directive's scope be extended to cover buildings, technical building systems and other systems, thus ensuring uniform EU rules for the labelling of such systems, instead of the current approach where Member States set the labelling rules in the national transposition of the Energy Performance of Buildings Directive and in other national legislation? (long survey)***

30% of the respondents, typically representing consumer organisations and environmental organisations are in favour that the Energy Labelling Directive's scope be extended to cover buildings, technical building systems and other systems, thus ensuring uniform EU rules for the labelling of such systems. 50% of the respondents, typically representing government bodies, intergovernmental organisations, industry organisations, retail organisations and individual manufacturers are not in favour Energy Labelling Directive's scope extension to cover buildings, technical building systems and other systems. 20% of respondents do not know. It must be noted that most of the respondents are industry interest groups, individual manufactures and other stakeholders.

In the following the free text clarifications made by the different stakeholder groups are summarised. The following comments have been made by different stakeholder types:

Arguments in favour (energy agency, surveillance body and Environmental interest group):

- *"The EU-energy label has become a symbol for energy efficiency, widely recognised by all actors. Thus there would be an advantage in harmonising the use of the label across the EU for other energy related products and systems. This has been done for tyres e.g. although under a different regulation. For non-tradable goods such as buildings it could also be positive."*
- Advantages to ensure a greater uniformity of all the energy labels used in the EU (labels for energy- related products, tyres (tires), cars and buildings.
- simplification and unification
- A harmonized labelling system would enable better monitoring and exchange of experiences

Remarks

- *"A common label design could be positive, since MS have now chosen different routes to implement the building energy certificates required by the EPBD."*
- Energy agency representative stress that the Energy Labelling Directive's scope extension *"need to be regulated through separate directives"*
- Surveillance body representatives stresses *"a very thorough study is needed to assess all different sides of this problem"* and *"in Germany there is already an energy label for buildings"*
- *It would imply a major transfer of national authority to the EU-level.*
- Very great endeavour which will require substantial resources to develop uniform & fully operational EP-determination methods (both calculation, measurement and testing/ asset & operational rating, etc.) taking in to account national aspects (climate).
- It is important to streamline the variety of calculation methods used in Member States, and various indicators used in energy performance certificates.

Arguments against (government body other than an energy agency or a surveillance body, standardisation organisation, individual manufacturer, Industry interest group):

- *Buildings are not comparable to other product groups since differences among Member States are very big, especially due to variation in energy systems, building culture, climates especially between countries from north to south.*
- *Buildings and these systems are adapted to the national building codes and other conditions in the different countries*
- *EPBD is the most appropriate tool to cover labelling of buildings, technical building systems and other systems.*
- *Buildings or parts of buildings raised within a construction process are complex entities that are not built in an industrialized and standardized manner.*
- *Additional regulation of construction products or buildings is unnecessary and leads to overregulation and confusion*
- *Too soon, at the moment, labelling seems a coherent method for industrial large scale products*

Remarks

- *Energy efficiency of buildings, including a labelling-scheme is already covered by the Energy Efficiency Directive (2012/27/EU) and the Environmental Performance of Buildings Directive (2010/31/EU).*
- *The harmonisation of EPCs should be tackled in the forthcoming revision of the EPBD. The energy labelling of technical and other building systems is not sensible either. Many countries have performance-based building codes that require the building as a whole to meet certain requirements.*

## Suggestions

- Consumer interest group highlighted that *"There still exist a directive and a (different) labelling system for buildings. The scales of the building directive could be adjusted to an A- G-Scale which is much easier to understand than numbers of kWh/year."*
- Industry interest group representative suggest that *"the various labels and certification schemes in the BREEAM, DGNB, HQE should be harmonised."*
- Another Industry interest group representative suggest *"A standard for calculation methodology for labelling of buildings would be most effective - making sense to consumers and allowing for fiscal incentives to improve. Ecodesign and energy labelling could then determine how products fit into the calculation methodology, including systems and allowing current and future supply chains to deliver improvements"*

Observation: Many multiple answers, partly by the same people, partly under different flags; also national organisations using the same wording as their umbrella organisations.

## 5 Energy Labelling

### 5.1 Objectives of the Energy Label

**AB 2a** *Energy Labels are currently (or soon to be) mandatory for the following range of product groups. For each of the following product groups, please indicate if these were the most appropriate product groups to select for Energy Labelling. (long and short surveys)*

In general there is strong support for the labelling of the current labelled product groups among the consulted stakeholders. Overall three quarters of stakeholders were in favour of labelling for the current products, only 5% were against and a fifth expressed no opinion. Support was strongest for white goods and consumer electronics but was slightly weaker for water heaters, lamps, vacuum cleaners and luminaires. The lowest support was for luminaires but still responses in favour were six times as numerous as those against.

In general the strongest support for labelling of those products already subject to labelling was from civil servants and consumer and environmental interest groups. Support was strong but weaker among industry and retailers. In the case of these latter groups those in favour outnumbered those against by roughly 10 to 1 but there were a much higher proportion of don't know answers than was true for the civil servants, consumer and environmental interest groups.

**AB 2b** *In retrospect, which other product groups (if any) should have been labelled: (long and short surveys)*

Respondents were asked whether they were in favour of energy labelling being developed for a variety of products that are not yet labelled but are already subject to Ecodesign requirements. The responses were less favourable than for those products already subject to labelling with overall about 35% of all responses being in favour of labelling for the products listed, 25% being against and 40% saying they didn't know. The responses were very similar when averaged across each type of stakeholder group rather than when counting each entry with equal weighting. When responses were assessed by type of stakeholder, however, important distinctions were evident. Industry and commercial stakeholders had a far greater percentage of don't know responses than other groups, with only 33% expressing a definite opinion. Amongst these, slightly over half were against labels for the Ecodesign products and just under half in favour. Among environmental and consumer interest groups 52% were in favour of labelling for these product groups, 20% were against and 27% were unsure. In the case of civil servants (government bodies, energy agencies and market surveillance authorities) some 41% were in favour of labelling these products, 45% against and 14% unsure; however, these findings are skewed by the inclusion of market surveillance authorities of whom 73% of responses were against labelling of these products. Among member state ministerial representatives the response in favour of labelling was 46% with 33% against. This reticence to extend labelling to cover other Ecodesign products among market surveillance authorities is likely to reflect a concern that they have insufficient capacity to deal with compliance activities for the products already subject to labelling and hence are reluctant to be charged with additional responsibilities unless matched by an appropriate increase in funding.

The results reported in the paragraph above are the aggregate response over 11 product groups (PCs and Servers, imaging equipment, external power supplies, electric motors, ventilation fans, circulation pumps, electric pumps, complex set-top boxes, simple set-top boxes, motors and variable speed drives, and lighting installations). There were notable differences in the response in favour or opposed to labelling when looked at by product type. The list below shows the responses averaged by respondent group with the values in brackets being: in favour of a label, opposed to a label and don't know respectfully:

- PCs and Servers (64%, 13%, 24%)
- complex set-top boxes (54%, 9%, 38%)
- simple set-top boxes (47%, 16%, 38%)
- imaging equipment (46%, 23%, 31%)
- lighting installations (42%, 15%, 42%)
- circulation pumps (36%, 28%, 37%)
- external power supplies (31%, 41%, 29%)
- electric pumps (27%, 36%, 38%)
- ventilation fans (26%, 54%, 21%)
- motors and variable speed drives (25%, 35%, 40%)
- electric motors (22%, 40%, 37%)

This list is ordered with the highest share of favourable responses at the top and the lowest at the bottom. From this it is apparent that there is more support for labelling of consumer orientated products and less for labelling of industrially orientated products among the stakeholders that completed the survey. This broad trend is generally true within each type of stakeholder group as it is across all of them. It is worth noting, however, that the question referred to labelling and not the mandatory provision of energy performance information in appropriate sales literature and media. Thus these responses may well, at least partially, reflect a view that physical printed energy labels are less appropriate for industrial equipment than for consumer equipment but that is not necessarily indicative that stakeholders would oppose the provision of appropriately delivered energy performance information for these product types.

When the explanation for these responses was assessed several remarks were made that corroborate this view, e.g. "EuroCommerce is in favour that the eco-design and energy label should focus on B2C products. Energy labels are unnecessary for professional products as other means of information are available.". Another explanation was the difficulty of labelling systems "All in all, we support the outcome of the selection of product groups. However, where energy labelling treads into product groups, for which the energy efficiency performance depends on how these products are incorporated in a wider system (e.g.: boilers), we do not consider that energy labelling is the best tool to provide information on the energy performance of that product. A focus on pure "plug and play" equipment seems most appropriate to us." Or "The energy label serves to inform layman customers about certain limited aspects. It is important to differentiate between Consumer Products that are generally sold directly to the customer without specialised and individual advice being part of the sales package (i.e. sales in shops of standardised products) and such products that are generally part of a wider service provision (i.e. installation services that comprise a product). Where a professional installer sells a service tailor made to the specific needs of the consumer, part of that service is the adequate selection of the product contained in that service. The professional installer is able to properly understand and interpret the technical specification of the product and does not need to draw on simplified colour codes that may ignore essential contextual information.



Furthermore, where the installer is involved the provision of labels can constitute additional burden, in particular if the label accompanying the product is not readily available or is lost. Manufacturers should ensure that such labels are readily available directly to installers.”

“In general, labelling should not be obligatory for industrial products/machines. Industry should have the possibility to choose if labelling is appropriate for a certain product on a voluntary basis. Labelling is appropriate for B2C but not for B2B. B2B clients are engineering experts, who have the knowledge to judge the product and its efficiency. If regulation is deemed necessary, minimum efficiency requirements are more appropriate for capital goods. If there are label obligations through a delegated act, a transitional time period for the introduction of the energy label prior to its initial coming into force would be useful (approx. 6 months). There is no clear statement on how long prior to coming into force of the energy label, it can be put on the machines. Market surveillances apply different timeframes, depending on what they think is appropriate for their country, which makes it more difficult for the manufacturers to cope adequately. Again, avoid double regulation by excluding products already covered by ecodesign requirements from any other ecodesign / labelling requirement.”

There was less explanation offered by those that supported labelling of not just consumer products, but some statements were:

“There is a good in principle case for the mandatory disclosure of energy performance of products, whether consumer products or not. The form this takes should be adapted to the audience. For consumer audiences, and with the EPBD in building markets, we have the A-G label, or adapted forms of it. The case for an A-G label for ventilation fans destined for the consumer market should be examined. Ditto the case for labelling ventilation fans destined for the commercial market, circulators in buildings, and electric pumps (all relevant to the commercial building context), although it should be examined whether and A-G label is appropriate or some other form of disclosing energy performance is more suitable for this context. The case for codifying the internationally agreed rating system for motors for the European context, and making it a requirement on manufacturers should be considered, similarly for EPS'.”

“The answer is based on the assumption that energy labelling can also be useful for commercial and industrial products. Furthermore, for PCs and servers an endorsement label is most suitable; and such a label already exists: the Energy Star label.”

**A 3** ***Has the correct level of ambition in product energy efficiency classification been set for the mandatory energy labels for the following product groups, taking into account economic technical potential, innovation and market developments? (long survey)***

Overall 24% of respondents said the ambition of the energy labelling classification was correct, 55% thought it was too low, 12% didn't know and no respondents said it was too high. Thus there is a clear majority of survey respondents that believe the ambition of the current labelling classification is not sufficiently ambitious. The response varied somewhat by stakeholder group: with 33% of industry and commercial respondents stating the ambition was correct, with 20% that it is too low or much too low and 47% that they didn't know; for government and civil servants, 39% said the ambition was correct, 45% that it is too low or much too low and 17% that they didn't know; for environment and consumer NGOs, 5% said the ambition was correct, with 95% responding it is too low or much too low and 0% saying they didn't know; lastly for other stakeholders, 20% said the ambition was correct, 60% said it is too low or much too low and 20% said they didn't know.

The responses to this question by labelled product group did reveal a small percentage of response that thought the classifications were too high for all products except TVs for which no one thought the classification was too high. In all cases, however, the ratio of too low to too high responses was greater than unity as follows:

<i>Product</i>	<i>Ratio of "too low" to "too high" responses</i>
TVs	Infinity
Room air conditioners	30.3
Domestic refrigerators	21.3
Domestic washing machines	20.8
Vacuum cleaners	12.1
Tumble driers	9.2
Ovens	7.6
Water heaters and hot water storage appliances	3.4
Boilers and combi boilers	2.7
Luminaires	1.6
Lamps	1.5

The survey respondents clearly believe ambition in the label classification is lacking for the products towards the upper end of this list in particular.

Statements made to support stakeholder views include:

"For the product groups with too low ambition there are several empty or rarely used classes at the bottom of the A-G scale and there is use for several classes above A (A+, A++ etc.)<sup>2</sup>

"The market development for TVs had been strongly underestimated. The label for white goods (fridges, washing machines..) is very confusing for the consumers (A as lowest class, A+++ already very well populated e.g. for washing machines) conventional fossil fuel boilers can reach a A rating, which gives a very wrong signal to the consumers."

"The addition of plusses (A+, A++ and A+++ ) for refrigerating appliances, washing machines, dishwasher, etc. is confusing for the consumers as worst products on the market get an A grade. Labels for heating products allow conventional fossil fuel products to get an A, which is confusing and insufficiently ambitious. The label for televisions has been quickly outplaced by market development. The label has been incorrectly set as classes that were planned for long-term (A+, A++) are in fact already populated. The A+++ class for washing machines is already substantially populated and therefore insufficiently ambitious. For washing machines and dishwashers producers the only purpose in innovation seems to be creating A+++ products regardless of the spin-drying efficiency class or the drying efficiency class or the water consumption. The label for air-conditioners allows poorly efficient small mobile air-co to get a good rating (A or better)."

"A short survey of the available products in high-street on-line stores for domestic appliances (Darty, Leroy Merlin) was made. When the lowest-cost products available on the market are rated as "A" or "A+", then we rated the ambition as "much too low". When the lowest-cost products available on the market are rated as "B" or "C", then we rated the ambition as "too low".

“Overall, we think that the classes with +s should have been avoided at least for products labelled for the first time. The + to +++ classes were aimed at giving room for future improvements but have been systematically populated even for products getting labelled for the first time. The requirements for the highest classes have not been enough ambitious. In the case of boilers and space heaters the adopted classification fails to stimulate product improvement and to give credit for efficient solutions due to the following reasons; all the classes are populated from the beginning, the A+++ that is already populated will only be shown in six years, the difference between classes above A are huge which can be a barrier for product improvement, energy efficiency (in percentage) is not indicated in the label.”

“The level of ambition should be assessed on the movement of the market. For new regulations this will become clear in a year or 4. For domestic appliances this level is good, a steady shift towards more efficient products is observed. For washing machines the ambition was good, but the regulation left too much room for changing the actual function of the product. A clothes line is a very efficient laundry dryer, but it doesn't fulfil the same need. It is therefore questionable if a washing machine with a program that takes 4 or 5 hours fulfils the requirements to the extent that it can be compared with other washing machines.”

**A 4b** *How effective are the EU energy labels, or are they expected to be, in reducing the energy consumption of new products placed on the market in the following product groups? (long survey)*

Across all labelled products 31% of survey respondents thought the labels were effective, 16% were neutral, 24% said they were ineffective and 27% said they don't know. No one answered that they were very effective and only 1% answered that they were very ineffective. The share of responses by option varied according to the type of stakeholder, with industrial and commercial stakeholders giving answers close to the overall average, government/public sector stakeholders tending to have a higher than average share of effective answers and environmental/consumer organisation stakeholders having a higher proportion of ineffective answers. It is clear many of those that answered that the label was ineffective were not disaffected with the policy instrument in general but were frustrated that it was not more effective than they perceive it to be due to perceived deficiencies in its design and implementation.

The responses by product group produced a similar rank order as for question A 3 as follows:

<i>Product</i>	<i>Ratio of "ineffective" to "effective" responses</i>
TV	1.9
Room air conditioners	1.2
Washing machines	1.1
Tumble driers	1.0
Domestic refrigerators	1.0
Tumble driers	0.9
luminaires	0.7
Vacuum cleaners	0.6
lamps	0.5
Ovens	0.4
Boilers and combi boilers	0.3
Water heaters and hot water storage appliances	0.2
<i>All (generic)</i>	<i>0.9</i>

Again these answers indicate there is most dissatisfaction with the effectiveness of the labelling of products towards the top of this list. The fact that correlates closely to the responses about the ambition of the energy label classifications suggests the relative satisfaction or dissatisfaction with the label effectiveness is closely related to the perceived adequacy of ambition of the requirements for products concerned.

Statements made to explain stakeholder views include:

"As for energy efficiency, manufacturers have developed series of products that are consuming less and less energy if you consider for instance the consumption per product cycle of a washing machine. The overall consumption in households is difficult to assess but should decrease consequently. When the size of the average appliances increases (e.g. washing machines) consumers use the appliance less frequently as the amount of laundry remains constant. As a result the overall consumption decreases. Recent consumer studies have confirmed this trend."

"The energy consumption of boilers and combi-boilers is largely determined by controls and these are only included in a limited way."

"Products with functions that have functions that are well-tailored to the need of consumers are less consuming when they become more efficient. Dish washer, lamps, etc. Products where this is not the case, refrigerators, televisions, this is not the case. A bigger television or refrigerator will be more efficient, but more consuming. The label is actively pushing the consumer, and the market, towards bigger, unsuited, appliances."

"Ecodesign requirements are so high, that worst energy classes are not used anyway."

"energy labelling is a major driver for producers to market their products: it improves R&D on energy efficiency and promotes better product policies"

"Labels are all about information, empowering EE choices for those motivated enough to consider those issues. Putting labels on new products has been shown to encourage suppliers to retire inefficient products from markets well before any consumer ever sees the label. The label allows a segment of the market to choose more efficient product. Labels however do not lock in energy savings like some other policies."

**AB 5** *Energy labelling currently focuses primarily on energy efficiency – as the rating and scale is based on an index of energy use per specific service/capacity unit, i.e. for example for televisions the power consumption per screen size expressed in W/dm<sup>2</sup> kWh/standard wash cycle. While energy consumption is also currently displayed on labels as a numeric (X kWh/year) value. What should be the focus in future? (long and short surveys)*

In response to this question in aggregate the responses were as follows:

- Only on energy efficiency, 10%
- Mainly on energy efficiency (existing focus), 34%
- On both energy efficiency and energy consumption, 39%
- Mainly on energy consumption, 9%
- Only on energy consumption, 4%
- Other: please specify, 3%

This suggests that the majority of those who completed the survey would prefer to focus on both energy efficiency and energy consumption but with a stronger focus on energy consumption than at present. As with other questions the proportion of responses varied by type of stakeholder with a greater proportion of industry and commerce stakeholders supporting the existing focus (48% compared to 34% for the whole set of stakeholders) and a greater proportion of other stakeholder types supporting a more equal focus on both energy efficiency and energy consumption (55% of government/public sector stakeholders, 68% of environment and consumer interest group stakeholders, and 75% of other stakeholders).

Statements made to explain stakeholder views include:

"Both groups are important because at least it enables consumer to see both efficiency and absolute consumption. However, I think that either efficiency should be recalculated (penalizing large products or the main emphasis should shift from efficiency to absolute consumption)."

"Consumption and EE can sometimes work in tandem – e.g. E\* v6 capping consumption for large TVs at not more than the energy standard for 50 inch screens but this is more for standards than for labelling. The Australian label provides an estimate of consumption and an EE scale as its effort at balancing these issues. The EU label carries a similar estimate. I would caution not changing your EE label too much because the range of assumptions to provide other than an average consumption figure will cause consternation. Having chosen to avoid this issue on past labels, it will be harder for you to make that change now; it will require significant political will and consumer education."

"Most consumer choice is based on cost. The labelling should give more emphasis on how much cost saving can be made by choosing a more efficient product."

"The labels should still include information on both, but the prominence should shift from efficiency towards consumption. This would further encourage consumers to save energy. It would also be simpler and more consistent with what most consumers probably believe the energy label rating is informing about (i.e. actual energy consumption of the product and not just technical efficiency)."

"As far as energy-related products such as windows are concerned, the focus can only be on energy efficiency as these products do not consume energy."

"Focus only on energy efficiency, but calculate and display this mandatory as specific energy use (= 1/efficiency) in order to: • prevent infinity issues when approaching zero-energy solutions and • enable easy accurate calculation of weighted values, for instance for package labels: which is currently not in place in e.g. Lot 1: it is using a physically incorrect inaccurate method in order to keep it easy for the installer."

“The current focus on energy efficiency is fine for us. As far as the energy consumption is concerned, we think that displaying it clearly makes sense for energy-using products, but that this is less obvious for energy-related products. We would therefore recommend that the decision whether to display energy consumption or not, should be made for each product group separately, based on the conclusions of the preparatory study.”

**A 6b** ***How effective has energy labelling been in leading to consumers taking greater account of energy use – as compared to price, size, design, functionality - in their product purchase decisions? (long survey)***

In response to this question in aggregate the responses were that 66% indicated it was effective or very effective, 5% that it was ineffective or very ineffective, 12% thought it neutral and 18% that they didn't know. This reveals that an overwhelming majority of the stakeholders who completed the questionnaire believe that the label has been effective in leading consumers to take greater account of energy use in their equipment purchase decisions. The responses to this question were quite consistent across the different stakeholder types.

Statements made to explain stakeholder views include:

“Effective on Household appliances, less effective on televisions.”

“For refrigerators, dishwashers, washing machines, television, it is effective in some cases. All classes of the population know more, however, only the richer can purchase the most energy saving appliance (even more since the economic/financial clash of 2008).”

“Buying decisions are naturally influenced by individual situations and the consumer's needs, while overall price considerations remain of significant importance”

“This is such a fundamental point that the European Commission should be carrying out detailed research.”

“According to CLASP's study “The New European Energy Label: Assessing Consumer Comprehension and Effectiveness as a Market Transformation Tool” when consumers were asked to mention up to seven criteria they would consider when purchasing a major household appliance, 53% of participants spontaneously mentioned energy, energy efficiency, or a closely related parameter. These aspects were included within the top two criteria by 30%. An interesting observation on this topic comes from academic research results presented at Business Strategy and the Environment 21(1), 60-70. According to the research, consumers attributed almost the same importance to price and energy efficiency when consulting a closed A-G scale. The importance they attributed to energy efficiency declined while the importance they attributed to the price increased when they had to consult the new “A plus” to G label”

“The energy labelling scheme has effectively raised the customers' awareness regarding the energy efficiency and energy use of products.”

**AB 12** ***To what extent do you agree or disagree with the following statements about the energy label: (long and short surveys)...***

*12a The product groupings for the label should be broader and not so technology specific, for example a label on refrigerators should cover all types of refrigerators without variation in label class ambition levels by individual technology type (refrigerator with fresh-food storing compartment, refrigerator-chiller, refrigerator with 1/2/3-star compartments, refrigerator-freezer etc.)*

Responses to this question were quite divergent with 40% agreeing or strongly agreeing, 46% disagreeing or strongly disagreeing and 14% neither agreeing nor disagreeing or entered as don't know. There were some systematic differences in the responses by type of stakeholder with 74% of industry and commerce stakeholders disagreeing or strongly disagreeing whereas a majority of the other stakeholder types agreed or strongly agreed.

*12b The information on the label is accurate and reliable*

Responses to this question were quite divergent with 40% agreeing or strongly agreeing, 20% disagreeing or strongly disagreeing and 34% neither agreeing nor disagreeing or entered; 5% responded don't know. There were some systematic differences in the responses by type of stakeholder with 65% of government and public sector stakeholders agreeing or strongly agreeing whereas 56% of consumer interest groups disagreed. Other stakeholder types tended to have a spread of responses distributed between these two positions.

*12c The information reflects real-life use of the product*

Responses to this question were again divergent with 24% agreeing or strongly agreeing, 34% disagreeing or strongly disagreeing and 36% neither agreeing nor disagreeing, with 7% entered as don't know. These responses by type of stakeholder also tended to be distributed similarly to the whole stakeholder sample except test laboratory respondents who disagreed 100% with the statement.

*12d Energy labels are usually displayed in appropriate places in retail stores and showrooms*

Responses to this question were reasonably convergent with 50% agreeing or strongly agreeing, 10% disagreeing or strongly disagreeing and 27% neither agreeing nor disagreeing or entered; 12% responded don't know. Consumer interest groups, researchers and individual retailers were most sceptical with 68%, 50% and 50% respectively disagreeing or strongly disagreeing.

*12e Energy labelling for distance selling (e.g. selling via internet) should be improved*

There was strong agreement on this topic with 62% agreeing or strongly agreeing, 0% disagreeing or strongly disagreeing and 38% neither agreeing nor disagreeing or entered as don't know. There were no systematic differences in the responses by type of stakeholder.

*12f It would make sense to allow for the use of QR-codes (see figure) in the label in order to display information about the product on the consumers' smartphones or on smart meters.*

Again there was broad agreement on this topic with 57% agreeing or strongly agreeing, 12% disagreeing or strongly disagreeing and 32% neither agreeing nor disagreeing or entered as don't know. There were few systematic differences in the responses by type of stakeholder with only a majority of market surveillance authority respondents disagreeing with the proposition.

*12g Energy labelling has led to lower production costs for manufacturers*

58% of responses were "don't know" to this question with most stakeholders admitting that they had no information on the topic. Of those that did express an opinion only 2% agreed or strongly agreed, 29% disagreeing or strongly disagreeing and 11% neither agreeing nor disagreeing. There were some systematic differences in the responses by type of stakeholder with 54% of industry and commerce stakeholders disagreeing or strongly disagreeing while other stakeholder types were much less likely to express a view on the statement.

*12h Energy labelling has led to improved profit margins on regulated products*

60% of responses were "don't know" to this question with most stakeholders admitting that they had no information on the topic. Of those that did express an opinion only 5% agreed or strongly agreed, 16% disagreeing or strongly disagreeing and 19% neither agreeing nor disagreeing. There were some systematic differences in the responses by type of stakeholder with 34% of industry and commerce stakeholders disagreeing or strongly disagreeing while other stakeholder types were less likely to express a view on the statement.

*12i Energy labelling has unduly restricted the range of products on the market*

Responses to this question were spread with 20% agreeing or strongly agreeing, 48% disagreeing or strongly disagreeing and 31% neither agreeing nor disagreeing or entered as don't know. There were some systematic differences in the responses by type of stakeholder with 26% of industry and commerce stakeholders disagreeing or strongly disagreeing whereas a much larger majority of the other stakeholder types (between 60 and 80% depending on the stakeholder type) held this view.

*12j Consumers prefer products with better label classes because they are interested in life cycle cost savings. It matters much less to them that a good label class also means a product which is better for the environment*

Again opinions are divided on this statement with 34% agreeing or strongly agreeing, 37% disagreeing or strongly disagreeing and 29% neither agreeing nor disagreeing or entered as don't know. There were some systematic differences in the responses by type of stakeholder with 60% of industry and commerce stakeholders agreeing or strongly agreeing whereas a majority of the consumer and environment interest groups and other stakeholder types disagreed or strongly disagreed. Government and public stakeholders were rather evenly divided on the statement.



Statements made in support of stakeholder views on the questions within question 12 include:

"Energy labels should display the energy efficiency of products with their functions. QR-codes and better information on internet sites would be great improvements. Most consumers look almost only at costs but a large minority also value environmental improvements"

"Please note that an omnibus regulation improving energy labelling for selling via the internet is being processed. Energy labels provide the possibility for manufacturers to compete (also) on efficiency and not only on price and performance. Manufacturers can ask a price premium for products with the highest energy class on the market. "

"The mandatory information on web shops must be restricted to what is really useful and necessary. And must be easier for retailers to obtain. In shops it is not always possible to place the label on the product. It is not practical on smaller televisions and it can harm the TV screen. The renewed directive must allow that labels may be placed for example near (the price tag of) the TV. The same goes for built-in appliances. It may be appropriate to display the Energy label inside or next to the appliance. "

"Keep it simple! In our opinion, it is not possible to integrate energy efficiency and life-cycle-cost in the same label. For some products it might work out, but for some products not."

"- a fair comparison between products is not possible if the range is not broader. Primary energy labels should be favoured in order to allow a true comparison of the products' environmental impact. - insufficient market surveillance and insufficient coherence to ecodesign standards don't allow to say that the information is always accurate and reliable - studies show that labels are often displayed incorrectly (e.g. in kitchen stores or for TVs) - online shops don't show often the whole label - labelling doesn't ban products, so it cannot restrict the range of products on the market "

"We support the provision of additional information in a comparable format but are concerned about the impact on the clarity of the energy label. A QR code may be an appropriate channel for some consumers, but further information should also be published in a format suitable for comparison sites and in leaflet form for those who want the information online or in-store but do not have access to a QR reader. Member States should take measures to improve online retail's compliance with existing energy labelling legislation and to improve the legislation to ensure it covers all online retailers and comparison sites. In 22 per cent of cases people go online to choose their appliance, yet research by the National Measurement Office found less than half of products offered online in the UK have an (accurate) energy label. Our research into the efficacy of the energy performance certificate\*\* found that the inclusion of environmental rating reduces clarity and comparability, and a strong consumer preference for inclusion of actual costs (even if they are estimated on the basis of average use). \*\*Consumer Focus (2011) Easy as EPC

"In order to allow transparent and fair comparability between products, energy labelling ratings should avoid as much as possible "correction factors", allowances, sub-categories and exceptions. In particular, for multi- energy product groups, primary energy labels should be favoured. At the moment, it is not possible to say that the information on the label is always accurate and reliable, due to the shortcomings of the classification (classes with too many plusses, empty classes at the bottom, etc.) and insufficient market surveillance. Information on the label does not always reflect real-life use of the products. Metrics and measurement methods tend to take more and more into account real-life use (e.g. washing machines) but progress is still possible Energy labels are not always displayed correctly in shops.

While it is generally acceptable for white goods, the situation is still bad for other product groups (e.g. televisions, air-conditioners) On-line shops still rarely display the full energy label, they only display partial or no information on the energy performance. Energy Labelling does not ban products from the market, so it has definitely not had any negative impact on the range of products on the market. A part of the consumers may be primarily interested in cost/price aspects, however the public awareness on energy and environmental issues is now widespread and most consumers know that saving energy is also good for the environment.”

## 5.2 Appropriateness of the Energy Label

### **B 1** *To what extent do you agree or disagree with the following statements regarding energy labels? (short survey)*

- *I / consumers feel more informed about product energy use since the introduction of the EU energy labels*  
 A vast majority of respondents felt consumers are more informed about product energy use since the introduction of the EU energy labels. The pattern of responses was roughly similar across consumers, retailers and manufacturers.
- *I / consumers understand the EU energy labels*  
 Most respondents believed that consumers understand the EU energy labels. The pattern of responses was roughly similar across consumers, retailers and manufacturers.
- *I / consumers understand the difference between the energy classes*  
 Most respondents thought that consumers understand the difference between energy classes. The pattern of responses was roughly similar across consumers, retailers and manufacturers.
- *The energy classes were set at ambitious levels*  
 While most respondents thought the levels were not set at ambitious enough levels, there was a diversity of opinions across groups: most consumers and retailers held the opinion that the levels were not ambitious enough, while most manufacturers deemed them ambitious.
- *I / consumers understand the difference between energy efficiency and energy consumption*  
 Most respondents held the view that consumers do not understand the difference between energy efficiency and energy consumption. While retailers and manufacturers clearly supported this view, consumer themselves were split in their responses.
- *EU energy labels have led to improvements in the energy efficiency of products on the market*  
 Most respondents believed the EU energy labels have led to improvements. The pattern of responses was roughly similar across consumers, retailers and manufacturers.
- *I / consumers use energy labels when making a product purchase decision*  
 Most respondents thought that consumers use the labels in their purchasing decisions. Consumer respondents held this view even more strongly than retailers and manufacturers.

**B 3** *Please rank the following aspects in their importance in a typical purchase decision for a labelled product, [1 most important, 7 least important, must number all]. (short survey)*

- Price
- Product design, style, colour, external dimensions
- Product with high energy efficiency
- Product with low environmental impact
- Product operating cost
- Size (capacity, output)
- Functionalities (extras such as a drink distributor or a fresh food compartment in a refrigerator)

Respondents felt the most important aspect to be considered in a typical purchase decision was clearly 'price', followed by 'high energy efficiency' (second in terms of people deeming it 'most important') 'operating cost'. 'Product design, style, colour, external dimensions' and 'size (capacity, output)' were deemed slightly less important, and 'low environmental impact' and 'functionalities' were considered the least important aspects.

**A 4a** *How effective are the EU energy labels, or are they expected to be, in improving the energy efficiency (energy use per specific service/capacity unit, i.e. for example X kWh/standard wash cycle) of new products placed on the market in the following product groups? (long survey)*

- *Overall, across all product groups*  
A very large number of respondents replied 'I don't know'. Of those who did have an opinion, respondents overwhelmingly deemed the labels 'effective' for products for which the label had been into force long enough, with the exceptions of televisions, air conditioners and electrical lamps (see more detailed comments below). Very few respondents thought they were 'very effective', 'neutral', 'ineffective' or 'very ineffective'. In their additional comments, respondents reinforced the idea that label had been an effective tool so far, not only in offering information for consumers but also as a competition tool for manufacturers. There was a perception that the labels could still be improved: respondents particularly noted the 'A+, A++ and A+++ classes' and the interaction with the Ecodesign Directive as areas for improvement. Some respondents thought it was too early to assess the effectiveness of some of the labels (e.g. for boilers and combi-boilers, water heaters and hot water storage appliances, vacuum cleaners and domestic ovens), and that market data was desirable for a proper effectiveness assessment.
- *Boilers and combi-boilers*  
A large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective', regardless of the respondent group they belonged to. Many respondents thought it was too early to assess the effectiveness of the labels.
- *Water heaters and hot water storage appliances*  
A large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective', regardless of the respondent group they belonged to. Many respondents thought it was too early to assess the effectiveness of the labels.

- *Televisions*

A non-negligible number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective', regardless of the respondent group they belonged to. There was a general view that the energy label was not the only factor responsible for the recent improvement in efficiency.
- *Room air conditioning appliances*

The majority of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective', regardless of the respondent group they belonged to. Environmental groups considered the label was more effective for split models than for mobile air-conditioners.
- *Domestic refrigerators and freezers*

A large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective' or 'very effective', regardless of the respondent group they belonged to.
- *Domestic washing machines*

A large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective' or 'very effective', regardless of the respondent group they belonged to.
- *Domestic dishwashers*

A large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective' or 'very effective', regardless of the respondent group they belonged to.
- *Domestic laundry dryers*

A large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective', regardless of the respondent group they belonged to.
- *Vacuum cleaners*

A large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective'. In their comments, there were diverging views as to the expected impact of the label, some expecting the labels to pull the market from a low starting efficiency point; others (mostly consumer groups and manufacturers) criticising the label on the grounds of 'too complex to understand', and 'formulas and testing of models do not reflect real life conditions', respectively; and yet some others thought it was too early to know.
- *Electrical lamps (part of 'electrical lamps and luminaires')*

A large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'neutral' or 'effective'. Environmental groups doubted the label had been a real drive in increasing the market share of CFLs and LEDs.
- *Domestic ovens*

A very large number of respondents replied 'I don't know'. Those who did have an opinion mostly deemed the labels 'effective'. Consumer IGs, environmental IGs and some energy agencies and manufacturers thought the new label for ovens might not be effective, but that it was too early to assess.

**A 4c** ***Some labels also provide information on other product-specific parameters. Please rate the overall effectiveness of energy labels in improving the following parameters for new products: (long survey)***

- *Noise (for Washing Machines and Dishwashers)*  
A large number of participants replied 'I don't know'. Those with an opinion largely thought the information provided was effective or very effective.
- *Water use (for Washing Machines and Dishwashers)*  
A non-negligible part of respondents replied 'I don't know'. Those with an opinion overwhelmingly found the information provided effective or very effective.
- *Capacity/Size*  
A large number of participants replied 'I don't know'. Those with an opinion largely thought the information provided was effective or very effective.
- *Product specific output efficiency (for example spin drying efficiency class)*  
A large number of participants replied 'I don't know'. Those with an opinion largely thought the information provided was effective or very effective.

There was a wide range of views as to the amount of information to be included in the label. Many respondents thought the information provided is beneficial to consumers, but warned against an overload of information, for two reasons: a) it might be harder for consumers to understand the labels; and b) it might slow down the regulatory process. Respondents who made specific comments about these product-specific parameters were in general more supportive of the water use and noise information than they were of information on capacity/size and product-specific output efficiency. Many respondents believed more consumer research was needed in order to properly assess the effectiveness of the information.

**B 4c** ***Labels also provide information on other product specific parameters. Please rate the overall usefulness of this information: (short survey)***

- *Noise (for Washing Machines and Dishwashers)*  
The vast majority of respondents across all groups deemed the information 'very useful' or 'useful'. Very few respondents were negative or responded 'I don't know'.
- *Water use (for Washing Machines and Dishwashers)*  
An overwhelming majority of respondents across all groups deemed the information 'very useful'. Very few respondents were negative or responded 'I don't know'.
- *Capacity / Size*  
The majority of respondents across all groups deemed the information 'useful' or 'very useful'. Few respondents were negative or responded 'I don't know'.
- *Product specific output efficiency (i.e. spin-drying efficiency class)*  
The majority of respondents across all groups deemed the information 'useful' or 'very useful'. Few respondents were negative or responded 'I don't know'.

**A 6a** ***How effective has energy labelling been in increasing the proportion of consumers that are informed about product energy use? (long survey)***

A strong majority of respondents across all groups thought energy labelling had been 'effective' in this respect, with those deeming energy labelling 'very effective' coming next. Very few respondents were neutral or negative on this point, or replied 'I don't know'.

Many respondents believed that energy labelling has increased awareness about 'energy efficiency' or 'energy aspects' of products, but few mentioned 'energy use' in particular. Some exceptions were lamps, for which many environmental interest groups considered that the 'label printed on the back of the products was probably being overlooked by consumers'; and boilers, combi-boilers, water heaters and hot-water storage appliances, for which it was deemed to early to assess the effectiveness of the labels. The two most common comments were a) increased awareness did not necessarily translate into better purchasing decisions; and b) awareness raising worked much better where there had been information campaign, retailer trainings, and tax incentives.

**A 6b** ***How effective has energy labelling been in leading to consumers taking greater account of energy use – as compared to price, size, design, functionality - in their product purchase decisions? (long survey)***

Most respondents across all groups believed that energy labelling has been 'effective' or 'very effective' in this respect. A small part of respondents felt 'neutral' on this point, or replied 'I don't know'. Very few respondents deemed the energy label 'ineffective' or 'very ineffective'.

Respondents considered that energy use was an important factor in purchasing decisions, and pointed to a wealth of research on these issues. There were two main caveats to this: a) while energy labels might play a role in this trend, there are other factors (e.g. rising of energy prices) responsible for it; b) there are personal circumstances and needs influencing purchasing decisions, which make price still be THE key criteria. Respondents believed that consumers are more likely to consider energy use for products with long life cycles and/or which consumed large amounts of energy (fridges, washing machines, dishwashers, boilers) than for other products (e.g. televisions or electronics)

**AB 7a** ***What do you think of the following statements regarding the effectiveness of the scale of the EU energy label: (long and short surveys)***

- *Consumers understand the current (A-G) + 3 (A+++, A++, A+) class system (long survey)*  
There was a wide range of views on this topic. Generally speaking, government bodies and industry groups held the view that the system was understood, whereas consumer and environmental interest groups held the opposite view. It is noteworthy that, of those disagreeing with the statement, all of them 'strongly disagreed'.
- *I understand the current (A-G) + 3 (A+++, A++, A+) class system (short survey)*  
A majority of respondents considered they understood the current label system. Some respondents were neutral or disagreed with the statement. No respondent replied 'I don't know'
- *An A-G class scale is easier to understand than the A+++-D class scale*  
A very large majority of respondents across all groups agreed to some degree with the statement, most of them 'strongly' agreeing with it.

- *Current energy label classes provide a clear and useful differentiation of product energy efficiency*  
There was a wide range of views on the topic. Generally speaking, government bodies and industry groups agreed, whereas respondents from consumer and environmental interest groups held the opposite view, most of them 'strongly' disagreeing with the statement. The responses from individual consumers were wide-ranging. Very few respondents replied 'I don't know'.
- *Classes are coherent with Ecodesign minimum requirements*  
A vast majority of respondents across respondent groups strongly disagreed with the statement. Most of those who agreed were industry interest groups and individual manufacturers.
- *The current classifications need to be changed*  
A vast majority of respondents across respondent groups strongly agreed with the statement. Most of those who disagreed were industry interest groups and individual manufacturers.
- *Consumers understand the seasonal and regional information provided in the energy label on air-conditioners*  
The majority of respondents replied 'I don't know'. Those who had an opinion mostly 'strongly disagreed' with the statement.

**AB 7b**                    ***What do you think of the following potential improvement options for the A-G, A+++ scale of the energy label: (long and short surveys)***

- *Adding further + classes, for example A++++*  
An overwhelming majority of respondents across all respondent groups disagreed with this option to some degree.
- *Re-setting all classes to an A-G scale*  
A vast majority of respondents agreed with this option. However manufacturers (both respondents from interests groups and from individual companies) and retailers (both respondents from interests groups and from individual companies) did not hold a clear view on the issue, their answers being widely ranging from 'Strongly agree' to 'Strongly disagree'. The only two respondents from Intergovernmental organisation disagreed.
- *Re-setting all classes to an A-G scale with an overlap in the market between old 'A' and new 'A' label*  
A vast majority of respondents disagreed to some extent with this option. Most of the 'strongly disagree' responses came from industry and consumer interest groups.
- *Re-setting all classes to an A-G scale with a dated (year) reference on the label*  
While the response 'agree' was the preferred one, the replies were broadly spread from 'Strongly disagree' to 'Strongly agree'. Energy agencies, government bodies, consumers (both individually and their interest groups) and environmental interest groups tended to agree with this option more than manufacturers and retailers, who both had more diverging views. Respondents from surveillance bodies and test laboratories mostly disagreed; however the low number of responses from these groups make it difficult to extract solid conclusions.

- Re-setting all classes to a 1-7 scale that takes over from A-G, in order to avoid overlap in the market between 'new' and 'old' A classes if the A-G scale was retained but rescaled*  
Most respondents across all groups disagreed to some extent with this option.
- Introducing an A-'X' label with less than 7 classes*  
Most respondents groups disagreed to some extent with this option. The only two respondents from test laboratories agreed with it.
- Introducing a dynamic class rating system, which automatically adjusts over time*  
There was not a general pattern of responses for this option. In general, energy agencies, environmental interest groups and consumers tended to agree with this option to some degree, whereas retailers and manufacturers tended to disagree to some degree. It is noteworthy that many respondents 'strongly' agreed or disagreed with this option.
- Moving to an open ended scale*  
This was the least-well understood option, judging from the fact that 'I don't know' was the preferred response. Those who did have an opinion mostly disagreed with this option to some extent, except for respondents from industry interest groups who mostly agreed with it.
- Removing or indicating on the label the energy classes that are empty of products*  
The majority of respondents supported this option to some degree, but clearly energy agencies, consumers (both individually and their interest groups) and environmental groups were more supportive than government bodies, industry and retailers, who tended to have a wider range of responses.
- The steps of the scale should be allowed to disregard life cycle cost savings to the consumer, meaning that a product with a better label class would be certain to save energy in the use phase, but could be so expensive to buy that it would not bring overall cost savings*  
While an important number of respondents replied 'agree' or 'strongly agree', the responses varied across groups: consumer interest groups disagreed with this option, environmental interest groups and energy agencies 'strongly agreed' with it, whereas for the rest of respondent groups it was difficult to identify a clear response pattern.
- Removing the entire labelling system*  
An overwhelming majority of respondents across all groups strongly disagreed with this option.
- Other, please specify*  
There were more principles (see section just below) than specific proposals. Among the concrete ideas, some respondents suggested that the label should include yearly benchmarks to indicate the best and worst performing products on a given year. Alternatively, an information system including an 'app' that would provide this and other information could be envisaged. At least two respondents mentioned that the label should more clearly address energy use rather than energy efficiency, but did not provide concrete solutions. A respondent mentioned that the label should follow a 'toprunner' approach, without elaborating further.



Respondents from all groups provided extensive comments. Across the board, they strongly felt that a) the energy label system should not be removed; and b) any solution to the EU energy label needs to be based on credible and robust consumer research. There were also multiple comments as to the need for dynamic and flexible labels that reflect product-specific market evolution and technology development, while at the same time avoiding as much as possible the frequency of rescaling or other changes. Rescaling too often increases administrative burden and costs and can be confusing to consumers. Some consumer interest groups felt that adding too much information to the label could clutter it, and that any solution other than an A-G scale was undesirable.

**AB 9a**            ***How has the Energy Labelling Directive affected, or is expected to affect, the prices of the following regulated products, compared to how they might otherwise have been? (long and short surveys)***

- *Overall, across all product groups*  
The preferred responses were 'I don't know' and 'prices have not been impacted'. All of the remaining respondents thought prices were higher..
- *Boilers and combi-boilers*  
The preferred responses were 'I don't know' and 'prices have not been impacted'. Most of the remaining respondents thought prices were higher.
- *Water heaters and hot water storage appliances*  
The preferred responses were 'I don't know' and 'prices have not been impacted'. Most of the remaining respondents thought prices were higher.
- *Televisions*  
The preferred response was 'prices have not been impacted', with a non-negligible part of respondents replying 'I don't know'.
- *Room air conditioning appliances*  
The preferred responses were 'I don't know' and 'prices have not been impacted'. All of the remaining respondents thought prices were higher or much higher.
- *Domestic refrigerators and freezers*  
The preferred responses were 'I don't know' and 'prices have not been impacted'. All of the remaining respondents thought prices were higher or much higher.
- *Domestic washing machines*  
The preferred responses were 'I don't know' and 'prices have not been impacted'. All of the remaining respondents thought prices were higher.
- *Domestic dishwashers*  
The preferred responses were 'I don't know' and 'prices have not been impacted'. All of the remaining respondents thought prices were higher or much higher.

- *Domestic laundry dryers*  
The preferred response was 'I don't know'. Of those who did have an opinion, there was a wide range of responses: generally speaking, consumer IGs thought prices were lower, industry IGs thought they were higher, and the others were neutral about it.
- *Vacuum cleaners*  
The preferred responses were 'I don't know' and 'prices have not been impacted'. All of the remaining respondents thought prices were higher or much higher.
- *Electrical lamps (part of 'electrical lamps and luminaires')*  
The preferred response was 'prices are higher', followed by 'I don't know'. No respondent thought that process were lower or much lower.
- *Luminaires (part of 'electrical lamps and luminaires')*  
Most respondents replied 'I don't know'. The rest of opinions were spread between 'much higher' and 'higher' (mostly responses from industry IGs) and neutral (the remainder of respondents).
- *Domestic ovens*  
The preferred response was 'prices are higher', followed by 'I don't know'. No respondent thought that process were lower or much lower.

There was a general impression across respondents that the energy efficiency of products tends to increase over time while real prices steadily decline, but that real market data and research would be needed to assess the veracity of those impressions. These trends were not necessarily deemed a consequence of energy labelling, which was seen to have a smaller impact than e.g. Ecodesign measures. Energy labelling was regarded as only affecting products in the top energy class(es), for which many respondents believed it drives prices up for a limited period of time (until newer, more efficient products appear on markets). Some respondents believed that it was however too early to assess the impact for products for which the labels had just entered into force or had not yet entered into force (e.g. boilers and combi-boilers, water heaters and water storage appliances, vacuum cleaners and domestic ovens). Many manufacturers declined to comment on price issues.

**AB 9b**      ***To what extent do you agree or disagree 'that a higher energy label class ranking results, or will result, in a price premium for better performing products': (long and short surveys)***

- *Overall, across all product groups*  
The preferred responses were 'Don't know' and 'neither agree nor disagree'. Of the remaining respondents, most of them agreed to some degree with the statement, manufacturers, retailers and government bodies being even more positive than other respondent groups on this issue.
- *Boilers and combi-boilers*  
The preferred response was 'Don't know'. Of the remaining respondents, most of them agreed to some degree with the statement, manufacturers and retailers being even more positive than other respondent groups on this issue.

- *Water heaters and hot water storage appliances*  
The preferred response was 'Don't know'. Of the remaining respondents, most of them agreed to some degree with the statement, manufacturers and retailers being even more positive than other respondent groups on this issue.
- *Televisions*  
There was a wide range of responses on this issue. The only clear pattern of responses is that environmental interest groups at large disagreed with the statement.
- *Room air conditioning appliances*  
Respondents across all groups agreed to some extent with the statement.
- *Domestic refrigerators and freezers*  
Respondents across all groups agreed to some extent with the statement.
- *Domestic washing machines*  
Respondents across all groups agreed to some extent with the statement.
- *Domestic dishwashers*  
Respondents across all groups agreed to some extent with the statement.
- *Domestic laundry dryers*  
Respondents across all groups agreed to some extent with the statement.
- *Vacuum cleaners*  
The majority of respondents replied 'I don't know'. Of the remaining respondents, there was a slight leaning towards agreeing rather than disagreeing with the statement, without clear differences among respondent groups.
- *Electrical lamps (part of 'electrical lamps and luminaires')*  
The preferred responses were 'Don't know' and 'neither agree nor disagree'. Of the remaining respondents, there was a slight leaning towards agreeing rather than disagreeing with the statement, without clear differences among respondent groups.
- *Luminaires (part of 'electrical lamps and luminaires')*  
The preferred response was 'Don't know'. Of the remaining respondents, there was a slight leaning towards agreeing rather than disagreeing with the statement, without clear differences among respondent groups.
- *Domestic ovens*  
The preferred responses were 'Don't know' and 'neither agree nor disagree'. Of the remaining respondents, there was a slight leaning towards agreeing rather than disagreeing with the statement, without clear differences among respondent groups.

Many respondents across different groups believed that the correlation between high energy class and higher prices needs to be evaluated on a product-by-product basis: while for some products such as white appliances, such correlation exists according to respondents; for others such as electronics, IT equipment, and particularly televisions, there is no clear correlation and the price depended on other factors of interest to consumers. Many respondents believed that it was however too early to assess the impact for products for which the labels had just entered into force or had not yet entered into force (e.g. boilers and combi-boilers, water heaters and water storage appliances, vacuum cleaners and domestic ovens). Many manufacturers declined to comment on price issues.

**AB 13a For Energy Labelling, should additional information be displayed on the label on: (long and short surveys)**

- Other environmental aspects (e.g. CO2 emissions)*

There was a wide range of views on the issue: Government bodies and environmental interest groups favoured this additional information 'as a piece of information additional to the label class scale'. Individual consumers mostly thought that 'it should form part of the scoring for the product's label class'. Manufacturers, retailers, intergovernmental governments and consumer interest groups replied mostly 'no'.
- Whole product life cycle energy consumption*

There was a wide range of views on the issue: environmental interest groups favoured this additional information 'as a piece of information additional to the label class scale'. Individual consumers mostly thought that 'it should form part of the scoring for the product's label class'. Manufacturers, retailers, and consumer interest groups replied mostly 'no'. Government bodies and energy agencies replied mostly 'no, but the information should be available on product fiches, QR codes or other mechanisms', as did a non-negligible part of respondents across different groups.
- Whole product life cycle resource efficiency*

There was a wide range of views on the issue: environmental interest groups favoured this additional information as 'a piece of information additional to the label class scale'. Individual consumers mostly believed this information should be included in the label, either as 'a piece of information additional to the label class scale', or as 'part of the scoring for the product's label class'. Energy agencies, government bodies, surveillance bodies, intergovernmental organizations, manufacturers, retailers, and consumer interest groups replied mostly 'no', or 'no, but the information should be available on product fiches, QR codes or other mechanisms'
- Annual running costs (the costs of operating the product)*

There was a wide range of views on the issue: consumer and environmental interest groups favoured this additional information mostly as 'a piece of information additional to the label class scale'. Manufacturers (both individual manufacturers and their interest groups) replied mostly 'no'. For other groups the wide range of responses does not allow for relevant conclusions.

- *Expected product life*

There was a wide range of views on the issue: consumer and environmental interest groups favoured this additional information as 'a piece of information additional to the label class scale'. Individual consumers mostly believed this information should be included in the label, either as 'a piece of information additional to the label class scale', or as 'part of the scoring for the product's label class'. Individual manufacturers had diverging views on this point, but industry interest groups and retailers replied mostly 'no'. For other groups the breadth of responses does not allow for relevant conclusions.

A respondent suggested including 'working conditions of employees, social and trade union rights, and fairness of business-to-business trade relations' to the label. Many environmental interest groups considered that the recyclability/reparability and some toxic components present in products could also be included in the label. Two respondents suggested that information on whether CO<sub>2</sub> is emitted at the point-of-use (e.g. for gas boilers) or not (electric appliances).

Most respondents across all groups regard the simplicity of the label as one of its strengths, and suggest keeping the label as simple as possible for several reasons:

- *To avoid confusing consumers with too many —potentially conflicting— messages (e.g. high energy class but low resource efficiency).*
- *Additional information would mean increased administrative burden and costs for manufacturers, retailers and policy-making bodies. It would make market surveillance more expensive and complicated.*
- *For CO<sub>2</sub> emissions and annual running costs, different national CO<sub>2</sub> factors and energy prices make it very complicated to include the info on the label.*

According to respondents, the decision of what additional information to include and in what format should be made case-by-case for each product groups. Information should be on aspects 'highly relevant' to the consumers purchasing decisions (according to some consumers interest groups), have a high environmental impact (according to environmental interest groups), and possible to measure and enforce based on existing, robust methodologies.

**AB 13b**      ***To what extent do you agree or disagree with the following statements on the inclusion of additional information on the energy label: (long and short surveys)***

- *Two separate labels should exist, one for energy consumption and the second one for other environmental aspects*

Respondents across all groups disagreed to some extent with the statement. Most manufacturers strongly disagreed with it.

- *One single label should exist, including both energy consumption and other significant environmental aspects*

Generally speaking, energy agencies and consumer and environmental interest groups agreed with the statement, whereas manufacturers (both companies and interest groups) disagreed with it to some degree. For other groups either there was not a clear pattern of responses, or the low number of responses did not allow the drawing of relevant conclusions.

- *Information on other environmental impacts should be provided on mandatory basis*  
 Generally speaking, manufacturers (both companies and interest groups), retailers (both individual companies and interest groups), and consumer interest groups disagreed with the statement, manufacturers feeling particularly strongly about it. Most individual consumers and respondents from environmental interest groups agreed with the statement, as did government bodies and research centres. For other groups either there was not a clear pattern of responses, or the low number of responses did not allow the drawing of relevant conclusions.
- *Information on other environmental impacts should be provided on a voluntary basis.*  
 Respondents across all groups disagreed to some extent with the statement. The disagreement was particularly strong from manufacturers.
- *Information on other environmental impacts should be provided in absolute terms (not in comparison with a benchmark or an index value)*  
 A large number of respondents replied 'Neither agree nor disagree'. The only clear response pattern were from manufacturers, who mostly 'strongly disagreed' with the statement; and from test laboratories, who 'agreed' with the statement.

Most respondents stressed the points made in their responses to the previous question (13a), namely that the label should be kept as simple as possible in order to reduce costs and administrative burden and ensure consumer understanding of the label.

Respondents across all groups warned against a 'proliferation' of labels, symbols and values on the label, and pointed out to already existing, alternative tools to account for and provide information on other environmental aspects: the Ecolabel, the Ecodesign Directive, product fiches and environmental product declarations. Some respondents believed it was 'too early' to respond to these questions, and suggested more research was needed. Regarding the question about absolute values for environmental impacts, most respondents considered the decision should be made on a case-by-case basis. Many respondents across different groups considered that a relative scale was simpler for consumers to understand. Some respondents suggested that information provided on absolute terms might still need to be complemented with some sort of relative scale or classes to help consumers understanding.

**AB 14**      ***Some products that are labelled are required to have fiches. Fiches are technical information presented within any product brochures accompanying the labelled product and provide standard information on specific parameters relating to the product (e.g. annual water consumption for dishwashers). What do you think of the following changes to fiches? (long survey)***

- *Adding information on other environmental aspects*  
 Most respondent groups deemed the suggested change positive, and in particular individual consumers, energy agencies and environmental interest groups at large deemed it 'very positive'. Most manufacturers (both interest groups and individual companies) thought it was 'very negative'.
- *Adding information on annual running costs (the costs of operating the product)*  
 There was a very wide range of opinions on the issue. The clearest response patterns were: individual consumers, research centres, surveillance bodies and environmental interest groups mostly consider the suggested change 'positive' or 'very positive'; and most manufacturers (both interest groups and individual companies) thought it was 'very negative'.

- *Adding information focused on business - to- business customers*  
A majority of respondents replied 'I don't know' or 'neutral'. Of the remaining respondents, it is noteworthy that most manufacturers (both interest groups and individual companies) thought it was 'very negative'.
- *Providing fiches online on a mandatory basis on all labelled products*  
A large majority of respondents across groups deemed the suggested change 'very positive' or 'positive'.
- *Providing fiches online on a mandatory basis on selected products that are not labelled*  
There was a wide range of opinions on the issue. Individual consumers energy agencies, test laboratories, research centres and consumer and environmental interest groups mostly consider the suggested change 'positive' or 'very positive'; most manufacturers (both interest groups and individual companies) thought it was 'very negative' or 'negative'.
- *Providing fiches as QR (bar) codes to labels to enable consumers to quickly access more detailed information on their smartphones (see picture)*  
A large majority of respondents across groups deemed the suggested change 'very positive' or 'positive'.
- *Removing the requirement for product fiches*  
Most respondents deemed the suggested change 'negative' or 'very negative'. Manufacturers interest groups were largely split on this issue, as were individual manufacturer companies.

Most respondents would see value in greater harmonisation of requirements on product fiches. According to some environmental interest groups, the labels should be 'regulated at the EU level', 'standardised', and 'dematerialised', suggestions that echoed other respondents' opinion on the issue. Regarding the inclusion of annual running costs, the issues of country- and time-specific prices were raised, however some participant pointed out that, with online fiches, these obstacles would be surmountable with appropriate software. Regarding QR codes, there was agreement that requiring them online was a good idea, however consumer interest groups would like to see paper fiches *and* online fiches (to ensure all consumers have access to them), whereas industry groups would mostly like to see paper fiches *or* online fiches (to reduce administrative burden).

**B 14x**      ***Some products that are labelled are required to have fiches (see example in figure) Fiches are technical information presented within any product brochures accompanying the labelled product and provide standard information on specific parameters relating to the product (e.g. annual water consumption for dishwashers). Have you ever seen and used a fiche? (short survey)***

Consumers were split exactly half and half between 'yes' and 'no', with a small minority responding 'Don't know'

**B 14xx**      ***Do consumers find fiches useful? (short survey)***

While most consumers considered fiches 'useful' or 'very useful', retailers were largely split on the issue, with no clear response pattern.

**B 14**            ***What do you think of the following changes to fiches? (short survey)***

**AB 15**            ***Energy use by appliances is determined partly by consumer behaviour. For example, frequent opening of a fridge will lead to an increased energy use, regardless of the energy label. A smart appliance could provide feedback to the user, after observing the user's behaviour with the appliance in the user's home, as to how his behaviour affects the energy performance of the appliance. Would you welcome the introduction of such an advanced and IT-supported form of energy labelling? (long and short surveys)***

Although the majority of respondents would welcome the introduction of such measures, there was a range of views on this point: surveillance bodies, consumer interest groups (but not individual consumers) and retailer industry groups were unsupportive of such form of energy-labelling, whereas energy agencies, government bodies, test laboratories, environmental interest groups and manufacturers (both individual manufacturers and interest groups) mostly supported the idea.

While generally respondents supported appliances that provide feedback to the user on their energy use, it was not clear to respondents how this would be linked to energy labelling. A respondent mentioned that the question was not clear, since consumers take the energy labelling into consideration before purchasing and not after product purchase. Many others questioned the existence of a clear definition for the term 'smart'.

For appliances that provide feedback, many respondents were wary of both increased manufacturing (and in turn purchasing) costs, and of increased energy consumption of the monitoring system or devices. Some respondents suggested however some IT-based labelling improvements: 'An electronic label could be more easily and quickly updated, adjusted to national or regional conditions. It could show best and worst performers on the market or in a particular shop. The label could become more individualised: it could show the best products according to specific user needs or usage patterns (provided through a form or based on observed feed-back).', according to a popular response from environmental interest groups, an energy agency and another respondent.



## 6 Effectiveness regulatory process

### 6.1 Current procedures

**29. Please rate the effectiveness of the following phases in the legislative procedure for laying down Energy Labelling and Ecodesign requirements for products? Effectiveness in the procedure relates to achieving useful results in a timely manner.**

- *Working Plan*  
35/114 of the respondents indicated that the process is ineffective or very ineffective, 46/114 rated the effectiveness as neutral, while 11/114 respondents were positive about the effectiveness. 22/114 were undecided. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Consumer groups indicated the working plan to be very effective, on average being more positive than other respondent groups. Also government bodies also were more positive about the effectiveness than other stakeholder groups. Businesses, or manufacturer groups, retailer groups, individual manufacturers and individual retailers, are on average neutral about the effectiveness of the working plan. Environmental groups and energy agencies were also more neutrally oriented. One surveillance body, some environmental groups and industry groups indicated the working plan was ineffective or very ineffective.
- *Preparatory study*  
48/112 of the respondents indicated that the process is ineffective or very ineffective, 15/112 rated the effectiveness as neutral, while 27/112 respondents were positive about the effectiveness. 22/112 were undecided. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Industry groups, individual manufacturers, environmental organisations and energy agencies on average rate the preparatory study as ineffective. Other stakeholders, including government bodies and intergovernmental organisations are more positive about the preparatory study.
- *Consultation Forum*  
10/112 of the respondents indicated that the process is ineffective or very ineffective, 8/112 rated the effectiveness as neutral, while 73/112 respondents were positive about the effectiveness. 21/112 were undecided. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Most stakeholders agree that the consultation forum is an effective part of the rulemaking process. Some criticism was heard from individual manufacturers and intergovernmental organisations.

- *Impact assessment and draft regulation*  
29/110 of the respondents indicated that the process is ineffective or very ineffective, 33/110 rated the effectiveness as neutral, while 26/110 respondents were positive about the effectiveness. 22/110 were undecided. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Government bodies, intergovernmental organisations and consumer organisations are positive about the effectiveness, Industry groups on average are more neutral, whereas individual manufacturers and energy agencies are more critical on the effectiveness of the impact assessment and draft regulation.
- *Member State expert group on labelling*  
10/111 of the respondents indicated that the process is ineffective or very ineffective, 33/111 rated the effectiveness as neutral, while 38/111 respondents were positive about the effectiveness. 30/111 were undecided. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Government bodies, intergovernmental organisations and industry groups and consumer groups are on average positive about the effectiveness of this step. Individual manufacturers and energy agencies are neutral about the effectiveness.
- *Regulatory Committee vote*  
The Regulatory Committee vote is judged as effective by most respondents. 4/110 of the respondents indicated that the process is ineffective or very ineffective, 21/110 rated the effectiveness as neutral, while 63/110 respondents were positive about the effectiveness. 22/110 were undecided. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. On average, most stakeholder groups have rated this step of the process as effective. A small part of the individual manufacturers were less positive about the effectiveness.
- *WTO notification process (neutral)*  
5/110 of the respondents indicated that the process is ineffective or very ineffective, 45/110 rated the effectiveness as neutral, while 33/110 respondents were positive about the effectiveness. 23/110 were undecided. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. On average, all stakeholder groups were neutral to positive about the effectiveness of this step of the process.
- *Scrutiny/Objection by European Parliament and Council*  
6/112 of the respondents indicated that the process is ineffective or very ineffective, 54/112 rated the effectiveness as neutral, while 22/112 respondents were positive about the effectiveness. 30/112 were undecided. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Consumer groups are positive about the effectiveness of this step of the process. Other stakeholder are on average neutral about the effectiveness. All stakeholders that rated the step as ineffective are from manufacturers or industry groups.

In the following the free text clarifications made by the different stakeholder groups are summarised. The following comments have been made by different stakeholder types and appear to reflect broadly supported opinions:

- Transparency of the process should be improved. One retailer organisation noted that *"some experts who have participated in the meetings do not have the feeling that decisions are taken during that time."* Another stakeholder noted that clear timelines are crucial as this is *"stakeholders and particularly stakeholders with very limited resources such as civil society organisations should identify the most relevant issues and allocate their resources."* Stakeholders in different stakeholder groups indicated that one way to improve transparency would be to communicate the impact assessment findings to all stakeholder groups.
- Preparatory study quality greatly varies among different product groups. Preparatory studies should provide the basis on which the discussions in the next phases can be based. In many cases gathering of more knowledge and data was needed, which led to a long process after finalising the preparatory study. One industry stakeholder noted that *"In the preparatory stage, studies should look at real products, not academic research"*. One industry group stakeholder indicated that preparatory study quality could be improved by *"a better focus on the quality of the stakeholder questionnaires and sufficient timelines being given to stakeholders to answer."*
- The Comitology procedure for Ecodesign is considered by many to be more effective than the process for energy labelling. Some stakeholder groups advocate the use of Comitology also for energy labelling. One stakeholder (category "other") mentioned that *"the transition from regulatory committee voting to member state expert group has the potential to undermine the effectiveness of energy labelling and Ecodesign"*

#### Energy agencies

- *The working plan should cover ecodesign and energy labelling*
- *Impact assessment studies sometimes seem to be biased documents just aiming at supporting already made decisions on the level of requirements*

#### Government bodies other than an energy agency or a surveillance body

- *Impact assessments are not useful as they are not available before the publication of the measure in the Official Journal.*

#### Intergovernmental organisation (incl. multilateral banks)

- *The process should be shortened.*
- *The process for alignment with standardisation organisations in effecting and respecting standards does not work well due to late changes in principles and lack of collaboration between Commission and standards working groups. Also, test standards sometimes fail to reflect the real life user conditions*
- *Ecodesign and Energy Labelling implementing Regulations (if both apply to a product group) should be adopted and published on the same day, as for space and water heaters.*

#### I work for a research institute or consultancy

- *There have been undesirable delays in producing the ecodesign working plan.*

## Other

- *Preparatory studies should not neglect impacts other than in use energy consumption.*
- *Indirect costs (e.g. costs to modify buildings to replace electrical water heaters by heat-pumps or gas boilers) are not sufficiently taken into account in the impact assessment.*
- *Too few product groups were selected in the working plan.*
- *The Member State expert group on labelling was slow and weakened the requirements too much.*
- *One stakeholder noted that the process should be shortened. Another noted that some implementing measures require more time than other depending on e.g. complexity of the product. The process should allocate sufficient time to ensure effective regulations are made.*

## Consumer interest groups

- *The largest problem for consumers is that requirements for the different product groups (What is the best rate: A+++, A++, A?) are different and change at different times. A better coordination of time and requirements for the different products would be helpful*

## Environmental interest groups

- *Labelling discussions should be shortened*

## Industry interest groups

- *In general, the project management should be improved in a way that would target only as many lots as manageable under the given resources and would avoid cutting necessary compliance deadlines for industry where time delays occurred at earlier stages of preparing the implementing measure. This would help to improve the legal certainty and the relevance of concluded study findings for final implementing measures.*
- *Do not include other environmental aspects in the review process of the regulations.*
- *Making better use of standardisation already at the preparatory study phase (synchronisation of the developments of standards tests and the adoption of implementing measures).*
- *The regulation should be based as much as possible on existing standards.*
- *Standards sometimes fail to reflect real life user conditions.*
- *Stakeholders should to be able to comment the final proposal before the regulatory committee vote.*
- *Implementation would be more effective if Ecodesign and Energy Labelling implementing Regulations (if both apply to a product group) are adopted and published on the same day*
- *The procedure to officially adopt the working plan 2012-2014 was very ineffective. It took a year between the finalization of the study for the Ecodesign working plan by the consultants (December 2011) and the adoption of the working plan by the Commission (December 2012). Several Member States have already developed specific energy labelling schemes thus making it more likely for EU authorities to experience objection to an EU-wide energy*

## 6.2 Improvements

### 6.2.1 Timing and planning in the regulatory process

**A 30a** ***Does the involvement of Member State authorities need to be changed in the preparatory and adoption process of delegated acts and implementing measures for Ecodesign and Energy Labelling in order to ensure their views are taken into account, their rights respected and their administrative burden is reduced to the necessary minimum? If yes, how?***

#### *Ecodesign*

In the case of Ecodesign 22/112 respondents indicated that the role of the Member State authorities in the regulatory process needs to change. 59/112 do not think their role needs to change, while 47/112 of all respondents did not know. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. The picture varies considerably for different stakeholder groups. Energy agencies, surveillance bodies, government bodies, test laboratories and environmental groups, research institutions and others indicate that there is no need for change. Industry groups, individual manufactures and intergovernmental organisations indicate a need for change.

#### *Energy Labelling*

In the case of energy labelling 53/111 respondents indicated that the role of Member State authorities in the regulatory process needs to change. 25/111 do not think their role needs to change, while 33/111 of all respondents did not know. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Most stakeholders indicate a need for different Member State involvement. Industry group stakeholder have varying opinions, whereas surveillance bodies, test laboratories, retailer organisations and individual retailers do not see a need for change. Consumer groups are largely undecided on the matter.

In the following the free text clarifications made by the different stakeholder groups are summarised.

Most of the free text clarifications are on the Member State involvement in the regulatory process for energy labelling and the Lisbonisation of the Ecodesign directive.

Those advocating change in the regulatory process for energy labelling all agree that Member State involvement should be higher. The most important motivations for higher member state involvement are to ensure that national differences between Member States are properly discussed and reflected in the regulation, to ensure Member State "buy-in" required for market surveillance and sufficient allocation of (Member State) expert resources. An environmental interest group stakeholder as well as an individual manufacturer indicated that more Member State involvement is unwanted because of the susceptibility for industry lobbying through Member States. An industry interest group indicated that the current procedures allow for sufficient stakeholder input and should not be changed.

Those who are in favour of adapting the energy labelling procedures indicate two options:

1. Reintroducing the regulatory Committee
2. Reinterpreting the Lisbon Treaty for Energy Labelling by replacing the procedure of delegated acts (Art. 290 of the TFEU) by a procedure with implementing acts (Art. 291)

Stakeholder groups advocating changing the Ecodesign directive to the Lisbon treaty indicate a preference for implementing acts over delegated acts. The main reason for changing the Regulatory procedure for Ecodesign is to ensure a better alignment with the procedures for energy labelling.

Lastly, one standardisation organisation stakeholder indicated that the Member State authorities should receive more time to analyse the proposals.

**A 30b** ***Does the involvement of stakeholders (industry, retailers/distributors, environmental and consumer organisations) need to be changed in the preparatory and adoption process of delegated acts and implementing measures for Ecodesign and Energy Labelling in order to ensure their views are taken into account, their rights respected and their administrative burden is reduced to the necessary minimum? If yes, how? (long survey)***

### *Ecodesign*

In the case of Ecodesign 34/113 respondents indicated that the role of stakeholders needs to change. 66/113 do not think their role needs to change, while 13/113 of all respondents did not know. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Individual manufacturers are the strongest advocates of change, while industry groups appear to be divided. All other groups do not see a need for changing the way stakeholders are involved in the rulemaking process for Ecodesign. The number of people that answered "don't know" for this question is particularly low.

### *Energy Labelling*

In the case of Energy Labelling 35/114 respondents indicated that the role of stakeholders needs to change. 62/114 do not think their role needs to change, while 17/114 of all respondents did not know. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Individual manufacturers and consumer groups and standardisation bodies are the strongest advocates of change, while retailer groups and individual retailers appear to be divided. All other groups do not see a need for changing the way stakeholders are involved in the rulemaking process for Ecodesign. Of interest are the conflicting opinions of industry groups, who do not want change, and individual manufacturers, who would like to see a change in the way stakeholders are involved in the process.

All stakeholders agree that a good stakeholder interaction is needed for effective policy. A varied group of stakeholders from government bodies, individual manufacturers and industry interest groups agree that early stakeholder involvement, already during the preparatory study phase, would improve the effectiveness of the process. Some stakeholders from industry and a consumer stakeholder group note that through improved transparency of the process their involvement could become more effective.

Industry interest group and environmental interest group stakeholders indicate that member State trade bodies should be involved in the process rather than EU trade bodies only. One other stakeholder indicates that the Commission should bear the costs for Member State trade body involvement.

A summary of stakeholder group specific comments is presented below.

### Energy agencies

- *Enhance the participation of consumers, citizens and environmental NGOs, and progressive but minor industries. Today they are sometimes overruled by the well-organized lobby from particularly conservative industry.*

## Government bodies other than an energy agency or a surveillance body

- *It should be made transparent which requirements sector organisations have to meet for admission, as there have been complaints about sector organisations were not allowed to participate in the Consultation Forum.*

## Standardisation organisations

- *Commission should better take into account industry views when preparing proposals.*

## Test laboratories

- *Stronger involvement of the CEN, the European Committee for standardisation. The CEN represents all interested stakeholders.*

## Individual manufacturers

- *Use internet portals to gather industry information. This would lead to greater involvement of industry through a process which is more streamlined, efficient and less demanding on industry time*
- *Cooperation with manufacturers responsible for implementing energy labelling should be improved – e.g. through a permanent and open stakeholder working group working closely with the European Commission and market surveillance authorities on the frequently asked questions.*

## Consumer interest groups

- *The future of the Energy Label should be discussed further outside of this evaluation study based on the widest participation of views. The Commission should establish a Consultation forum/political platform, where the views of stakeholders can be exchanged.*
- *The involvement of industry /manufacturers is necessary, but their influence has to be reduced. The influence of the industry should not result in effects like larger products with high absolute consumption and very good rates of efficiency.*

## Industry interest groups

- *Products should be regulated as system (e.g. washing machine/detergent combination), rather than as an individual product (only washing machine). The stakeholder consultation should include stakeholders from related products that are also affected by the regulation (e.g. detergent manufacturers)*
- *There is a structural problem with the involvement of SME stakeholders in the process due to lack of resources.*
- *The standardisation process should be consensus based, all stakeholder, industry and NGOs alike, have to agree on a text.*

## 6.2.2 Resources

### A 31a ***How will the administrative burden for the European Commission to implement Ecodesign and the Energy Label change in the future, assuming: (long survey)***

- *No changes*  
23/97 respondents expect an increase of administrative burden, 46/97 expect it to remain about the same, while 5/97 expect a decrease. 23/97 indicated that they did not have an answer to this question. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Surveillance bodies, test laboratories, individual manufacturers and individual retailers expect an increase in the administrative burden. Other stakeholder think the administrative burden will remain about the same.
- *Extension to non-energy-related products and means of transport*  
72/100 respondents expect an increase in the administrative burden, 2/100 respondents expects the burden to stay the same and 4/100 expect the administrative burden to decrease. 22/100 respondents did not have an answer. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. All stakeholder types agreed that the expansion of the scope would lead to a higher administrative burden. All stakeholders expect the administrative burden to increase.
- *Environmental impacts other than resource use are shown on the label, ecodesign shifts focus to production phase impacts*  
The administrative burden is expected to increase strongly in the case of the proposed shift in focus. 57/97 respondents expect an increase in the administrative burden, 17/97 respondents expects the burden to stay the same and 3/97 expect the administrative burden to decrease. 20/97 respondents did not have an answer. It must be noted that roughly half of the respondents are industry groups or individual manufacturers. Most stakeholder groups think the administrative burden for the Commission would increase.  
Environmental organisations and test laboratories think it will remain about the same. Especially surveillance bodies, industry groups and individual manufacturers think this change of focus would lead to a large increase in administrative burden.

In the free text all stakeholders underlined the likelihood of an increase in administrative burden if the scope is widened. More Commission resources would be needed to guide the rulemaking process, as well as to enforce the regulations. Stakeholder from energy agencies, research institutes, environmental interest group stakeholders and other stakeholders indicated that the use of the word "burden" comes across as a rather negative description of the primary task of the Commission, which is designing and implementing effective policies. A number of stakeholders mention that expanding the scope at this point in time would not be wise, as there are already too limited resources available to deal with the current scope of the Ecodesign and energy labelling directives. One environmental interest group indicated that widening the scope would risk an overlap with the scope of the Ecolabel.



**A 31b** *How could the administrative burden of the Commission in developing implementing measures and delegated acts be decreased so as to allow a faster development and review of measures and acts? (long survey)*

40 respondents indicated that a fast track method for reviewing existing measures, where the level of the revised requirements would be determined in a partly automatic procedure based on technological progress achieved in the meantime, would lead to a lower administrative burden and faster development. Particularly environmental interest groups and consumer organisation favour this idea. It must be noted that there are various stakeholders representing industry, governmental and research groups that see risks in shortening the process. They fear that fast track procedures will result in “quick and dirty” work that overlooks key issues that should have been considered.

Environmental interest group, energy agency and other stakeholders noted that the fast track approach would require to set up a robust and systematic market monitoring instrument

32 respondents indicated that carrying out certain consultations in parallel would lead to a lower administrative burden and faster development. Particularly individual manufacturers and industry groups favoured this idea.

34 respondents had suggestions of their own including:

- A tighter project planning, including a more engaging implementation calendar, deadlines and milestones in the Working Plans
- Set maximum durations for the different steps of the implementation process
- In case of overshooting, the Commission would have to send a justification to the European Council and Parliament.
- Develop templates and guidelines for drafting measures and requirements
- Create harmonised feedback forms for consultations
- Use other EC related external entity such as the JRC and the EACI to reduce the administrative burden at the Commission and speed up the process. Furthermore the external agency could do more than just the Ecodesign and energy labelling implementation, such as launching an informative website for businesses and consumers.

### **6.2.3 Ambition level of requirements**

**A 20** *Requirements on energy use in Ecodesign implementing measures and voluntary agreements are based primarily on energy efficiency - the energy use per specific ser-vice/capacity unit, i.e.for example for televisions the power consumption per screen size expressed in W/dm<sup>2</sup>X kWh/standard wash cycle -, rather than on the absolute energy consumption. What should be the basis of such requirements in implementing measures and voluntary agreements in the future? (long survey)*

14/117 respondents indicated that Ecodesign requirements should focus only on energy efficiency.

33/117 respondents indicated that Ecodesign requirements should focus mainly on energy efficiency. This focus was voiced particularly among industry interest groups.

44/117 respondents indicated that Ecodesign requirements should focus on both energy efficiency and energy consumption. This opinion was supported on average by energy agencies, surveillance bodies, government bodies, test labs, environmental organisations, research institutes and other stakeholders.

14/117 respondents indicated that Ecodesign requirements should focus mainly on energy consumption. Consumer organisations in particular voiced this opinion.

3/117 respondents indicated that Ecodesign requirements should focus only on energy consumption.

8/117 respondents, all from industry interest organisation, indicated that they were undecided.

In the free text answers we can distinguish two main stakeholder opinions

3. Groups that want focus on energy efficiency
4. Groups that want focus on energy efficiency and energy consumption

As stated above stakeholders that want a focus on energy efficiency are mostly among industry interest groups, but are also found in other stakeholder groups. The argumentation for a main focus on energy efficiency is that the calculation of energy consumption would also take into account the usage of a product, which cannot be foreseen or influenced by the manufacturer. Also, with underlying usage patterns certain technologies can be preferred which is against the principle of technology-neutrality. Ecodesign requirements need to focus on areas that the manufacturer can control to be able to provide a level playing field and fair competition. One industry interest groups indicated that the recyclability of products, i.e. whether the materials contained in a product will be recycled or not at the end of a product's life, should be considered on top of energy efficiency.

Most stakeholder groups indicate a preference for a hybrid focus on energy efficiency as well as energy efficiency. Their argumentation is that the energy efficiency metric should not artificially promote larger products. For example:

- Requirements on energy efficiency could be curved / progressive so that it is more challenging for bigger/larger products to comply. Two considerations are made by an energy agency:
  - the energy efficiency metric should not artificially promote larger products. The difficulty on making efficient products should be at least equally difficult independently of the size.
  - It should be considered to require larger products to be more energy efficient for those where there is evidence that the product is not used at its full capacity (washing machines)
- Energy consumption levels could be capped for very large products, effectively setting a maximum power consumption threshold. This options is mentioned by other, consumer interest groups and individual manufacturers stakeholders

**A 26a**      ***To what extent do you agree or disagree with the following potential changes to the method of setting specific minimum requirements in the Ecodesign Directive? (long survey)***

- *Go beyond the Least Life Cycle Cost Approach (LLCC) when setting minimum requirements, i.e. to aim for a staged approach towards the highest feasible energy efficiency level while at the same time ensuring that the life cycle costs of products are not getting higher for the consumer compared to the base case (considering also what room this would leave to energy labelling). The revised Methodology for Ecodesign of Energy-related Products (MEErP) already refers to this efficiency point as "Break Even Point"*

33/112 respondents, in particular stakeholders from energy agencies, government bodies, environmental interest groups other interest groups, research institutes and others, are in favour of using the breakeven point to go beyond minimum life cycle costs. 12/112 respondents are neutral. 47/112 respondents, mostly representing surveillance bodies, industry interest groups and individual manufacturers, are not in favour of going beyond minimum life cycle costs. 22/112 respondents from various stakeholder groups don't know. It must be noted that most respondents are industry interest groups or individual manufacturers.

- Involve a check on what would it mean to go beyond LLCC by identifying the "Break Even Point" in the preparatory studies.*

69/112 respondents, from the larger part of the respondent groups, indicated that such a check would be a good idea. 4/112 respondents are neutral in the matter, whereas 20/112 respondents indicated that such as check is not a good idea. 19/112 respondents, typically from test labs, retailer interest groups and individual retailers, have no opinion.
- Strive for more ambitious requirements not by going beyond LLCC cost but rather to make life cycle cost calculations more realistic by applying "learning curves" (consideration of decreasing production costs over time)*

57/111 respondents, typically representing the majority of stakeholder groups, are in favour of applying learning curves in the Life Cycle Costing calculations. 7/111 respondents are neutral to the matter, whereas 24/111 respondents do not think applying learning curves is a good idea. 23/111 respondents, typically retailer interest groups, do not know. Manufacturers and industry interest groups are divided on the topic with roughly half of the respondents being in favour and the other half against applying learning curves.
- Keep the present practice of life cycle calculation*

37/111 respondents, typically representing industry groups, are in favour of keeping the present practice in the LCC calculations. 24/111 respondents, typically representing government bodies and individual manufactures are neutral to the matter, whereas 24/111 respondents, typically representing environmental groups, think current practices should be changed. 26/111 respondents, typically retailer interest groups, do not know. Energy agencies and other stakeholders are divided on the topic with roughly half of the respondents being in favour and the other half against changing the current practices.
- Give benchmarks a more powerful role as targets. They should serve as starting point for setting new MEPS at the time of revision, while still respecting the rules of Article 15 of the Ecodesign Directive*

47/109 respondents, typically representing consumer interest groups, environmental interest groups, government bodies, research institutions and other stakeholders, are in favour of the use of benchmarks. 15/109 respondents, typically representing surveillance bodies are neutral to the matter, whereas 17/109 respondents are not in favour of using benchmarks. 32/109 respondents, to a large extent industry interest groups and retailer interest groups, do not know. Energy agencies and industry groups show a large variation in the answers presented.

- *Identify reference levels for best not yet available technology in preparatory studies and use it to predefine future energy efficiency classes in Energy Label.*

56/111 respondents, typically representing energy agencies, government bodies, consumer interest groups, environmental interest groups, research institutions and other stakeholders, are in favour of defining and using BNAT for future labelling classes. 21/111 respondents, typically representing industry stakeholder are neutral on the matter, whereas 17/111 respondents are against defining and using BNAT. 19/111 respondents, typically from retailer interest groups, do not have an opinion. It must be noted that industry interest groups and individual manufactures show large variation in their answers to this question.

In the text below the free text answers from different stakeholders are summarised.

#### Energy agencies

- *The Ecodesign rulemaking and methodology should use learning curves and open up the possibility for setting requirements beyond the LLCC point.*
- *Better identification of best not yet available technologies is a must, in order to prepare the ground for further Ecodesign and potentially Energy Labelling steps.*
- *Including breakeven point and best not yet available technology in the preparatory study will even more mean that the preparatory studies need to be "fresh" and used immediately*

#### Government bodies other than an energy agency or a surveillance body

- *Do not strive for setting the minimum requirements at breakeven point, but rather use learning curves*
- *Use BNAT to identify future label classes, as long as there is evidence is that this BNAT will lead to a defined improvement*

#### Individual manufacturers

- *Companies will not share the information on BNAT, therefore it will not be possible to determine this point in the preparatory study.*
- *For the "learning curves" approach, it has to be ensured that the methodology is consistent. The market will have evolved between the time of data collection and the time the legislation is drafted.*
- *Benchmarks are not reliable, because they are based on fictive data*

#### Research institutes or consultancies

- *The Ecodesign rulemaking and methodology should use learning curves and open up the possibility for setting requirements beyond the LLCC point.*
- *Better identification of best not yet available technologies is a must, in order to prepare the ground for further Ecodesign and potentially Energy Labelling steps.*

Various and sometimes conflicting statements also made by other stakeholder groups including most notably:

- *That today's best available technology (benchmarks) should be used as basis for minimum requirements within a few years (3 - 6 years) depending on technical and economic considerations, similar to the Japanese Top Runner approach.*
- *Renewable energy is often supported by systems that provide an incentive for kWh delivered to the system. A similar system should be used for avoided energy use because of higher energy efficiency. This premium should be taken into account in the calculations. This way the LCC analysis is performed, not from a narrow private economic viewpoint, but in a more appropriate wider context*

Consumer interest groups

- *There should be a clear and binding role for the use of benchmarks in the minimum requirement setting.*
- *Set a requirement for manufacturers to report how the design of a product is performing compared with the benchmarks of the Implementing Measure.*
- *Benchmarks should also cover aspects other than energy efficiency.*

Environmental interest groups

- *The current LLC method tend to give too low requirements compared with actual LLC when requirements enter into force. Proposed changes to the process could change that.*
- *Learning curves should be used*
- *It should be considered to go beyond LLC*

Industry interest groups

- *Constantly setting minimum requirements at LLCC already improves the efficiency of products, and it ensures affordability and fair competition. Going beyond these levels is not in line with the rationale of the Ecodesign directive*
- *Assuming a specific path for technology progress and making those assumptions the basis for automatic adaptation risks precluding technology developments which could not be foreseen. Often it is not possible to determine the level of best not yet available technology. Technology-neutrality would be compromised by limiting the freedom of a product designer to predefined efficiency assumptions.*

## **A 26b Which other changes would you suggest and why? (long survey)**

Several stakeholder groups, including energy agencies, research institutes, other stakeholders and environmental interest groups, suggest including societal costs in the LCC calculations.

Suggestions given in the free text answers are summarised below.

Energy agencies:

- *The same methodology should be used for Ecodesign and Energy labelling.*

Government bodies other than an energy agency or a surveillance body

- *For electronic products LCC cannot be used to guide ecodesign efficiency/energy requirements because there is no relation between efficiency and price. However, products with higher performance tend to be more efficient and have a higher price which decreases (quickly) in time. An alternative to the LLC is to take the price decrease into account when determining the timing of the requirements.*
- *Stronger focus on deviating energy costs and usage patterns throughout Europe*

Individual manufacturers:

- *Alongside the implementing measures, we believe that the EU should require manufacturers to conduct early stage design assessment / audit. Such an assessment would aim to an optimisation of the design based on resource and cost efficiency together with durability and quality requirements of the specific product. This could apply to a broad range of products (not only those covered by implementing measures) primarily products already covered by a CE marking obligation. For those CE marked products, compliance would be based on self-certification and could be documented as part of the CE marking documentation.*
- *Setting minimum requirements can drive up the costs of new appliances, leading to consumers holding on to their old equipment rather than buying new energy efficient appliances. This should be taken into account in the LCC calculations.*

Other, namely:

- *According to article 15 §2.a of the Directive, the Eco-design Directive should be used only for products with more than 200 000 units sold per year. However, lots are usually quite large and encompass in the same definition many different products, even sometimes (for transformers) made to measure for very specific purposes. We believe that the EcoDesign process could be more efficient and accurate by explicitly excluding from its scope products or sub-group of products with less than 5000 units sold per year.*

Consumer interest groups:

- *Involve a check of the expected lifetime of product groups in the preparatory study.*

Industry interest groups:

- *Setting minimum requirements can drive up the costs of new appliances, leading to consumers holding on to their old equipment rather than buying new energy efficient appliances. This should be taken into account in the LCC calculations.*
- *In the Ecodesign directive, as in other legislation, the Commission continues to discriminate against electric products across its policy agenda by utilising a conversion factor which clearly favours fossil fuelled products in the field of heating/cooling and transport. This is in stark contradiction to it's 2050 vision and creates a fossil fuel lock-in. Two suggestions:*
  - *Have the conversion factor reflect the long-term electricity generation mix, or*
  - *Instead regulate the consumption of primary energy directly (e.g. through the ETS) as a conversion factor will only influence the end-use of electricity and the choice of energy carriers for consumption. It does not provide utilities with any incentive to change the production mix.*
- *Tailor-made products should be excluded from Ecodesign Directive because of the high variation in their applications, specific characteristics and the very small production runs. business-to-business products should be excluded from Ecodesign Directive because these products are tailor-made to specific needs and the information flow is already suitable between businesses*

## 7 Implementation

### 7.1 Energy Label

**AB 16a** ***Have the energy labels been enforceable? If not sufficiently or not at all, what could be done to improve enforcement of energy labels? (long and short surveys)***

Almost 60% of respondents consider the energy labels to be enforceable very much or to some extent. 18% consider them not to be enforceable sufficiently, mostly environmental groups another stakeholders. 22/103 did not know the answer.

A general lack of surveillance activities is mentioned in the free answers provided. Some of the obstacles mentioned in the free answers include the complicated calculation methodologies and formulas, slow development of harmonisation, and the need to reinforce and harmonise sanctions for free riders. Also the lack of quality in laboratory testing is mentioned as an obstacle, resulting in possible risk of wrong assessment of test reports. The strong role of EC is mentioned to support market surveillance as well as the need for coordination among member states. Also the need for all parameters on the label to be measurable is mentioned. Several respondents mentioned the need to train the retailer staff, the economic operators, and the general consumers, but possibly also to the market surveillance authorities. A special need to focus on online shops is mentioned. The Heating Industry Associations supports the third party certification for central heating and water applications.

**AB 16b** ***How effective do you think the following options for improving enforcement would be? (long and short surveys)***

*EU-Wide market surveillance authority covering the internal market*

54% of the respondents consider such authority to be very effective or effective including industry interest groups. 20% of respondents would consider it as not very effective or not effective, including some individual manufacturers and government bodies. 26% of respondents do not know.

*An EU-wide mandatory product database*

Over one half of respondents would consider such database as very effective or effective, mainly the environmental interest groups, but also the government and surveillance bodies and energy agencies and also one quarter of industry interest groups which have responded to this question.

*An EU-wide transparent compliant procedure*

Some 55% of respondents would consider it as effective or very effective, represented by environmental and consumer groups as well as some industry interest groups and individual manufacturers. Some 30% would not consider it as an effective tool, mainly some industry groups. 15/202 do not know the answer.

*MS-based transparent compliant procedure*

51% of respondents consider it as very effective or effective, roughly one quarter would not consider it as effective and one quarter does not know the answer, including 4 out of 10 government bodies responding.

**AB 17** ***Are incorrectly or non-labelled products a significant problem, i.e. large numbers of these products are sold, in the following product groups covered by labelling requirements? (long and short surveys)***

A majority of the respondents, 71/102, were not able to answer to what degree is the incorrectly labelled products a problem. 14/102 consider that yes, but the impact on new product energy efficiency is low, 9/102 think that yes and that it results in products with significantly lower energy efficiency being sold. When asking about individual product groups (TVs, air-conditioners, refrigerating appliances, washing machines, dishwashers, dryers, and lamps), 40 – 60% of the respondents do not know the level of noncompliance. The suspicion of largest numbers of noncompliant products is among televisions and air-conditioners (36-38% of respondents each) and lamps (39%), the lowest among white goods appliances (4-10%).

Respondents, using the free text option, highlighted the lack of knowledge on the level of noncompliance on the market. Lack of the label display on some products, such as TVs and air-conditioners has been also mentioned, where it could lead to products with lower efficiency being sold. Other stakeholders mentioned washing machines, ovens and driers as lacking the labels in shops. Another issue relates to possible misuse of measurement tolerances, serving to declare the product in a higher energy class, e.g. for halogen lamps. Products sold in small batches are also a problem, when it is not easily possible to get hold of the manufacturer or importer. A reference to the ATLETE project was made, identifying 20% of refrigerators tested as having a wrong energy class declared. A support to strengthen enforcement activities has been expressed repeatedly, both by industry groups and nongovernmental organisations.

## 7.2 Ecodesign

**AB 27** ***Are non-compliant products a problem in the product groups that are regulated by Ecodesign regulations? (long and short surveys)***

Some 10% of respondents consider the noncompliance of products related to ecodesign a problem, some 12% consider it as low or not existing. But 80/102 could not answer the question.

The vast majority of respondents also could not answer this question when asked about individual product groups, with only some 3 – 7% of respondents considered the problem to be significant.

In general for ecodesign, even a larger lack of information and experience is expressed as there is for energy label related legislation. Also industry groups consider the level of surveillance as low, some even stating of “not being aware of any market surveillance at all”. Light sources, external power supplies, circulators and room air conditioning appliances have been mentioned among the ones most often being noncompliant. Within the free text answers provided, the issues highlighted include the possible noncompliance of products with the documentation requirements as well as with small importers in low price segments. One of the stakeholders stated that “In case a Member State does not perform the surveillance tasks that it should, sanctions should be implemented and / or adequate technical or financial support should be provided.” Improvement of study phase and avoiding double regulations are also mentioned.



### 7.3 Energy Labelling and Ecodesign

**A 32a** *Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities on Energy Label Directive? (long survey)*

About half of the respondents agree, including energy agencies, most industry and environmental groups, 13% do not agree – mainly consumer groups, and 35% does not know the answer to this question, including some industry groups and individual manufacturers and some government bodies.

The need to make sure that the Market Surveillance legislation (“new 765”) fully includes the energy label and ecodesign regulations is highlighted in a response by an energy agency/surveillance authority as well as other stakeholders, including manufacturers. Avoiding double requirements is essential, the text on market surveillance could be even removed from the energy label and ecodesign regulations and included fully in the 765 regulation. One example of a different specifications in the legislations is the description of “economic operators”. Heating industry manufacturer mentions this party certification as a tool to ease the market surveillance, which is lacking resources. Improving cross-border cooperation, use of available databases and guidance documents are mentioned as opportunities to improve effectiveness. A risk of continued inconsistency in national level of surveillance, even under the proposed new legislation, is mentioned by consumer groups.

**A 32b** *Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities on Ecodesign Directive? (long survey)*

Similarly to the energy label directive, about half of the respondents agree to the statement, 10% disagrees and 39% does not know, with also identical distribution of stakeholders as indicated in the question above.

Similarly to the energy label area, the need to ensure that this legislation is also applicable to energy label and ecodesign, is stressed, both by a market surveillance authority and industry representatives. The authority representative makes the proposal to remove the text about market surveillance from the energy label and ecodesign legislation and include it instead in the “new 765”. Furthermore, further clarification on the use of databases is required, as well as a support to international cooperation is expressed, including a more active role of the Commission. Other repeated suggestions include the better definition of economic operators, and the possibility of a third party certification, made by a heating industry member. A general lack of surveillance is also mentioned, with one risk being identified that individual states still define their own level of surveillance activities. Better use of databases and more staff resources are mentioned by industry groups.

**A 33a** *Have appropriate and effective mechanisms for cooperation in market surveillance between administrations been established for Energy Labelling and Ecodesign? (long survey)*

55% of the respondents does not agree to the statement on effective mechanisms being established, mainly industry, environmental and consumer groups, including 9/13 of individual manufacturers. 20% consider it as effective and 28/110 respondents did not know the answer including 5/9 government bodies.

The surveillance authorities responding to this question in the free format expressed the need for a system to exchange surveillance activities and results, equivalent model names, harmonisation of approaches and sanctions and a mechanism for removing noncompliant products from all countries where it is distributed, not only the one where it was identified. Improved usage of databases was supported as well as the very availability of MSA contacts in various countries.

In general, an increased level of cooperation, even beyond the ADCO meetings and the Ecopliant projects (which only consists of already active authorities) is supported as well as the higher role for the EC. Similar ideas have been also expressed by manufacturers, who ask for strengthening enforcement and cooperation among authorities and also call for being informed about individual requirements with possibly unclear interpretations. They also support the newly planned Market Surveillance Forum. Others point out that "even if the Ecopliant project has been launched and ADCO group reinforced, there is no systematic sharing of tasks and results among MS".

**AB 33b** ***Do Member States provide sufficient resources for national market surveillance activities for Energy Labelling and Ecodesign? (long and short surveys)***

80% think that not enough resources are given to market surveillance, 21/104 respondents consider the resources as sufficient, including two out of three responding market surveillance authorities.

Within the free text responses provided, most stakeholders express the concern that the majority of the member states do not organise sufficient, if any, level of surveillance. Some other obstacles include the lack of laboratories, low policy priorities, and the pressure of economic crisis versus growing number of legislation. Industry groups raise the concern that the lack of resources for effective action does mitigate the impact of free riders.

**AB 33c** ***Should the Commission or other EU bodies be more involved to ensure enforcement activities for the Energy Labelling and Ecodesign Directives, considering for example the EU product notification system in place under the cosmetic products regulation (2009/1223/EC, Article 13) or in form of an EU-wide complaint system or other? (long and short surveys)***

55% of respondents prefer higher level or EC/EU involvement and 45% prefers otherwise. Individual manufacturers are also almost equally divided in their opinion, industry associations prefer lower involvement (18 in comparison to 8), whereas the majority of consumer groups, surveillance bodies and energy agencies prefer a higher involvement. 5/8 government authorities answered negatively. Within the free text answers, the following opportunities have been identified and asked for: platform for sharing market surveillance, website platform to compile all information about process, FAQ, etc., involvement and information for other stakeholders, use of databases, publication of an annual report on compliance, setting up a reference laboratory, more room for NGOs to name and shame free riders. As one of the manufacturers put it, "the envisioned single market seems to be much simpler to realise if there were more EU coordination in market surveillance". The need to recall a product from all markets, it found noncompliant, is stressed by consumer groups, as well as the need to ensure coherent action in all Member States.

**A 33d** *Should the Energy Labelling Directive be changed to include a conformity assessment procedure (like the Ecodesign Directive has)?*

The views are divided roughly by thirds in this question – in favour, against, and not knowing the answer. 39% agree to the statement, represented mainly by energy agencies, consumer and environmental groups. Most disagreement comes from industry groups.

Some stakeholders advocate for the same aspects to be included, since the same products are often regulated by both directives. The simple solution could be to merge both directives and thereby to keep the system of the Ecodesign directive, including the conformity assessment procedure. Others, however, do not agree, arguing that it would not improve the accuracy of labelling nor make market surveillance more effective. One authority and two heating industry members ask for third party certification. Consumer group representatives also stress that in many cases the calculation of energy efficiency index is common. Industry groups are divided – some supporting the conformity assessments (household products representatives), others supporting third party verification (heating industry), others raise the difference between CE marking and the energy label content and possibly the other surveillance related legislation.

**A 33e** *Is the conformity assessment procedure in the Ecodesign Directive appropriate? (long survey)*

48% of the respondents agree to the statement, with the majority of responding energy agencies and government bodies, environmental and industry groups. 10/102 disagree and 42% do not know, including some industry groups, consumer and environmental groups, and 3/9 government bodies responding.

Within the free text answers, a generally positive answer was made, however, identifying some improvement potential, such as that the requirements on internal design control and management systems are too complicated to understand, a registration system could be put in place to enable to track products and to store their technical documentation in a centralised system. Furthermore, specific obligations in the Directive should be also further clarified – both to the authorities and individual manufacturers and importers. A recommendation could also be made e.g. to develop common guidelines for technical documentation, as developed in the Nordic countries. Other stakeholders ask for an individual level of evaluation for each product group within the preparatory studies, and the heating industry calls for third party certification. Industry groups call to maintain the self declaration system to limit their administrative and economic burdens while keeping the producer reliable for their products placed on the market.

**A 34                    *What else could be improved with regard to market surveillance? (long survey)***

The points mentioned include: cooperation between surveillance authorities and standardisation bodies to prepare test methods and calculations; remove verification procedures from the regulations; ensure efficient ways to share information; get more interpretation guidelines from the Commission; usage of the database across the EU; think of market surveillance – including some pilot actions – at the time of preparing the legislation; make sure that manufacturers pay the costs of testing noncompliant products; better quality of technical documentation, also coming from tests based on laboratories from outside the EU; third party certification for central heating and hot water applications; more cooperation among authorities and sharing test results; pool resources between authorities; increase the reputational risk of noncompliance; allow trade unions and environmental/consumer associations to gather information and infringements to the legislation; mandatory registration of products in a central database; improve sampling of products to be selected for compliance verification from all market segments.

In summary, as one stakeholder put it, "It may be time to reconsider compliance in a more strategic frame taking into account the level of compliance which would constitute success, the way in which MV&E would have to be arranged to achieve this level, and what this would mean for what is done at the EU and the Member State level of governance".

**A 35                    *Have effective harmonised energy performance testing standards been developed for the product groups regulated under the Energy Labelling and Ecodesign Directives? (long survey)***

The answers are divided roughly by one third between "yes", "no" and "do not know", with also most of the stakeholder types being split into different types of answers.

According to the free text answers, sometimes standards are late, in some specific products there are substantial loopholes, and a revision and transitional methods are needed. Both the European Commission and CEN/CENELEC should act more adequately and swiftly. The influence of public authorities and consumer representatives is very restricted. Some standards are still too much function-oriented, leaving little laboratories to be equipped for any single regulation and resulting prices being "out of measure" to the need of market surveillance. Industry stress that measuring and calculation methods should be finalised and communicated before the regulations are decided. Test standards for some products, vacuum cleaners being mentioned, are also not related to real life conditions, limiting consumer satisfaction. Industry interest groups ask for a better synchronisation of the development of implementing measures and standardisation.

## 8 Market effects

### 8.1 Energy Labelling

**A 8a** ***What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU manufacturers in the following product groups (long survey)***

A clear majority of respondents thought that Energy Labelling has had or will have a positive impact in the competitiveness of EU manufacturers. Furthermore there is a strong consensus among the different types of stakeholders. This assessment is consistent across product groups with the exception of luminaires - for which most respondents thought the impact is neutral or there is no impact. For refrigerators, washing machines, domestic dishwashers and laundry dryers a high proportion of respondents thought that the impact on competitiveness has been or will be very positive.

Many replies supported the idea that Energy Labelling has had or will have a positive impact in the competitiveness of EU manufacturers:

- *"The Energy Label is stimulating to the sales of innovative products that EU manufacturers are placing on the market. By discouraging the purchase of low-quality low-efficiency products (often manufactured outside the EU) they reinforce the market positions of EU producers".*
- *"The Energy Labelling Directive has positively contributed to manufacturer's overall competitiveness".*
- *"The energy label has enhanced the competitiveness among manufacturers for those products that are labelled. Standardisation activity has also positively impacted it".*
- *"Although the standards should be more strict, the presence of a directive and the clear aim to a better performance that it is promoting is a general push towards competition. Other parts of the world have more challenging standards".*

Concerns were raised about the competitiveness of installers in certain situations:

- *"There is however an important question about impacts on the competitiveness of installers for certain product groups, due to additional burden and the risk of distortion of competition created as a side effect of the label. E.g. as regards lot 1/2, manufacturers may be in the position to provide necessary information for a system at a lower cost/effort than installers. In addition, there is a risk for installers not to have access to the relevant information before official introduction dates, whilst certain manufacturers already use labels for publicity purposes".*

One respondent argues that Energy Labelling is unlikely to have an effect on the competitiveness of EU manufacturers because the EU label is already being taken into account by foreign producers:

- *"No effect for all product groups; global markets take the labelling in EU into account".*

**A 8b** *What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU SME (Small and Medium Enterprises, firms with less than 250 employees and turnover <50million euros/annum) manufacturers in the following product groups (long survey)*

Most respondents were undecided about this question. When asked in general terms i.e. across all product groups, the majority of those who gave an opinion thought that Energy Labelling has had a positive or very positive effect on the competitiveness of EU SMEs. Only a small number of respondents replied that the effect was negative or very negative.

Some differences can be observed across product groups. Most products showed similar numbers of positive and negative responses. Some product groups e.g. electrical lamps or domestic ovens show a clear majority of positive responses. Two product groups (boilers and water heaters) show a slight majority of negative opinions. No remarkable differences are observed across stakeholder groups.

Several respondents alluded to the fact that there is little data or studies to form a strong opinion on this topic.

Some remarks were made about potential risks for SMEs of not having enough resources to stay up to date with legislation and of being exposed to higher relative costs than larger corporations e.g. "SMEs will face higher costs and issues to implement the new rules than larger companies, due to economies of scale". One respondent suggests that specific support could be given to SMEs to help them comply with EU energy efficiency targets, e.g. by: (1) mutualised testing facilities (2) mutualised consulting and engineering services.

Some respondents think that the impact is expected to be different depending on factors such as the type of appliance or the specialization of the SME (sub-component manufacturer, small appliances, etc.) With regards to different impacts depending on the type of appliance, a respondent considers that the impact on SMEs could be positive for electrical lamps due to the fact that SME will find it easier to emerge in the area of LEDs while it was more difficult for them to participate in the traditional light bulb market. In contrast, the same respondent considers that in the case of heating equipment the impact could be negative because small producers and installers may experience difficulties in keeping up with technological developments.

At least two respondents think that the impact is likely to be low because SMEs play little role in the production of most of products concerned.

**A 8c** *What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU importers in the following product groups: (long survey)*

Most respondents are undecided about this question. When asked in general terms i.e. across all product groups, the majority of those who gave their opinion thought that Energy Labelling has had a positive or very positive effect on the competitiveness of EU importers. Only a small fraction of respondents replied that the effect was negative.

No remarkable differences are observed across product groups. No remarkable differences are observed across stakeholder groups.

On the one hand stakeholders identified Energy Labelling as a competitive advantage for EU manufacturers compared to importers:

- *"For products with large imports, the energy label is generally a benefit for EU producers compared with importers. Two exemptions are air conditioners, where most equipment is imported and lamps, where also importers have been good in catching up with the efficiency requirements of the higher label classes".*

On the other hand several stakeholders also expressed their concerns about potentially unfair competition in cases of lack of appropriate surveillance and enforcement for imports:

- *"The fact that there is no third party verification could allow some manufacturers or importers to declare false values. This would be against a level playing field in EU"*
- *"EU importers are global giants (in most of the cases), and the cost per product is the same for any size of the companies, hence relative cost to SME's are huge compared to global giants. And because there are virtually no Market surveillance, there is no chance to be caught on false information"*

**A 8d      *To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Energy Labelling had on innovation (long survey)***

Overall, a clear majority of respondents replied that Energy Labelling has had a positive or very positive effect on innovation for all product groups. The number of positive or very positive replies was also higher than the undecided. Replies from consumer organisations and environmental NGOs are consistently positive about this topic, with only a minority of people being undecided. Industry groups showed a greater proportion of undecided respondents. For all stakeholder groups there are more positive than negative replies.

This assessment is consistent across product groups. In the case of refrigerators, washing machines, dishwashers and laundry dryers many respondents thought that the impact on innovation has been or will be very positive.

Most stakeholders supported the idea that Energy Labelling has had a positive impact on innovation:

- *"Energy labels stimulate manufacturers to place more efficient products on the market and consumers to purchase them. Efficiency is often linked to innovation. So the labels have certainly had a positive impact on innovation in the EU. For boilers, water heaters, vacuum cleaners and luminaires it is too early to say, since the labels have not entered into force yet".*
- *"The impact of innovation depends on the product. For televisions and lamps the label has a very positive impact on innovation towards higher energy efficiency. For other products such as washing machines and dishwashers there have been innovation, but the innovation has primarily led to machines with higher capacity and number of place settings".*
- *"The energy label can help to justify extra cost of certain innovative solutions. Nevertheless, fair market conditions must be ensured".*
- *"Increasing existing requirements, and even more, adding new classes of requirements, to the specification of an industrial product, while retaining or even increasing the existing ones, feeds R&D engineers with new and difficult challenges, and is a proven engine for process and product innovation".*
- *"We consider the energy label triggers placing rapidly more energy efficient products on the market because of providing a common basis for comparison as well as information to consumers concerning value for money".*

- *"For some products as fridges and dryers, we have seen strong improvements on energy efficiency based on innovation, for new product groups, as boilers and vacuum cleaners, we see positive impact on innovation, but it is too early to state if the labelling will be "very positive" for innovation".*

Some stakeholders expressed concerns about impact on innovation for specific product groups:

- *"Very negative impact on high efficient CHP innovation as discriminating calculation method gives lower ratings to higher efficient packages"*
- *"We believe that the level of ambition of the energy label must be set high as this can speed up the innovative process to reach the highest energy class as quickly as possible. This has not been the case in several product specific measures. Indicatively we mention boilers and ovens where electric and gas ovens are placed in different labels as electric ovens would occupy the lower classes of the label. Cogeneration boilers as well as heat pumps already reach A+ and A++ classes from Tier 1 leaving little incentive for manufacturers to innovate in the future".*

One stakeholder provided recommendations for future definitions of the label in terms of incentivising innovation:

- *"To continue encouraging innovation, the revision of the energy label regulations should introduce stable labelling scales that give long-term planning certainty. Fixing an A-G scale that ends at the physical limit could be an option to explore".*



## 8.2 Ecodesign

**A 22a** *To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU manufacturers: (long survey)*

Most respondents are undecided about this question. A clear majority among those who gave their opinion thought that Ecodesign has had a positive or very positive effect on the competitiveness of EU manufacturers. Most of respondents from industry interest groups are undecided, while the rest of stakeholder groups provided mostly positive answers. Only a small fraction of respondents thought that Ecodesign had a negative or very negative impact on EU manufacturers.

No remarkable differences are found across product groups.

In their open text replies a respondent from an energy agency notes:

- *"Ecodesign is banning products with poor environmental performance it is affecting primarily low-cost manufacturers and reinforcing the position of EU manufacturers, that are usually more advanced and able to product high performing products. In addition, Ecodesign accelerates the uptake and mass production of technologies contributing to energy efficiency. This generates economies of scale and cost reductions that benefit EU manufacturers."*

Respondents from surveillance bodies highlight that there are great differences between manufacturers:

- *"Some have had high advantages; others have gone out of business".*

Industry groups do not provide a conclusive assessment alluding mainly to the limited data available and the fact that many requirements have been in place for little time or still not in force. They also note that there may be changes across product groups but

- *"there is no clear picture in this respect".*

Individual manufacturers express their concern that

- *"energy efficiency standards only help EU companies if imports of non-compliant products are stopped".*

Other stakeholders also mention the lack of data available about this topic while expressing that:

- *"In so far as the ecodesign directive has encouraged innovation by EU manufacturers, their competitiveness will have been improved".*

**A 22b** *To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU SME (Small and Medium Enterprises, firms with less than 250 employees and turnover <50million eu-ros/annum) manufacturers: (long survey)*

Most respondents are undecided about this question. Among the respondents who gave their opinion there was only a slight difference in numbers between those thinking that Ecodesign has had a positive or very positive impact on the competitiveness of EU SMEs and those who thought that the effect was negative or very negative.

While for most product groups there is no clear trend (positive/negative impact), there was a majority of respondents with the view that the impact has been positive for tertiary lighting as well as directional and non-directional lighting. Conversely, there is a majority of negative opinions in the case of circulators.

There is no appreciable difference in opinion across stakeholder groups.

Several stakeholders warned about potential negative effects on SMEs in the following terms:

- *"The SME have difficulties using the resources to keep up to date with legal requirements and creating the demanded documentation".*
- *"Effect on SMEs is very, very negative because ecodesign has created too much extra burden and costs for SMEs. Cost per product is the same for SME and a huge global player, hence relative cost to SME is gigantic".*
- *"[Ecodesign] had a negative impact on SMEs in the supply chain as they are required to provide data that they are not able to produce".*
- *"One example where SMEs may have been negatively affected is circulators. Ecodesign requirements for these products are rather reinforcing the position of big players able to innovate and mass produce efficient products".*

However, according to some stakeholders the impact can also be positive for SMEs in certain situations:

- *"[Ecodesign] had a positive impact only on SMEs which are selling high quality niche products directly to final consumers (those ready to pay a high price for highly efficient products)"*
- *"In general, measures for lighting stimulating the development of more efficient technologies (such as LEDs) are a clear opportunity for the creation of SMEs in the sector (because room is made for a wider variety of highly innovative products)".*

**A 22c** ***To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU importers: (long survey)***

Most respondents were undecided about this question. Overall, among the respondents who gave their opinion there is only a slight difference in numbers between those thinking that Ecodesign has had a positive or very positive impact on the competitiveness of EU importers and those who thought that the impact was negative or very negative. However, when analysing the replies on a product by product basis most respondents lean towards a positive impact for each and every product/regulation analysed.

**A 22d** ***To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on innovation: (long survey)***

Overall, a clear majority of respondents replied that Ecodesign has had a positive or very positive effect on innovation. The number of positive or very positive replies was also higher than the undecided. Replies from consumer organisations and environmental NGOs are consistently positive about this topic, with only a minority of people being undecided. Industry groups and government bodies showed a greater proportion of undecided respondents. However none of these groups gave any negative answer to this question. For all stakeholder groups there are more positive than negative replies.

Positive or very positive replies outnumbered negative or very negative for all product groups. However, for some product groups there are more undecided than positive replies e.g. simple and complex set-top boxes, imaging equipment, dishwashers, vacuum cleaners or washing machines.

Most stakeholders supported the idea that Ecodesign has had a positive impact on innovation:

- *"Increasing existing requirements, and even more, adding new classes of requirements, to the specification of an industrial product, while retaining or even increasing the existing ones, feeds R&D engineers with new and difficult challenges, and is a proven engine for process and product innovation".*
- *"Ecodesign has an impact on the bottom of the market, therefore its primary goal is not to stimulate innovation at the top. This being said, it can be suspected that Ecodesign measures have sometimes accelerated the development and uptake of innovative products or technologies (e.g. for standby, EPS, lighting, motors, VSD, circulators, fridges). It is difficult to find examples where Ecodesign would have stifled or hampered innovation"*
- *"Ecodesign has a positive impact on innovation with regard manufacturing process and uptake of efficient technologies, as mass production is required for more efficient products"*
- *"The scientific based approach of the framework led to the identification of the real environment benefit areas in application of life cycle thinking, namely the focus on the use phase and mass standalone products. This supported manufacturers' own innovation efforts in improving energy efficiency performance of products".*
- *"GOOD. It's good that finally the AIM of bigger and bigger power of VC has been cut. 700or 1000w is really enough for good VC. 2000W or more was idea of marketing, more power consumption but still same vacuuming result"*
- *"Regarding lighting: based on empirical data we see a growing market of LEDs as well as most research and development in the lighting field being dedicated to LEDs. We believe that Ecodesign measures are a primary cause to this phenomenon and we therefore advocate in general in favour of ambitious ecodesign requirements in all product groups"*

Some industry groups expressed their doubts about Ecodesign being a trigger of innovation:

- *"Once a technology exists for market access it will be used and need not be improved. To our view the Energy label is the driver for innovation"*

**AB 23a**      ***How has the Ecodesign Directive affected the prices of the following regulated product groups, compared to how they might otherwise have been? (long and short surveys)***

The majority of respondents are undecided about this question. Among those providing an answer the majority thought that the prices have not been impacted by the Ecodesign Directive. This picture is relatively consistent across all stakeholder groups, except for energy agencies and industry interest groups, with a slight majority answering that prices increased because of the directive.

The assessment per product group is consistent with the general opinion across product groups except for three product groups: directional lighting, non-directional lighting and circulators. For these three product groups more respondents thought that prices have increased.

Most stakeholders expressed that the overall trend has been towards decreased prices:

- *"The price of the products, considering the same level of energy efficiency has decreased significantly, more than it was foreseen in the prep studies. This learning curve effect should be more taken into account. In absolute terms, there is evidence (CSEP study on the evaluation of the ED) that the price has decreased for many products. It is understandable that this will not be the case for products like motors where more efficient products imply a larger use of materials".*
- *"No specific data is available, but in general research shows that the impact on prices of minimum efficiency performance standards is non-existent or minimal".*
- *"Overall, and including the effect of inflation, average price of appliances has decreased. It is difficult to say what impact Ecodesign has had in this change"*
- *"Many studies in the world have shown that in the last few decades, products have become more energy efficient while prices have generally declined steadily. Policies such as Ecodesign do not seem to disrupt the average price decline trends. As Ecodesign prohibits low performing products – that can also be low cost products – a slight price increase at the bottom of the market may eventually be triggered. However, this is usually only temporary".*

Concerns about increased prices concentrated in two product groups: lighting and circulators

- *"Especially consumers are complaining about the prices of lamps"*
- *"The costs of the circulators increased more than 50 %"*
- *"One exception [to generally reduced prices] might be lighting, in which the discrete technologies on the market have different price levels. But they also have different attributes and lifetimes, so a direct comparison is not meaningful. The price of standard circulators may also have increased following the entry into force of Ecodesign requirements"*

Industry groups recommend placing the discussion on the life cycle costs rather than the prices:

- *"Focus should be set on the products life cycle cost, and that should be evaluated. In general, the LLCC method aims at ensuring affordability of products and should be maintained".*

**A 28                    To what extent do you agree or disagree with the following statements about Ecodesign: (long survey)**

- *'Ecodesign has led to lower production costs for manufacturers'*  
A majority of respondents replied 'I do not know' to this question. Among those providing an answer a clear majority disagreed or strongly disagreed with the statement. This holds true for most stakeholder groups, except for energy agencies and research institutes, which neither agreed nor disagreed. No respondent agreed or strongly agreed with this statement.
- *Ecodesign has led to improved profit margins on regulated products*  
A clear majority of respondents replied either 'I do not know' or 'neither agree nor disagree' to this question. Among those providing a different answer a majority disagreed with this statement. Opinions change across stakeholder groups. Some manufacturers and industry groups replied that Ecodesign has not led to improved profit margins on regulated products. However, government bodies, test laboratories and individual retailers thought that Ecodesign might have had a positive impact on profit margins.
- *The Ecodesign regulations unduly restricted the range of products on the market*

A clear majority of respondents disagreed or strongly disagreed with this statement. However opinions change across stakeholder groups. Manufacturers were divided about this topic, with the same number of respondents agreeing and disagreeing with the statement. A majority of industry groups and retailers thought that Ecodesign regulations have unduly restricted the range of products on the market. The rest of stakeholder groups disagreed or strongly disagreed with the statement. This trend is particularly clear for consumer organisations and environmental groups, whose majority answer was 'strongly disagree'.

Most stakeholder groups expressed that Ecodesign was unlikely to have a negative effect on the range of products on the market:

- *"There is no sign that Ecodesign regulations would have unduly restricted the range of products on the market. Even for light bulbs, the ban of incandescent light bulbs has had a stimulating effect and now more technologies and product types are available on the market"*

On the contrary some industry groups thought that for some product groups Ecodesign may indeed restrict the range of products in the market:

- *"Ecodesign measures will remove certain products from the market. However, as regards to heating, national markets are very different and thus requires different systems. Excessive restrictions may have a very detrimental effect in cases when only certain types of equipment can be installed in existing homes".*

**B 28** ***To what extent do you agree or disagree with the statement that Ecodesign regulations, or voluntary agreements under Ecodesign, have unduly banned or will unduly ban products from the market in the following categories? (short survey)***

A clear majority of respondents disagreed or strongly disagreed with this statement. Opinions differ across stakeholder groups. The overwhelming majority of consumers do not think that Ecodesign regulations or voluntary agreements have unduly banned or will unduly ban products in the market. Retailers were mixed about this question, however a slight majority thought that Ecodesign might indeed have unduly banned or will ban products. Manufacturers were also divided about this topic, however with a slight majority disagreeing with the statement.

These results are very similar across product groups, except for directional and non-directional lighting. For those two product groups a majority of manufacturers thought that Ecodesign regulations have unduly banned or will unduly ban products from the market.

**A 24a** ***For you, or your organisation, do you think that the benefits of the Ecodesign regulations and voluntary agreements outweigh their costs? (long survey)***

Overall the majority of respondents thought that the benefits of Ecodesign outweigh the costs for them or their organisations. This is consistent across all stakeholders groups except for industry groups and manufacturers. Most industry groups reply 'Do not know' to this question. Among the few industry groups that provide an assessment the majority thought that the benefits of Ecodesign regulations and voluntary agreements do not outweigh the costs. This is the same opinion held by the majority of manufacturers. For the rest of stakeholder groups a clear majority thought that Ecodesign provides high overall benefits outweighing the costs.

Stakeholders explained the benefits of Ecodesign for their organisations in the following terms:

- *"For NGOs, Ecodesign has high benefits: it contributes to environmental and energy saving objectives and supports sustainable consumption. Information requirements in Ecodesign measures can also support the development of NGO tools and campaigns (such as the Topten guide [www.topten.eu](http://www.topten.eu) that uses technical information to rank products on the market)"*
- *"Despite the costs, we consider that the Ecodesign framework provides short and long term benefits for consumers and we are highly supportive of it. We express reservations on voluntary agreements as they have so far shown an incoherent approach. Given practical experience from existing voluntary agreements, which have often been proven to take more time to achieve an output and implementation than regulation itself, ANEC/BEUC are doubtful regarding the efficiency of self-regulation and therefore propose the deletion of this option when the Directive is revised"*
- *"The savings in cost and for the environment are much higher than the costs. Energy savings and improved environment is important for our organisation"*

Some manufacturers expressed their concerns about increased costs to comply with Ecodesign regulations:

- *"Our company needed to do a lot of efforts to catch ECO requirements. Moreover - we need to improve our lab to be able to check ECO VCs. At the moment - we see cost only and we do not plan to have bigger profit because of eco"*

Industry groups thought that it is too premature to provide an assessment on this, in particular for recently adopted regulations:

- *"Too early to say anything on this"*
- *"A general answer would be difficult. A basic study on this would be recommended"*
- *"The energy labelling and ecodesign requirements for boilers and combi-boilers, water heaters and hot water storage appliances will only be applicable in two years, so that assessing if the benefits of Ecodesign outweigh their costs for these two product groups is not possible today and is difficult to assess for the future".*

**A 24b** ***For EU society as a whole, do you think that the benefits of Ecodesign regulations and voluntary agreements outweigh their costs? (long survey)***

Overall the majority of respondents thought that the benefits of Ecodesign outweigh the costs for EU society as a whole. This is consistent across all stakeholders groups except for industry groups and manufacturers. Most industry groups reply 'Do not know' to this question. Among the few industry groups that provide an assessment there were mixed views. Manufacturers also showed mixed views, however with a slight majority that thought benefits do not outweigh costs. For the rest of stakeholder groups a clear majority thought that Ecodesign provides high overall benefits outweighing the costs for EU society as a whole.

Most answers found in the open text replies highlighted the benefits of Ecodesign regulations for EU society as a whole:

- *"Ecodesign is a very cost-effective policy for society. The benefits for EU citizens and the environment through energy savings are quantifiable and very high. This has already been demonstrated in previous evaluation studies in the EU and in other economies".*
- *"Huge cost effectiveness (CSES 2012) and reduced dependency of Europe and CO2 savings and financial savings for citizens and companies (ECOFYS 2012)"*

- *"The answer depends very much on how the benefits for the society are quantified (costs for climate change are existing but difficult to evaluate). We are convinced, that in combination with Energy label there is a significant energy saving effect and thus hopefully a positive effect on climate"*
- *"The Ecodesign framework provides a positive service to the society driving product design towards the maximum of its energy efficiency by enabling consumers to adopt more sustainable consumption patterns and motivating industry to continue investing in innovation. The contributions of ecodesign to energy security are also important"*

Similarly as for the previous question, industry groups generally thought that it is too premature to provide an assessment on this, in particular for recently adopted regulations:

- *"Too early to say anything on this"*
- *"A general answer would be difficult. A basic study on this would be recommended"*
- *"The energy labelling and ecodesign requirements for boilers and combi-boilers, water heaters and hot water storage appliances will only be applicable in two years, so that assessing if the benefits of Ecodesign outweigh their costs for these two product groups is not possible today and is difficult to assess for the future".*

**A 10a For you, or your organisation, do you think that the benefits of mandatory energy labels outweigh their costs? (long survey)**

A clear majority of respondents answered that the benefits of mandatory energy labels outweigh the costs for them or their organisations. This result is consistent across all stakeholder groups except for industry groups and manufacturers. Most industry groups reply 'Do not know' to this question. Among those industry groups that provide an assessment there were mixed views. Manufacturers showed similar mixed views. For the rest of stakeholder groups a clear majority thought that mandatory energy labels provide high overall benefits outweighing the costs for them or their organisations.

Stakeholders explained the benefits of mandatory energy labels for their organisations in the following terms:

- *"For NGOs, Energy Labelling has high benefits: it contributes to environmental and energy saving objectives, informs consumers on energy issues and energy savings (highly complementary to NGO awareness raising and information campaigns), and supports the development of NGO tools and campaigns (such as the Topten guide [www.topten.eu](http://www.topten.eu) that uses Energy Labelling information to rank products on the market)".*
- *"All Europe sees large benefits for the workers that it represents in a mandatory labelling scheme of energy-using products. Indeed, such a mandatory labelling places competition on a qualitative plane, gives a premium to quality, innovation, and technical / scientific know-how, and an advantage to high-skilled workers, technicians and engineers, with stable contracts, which is the type of employment what industriAll Europe favours and supports"*
- *"Several consumer surveys found that the (previous) Energy Label has been well understood by consumers and influenced their choices for more efficient models"*
- *"In a 2012 survey for Consumer Futures report 'Under the Influence' 40% consumers claimed that the rating had a significant impact on their white goods purchase decisions. This will have saved them money on running costs, provided a return on R&D investment to manufacturers, and delivered greenhouse gas emissions reductions (at point of use at least)".*

- *"Experience have shown that consumers prefer energy efficient products, saving money and benefitting the environment from less energy consumption. As an environmental organisation, the reduced energy consumption and reduced environmental impacts is very important for our organisation"*

Some individual manufacturers, industry groups and retailers expressed their concerns about additional costs:

- *"Labelling has created so much extra costs and burden that it will never bring money back (especially for SMEs)!"*
- *"The costs of the system are considerable. From necessary stakeholder representation to avoid competition distortion to implementation in the market. This is particularly true when complex product groups such as made to measure systems are being labelled".*
- *"For retailers, the energy label brings few benefits. The energy label informs customers in the sales process, but does not increase the number of sales. At the same time, obtaining the energy label and ensuring that the right energy label is displayed properly represents an additional burden. The energy label scheme has also been an invitation for lawyers to find improperly displayed energy labels in stores and issue a written warning (+ legal fee) to the retailer".*

Some industry groups also expressed that the potential benefits for their organisation are dependent on market surveillance and enforcement:

- *"It will depend on there being effective market surveillance (and action on non- conformance) and consumers using the labels for purchasing decisions".*

**A 10b For EU society as a whole, do you think that the benefits of mandatory energy labels outweigh their costs? (long survey)**

A clear majority of respondents answered that mandatory energy labels provide high overall benefits outweighing the costs for EU society as a whole. This result is consistent across all stakeholders groups except industry groups and manufacturers. Most industry groups and manufacturers reply 'Do not know' to this question. However, among those industry groups and manufacturers that provide an assessment the majority answered that benefits outweigh the costs.

Most answers found in the open text replies highlighted the benefits of mandatory energy labels for EU society as a whole:

- *"Energy Labelling is an extremely cost-effective policy for society. The implementation costs are limited, while the benefits for EU citizens and the environment through energy savings are very high"*
- *"Labelling informs markets and accelerates EE improvements at a much lower cost than alternates. The costs of label compliance are part of good manufacturing practice".*
- *"Energy efficiency policies are no regret options and have multiple benefits for the society such as lower energy bills, creating jobs and reducing greenhouse gas emissions".*
- *"Energy labels increase transparency in the market, thus resulting in a level playing field for competition on energy efficiency which stimulates innovation and reduces price".*
- *"The mandatory energy label is beneficial for the EU society. First of all, it provides a common level of comparison across different brands and shops regarding the energy efficiency of electric appliances. Moreover, it raises consumer awareness on the importance of saving energy".*



Some industry groups expressed their concerns about additional costs, in particular for SMEs:

- *"The costs of the system are considerable. From necessary stakeholder representation to avoid competition distortion to implementation in the market. This is particularly true when complex product groups such as made to measure systems are being labelled. A recent example is the transposition of the "package label" for lot 1/2 products. This system is necessary to avoid distorting competition but remains very burdensome for SMEs".*

## Annex A Survey results – closed questions

## Annex A Survey results – closed questions

Full response stakeholder	Short
I work for an energy agency	EA
I work for a surveillance body	Surv.Body
I work for a government body other than an energy agency or a surveillance body	Gov.Body
I work for a standardisation organisation	Stand.Org
I work for a test laboratory	Test Lab.
I work for an intergovernmental organisation (incl. multilateral banks)	Int.Gov
I work for an interest group	Interest G.
I work for an individual manufacturer	Indiv.Manu.
I work for an individual retailer	Indiv.Ret.
I work for a research institute or consultancy	Research
Other, namely	Other SH
<b>Interest groups</b>	
Consumer interest group	Consumer IG
Environmental interest group	Environ. IG
Industry interest group	Industry IG
Retailers' interest group	Retailer IG
Other interest group	Other IG

### General Questions

#### 0. Location selection – please select the country of your response

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Austria	0	0	0	0	0	0	1	1	1	0	0	0	0	0	0	0	3
Belgium	0	1	1	0	0	1	2	3	15	1	1	3	1	0	0	6	35
Czech Republic	0	0	0	0	0	0	1	1	1	1	0	0	0	0	0	1	5
Denmark	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	3	5
Finland	0	1	1	1	0	0	0	0	7	0	0	1	0	0	0	0	11
France	0	0	1	0	0	0	0	1	1	0	0	2	0	0	0	5	10
Germany	0	1	2	0	0	1	3	1	11	3	0	4	3	2	1	32	
Italy	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	1	3
Malta	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Netherlands	1	0	1	0	0	0	0	1	0	1	0	0	0	0	0	0	4
Non EU-28	3	0	2	0	1	0	0	0	2	0	0	0	0	1	0	0	9
Poland	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1

Portugal	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Spain	0	0	0	0	1	0	1	0	1	0	0	1	0	0	5
Sweden	1	0	0	0	0	0	0	0	1	0	0	1	0	0	3
United Kingdom	0	0	2	0	0	0	1	2	2	0	0	3	0	0	10

**0.a What is your affiliation?**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
I work for an energy agency	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	6
I work for a surveillance body	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
I work for a government body other than an energy agency or a surveillance body	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	11
I work for a standardisation organisation	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
I work for a test laboratory	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2
I work for an intergovernmental organisation (incl. multilateral banks)	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	2
I work for an interest group	0	0	0	0	0	0	9	1	42	6	1	0	0	0	0	0	71
I work for an individual manufacturer	0	0	0	0	0	0	0	0	0	0	0	16	0	0	0	0	16
I work for an individual retailer	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	0	4
I work for a research institute or consultancy	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0	0	4
Other, namely	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	18	18

**0.a.ii Which geographic level do you represent?**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
International	2	0	0	0	1	0	0	0	0	1	0	0	9	2	1	1	17
EU-level	1	0	1	0	0	1	2	4	14	2	1	3	0	0	0	7	36
EU Member state	2	2	6	1	0	1	6	8	21	4	0	4	1	3	7	66	
EEA country	0	0	2	0	0	0	0	0	3	0	0	0	0	0	0	5	
Other country	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	2	
Regional	0	1	1	0	0	0	1	1	1	0	0	0	0	0	0	2	7
Local	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Individual	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1

- 0.b This survey personalises the questions you answer based on the affiliation you selected above. The purpose of this is to ask only the most appropriate questions and to restrict the time required to respond. If you are happy to answer all questions, noting that this will take longer, please check the following box:

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, I would like to take the full survey	5	2	9	0	2	2	8	9	34	5	1	14	3	3	16	11	3

- 0.d Contributions received to this consultation, together with the identity of the contributor may be published by the Commission, unless the contributor objects to the publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case, the publication may be published in anonymous form. The contributor may also object to the publication of his contribution, but should be aware that he may later be requested to provide justification in accordance with the exceptions provided under Regulation 1049/2001 regarding public access to European parliament, Council and Commission documents ([http://ec.europa.eu/transparency/access\\_documents/index\\_en.htm](http://ec.europa.eu/transparency/access_documents/index_en.htm)). Do you object the publication of your personal data and/or your contribution? (compulsory)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
My contribution may be published	3	2	5	1	2	1	8	9	35	5	1	10	2	4	0	88	
I object to the publication of my personal data (publication in anonymous form)	3	1	4	0	0	1	0	4	6	0	0	6	1	0	0	26	
I object to the publication of my contribution	0	0	2	0	0	0	1	0	1	1	0	0	1	0	0	6	

0. d.ii) Please provide your contact details

## Energy labeling directive & Ecodesign directive

1.a Overall, do you think that the Energy Labelling and Ecodesign Directives have achieved energy savings consistent with economic technical potential (potential savings that are technologically possible at reasonable cost)?

1.a Ecodesign Directive

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, it has exceeded the potential	1	0	1	0	0	0	1	1	1	1	0	2	1	0	0	9
Yes, it has met the potential	0	1	3	0	0	0	2	0	16	0	0	4	0	1	2	29
No, it has been successful but there is missed potential	4	2	6	0	2	2	5	11	8	0	1	6	1	3	8	59
No, there is significant missed potential	1	0	1	0	0	0	0	1	1	0	0	2	0	0	3	9
Don't know	0	0	0	1	0	0	1	0	14	4	0	1	1	0	1	23

1.a Energy Labelling Directive

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, it has exceeded the potential	1	0	1	0	0	0	0	0	1	0	0	2	0	0	0	5
Yes, it has met the potential	0	0	2	0	0	1	1	1	24	5	0	5	2	1	4	46
No, it has been successful but there is missed potential	4	3	8	0	2	1	3	8	6	0	1	5	0	3	6	50
No, there is significant missed potential	0	0	0	0	0	0	5	4	3	0	0	3	0	0	3	18
Don't know	0	0	0	1	0	0	0	0	5	1	0	0	1	0	0	8

1.a Please explain your answer (note that you will have the chance to discuss the ambition shown by the Directives later in the questionnaire)

1.b Do you think that the Energy Labelling and Ecodesign Directives need to be changed to achieve energy savings that are closer to the full economic technical potential?

1.b Ecodesign Directive

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	5	2	4	0	0	0	6	13	12	1	1	7	1	4	10	66	
No	1	1	7	0	2	1	2	0	23	2	0	4	1	0	4	48	
Don't know	0	0	0	0	0	1	1	0	5	2	0	3	1	0	0	13	

1.b Energy Labelling Directive

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	6	3	6	0	1	1	7	12	11	1	1	9	3	4	10	75	
No	0	0	5	0	1	1	1	1	13	3	0	3	0	0	3	31	
Don't know	0	0	0	0	0	0	1	0	15	1	0	2	0	0	1	20	

1.b Please explain your answer

1.c Are the Energy Labelling and Ecodesign Directives coherent ( non-contradictory, mutually supportive) with other EU policies and objectives?

1.c Ecodesign Directive

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	3	8	0	1	1	1	8	27	1	1	9	0	3	10	77	
No	0	0	2	0	1	0	6	2	10	1	0	2	1	0	4	29	
Don't know	1	0	1	0	0	1	2	2	0	3	0	3	2	0	0	15	

1.c Energy Labelling Directive

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	3	8	0	1	1	3	8	25	1	1	9	1	3	11	79	
No	0	0	2	0	0	0	6	2	10	4	0	2	1	0	3	30	
Don't know	1	0	1	0	1	1	0	2	1	0	0	3	1	0	0	11	

1.c Please explain your answer



## Energy labeling directive

2.a Energy Labels are currently (or soon to be) mandatory for the following range of product groups. For each of the following product groups, please indicate if these were the most appropriate product groups to select for Energy Labelling.

2.a Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	1	10	0	1	1	8	12	11	1	1	9	2	3	11	75	
No	0	1	1	1	0	0	1	0	5	0	0	1	1	0	0	11	
Don't know	0	0	0	0	1	0	0	0	10	3	0	3	0	1	0	18	

2.a Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	1	11	0	2	0	8	11	12	1	1	4	2	4	11	72	
No	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	2	
Don't know	0	1	0	1	0	0	0	0	10	2	0	6	0	0	1	21	

2.a Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	2	10	0	2	2	7	11	10	0	1	7	2	4	11	73	
No	0	0	0	0	0	0	0	0	1	0	0	1	1	0	0	3	
Don't know	0	0	0	1	0	0	1	0	12	3	0	3	0	0	0	20	

## 2.a Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	4	2	11	0	2	1	8	11	12	2	1	7	3	4	12	80	
No	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	0	1	0	0	0	0	11	2	0	3	0	0	0	17	

## 2.a Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	4	2	11	0	2	1	8	11	13	2	1	7	3	4	11	80	
No	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	0	1	0	0	0	0	10	2	0	3	0	0	0	16	

## 2.a Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	4	2	11	0	2	0	8	11	13	2	1	7	3	4	12	80	
No	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	0	1	0	0	0	0	10	2	0	3	0	0	0	16	

## 2.a Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	3	2	11	0	2	0	8	11	13	2	1	7	3	4	11	78	
No	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2	
Don't know	0	0	0	1	0	0	0	0	10	2	0	3	0	0	0	16	

## 2.a Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	4	1	11	0	2	0	6	10	11	1	1	6	1	3	10	67	
No	0	0	0	0	0	0	2	0	1	0	0	2	1	0	0	6	
Don't know	0	1	0	1	0	0	0	1	11	2	0	4	1	1	1	23	

## 2.a Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	4	2	10	0	1	0	8	11	10	0	1	3	2	4	12	68	
No	0	0	0	0	0	0	0	0	3	0	0	2	1	0	0	6	
Don't know	0	0	0	1	1	0	0	0	9	3	0	6	0	0	0	20	

2.a Luminaires (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Yes	4	2	5	0	1	0	6	11	9	0	1	3	4	2	10	58
No	0	0	0	0	0	0	2	0	4	0	0	2	0	2	0	10
Don't know	0	0	5	1	1	0	0	0	9	3	0	6	0	0	1	26

2.a Domestic ovens

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Yes	4	2	10	0	2	0	8	12	13	1	1	6	3	2	10	74
No	0	0	0	0	0	0	1	0	1	1	0	2	0	2	0	7
Don't know	0	0	1	1	0	0	0	0	10	2	0	3	0	0	1	18

2.a Please explain your answer

2.b In retrospect, which other product groups (if any) should have been labelled:

2.b PCs and servers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Yes, and should still be labelled	3	0	6	0	1	0	8	11	4	1	1	2	1	3	8	49
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
No, but should now be labelled	0	0	0	0	1	1	0	0	0	0	0	0	1	1	1	5
No, and still should not be labelled	1	2	4	0	0	0	0	0	0	0	0	1	0	0	2	10
Don't know	0	0	1	1	0	0	1	1	17	3	0	6	0	0	1	31

## 2.b Imaging equipment

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and should still be labelled	3	0	5	0	1	0	6	9	2	0	1	1	0	2	8	38	
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	
No, but should now be labelled	0	0	0	0	0	0	1	1	0	0	0	0	1	0	1	4	
No, and still should not be labelled	1	2	3	0	1	0	0	1	1	0	0	1	1	1	2	14	
Don't know	0	0	2	1	0	0	2	1	18	4	0	6	0	1	1	36	

## 2.b External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and should still be labelled	0	0	2	0	0	0	1	1	2	0	0	3	1	2	6	18	
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	2	
No, but should now be labelled	0	0	1	0	2	0	1	1	0	0	0	0	1	0	0	6	
No, and still should not be labelled	4	2	5	0	0	0	4	8	2	0	1	1	0	2	5	34	
Don't know	0	0	2	1	0	0	3	2	17	4	0	5	0	0	1	35	

## 2.b Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and should still be labelled	0	0	4	0	0	0	1	2	2	0	0	2	1	1	5	18	
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
No, but should now be labelled	0	0	2	0	1	0	0	1	0	0	0	0	1	0	0	5	
No, and still should not be labelled	4	2	2	0	0	1	0	8	10	0	1	1	0	1	6	36	

Don't know	0	0	3	1	1	0	5	1	17	4	0	6	0	2	1	41
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## 2.b Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and should still be labelled	0	0	3	0	1	1	6	2	2	0	0	1	1	0	5	22	
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
No, but should now be labelled	0	0	1	0	0	0	0	1	0	0	0	1	0	1	0	4	
No, and still should not be labelled	4	2	4	1	1	1	0	7	12	0	1	2	1	2	7	45	
Don't know	0	0	2	0	0	0	2	2	16	4	0	6	0	1	1	34	

## 2.b Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and should still be labelled	3	1	3	0	0	0	3	9	2	0	1	1	0	2	7	32	
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
No, but should now be labelled	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	2	
No, and still should not be labelled	1	1	6	1	0	1	0	0	11	0	0	2	0	0	3	26	
Don't know	0	0	2	0	2	0	3	2	16	4	0	6	2	1	2	40	

## 2.b Electric pumps

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and should still be labelled	1	0	4	0	1	1	2	3	2	0	0	2	0	1	5	22	
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
No, but should now be labelled	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	3	

No, and still should not be labelled	3	0	2	1	0	1	0	7	10	0	1	2	0	1	6	34
Don't know	0	1	3	0	1	0	4	2	17	4	0	6	2	1	1	42

## 2.b Complex set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes, and should still be labelled	3	0	6	0	0	0	5	9	2	0	1	1	1	3	8	39	
Yes, but labelling is no longer relevant	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	
No, but should now be labelled	0	1	1	0	0	0	0	0	0	0	0	0	1	0	2	5	
No, and still should not be labelled	1	0	3	0	0	0	0	1	1	0	0	2	0	1	1	10	
Don't know	0	0	1	1	2	0	4	2	19	4	0	6	0	0	1	40	

## 2.b Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes, and should still be labelled	0	0	5	0	0	0	5	2	3	0	0	2	1	1	4	23	
Yes, but labelling is no longer relevant	2	1	0	0	0	0	0	7	0	0	1	0	0	2	4	17	
No, but should now be labelled	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	
No, and still should not be labelled	2	1	5	0	0	0	0	1	1	0	0	1	0	1	3	15	
Don't know	0	0	1	1	2	0	4	2	18	4	0	6	0	0	1	39	

## 2.b Motors and variable speed drives

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes, and should still be labelled	0	0	4	0	1	0	2	1	3	0	0	1	0	0	6	18	
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

No, but should now be labelled	0	0	2	0	0	0	0	0	0	0	0	0	1	1	0	4
No, and still should not be labelled	4	2	1	0	0	0	0	7	10	0	1	2	0	1	5	33
Don't know	0	0	3	1	0	0	4	4	16	4	0	7	1	2	1	43

## 2.b Lighting installations

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and should still be labelled	2	0	2	0	1	0	1	10	2	0	1	1	1	1	1	8	30
Yes, but labelling is no longer relevant	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
No, but should now be labelled	0	0	1	0	1	0	0	0	0	0	0	0	1	1	1	1	5
No, and still should not be labelled	1	2	3	0	0	0	0	0	6	0	0	2	0	0	0	2	16
Don't know	1	0	4	1	0	0	5	2	19	4	0	7	1	2	0	0	46

## 2.b Other (please specify)

### 2.b Please explain your answer

3. Has the correct level of ambition in product energy efficiency classification been set for the mandatory energy labels for the following product groups, taking into account economic technical potential, innovation and market developments?

### 3. Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	0	2	5	0	0	0	1	0	8	0	0	3	2	0	4	25	
Too low ambition	4	0	3	0	0	0	2	10	0	0	1	1	1	3	7	32	
Much too low ambition	0	0	1	0	0	0	5	1	0	0	0	1	0	0	1	9	
Don't know	0	0	2	1	1	1	0	0	17	3	0	1	0	1	1	28	



### 3. Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	1	1	0	0	0	1	1	2	1	0	4	0	0	1	12
Correct ambition	0	0	7	0	0	1	0	0	5	0	0	4	0	0	2	19
Too low ambition	2	0	1	0	0	0	1	9	1	0	1	1	1	1	6	24
Much too low ambition	1	0	0	0	0	0	5	1	2	0	0	0	0	0	1	10
Don't know	1	1	1	1	1	0	1	1	11	1	0	3	1	3	2	28

### 3. Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Much too high ambition	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Too high ambition	0	1	1	0	0	0	1	1	1	1	0	3	0	0	0	9
Correct ambition	1	0	6	0	0	1	0	0	8	0	0	5	0	0	3	24
Too low ambition	2	0	2	0	0	0	6	9	1	0	1	1	1	1	6	30
Much too low ambition	0	0	0	0	0	0	0	1	1	0	0	0	0	0	2	4
Don't know	1	1	1	1	1	0	1	1	10	1	0	3	1	3	1	26

### 3. Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Correct ambition	1	1	2	0	0	0	1	0	2	1	0	1	1	1	1	12
Too low ambition	0	0	6	0	0	0	1	3	1	0	0	0	1	2	1	15
Much too low ambition	3	0	1	0	1	0	5	8	0	0	1	1	0	1	8	29
Don't know	0	1	1	1	0	0	1	1	17	1	0	8	0	0	2	33

### 3. Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2
Correct ambition	1	1	5	0	0	1	0	1	3	0	0	2	0	0	2	16
Too low ambition	3	0	3	0	0	0	1	9	1	0	1	2	1	2	6	29
Much too low ambition	0	0	0	0	0	0	5	0	0	0	0	0	0	0	2	7
Don't know	0	1	1	1	1	0	2	2	15	2	0	5	1	2	2	35

### 3. Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	2
Correct ambition	0	2	5	0	0	0	0	1	3	1	0	4	2	0	2	20
Too low ambition	4	0	4	0	1	0	2	8	2	0	1	1	1	3	5	32
Much too low ambition	0	0	0	0	0	0	5	2	0	0	0	1	0	1	3	12
Don't know	0	0	1	1	0	0	1	1	15	1	0	4	0	0	2	26

### 3. Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Correct ambition	0	2	5	0	0	0	0	0	3	1	0	3	2	0	2	18
Too low ambition	1	0	3	0	1	0	1	2	3	0	0	1	1	2	2	17
Much too low ambition	3	0	0	0	0	0	6	9	0	0	1	2	0	2	7	30
Don't know	0	0	1	1	0	0	1	1	15	1	0	4	0	0	1	25

### 3. Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Correct ambition	0	2	5	0	1	0	0	0	4	1	0	3	2	1	2	21
Too low ambition	4	0	4	0	0	0	1	9	2	0	1	2	1	3	6	33
Much too low ambition	0	0	0	0	0	0	5	2	0	0	0	1	0	0	2	10
Don't know	0	0	1	1	0	0	2	1	15	1	0	4	0	0	2	27

### 3. Domestic Laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Correct ambition	2	2	6	0	0	0	0	10	5	1	1	3	2	2	8	42

Too low ambition	1	0	3	0	0	0	1	1	1	0	0	2	1	1	1	12
Much too low ambition	0	0	0	0	0	0	5	0	0	0	0	1	0	0	1	7
Don't know	1	0	1	1	1	0	2	1	15	1	0	4	0	1	2	30

### 3. Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Correct ambition	0	1	5	0	0	0	0	1	5	1	0	3	1	0	2	19
Too low ambition	1	0	2	0	0	0	0	1	0	0	0	1	0	0	1	6
Much too low ambition	0	0	0	0	0	0	5	0	0	0	0	1	0	0	1	7
Don't know	3	1	3	1	1	0	3	10	15	1	1	5	1	4	8	57

### 3. Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Too high ambition	0	0	1	0	0	0	0	0	3	0	0	1	2	0	1	8
Correct ambition	1	1	5	0	1	0	5	9	3	0	1	1	0	2	7	36
Too low ambition	1	0	1	0	0	0	1	1	0	0	0	0	1	1	2	8
Much too low ambition	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2
Don't know	2	1	1	1	0	0	2	2	13	2	0	7	0	1	2	34

### 3. Luminaires (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Too high ambition	0	0	0	0	0	0	0	0	2	0	0	1	2	0	1	6
Correct ambition	2	0	3	0	1	0	1	7	2	0	1	1	0	1	5	24
Too low ambition	0	0	0	0	0	0	0	1	1	0	0	0	0	0	1	3
Much too low ambition	0	0	1	0	0	0	4	0	0	0	0	0	0	0	2	7
Don't know	2	2	5	1	0	0	3	4	14	2	0	7	1	3	3	47

### 3. Domestic ovens

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	1	1	1	1	0	1	0	0	0	5
Correct ambition	0	0	3	0	0	0	0	1	5	0	0	3	2	0	2	16
Too low ambition	3	1	3	0	0	0	1	9	2	0	1	1	0	1	6	28
Much too low ambition	1	0	1	0	1	0	6	0	0	0	0	1	0	1	1	12
Don't know	0	1	3	1	0	0	0	1	14	1	0	4	1	2	2	30

### 3. Please explain your answer

4.a How effective are the EU energy labels, or are they expected to be, in improving the energy efficiency (energy use per specific service/capacity unit, for example X kWh/standard wash cycle) of new products placed on the market in the following product groups?

4.a Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Very effective	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2	3
Effective	2	2	8	0	2	0	3	2	10	2	0	0	1	1	2	3	38
Neutral	0	1	0	0	0	0	0	0	1	0	0	0	1	0	0	0	3
Ineffective	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	3
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Don't know	2	0	1	0	0	0	3	9	15	0	1	1	4	0	2	7	44

4.a Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Very effective	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	2
Effective	3	0	2	0	0	0	2	10	6	1	1	4	4	0	2	5	36
Neutral	0	0	1	0	0	0	0	0	2	0	0	2	0	0	0	0	5
Ineffective	0	1	0	0	0	0	0	0	1	0	0	0	1	0	0	0	3
Very ineffective	0	0	0	0	0	0	0	0	1	0	0	2	0	0	0	0	3
Don't know	1	1	4	0	0	1	6	2	11	1	0	3	3	1	2	3	36

#### 4.a Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	2
Effective	3	0	2	0	0	0	2	10	8	1	1	6	0	2	5	40	
Neutral	0	0	1	0	0	0	2	0	2	0	0	2	0	0	0	7	
Ineffective	0	1	0	0	1	0	0	0	0	0	0	0	1	0	0	3	
Very ineffective	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2	
Don't know	1	1	4	0	0	1	4	2	11	1	0	2	1	2	3	33	

#### 4.a Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	2	0	0	0	0	1	0	0	0	0	0	0	0	1	4
Effective	2	1	6	0	1	1	1	8	6	1	1	0	0	3	4	35	
Neutral	1	0	0	0	0	0	6	0	1	0	0	2	0	1	1	12	
Ineffective	0	2	0	0	0	0	0	0	0	0	0	1	1	0	0	4	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	
Don't know	1	0	1	0	0	0	1	2	13	1	0	4	0	0	2	25	

#### 4.a Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	1	3
Effective	1	0	4	0	0	2	1	1	1	8	0	0	4	0	0	1	22
Neutral	1	0	0	0	0	0	5	0	1	1	0	0	1	0	1	1	10
Ineffective	0	1	0	0	0	0	0	0	0	0	0	0	1	1	0	0	3
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	0	0	2	10	12	2	2	1	3	0	3	6	44

#### 4.a Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	3	0	1	0	0	0	1	1	0	0	1	1	1	1	10
Effective	1	2	5	0	0	1	1	1	1	7	2	0	4	1	2	1	28
Neutral	1	0	0	0	0	0	6	0	1	0	0	0	1	0	0	1	10
Ineffective	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	0	0	1	10	12	1	1	1	2	0	1	6	37



#### 4.a Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	3	0	1	0	0	0	1	1	0	0	1	0	1	1	9
Effective	1	1	5	0	0	1	1	1	1	7	2	0	5	1	2	1	28
Neutral	1	1	0	0	0	0	5	0	1	0	0	0	0	0	0	1	9
Ineffective	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	2
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	0	0	1	10	12	1	1	1	2	0	1	6	37

#### 4.a Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	3	0	1	0	0	0	1	1	0	0	1	1	1	1	10
Effective	1	2	5	0	0	1	1	1	1	7	2	0	5	1	1	1	28
Neutral	1	0	0	0	0	0	6	0	1	0	0	0	0	0	0	1	9
Ineffective	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	0	0	1	10	12	1	1	1	2	0	2	6	38

#### 4.a Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	1	0	1	0	0	0	1	0	0	0	1	0	0	1	5
Effective	2	1	6	0	0	1	1	9	7	2	1	5	1	3	4	43	
Neutral	1	1	0	0	0	0	6	0	1	0	0	0	0	0	1	10	
Ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	2	0	0	0	1	3	12	1	0	2	0	1	3	26	

#### 4.a Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	2	0	1	0	0	1	1	0	0	0	0	0	0	1	6
Effective	3	0	3	0	0	0	1	6	6	1	1	1	1	0	3	4	29
Neutral	0	0	1	0	0	0	2	0	1	0	0	0	3	0	1	0	8
Ineffective	0	1	0	0	0	0	0	0	0	0	0	2	1	0	0	4	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	1	3	0	0	0	5	5	13	1	0	4	0	0	4	37	

#### 4.a Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	1	0	1	0	0	0	1	0	0	0	0	1	0	1	5
Effective	2	0	5	0	0	1	2	2	5	0	0	2	0	0	0	1	20
Neutral	1	0	1	0	0	0	5	7	1	0	1	0	0	4	5	25	

Ineffective	0	1	0	0	0	0	0	0	0	0	0	1	1	0	0	3
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	1	1	1	0	0	0	1	3	13	2	0	5	0	0	2	29

#### 4.a Luminaires (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	1	3
Effective	2	0	2	0	0	0	0	2	5	0	0	2	1	0	0	0	14
Neutral	0	1	0	0	0	0	5	0	3	0	0	0	0	1	1	1	11
Ineffective	0	1	0	0	0	0	1	0	0	0	0	1	1	0	0	0	4
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	2
Don't know	2	1	5	0	0	0	2	10	12	2	1	5	0	2	7	7	49

#### 4.a Domestic ovens

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	2	0	0	0	0	1	0	0	0	0	1	0	0	1	5
Effective	1	2	5	0	0	0	1	2	8	1	0	5	1	0	0	0	26
Neutral	0	0	0	0	0	0	3	0	2	0	0	1	0	1	0	0	7
Ineffective	0	0	0	0	0	0	4	0	0	0	0	1	0	0	0	1	6
Very ineffective	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Don't know	2	0	1	0	1	0	0	9	11	1	1	2	0	3	7	7	38

#### 4.a Please explain your answer

4.b How effective are the EU energy labels, or are they expected to be, in reducing the energy consumption of new products placed on the market in the following product groups?

4.b Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Effective	2	1	7	0	1	0	1	2	4	2	0	0	0	1	2	5	28
Neutral	0	2	1	0	1	0	1	0	7	0	0	2	0	0	1	15	
Ineffective	1	0	1	0	0	0	2	8	0	1	1	0	1	2	5	22	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	1	0	0	0	2	1	15	0	0	5	0	0	1	25	

4.b Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Effective	2	1	1	0	0	0	2	3	5	1	0	3	0	2	3	23	
Neutral	1	0	2	0	0	0	0	7	3	0	1	3	1	1	4	23	
Ineffective	0	1	1	0	0	0	1	0	3	0	0	0	0	0	1	7	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2	
Don't know	0	0	4	0	1	1	5	1	10	0	0	3	0	1	2	28	

#### 4.b Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Effective	2	1	2	0	1	0	2	3	7	1	0	5	0	2	3	29	
Neutral	1	0	2	0	0	0	0	7	4	0	1	3	1	1	4	24	
Ineffective	0	1	1	0	0	0	2	0	0	0	0	0	0	0	1	5	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	4	0	0	1	4	1	10	0	0	2	0	1	2	25	

#### 4.b Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	2	0	0	0	0	1	0	0	0	0	0	0	1	4	
Effective	1	1	6	0	0	0	0	1	4	0	0	0	0	1	1	15	
Neutral	0	0	1	0	0	1	0	0	3	0	0	1	1	1	0	8	
Ineffective	1	1	0	0	1	0	7	8	0	0	1	0	0	2	7	28	
Very ineffective	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2	
Don't know	0	0	1	0	0	0	1	2	13	1	0	6	0	0	1	25	

#### 4.b Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	
Effective	1	1	4	0	0	1	0	1	7	0	0	4	0	2	2	23	
Neutral	1	1	1	0	0	1	0	0	3	0	0	1	1	0	1	10	

Ineffective	1	0	0	0	0	0	5	8	0	0	1	0	0	2	6	23
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	4	0	0	0	3	2	11	1	0	3	0	0	1	25

#### 4.b Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	0	0	0	0	0	1	0	0	0	1	1	0	0	3
Effective	1	0	8	0	0	0	0	1	7	1	0	4	0	1	3	26
Neutral	1	1	1	0	0	1	1	0	3	0	0	1	1	1	1	12
Ineffective	1	1	0	0	0	0	6	8	0	0	1	0	0	2	5	24
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	0	0	0	1	2	11	1	0	2	0	0	1	19

#### 4.b Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	2
Effective	1	0	7	0	0	0	0	1	7	1	0	5	0	1	2	25
Neutral	1	1	0	0	0	1	0	0	3	0	0	0	1	1	2	10
Ineffective	1	1	1	0	0	0	7	8	0	0	1	0	0	1	5	25
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	1	2	12	1	0	2	0	1	1	22

## 4.b Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Very effective	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	0	3
Effective	1	1	7	0	0	0	0	0	1	7	1	0	5	0	1	2	26
Neutral	1	1	1	0	0	1	0	0	3	0	0	0	0	1	1	2	11
Ineffective	1	0	0	0	0	0	7	8	0	0	0	1	0	0	1	5	23
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	1	2	12	1	0	0	2	0	1	1	22

## 4.b Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Very effective	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Effective	1	0	7	0	0	0	0	0	2	7	1	0	5	0	2	2	27
Neutral	0	1	0	0	0	1	0	0	3	0	0	0	0	1	0	0	6
Ineffective	2	0	1	0	0	0	7	8	0	0	0	1	0	0	1	5	25
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	1	2	0	0	0	1	2	12	1	0	0	2	0	1	3	25

## 4.b Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Very effective	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Effective	2	1	5	0	0	0	0	0	0	6	0	0	2	0	3	1	20
Neutral	0	0	0	0	0	1	1	1	3	0	0	0	2	0	0	0	8

Ineffective	0	0	0	0	0	0	5	0	0	0	0	1	1	0	2	9
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	1	1	4	0	0	0	2	10	12	1	1	4	0	1	7	44

#### 4.b Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	2
Effective	2	1	6	0	0	0	1	3	7	0	0	2	1	2	2	27
Neutral	1	0	1	0	0	0	1	5	2	0	1	0	1	2	4	18
Ineffective	0	1	0	0	0	0	5	1	0	0	0	1	0	0	2	10
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	1	3	11	1	0	5	0	0	1	24

#### 4.b Luminaires (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Effective	2	1	3	0	0	0	0	2	6	0	0	2	1	2	2	21
Neutral	0	0	1	0	0	0	1	1	3	0	0	0	1	0	0	7
Ineffective	0	1	0	0	0	0	5	0	0	0	0	1	0	0	2	9
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	2
Don't know	1	0	5	0	0	0	2	9	11	1	1	5	0	1	6	42



4.b Domestic ovens

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	1	0	0	0	0	1	0	0	0	0	0	1	0	0	3
Effective	1	1	4	0	0	0	1	3	7	1	0	0	6	0	0	1	25
Neutral	1	1	2	0	0	0	1	5	4	0	1	0	1	2	5	23	
Ineffective	0	0	0	0	0	0	6	0	0	0	0	0	0	1	2	9	
Very ineffective	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	2	
Don't know	0	0	3	0	1	0	0	3	9	0	0	0	2	0	1	2	21

4.b Please explain your answer

4.c Some labels also provide information on other product- specific parameters. Please rate the overall effectiveness of energy labels in improving the following parameters for new products:

4.c Noise (for Washing Machines and Dishwashers)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	1	1	2	0	0	0	1	0	0	0	0	0	1	1	1	1	9
Effective	0	1	7	0	2	0	7	3	6	1	0	0	4	1	1	4	37
Neutral	1	1	0	0	0	0	0	0	4	1	0	0	3	0	0	1	11
Ineffective	0	0	1	0	0	1	0	0	1	1	0	0	0	1	0	2	7
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	1	0	0	1	1	9	12	3	1	1	2	0	2	5	39

#### 4.c Water use (for Washing Machines and Dishwashers)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	2	0	1	0	1	0	0	0	0	0	3	2	1	2	12
Effective	2	2	6	0	1	0	7	4	11	3	0	0	5	1	1	5	48
Neutral	0	1	2	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Ineffective	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	2
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	1	0	0	1	1	8	8	3	1	2	0	2	5	34	

#### 4.c Capacity/Size

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	1	0	0	0	1	0	0	0	0	0	1	1	0	1	5
Effective	0	2	6	0	1	0	6	3	5	1	0	0	4	0	0	3	31
Neutral	2	0	1	0	1	0	0	0	5	0	0	0	2	1	2	2	16
Ineffective	0	0	0	0	0	1	1	0	1	1	0	0	1	0	0	1	6
Very ineffective	0	1	0	0	0	0	0	0	0	0	0	0	1	1	0	0	3
Don't know	2	0	3	0	0	1	1	9	9	4	1	2	0	2	6	40	

#### 4.c Product specific output efficiency (for example spin drying efficiency class)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	2	0	0	0	0	0	0	0	0	0	1	1	0	1	5
Effective	2	2	4	0	1	0	7	3	9	1	0	0	4	2	1	4	40
Neutral	0	0	2	0	0	0	1	0	1	1	0	0	3	1	1	2	12

Ineffective	0	1	1	0	0	1	0	0	0	0	0	0	0	0	1	4
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	2	0	1	1	1	9	10	4	1	2	0	2	5	40

4.c Please explain your answer, identifying particular product groups of concern

5. Energy labelling currently focuses primarily on energy efficiency – as the rating and scale is based on an index of energy use per specific service/capacity unit, for example for televisions the power consumption per screen size expressed in W/dm<sup>2</sup>. While energy consumption is also currently displayed on labels as a numeric (X kWh/year) value. What should be the focus in future?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Only on energy efficiency	1	0	1	0	0	1	0	0	5	0	0	4	0	0	0	0	12
Mainly on energy efficiency (existing focus)	0	0	3	0	0	1	1	2	22	4	0	3	2	0	3	41	
On both energy efficiency and energy consumption	4	1	6	0	2	0	8	7	3	0	1	1	2	2	10	47	
Mainly on energy consumption	0	1	1	0	0	0	0	2	3	0	0	3	0	1	0	11	
Only on energy consumption	0	0	0	0	0	0	0	0	2	1	0	2	0	0	0	5	
Other: please specify	0	0	0	0	0	0	0	2	1	0	0	0	0	1	0	4	

5. Please explain your answer

6.a How effective has energy labelling been in increasing the proportion of consumers that are informed about product energy use?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	1	1	0	0	1	1	2	5	0	0	2	0	0	4	17	
Effective	4	2	6	0	1	0	7	10	23	6	1	7	1	4	9	81	
Neutral	0	0	1	0	0	1	0	1	2	0	0	0	1	0	0	6	
Ineffective	1	0	0	1	1	0	0	0	0	0	0	0	1	0	0	4	
Very ineffective	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2	
Don't know	0	0	2	0	0	0	1	0	2	0	0	3	1	0	0	9	

**6.b How effective has energy labelling been in leading to consumers taking greater account of energy use – as compared to price, size, design, functionality - in their product purchase decisions?**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	1	0	0	0	0	0	1	1	6	0	0	0	0	0	0	2	11
Effective	4	1	6	0	1	1	8	10	10	4	1	8	3	4	7	68	
Neutral	0	2	2	0	0	0	0	2	2	1	0	2	1	0	2	14	
Ineffective	0	0	0	1	1	0	0	0	1	0	0	0	0	0	0	3	
Very ineffective	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	2	
Don't know	0	0	2	0	0	1	0	0	13	0	0	3	0	0	2	21	

**7.a What do you think of the following statements regarding the effectiveness of the scale of the EU energy label**

**7.a Consumers understand the current (A-G) + 3 (A+++, A++, A+) class system**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	1	2	3	0	0	1	1	0	7	0	0	4	1	0	1	21	
Agree	2	0	4	0	2	1	2	2	10	5	0	7	0	3	5	43	
Neither agree nor disagree	0	0	1	0	0	0	1	1	12	0	0	1	0	0	0	16	
Disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Strongly disagree	2	1	0	0	0	0	5	10	2	0	1	2	3	1	7	34	
Don't know	0	0	2	0	0	0	0	0	2	1	0	0	0	0	0	5	

7.a An A-G class scale is easier for consumers to understand than the A+++-D class scale

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	4	1	5	0	1	0	8	11	4	2	1	1	1	4	9	52	
Agree	1	0	2	0	0	0	1	2	9	3	0	4	2	0	2	26	
Neither agree nor disagree	0	1	2	0	1	1	0	0	16	0	0	5	0	0	1	27	
Disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Strongly disagree	0	1	1	0	0	1	0	0	2	0	0	3	1	0	1	10	
Don't know	0	0	0	0	0	0	0	0	2	1	0	1	0	0	0	4	

7.a Current energy label classes provide a clear and useful differentiation of product energy efficiency

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	1	0	1	0	0	0	1	0	4	1	0	2	0	0	1	11	
Agree	2	1	5	0	1	2	2	2	11	1	0	6	2	0	2	37	
Neither agree nor disagree	0	2	3	0	1	0	0	0	14	2	0	3	0	2	3	30	
Disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Strongly disagree	2	0	1	0	0	0	6	11	1	1	1	2	2	2	5	34	
Don't know	0	0	0	0	0	0	0	0	2	1	0	0	0	0	1	4	

7.a Classes are coherent with Ecodesign minimum requirements

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	1	0	0	0	0	0	1	0	0	0	0	0	1	0	1	4	
Agree	0	1	2	0	1	0	0	0	10	1	0	4	0	0	1	20	
Neither agree nor disagree	1	0	2	0	0	2	1	2	5	4	0	3	1	0	2	23	

Disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strongly disagree	3	2	0	0	0	0	5	11	14	0	1	4	0	4	8	52
Don't know	0	0	5	0	1	0	2	0	3	1	0	3	2	0	1	18

**7.a The current classifications need to be changed**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	4	1	4	0	0	0	7	11	3	1	1	5	1	3	6	47	
Agree	0	1	2	0	1	0	0	1	3	3	0	2	3	1	0	17	
Neither agree nor disagree	1	0	2	0	1	0	1	1	8	1	0	3	0	0	4	22	
Disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Strongly disagree	0	1	1	0	0	1	1	0	7	0	0	3	0	0	0	14	
Don't know	0	0	1	0	0	1	0	0	12	1	0	1	0	0	1	17	

**7.a Consumers understand the seasonal and regional information provided in the energy label on air-conditioners**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Agree	1	0	2	0	0	1	0	1	3	1	0	2	0	0	1	12	
Neither agree nor disagree	1	1	0	0	0	0	1	1	8	1	0	1	1	2	2	19	
Disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Strongly disagree	0	0	0	0	1	1	2	2	10	0	0	4	1	0	1	22	
Don't know	2	2	8	0	1	0	6	8	10	4	1	6	2	2	9	61	

**7.a Please explain your answer**

7.b What do you think of the following potential improvement options for the current A-G, A+++ scales of the energy labels:

7.b Adding further + classes, for example A++++

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Strongly agree	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	3
Agree	0	0	0	0	1	0	0	0	0	0	0	0	1	1	0	1	4
Neither agree nor disagree	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2
Disagree	1	1	2	0	1	0	0	0	17	3	0	0	2	1	0	3	31
Strongly disagree	3	2	7	0	0	2	8	13	13	2	1	0	6	2	4	9	72
Don't know	0	0	0	1	0	0	0	0	2	0	0	0	2	0	0	0	5

7.b Re-setting all classes to an A-G scale

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Strongly agree	2	2	3	0	0	0	7	6	3	0	0	0	1	1	2	3	30
Agree	3	1	4	0	0	0	1	5	5	0	0	0	3	2	1	4	29
Neither agree nor disagree	0	0	0	0	1	0	0	0	3	3	0	0	2	1	1	0	11
Disagree	0	0	0	0	1	2	0	0	2	0	0	0	0	0	0	1	6
Strongly disagree	0	0	2	0	0	0	0	0	8	0	0	0	4	0	0	2	16
Don't know	1	0	0	1	0	0	1	2	11	2	1	0	3	0	0	3	25

**7.b Re-setting all classes to an A-G scale with an overlap in the market between old 'A' and new 'A' label**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	1	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	2
Agree	1	1	2	0	0	0	0	1	1	1	1	0	1	1	0	0	9
Neither agree nor disagree	0	1	1	0	0	0	0	2	6	2	2	0	3	0	1	0	16
Disagree	0	0	4	0	2	2	0	1	5	1	0	2	2	1	3	6	27
Strongly disagree	1	1	3	0	0	0	7	0	16	0	0	5	2	0	2	3	37
Don't know	2	0	0	1	0	0	1	9	4	1	1	1	2	0	0	4	25

**7.b Re-setting all classes to an A-G scale with a dated (year) reference on the label**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	2	0	3	0	0	0	0	2	3	0	0	0	0	0	2	2	14
Agree	2	1	4	0	0	0	5	8	8	0	0	1	2	1	3	3	35
Neither agree nor disagree	0	0	0	0	2	0	2	1	8	2	0	3	0	1	1	1	20
Disagree	0	0	0	0	0	2	1	0	4	2	0	2	1	0	3	3	15
Strongly disagree	1	2	1	0	0	0	0	0	6	0	0	5	1	0	0	0	16
Don't know	1	0	1	1	0	0	1	2	3	1	1	1	2	0	0	4	17



**7.b Re-setting all classes to a 1-7 scale that takes over from A-G, in order to avoid overlap in the market between ‘new’ and ‘old’ A classes if the A-G scale was retained but rescaled**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	1	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	3
Agree	0	1	1	0	2	0	0	0	4	2	0	3	1	0	0	0	14
Neither agree nor disagree	0	0	3	0	0	0	0	1	5	1	0	3	1	0	2	16	
Disagree	3	1	0	0	0	1	0	10	5	0	1	2	0	3	4	30	
Strongly disagree	1	1	4	0	0	1	7	1	10	0	0	3	0	1	3	32	
Don't know	0	0	1	1	0	0	1	1	4	2	0	2	0	0	4	16	

**7.b Introducing an A-‘X’ label with less than 7 classes**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	1	0	0	0	0	0	2	0	0	0	0	0	0	0	0	1	4
Agree	1	2	1	0	2	0	0	1	2	0	0	2	1	0	0	0	12
Neither agree nor disagree	0	0	3	0	0	1	1	2	9	2	0	1	0	1	1	21	
Disagree	1	1	1	0	0	1	0	5	9	0	0	4	1	1	5	29	
Strongly disagree	1	0	3	0	0	0	5	1	7	0	0	4	1	1	1	24	
Don't know	1	0	1	1	0	0	1	4	5	3	1	3	0	1	4	25	

**7.b Introducing a dynamic class rating system, which automatically adjusts over time**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	3	0	0	0	0	0	3	8	2	0	0	0	1	1	5	23	
Agree	0	2	3	0	2	0	0	1	2	0	0	2	0	2	1	15	
Neither agree nor disagree	0	0	3	0	0	0	0	0	3	2	0	1	0	1	0	10	
Disagree	1	1	0	0	0	1	0	1	8	1	0	4	0	0	2	19	
Strongly disagree	0	0	3	0	0	1	5	0	13	1	0	5	1	0	2	31	
Don't know	1	0	0	1	0	0	0	2	4	0	1	2	1	0	3	15	

**7.b Moving to an open ended scale**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	1	1	0	0	1	0	2	1	2	1	0	1	1	0	1	12	
Agree	1	1	3	0	0	0	1	1	7	3	0	2	0	0	1	20	
Neither agree nor disagree	1	0	1	0	1	0	0	0	9	0	0	4	0	2	0	18	
Disagree	1	0	1	0	0	1	0	6	1	0	0	2	0	1	4	17	
Strongly disagree	0	0	3	0	0	1	6	1	5	0	0	3	3	0	1	23	
Don't know	1	1	1	1	0	0	0	4	8	1	1	2	0	1	5	26	

**7.b Removing or indicating on the label the energy classes that are empty of products**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	4	1	1	0	0	0	7	10	3	0	1	0	0	3	6	36
Agree	1	1	4	0	1	0	0	2	14	0	0	4	2	0	2	31
Neither agree nor disagree	0	0	2	0	0	0	0	0	3	2	0	3	0	1	1	12
Disagree	0	0	2	0	1	0	0	0	4	0	0	1	0	0	1	9
Strongly disagree	0	0	1	0	0	1	1	0	2	1	0	1	1	0	2	10
Don't know	0	1	0	1	0	1	1	1	5	2	0	4	0	0	1	17

**7.b The steps of the scale should be allowed to disregard life cycle cost savings to the consumer, meaning that a product with a better label class would be certain to save energy in the use phase, but could be so expensive to buy that it would not bring overall cost savings**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	4	1	2	0	0	0	0	9	4	0	1	2	0	1	4	28
Agree	0	0	3	0	1	0	1	1	6	1	0	2	1	2	3	21
Neither agree nor disagree	0	1	2	0	0	0	0	0	0	3	0	3	2	0	1	12
Disagree	0	0	1	0	1	1	6	2	3	0	0	1	0	0	2	17
Strongly disagree	0	0	1	0	0	1	1	0	5	0	0	0	0	0	2	10
Don't know	1	0	0	1	0	0	1	1	11	1	0	5	0	1	0	22

**7.b Removing the entire energy labelling system**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	1	0	0	0	0	0	0	2	1	1	0	0	1	0	0	0	6
Agree	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Neither agree nor disagree	0	0	0	0	0	0	0	0	0	5	0	0	2	1	0	0	8
Disagree	0	0	0	0	0	1	0	0	0	2	3	0	4	0	0	2	12
Strongly disagree	3	3	9	0	2	1	6	4	4	19	0	0	5	1	4	9	66
Don't know	1	0	1	1	0	0	1	8	3	2	1	1	1	0	0	2	21

**7.b Other, please specify**

**7.b Please explain your answer**

**8.a What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU manufacturers in the following product groups:**

**8.a Overall, across all product groups**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	1	0	4	7
Positive	2	0	7	0	1	0	5	10	14	1	1	3	2	2	5	53	
Neutral or no impact	0	1	0	0	1	0	0	0	1	0	0	0	0	0	1	4	
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Very negative	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2	
Don't know	0	1	1	0	0	1	0	2	10	3	0	4	0	1	0	23	

## 8.a Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	2	0	0	0	0	0	0	0	0	0	0	0	1	2	6
Positive	1	0	2	0	1	0	2	9	5	1	1	4	2	2	4	34	
Neutral or no impact	0	1	0	0	0	0	0	1	3	0	0	1	0	0	0	6	
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	2	0	0	1	2	1	12	3	0	4	0	1	0	27	

## 8.a Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	2	0	0	0	0	0	0	0	0	0	0	0	1	2	6
Positive	1	0	3	0	0	0	2	9	8	1	1	5	2	2	4	38	
Neutral or no impact	0	1	0	0	0	0	0	1	1	0	0	2	0	0	0	5	
Negative	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	2	
Very negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	
Don't know	1	0	1	0	0	1	2	1	10	3	0	3	0	1	0	23	

## 8.a Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	2	0	0	0	0	0	0	0	0	0	0	0	3	5
Positive	0	1	2	0	0	0	2	2	5	0	0	1	2	2	1	18
Neutral or no impact	1	0	0	0	0	0	1	8	0	0	1	1	0	1	2	15
Negative	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Very negative	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	2
Don't know	1	0	2	0	0	0	0	0	13	3	0	5	0	1	0	25

## 8.a Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	2	0	0	0	0	0	0	0	0	0	0	0	3	5
Positive	1	0	3	0	0	1	1	8	5	0	1	4	1	3	2	30
Neutral or no impact	1	1	0	0	0	0	1	1	1	0	0	1	0	0	1	7
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	1	0	0	0	0	0	0	2	0	0	0	3
Don't know	1	0	1	0	0	0	1	1	12	3	0	4	1	1	0	25

## 8.a Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	2	0	1	0	0	0	1	7	0	0	1	0	1	2	5	20
Positive	0	1	4	0	1	0	2	3	7	1	0	5	2	1	1	28
Neutral or no impact	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	1	0	0	0	0	0	0	11	3	0	3	0	1	0	20

## 8.a Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	2	0	1	0	0	0	1	7	0	0	1	0	0	2	6	20	
Positive	0	1	4	0	1	0	2	2	7	1	0	5	2	1	0	26	
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	1	0	0	0	0	0	11	3	0	3	0	1	0	20	

## 8.a Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	2	0	1	0	0	0	0	7	0	0	1	0	1	2	6	20	
Positive	0	1	4	0	1	0	3	2	7	1	0	5	2	1	0	27	
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	1	0	0	0	0	0	11	3	0	3	0	1	0	20	

## 8.a Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	2	0	2	0	0	0	0	7	0	0	1	0	0	2	6	20	
Positive	0	1	3	0	1	0	3	2	7	1	0	4	2	1	0	25	
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	1	0	0	0	0	0	11	3	0	3	0	1	0	20	

## 8.a Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	2	0	0	0	0	0	0	0	0	0	0	0	3	6	
Positive	1	1	3	0	0	0	0	9	7	0	1	4	2	2	3	33	
Neutral or no impact	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	2	
Negative	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	2	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	1	0	0	0	3	1	11	3	0	4	0	1	0	25	

## 8.a Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	3	5	
Positive	2	0	3	0	0	0	3	7	4	0	1	2	1	2	3	28	
Neutral or no impact	1	1	0	0	0	0	0	2	1	0	0	0	0	1	0	6	



Negative	0	0	0	0	1	0	0	0	0	0	0	1	1	0	0	3	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	2	0	0	0	0	0	1	12	3	0	5	1	1	0	25

**8.a Luminares (part of 'electrical lamps and luminaires')**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	3	5
Positive	1	0	3	0	0	0	1	2	5	0	0	2	1	0	0	0	15
Neutral or no impact	2	1	0	0	0	0	0	7	1	0	1	0	0	3	3	3	18
Negative	0	0	0	0	1	0	0	0	0	0	0	1	1	0	0	0	3
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	0	0	2	0	0	0	2	1	11	3	0	5	1	1	0	0	26

**8.a Domestic ovens**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	1	0	0	3	6
Positive	1	0	4	0	0	0	2	10	6	1	1	5	2	1	3	3	36
Neutral or no impact	0	1	0	0	1	0	0	1	1	0	0	0	0	1	0	0	5
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	1	0	0	0	2	0	11	3	0	3	0	2	0	0	23

**8.a Please explain your answer**

8.b What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU SME (Small and Medium Enterprises, firms with less than 250 employees and turnover <50million euros/annum) manufacturers in the following product groups

8.b Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2	4
Positive	1	0	3	0	0	0	1	2	11	1	0	0	1	0	1	1	21
Neutral or no impact	0	0	2	0	2	0	0	1	1	0	0	3	0	2	1	12	
Negative	0	0	0	0	0	0	0	0	4	0	0	1	0	0	1	6	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	2	1	3	0	0	1	4	9	8	3	1	6	1	2	5	46	

8.b Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	1	3	
Positive	1	0	3	0	1	0	1	2	2	1	0	0	1	1	0	13	
Neutral or no impact	0	0	0	0	0	0	0	2	2	0	0	2	0	1	0	7	
Negative	1	0	0	0	0	0	0	3	4	0	1	2	0	1	2	14	
Very negative	0	1	0	0	0	0	0	1	0	0	0	2	0	0	0	4	
Don't know	1	0	2	0	0	1	1	2	10	1	0	4	0	1	2	25	

## 8.b Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	3
Positive	1	0	3	0	0	0	1	2	3	1	0	0	1	1	0	0	13
Neutral or no impact	0	0	0	0	0	0	0	2	2	0	0	3	0	1	0	0	8
Negative	1	0	0	0	0	0	0	3	4	0	1	2	0	1	3	0	15
Very negative	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2
Don't know	1	0	2	0	1	1	1	3	9	1	0	4	0	1	1	0	25

## 8.b Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	3
Positive	0	0	2	0	0	0	0	1	1	0	0	0	1	0	0	0	5
Neutral or no impact	0	0	1	0	0	0	0	1	1	0	0	0	0	1	1	0	5
Negative	1	0	0	0	1	0	0	0	3	0	0	1	0	0	0	0	6
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	2	1	2	0	0	0	1	7	10	1	1	6	0	3	3	0	37

## 8.b Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	3
Positive	0	0	3	0	0	0	0	1	2	0	0	0	1	0	0	1	8
Neutral or no impact	0	0	1	0	1	1	0	1	1	0	0	1	0	2	0	0	8

Negative	1	1	0	0	0	0	0	0	0	3	0	0	2	0	0	0	7
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	1	0	0	0	0	1	7	9	1	1	6	0	2	3	33

## 8.b Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	3
Positive	1	0	3	0	1	0	0	1	2	0	0	0	0	1	0	0	9
Neutral or no impact	0	0	0	0	0	0	0	1	1	0	0	0	0	0	2	0	4
Negative	0	0	0	0	0	0	0	0	3	0	0	0	1	0	0	0	4
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	1	2	0	0	0	1	7	9	1	1	6	0	2	4	4	36

## 8.b Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	3
Positive	1	0	3	0	1	0	0	1	2	0	0	0	0	1	0	0	9
Neutral or no impact	0	0	0	0	0	0	0	1	1	0	0	0	0	0	2	0	4
Negative	0	0	0	0	0	0	0	0	3	0	0	0	1	0	0	0	4
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	1	2	0	0	0	1	7	9	1	1	6	0	2	4	4	36

## 8.b Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Positive	1	0	3	0	1	0	0	0	1	2	0	0	0	1	0	0	9
Neutral or no impact	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	4
Negative	0	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	4
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	1	2	0	0	0	1	7	9	1	1	1	6	0	2	4	36

## 8.b Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2	4
Positive	1	0	3	0	1	0	0	0	1	2	0	0	0	1	0	0	9
Neutral or no impact	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	4
Negative	0	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	4
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	1	2	0	0	0	1	7	9	1	1	1	6	0	2	3	35

## 8.b Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	3
Positive	1	0	3	0	1	0	0	0	0	2	0	0	0	1	0	0	8
Neutral or no impact	0	0	1	0	0	0	0	0	1	1	0	0	0	0	2	0	5
Negative	0	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	4
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	1	1	0	0	0	1	7	9	1	1	5	0	2	4	34	

## 8.b Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	5	0	0	1	0	0	0	1	4	13
Positive	1	0	3	0	0	0	0	1	1	0	0	0	0	2	1	1	10
Neutral or no impact	0	0	0	0	0	0	0	1	2	0	0	1	0	1	0	0	5
Negative	0	0	0	0	1	0	0	0	3	0	0	1	0	0	0	0	5
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	1	1	2	0	0	0	1	2	9	1	0	5	0	1	0	0	23

## 8.b Luminaires (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	2
Positive	1	0	3	0	0	0	0	1	1	0	0	0	0	2	1	0	9
Neutral or no impact	0	1	0	0	0	0	0	1	2	0	0	1	0	1	0	0	6

Negative	0	0	0	0	1	0	0	0	4	0	0	1	0	0	0	6
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	2	0	0	0	1	7	8	1	1	5	0	2	4	33

## 8.b Domestic ovens

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	2
Positive	1	0	3	0	0	0	1	2	3	1	0	0	1	0	0	0	12
Neutral or no impact	0	0	1	0	1	0	0	1	1	0	0	2	0	1	0	0	7
Negative	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	0	4
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	2	1	1	0	0	0	1	7	9	1	1	4	0	3	4	34	

## 8.b Please explain your answer

## 8.c What kind of impact has Energy Labelling had, or is expected to have, on the competitiveness of EU importers in the following product groups:

## 8.c Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	2	0	1	4	
Positive	0	0	4	0	1	0	0	0	10	0	0	1	0	0	2	18	
Neutral or no impact	1	1	0	0	1	0	0	1	4	0	0	2	0	1	0	11	
Negative	0	0	0	0	0	0	1	2	1	1	0	1	0	1	1	8	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	2	1	4	0	0	1	4	9	8	3	1	6	1	2	7	49	

## 8.c Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	3	0	0	0	0	0	1	0	0	1	0	1	1	7
Neutral or no impact	1	1	0	0	0	0	0	2	5	0	0	4	0	0	0	13
Negative	0	0	0	0	1	0	1	1	1	1	0	0	0	1	0	6
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	1	1	7	8	0	1	3	0	2	4	31

## 8.c Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	3	0	0	0	0	0	2	0	0	1	0	1	1	8
Neutral or no impact	1	1	0	0	0	0	0	2	5	0	0	3	0	0	0	12
Negative	0	0	0	0	0	0	1	1	1	1	0	0	0	1	0	5
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	1	1	1	7	7	0	1	4	0	2	4	32



## 8.c Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	3	0	1	0	0	0	0	1	0	0	1	0	1	7
Neutral or no impact	1	1	0	0	0	0	0	1	4	0	0	2	0	2	0	11
Negative	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	0	1	7	8	0	1	3	0	2	4	30

## 8.c Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	4	0	0	1	0	0	2	0	0	1	0	0	1	9
Neutral or no impact	1	1	0	0	0	0	0	2	4	0	0	2	0	1	0	11
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	1	0	1	7	7	0	1	4	0	2	4	30

## 8.c Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG				
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	4	0	0	0	0	0	2	0	0	1	0	0	1	8
Neutral or no impact	1	1	0	0	0	0	0	2	4	0	0	1	0	1	0	10

Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	1	0	1	7	7	0	1	4	0	2	4	30	

## 8.c Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	4	0	1	0	0	0	0	2	0	0	1	0	0	1	9
Neutral or no impact	1	1	0	0	0	0	0	2	4	0	0	0	1	0	1	0	10
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	0	0	1	7	7	0	1	4	0	2	4	29	

## 8.c Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	4	0	1	0	0	0	0	2	0	0	1	0	0	1	9
Neutral or no impact	1	1	0	0	0	0	0	2	4	0	0	0	1	0	1	0	10
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	0	0	1	7	7	0	1	4	0	2	4	29	

## 8.c Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	4	0	1	0	0	0	2	0	0	1	0	0	1	9
Neutral or no impact	1	1	0	0	0	0	0	2	4	0	0	1	0	1	0	10
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	0	0	1	7	7	0	1	4	0	2	4	29

## 8.c Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	1	1	0	1	4
Positive	0	0	4	0	1	0	0	0	2	0	0	1	0	0	1	9
Neutral or no impact	1	1	0	0	0	0	0	1	4	0	0	1	0	1	0	9
Negative	0	0	0	0	0	0	0	1	0	0	0	1	0	1	0	3
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	0	0	1	7	7	0	1	4	0	2	4	29

## 8.c Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	3	0	0	0	0	0	1	0	0	1	0	0	1	6
Neutral or no impact	1	1	0	0	0	0	0	2	4	0	0	1	0	1	0	10

Negative	0	0	0	0	0	0	0	0	0	0	0	2	1	1	0	4
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	1	0	1	7	8	0	1	2	0	2	4	30

## 8.c Luminaire (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	3	0	0	0	0	0	1	0	0	1	0	0	1	6
Neutral or no impact	1	1	0	0	0	0	0	2	4	0	0	1	0	1	0	10
Negative	0	0	0	0	0	0	0	0	0	0	0	2	1	1	0	4
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	1	0	1	7	8	0	1	1	0	2	4	29

## 8.c Domestic ovens

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3
Positive	0	0	4	0	0	0	0	0	2	0	0	1	0	0	1	8
Neutral or no impact	1	1	0	0	1	0	0	2	4	0	0	2	0	1	0	12
Negative	0	0	0	0	0	0	1	1	1	1	0	0	0	1	0	5
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	1	0	0	0	1	7	7	0	1	3	0	2	4	28

## 8.c Please explain your answer

8.d To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Energy Labelling had on innovation

8.d Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	1	0	1	2	1	1	0	0	1	2	3	14	
Positive	2	1	6	0	1	0	5	9	7	0	1	2	2	2	8	46	
Neutral or no impact	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	4	
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	1	0	0	0	2	1	11	3	0	5	0	0	1	24	

8.d Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	1	0	1	1	1	1	0	0	0	1	0	8	
Positive	0	0	4	0	0	0	1	1	4	0	0	4	0	0	1	15	
Neutral or no impact	1	0	0	0	0	0	0	1	4	0	0	1	0	0	0	7	
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2	
Don't know	1	1	2	0	0	1	4	9	8	0	1	3	1	3	6	40	

## 8.d Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	0	0	1	1	2	1	0	1	0	1	1	1	10
Positive	0	0	5	0	0	0	1	1	3	0	0	4	0	0	0	1	15
Neutral or no impact	1	0	0	0	1	0	0	1	4	0	0	1	0	0	0	0	8
Negative	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	2
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	1	1	1	0	0	1	4	9	7	0	1	3	1	3	5	5	37

## 8.d Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	0	0	0	1	0	0	0	0	0	0	0	1	4
Positive	0	1	4	0	1	0	6	2	4	0	0	1	0	2	3	3	24
Neutral or no impact	2	0	0	0	0	0	0	7	3	0	1	1	1	2	3	3	20
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	1	9	0	0	6	0	0	0	0	18

## 8.d Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	1	0	0	0	0	0	1	0	0	1	0	1	0	0	5
Positive	2	1	4	0	1	2	5	9	4	0	1	2	0	2	5	5	38
Neutral or no impact	0	0	0	0	0	0	0	1	3	0	0	1	1	0	0	0	6

Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Don't know	0	0	2	0	0	0	0	0	1	8	0	0	5	0	1	2

## 8.d Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	2	0	1	0	0	0	0	8	2	0	1	1	0	4	4	23	
Positive	1	1	3	0	0	0	6	2	4	0	0	2	1	0	3	23	
Neutral or no impact	0	0	1	0	0	0	0	0	3	0	0	1	0	0	0	5	
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	1	0	0	1	7	0	0	4	0	0	0	15	

## 8.d Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	2	0	1	0	0	0	0	8	2	0	1	1	0	4	4	23	
Positive	0	0	3	0	1	0	6	2	4	0	0	2	1	0	2	21	
Neutral or no impact	1	1	1	0	0	0	0	0	3	0	0	1	0	0	1	8	
Negative	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	2	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	1	0	0	0	0	1	7	0	0	4	0	0	0	13	

## 8.d Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	2	0	1	0	0	0	0	8	2	0	1	1	0	4	4	23	
Positive	0	1	3	0	1	0	6	2	4	0	0	2	1	0	2	22	
Neutral or no impact	1	0	1	0	0	0	0	0	3	0	0	1	0	0	1	7	
Negative	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	2	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	1	0	0	0	0	1	7	0	0	4	0	0	0	13	

## 8.d Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	2	1	1	0	0	0	0	8	2	0	1	1	0	3	4	23	
Positive	1	0	4	0	1	0	5	2	4	0	0	2	1	1	3	24	
Neutral or no impact	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	4	
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	0	0	0	1	7	0	0	4	0	0	0	14	



## 8.d Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals	
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	0	0	1	0	0	1	0	0	0	4
Positive	0	0	4	0	1	0	1	2	4	2	0	0	4	0	2	1	21
Neutral or no impact	1	0	0	0	0	0	0	0	3	0	0	0	1	1	0	0	6
Negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	1	2	0	0	0	4	9	8	0	0	1	3	0	2	6	37

## 8.d Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals	
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	1	0	0	0	0	0	0	1	1	5
Positive	2	1	4	0	1	1	5	9	4	0	1	1	1	3	6	6	39
Neutral or no impact	0	0	0	0	0	0	0	0	4	0	0	0	1	0	0	0	6
Negative	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	1	8	0	0	0	5	0	0	0	16

## 8.d Luminaires (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals	
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Positive	0	1	2	0	1	0	4	3	4	0	0	0	1	1	2	3	22
Neutral or no impact	1	0	1	0	0	0	0	0	4	0	0	0	1	1	0	0	8

Negative	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	3	0	0	0	1	8	8	0	1	5	0	2	4	33

**8.d Domestic ovens**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	1	0	0	0	1	1	3	1	0	1	0	0	0	0	9
Positive	0	1	4	0	0	0	1	3	3	0	0	2	1	0	1	1	16
Neutral or no impact	1	0	0	0	1	0	1	0	3	0	0	2	0	1	1	1	10
Negative	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	0	2
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	3	8	7	0	1	3	0	3	5	5	33

**8.d Please explain your answer**

**9.a How has the Energy Labelling Directive affected, or is expected to affect, the prices of the following regulated products, compared to how they might otherwise have been?**

**9.a Overall, across all product groups**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	1	1	0	1	0	0	1	4	0	0	3	3	1	2	2	17
Prices have not been impacted	3	0	3	0	1	1	1	9	1	0	1	1	0	2	6	6	29
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	1	4	0	0	0	7	1	12	3	0	6	0	0	3	3	37

## 9.a Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	1	0	1	2	2	1	0	0	0	0	0	0	7
Prices are higher	1	0	0	0	0	0	0	7	7	0	1	3	0	2	3	24	
Prices have not been impacted	2	0	2	0	0	0	1	1	3	0	0	1	0	0	1	11	
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	1	1	0	0	1	0	1	5	0	0	4	1	1	0	15	

## 9.a Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	1	2	2	1	0	0	0	0	0	0	6
Prices are higher	1	0	0	0	0	0	0	6	7	0	1	2	0	2	3	22	
Prices have not been impacted	2	0	2	0	1	0	1	2	3	0	0	2	0	0	1	14	
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	1	1	0	0	1	0	1	5	0	0	4	1	1	1	16	

## 9.a Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	0	6	0	0	1	1	0	0	8
Prices have not been impacted	3	0	2	0	0	0	1	8	1	1	0	1	0	0	3	4	23
Prices are lower	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	2
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	1	1	0	0	0	0	1	6	0	0	0	5	0	0	1	15

## 9.a Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	0	6	0	0	1	1	1	0	9
Prices have not been impacted	3	0	2	0	0	0	1	9	1	1	0	1	1	0	1	4	23
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	1	1	0	1	1	0	1	6	0	0	0	5	0	1	1	18

## 9.a Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	4
Prices are higher	0	0	0	0	0	0	0	0	3	0	0	0	1	1	0	5
Prices have not been impacted	3	0	2	0	1	0	1	9	1	0	1	0	0	2	4	24
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	1	1	0	0	0	0	1	6	0	0	5	0	0	1	15

## 9.a Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	1	0	0	0	6	0	0	1	1	1	0	10
Prices have not been impacted	3	0	2	0	0	0	1	9	1	0	1	0	0	2	4	23
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	1	1	0	0	0	0	1	6	0	0	5	0	0	1	15

## 9.a Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	4
Prices are higher	0	0	0	0	0	0	0	0	3	0	0	0	1	1	0	5
Prices have not been impacted	3	0	2	0	1	0	1	9	1	0	1	0	0	2	4	24

Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	1	1	0	0	0	0	0	1	6	0	0	5	0	0	1	15

## 9.a Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	0	4
Prices are higher	0	0	0	0	1	0	0	0	3	0	0	0	1	1	1	1	7
Prices have not been impacted	2	0	2	0	0	0	1	3	1	0	0	0	0	0	0	1	10
Prices are lower	1	0	0	0	0	0	0	6	0	0	1	0	0	1	2	11	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	1	1	0	0	0	0	1	6	0	0	5	0	1	1	1	16

## 9.a Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Prices are higher	0	0	0	0	0	0	0	0	6	0	0	1	1	0	0	1	9
Prices have not been impacted	2	0	2	0	1	0	1	1	1	0	0	1	0	1	0	0	10
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	1	1	0	0	0	0	9	6	0	1	4	0	2	4	4	29

9.a Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	1	0	0	1	3	0	0	1	1	0	0	0	7
Prices are higher	1	0	1	0	0	0	0	7	4	0	1	1	1	2	4	22	
Prices have not been impacted	2	0	1	0	0	0	1	1	0	0	0	0	0	1	0	6	
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	1	1	0	0	0	0	1	6	0	0	4	0	0	1	14	

9.a Luminaires (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	0	3	0	0	0	1	1	0	0	5	
Prices are higher	0	0	0	0	1	0	0	1	4	0	0	1	1	0	0	8	
Prices have not been impacted	2	0	2	0	0	0	1	1	0	0	0	0	0	1	2	9	
Prices are lower	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	1	0	0	0	0	0	8	6	0	1	4	0	2	3	26	

9.a Domestic ovens

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	1	1	1	1	0	0	0	0	0	0	4
Prices are higher	0	0	0	0	0	0	0	0	6	0	0	1	1	0	0	0	8
Prices have not been impacted	3	0	2	0	1	0	1	9	2	0	1	0	0	1	3	23	

Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	1	1	0	0	0	0	0	1	5	0	0	4	0	2	1	15

9.a Please explain your answer

9.b To what extent do you agree or disagree 'that a higher energy label class ranking results, or will result, in a price premium for better performing products':

9.b Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Strongly agree	0	0	2	0	0	0	0	0	4	0	0	2	1	0	1	10	
Agree	1	1	2	0	1	1	1	4	5	0	0	0	2	1	2	21	
Neither agree nor disagree	1	0	1	0	0	0	3	7	1	0	1	1	0	2	5	22	
Disagree	1	0	0	0	0	0	4	0	1	0	0	2	0	0	1	9	
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	
Don't know	0	0	4	0	0	0	0	1	8	3	0	5	0	0	1	22	

9.b Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Strongly agree	0	1	1	0	1	0	1	2	2	1	0	0	0	0	0	9	
Agree	1	0	0	0	0	0	0	1	6	0	0	1	1	1	1	12	
Neither agree nor disagree	0	0	1	0	0	0	2	0	1	0	0	2	0	0	1	7	
Disagree	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2	
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	1	0	2	0	0	1	0	8	5	0	1	4	0	2	3	27	



## 9.b Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	1	1	0	0	0	1	2	3	1	0	0	0	0	0	0	9
Agree	1	0	0	0	1	0	0	1	5	0	0	1	1	1	1	1	12
Neither agree nor disagree	0	0	1	0	0	0	2	0	1	0	0	2	0	0	1	7	
Disagree	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2	
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	1	0	2	0	0	1	0	8	5	0	1	4	0	2	3	27	

## 9.b Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	1	0	0	0	1	1	1	1	0	0	0	0	0	0	4
Agree	1	1	0	0	1	0	0	1	2	0	0	0	0	1	0	0	7
Neither agree nor disagree	0	0	1	0	0	0	2	0	1	0	0	1	0	1	1	7	
Disagree	1	0	0	0	0	0	0	7	0	0	1	2	0	2	4	17	
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	0	0	0	1	7	0	0	4	0	0	0	14	

## 9.b Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	1	1	0	0	0	0	2	1	0	0	0	0	0	0	0	5
Agree	2	0	0	0	0	1	0	6	2	0	1	0	1	2	4	19	
Neither agree nor disagree	0	0	1	0	0	0	2	1	1	0	0	1	0	0	1	7	
Disagree	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	2	0	1	0	0	1	7	0	0	5	0	1	0	17	

## 9.b Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	1	1	0	0	0	1	2	1	0	0	0	1	1	0	8	
Agree	2	0	0	0	0	0	0	7	2	0	1	1	1	1	4	19	
Neither agree nor disagree	0	0	1	0	1	0	2	1	1	0	0	1	0	1	1	9	
Disagree	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2	
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	0	0	0	0	7	0	0	3	0	0	0	12	

## 9.b Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	1	1	0	0	0	0	2	1	0	0	0	0	0	1	0	6
Agree	2	0	0	0	0	0	0	7	2	0	1	0	1	1	4	18	
Neither agree nor disagree	0	0	1	0	1	0	2	1	1	0	0	1	0	1	1	9	

Disagree	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0	3
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	0	7	0	0	3	0	0	0	12

## 9.b Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	1	1	0	0	0	0	2	1	0	0	0	1	1	0	7
Agree	2	0	0	0	0	0	0	7	2	0	1	1	1	1	4	19
Neither agree nor disagree	0	0	1	0	1	0	2	1	1	0	0	1	0	1	1	9
Disagree	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	0	7	0	0	3	0	0	0	12

## 9.b Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	1	1	0	0	0	0	2	1	0	0	0	0	1	0	6
Agree	2	0	0	0	0	0	0	7	2	0	1	1	1	1	4	19
Neither agree nor disagree	0	0	1	0	1	0	2	1	1	0	0	1	0	1	1	9
Disagree	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	0	6	0	0	3	0	0	0	11

## 9.b Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Agree	1	0	0	0	0	0	0	0	1	2	0	0	1	1	0	1	7
Neither agree nor disagree	0	0	1	0	1	0	2	0	1	0	0	0	1	0	1	1	8
Disagree	0	0	0	0	0	0	0	0	1	0	0	0	2	0	0	0	3
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	1	2	0	0	0	0	0	9	7	0	1	4	0	2	3	30

## 9.b Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	1	0	0	0	0	1	1	0	0	0	0	0	1	0	4
Agree	1	0	0	0	0	0	0	2	2	0	0	0	1	1	1	1	8
Neither agree nor disagree	1	1	1	0	0	0	2	5	1	0	1	1	1	0	1	3	17
Disagree	0	0	0	0	0	0	0	1	0	0	0	0	2	1	0	0	4
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	1	0	0	1	7	0	0	0	4	0	0	1	16

## 9.b Luminaires (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	1	0	0	0	0	0	1	1	0	0	0	0	0	0	3
Agree	1	0	0	0	0	0	0	0	1	2	0	0	0	2	1	0	7
Neither agree nor disagree	0	1	1	0	0	0	2	0	0	1	0	0	1	0	0	1	7
Disagree	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	1	0	0	8	7	0	1	4	0	2	4	30	

## 9.b Domestic ovens

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	1	0	0	0	1	2	2	1	0	0	0	1	0	0	8
Agree	1	0	0	0	1	0	0	2	2	0	0	0	0	1	0	0	7
Neither agree nor disagree	1	0	1	0	0	0	2	4	2	0	1	2	0	1	4	18	
Disagree	0	0	0	0	0	0	0	1	0	0	0	2	0	0	0	3	
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	1	2	0	0	0	0	1	6	0	0	3	0	2	1	16	

## 9.b Please explain your answer

**10.a For you, or your organisation, do you think that the benefits of mandatory energy labels outweigh their costs?**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, high overall benefits	5	2	4	0	1	0	7	11	3	1	1	1	1	0	3	10	49
Yes, low overall benefits	0	0	1	0	0	2	0	1	5	0	0	1	2	1	0	0	13
Benefits and costs about the same	0	0	0	0	1	0	0	0	4	0	0	2	1	0	1	9	
No, benefits are less than costs	0	0	0	0	0	0	0	0	0	4	0	4	0	0	1	9	
No, costs are significantly higher than benefits	0	0	0	0	0	0	0	1	6	0	0	3	0	0	0	10	
Don't know	0	1	2	0	0	0	1	0	15	0	0	4	1	0	1	25	

**10.a Please explain your answer**

**10.b For EU society as a whole, do you think that the benefits of mandatory energy labels outweigh their costs?**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, high overall benefits	3	2	5	0	0	1	9	12	2	1	1	1	0	4	10	51	
Yes, low overall benefits	0	1	1	0	1	1	0	0	7	0	0	3	2	0	0	16	
Benefits and costs about the same	0	0	0	0	0	0	0	0	4	0	0	2	0	0	1	7	
No, benefits are less than costs	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	2	
No, costs are significantly higher than benefits	0	0	0	0	0	0	0	1	2	0	0	1	0	0	0	4	
Don't know	0	0	1	0	1	0	0	0	19	4	0	5	1	0	1	32	

**10.b Please explain your answer**

11. Should there be a legal provision, like for ecodesign, for voluntary initiatives on energy labelling, considering the administrative burden for the Commission and member state market surveillance costs?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	1	2	0	0	2	0	0	0	9	0	0	3	0	1	0	18	
No	3	0	6	0	0	1	9	10	14	5	1	6	2	3	11	71	
Don't know	1	0	3	0	0	1	0	3	11	0	0	4	1	0	2	26	

11. Please explain your answer

12. To what extent do you agree or disagree with the following statements about the energy label:

12. The product groupings for the label should be broader and not so technology specific, for example a label on refrigerators should cover all types of refrigerators without variation in label class ambition levels by individual technology type (refrigerator with fresh-food storing compartment, refrigerator-chiller, refrigerator with 1/2/3-star compartments, refrigerator-freezer etc.)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	1	0	2	0	0	0	1	0	0	0	0	0	1	0	0	5	
Agree	3	2	2	0	1	1	5	9	5	0	1	1	2	4	6	42	
Neither agree nor disagree	0	0	1	0	0	1	0	0	5	0	0	1	0	0	1	9	
Disagree	0	1	1	0	1	0	2	3	3	5	0	2	1	0	2	21	
Strongly disagree	1	0	4	0	0	0	1	1	14	0	0	7	0	0	4	32	
Don't know	0	0	0	0	0	0	0	0	5	0	0	2	0	0	0	7	

12. The information on the label is accurate and reliable

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Strongly agree	3	0	2	0	0	1	0	0	5	0	0	2	0	0	2	15	
Agree	0	2	5	0	1	0	1	3	7	2	0	5	2	1	3	32	
Neither agree nor disagree	2	1	3	0	1	1	2	8	8	3	1	0	1	3	6	40	
Disagree	0	0	0	0	0	0	5	1	7	0	0	4	1	0	2	20	
Strongly disagree	0	0	0	0	0	0	0	1	1	0	0	2	0	0	0	4	
Don't know	0	0	0	0	0	0	1	0	4	0	0	1	0	0	0	6	

12. The information reflects real-life use of the product

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Strongly agree	1	0	1	0	0	0	1	0	4	0	0	2	0	0	1	10	
Agree	1	1	2	0	0	0	0	1	6	0	0	4	0	0	3	18	
Neither agree nor disagree	2	1	4	0	0	2	2	10	8	1	1	1	2	3	5	42	
Disagree	0	1	3	0	2	0	2	1	7	1	0	2	2	1	1	23	
Strongly disagree	0	0	0	0	0	0	4	1	5	0	0	4	0	0	2	16	
Don't know	0	0	0	0	0	0	0	0	3	3	0	1	0	0	1	8	

12. Energy labels are usually displayed in appropriate places in retail stores and showrooms

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Strongly agree	1	0	2	0	0	0	1	0	0	0	0	0	1	1	0	1	7
Agree	1	3	5	0	1	1	2	4	17	5	0	7	1	0	4	51	
Neither agree nor disagree	1	0	3	0	1	1	0	8	6	0	1	1	0	2	7	31	



Disagree	0	0	0	0	0	0	2	1	0	0	0	1	1	2	0	7
Strongly disagree	0	0	0	0	0	0	3	0	0	0	0	0	1	0	1	5
Don't know	1	0	0	0	0	0	0	0	10	0	0	3	0	0	0	14

12. Energy labelling for distance selling (e.g. selling via internet) should be improved

	EA	Surv. Body	Gov. Body	Stand. Org	Test Lab.	Int. Gov	Interest G.						Indiv. Manu.	Indiv. Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	5	0	3	0	0	0	3	8	1	0	1	1	1	2	7	32	
Agree	1	2	3	0	2	1	4	3	9	1	0	5	3	2	3	39	
Neither agree nor disagree	0	1	3	0	0	0	0	1	13	2	0	3	0	0	3	26	
Disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Strongly disagree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	1	0	0	0	2	1	9	2	0	4	0	0	0	19	

12. It would make sense to allow for the use of QR-codes (see figure) in the label in order to display information about the product on the consumers' smartphones or on smart meters.

	EA	Surv. Body	Gov. Body	Stand. Org	Test Lab.	Int. Gov	Interest G.						Indiv. Manu.	Indiv. Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	4	0	2	0	0	0	2	9	2	0	1	1	1	1	6	29	
Agree	0	1	5	0	1	0	4	0	7	2	0	10	1	2	4	37	
Neither agree nor disagree	1	0	2	0	0	1	0	3	10	1	0	1	1	0	2	22	
Disagree	0	2	0	0	1	0	0	0	4	0	0	0	1	1	0	9	
Strongly disagree	0	0	1	0	0	1	0	0	2	0	0	1	0	0	0	5	
Don't know	0	0	0	0	0	0	3	1	7	2	0	1	0	0	1	15	

12. Energy labelling has led to lower production costs for manufacturers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Agree	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	2
Neither agree nor disagree	0	1	2	0	1	1	1	1	1	0	0	0	1	0	2	2	13
Disagree	1	1	1	0	1	0	2	1	7	1	0	0	4	1	0	2	22
Strongly disagree	0	0	1	0	0	1	0	0	2	0	0	0	5	3	0	0	12
Don't know	2	1	5	0	0	0	6	11	22	4	1	1	4	0	2	9	67

12. Energy labelling has led to improved profit margins on regulated products

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Agree	1	1	1	0	0	0	0	0	0	0	0	0	0	1	2	0	6
Neither agree nor disagree	0	0	4	0	2	0	1	1	6	0	0	0	4	1	0	3	22
Disagree	0	1	1	0	0	1	1	1	2	1	0	0	2	0	0	1	11
Strongly disagree	0	0	0	0	0	0	0	0	2	0	0	0	3	2	0	0	7
Don't know	3	1	3	0	0	1	7	11	23	4	1	1	4	0	2	9	69

12. Energy labelling has unduly restricted the range of products on the market

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	0	0	0	0	1	1	1	0	0	0	2	0	0	0	5
Agree	0	0	1	0	0	0	1	1	11	0	0	0	1	2	0	1	18
Neither agree nor disagree	0	0	0	0	1	0	0	1	1	0	0	0	6	0	0	2	11
Disagree	1	2	6	0	1	1	1	0	3	2	0	1	0	1	2	21	
Strongly disagree	3	0	1	0	0	0	4	9	2	0	1	1	1	3	8	33	
Don't know	0	1	1	0	0	1	1	1	13	3	0	3	0	0	0	24	

12. Consumers prefer products with better label classes because they are interested in life cycle cost savings. It matters much less to them that a good label class also means a product which is better for the environment

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	2	0	1	0	0	0	1	0	2	0	0	0	0	1	0	1	8
Agree	0	2	1	0	1	0	2	1	10	4	0	0	5	2	1	2	31
Neither agree nor disagree	0	1	6	0	0	0	2	4	6	1	0	0	3	1	1	1	26
Disagree	1	0	2	0	1	0	4	0	10	0	0	0	2	0	1	6	27
Strongly disagree	2	0	0	0	0	0	0	7	1	0	1	1	1	0	1	3	16
Don't know	0	0	0	0	0	2	0	1	3	0	0	0	2	0	0	0	8

12. Please explain your answer

**13.a For Energy Labelling, should additional information be displayed on the label on:**

**13.a Other environmental aspects (e.g. CO2 emissions)**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes, and it should form part of the scoring for the product's label class	0	0	1	0	0	0	1	2	1	0	0	1	0	0	1	7	
Yes, as a piece of information additional to the label class scale	2	0	4	0	1	0	0	9	4	0	1	6	0	1	7	35	
No	1	2	2	1	0	2	6	2	21	5	0	6	2	2	3	55	
No, but the information should be available on product fiches, QR codes or other mechanisms	2	1	2	0	0	0	2	0	1	0	0	1	1	0	1	11	
Don't know	0	0	0	0	0	0	0	0	3	0	0	1	0	1	1	6	

**13.a Whole product life cycle energy consumption**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes, and it should form part of the scoring for the product's label class	0	0	1	0	0	0	0	1	1	0	0	2	0	0	1	6	
Yes, as a piece of information additional to the label class scale	1	1	0	0	0	0	1	9	5	0	1	3	0	2	7	30	
No	1	1	3	1	0	2	6	1	21	5	0	8	2	1	4	56	
No, but the information should be available on product fiches, QR codes or other mechanisms	3	1	4	0	1	0	2	2	1	0	0	1	1	0	0	16	
Don't know	0	0	1	0	0	0	0	0	2	0	0	1	0	1	1	6	

### 13.a Whole product life cycle resource efficiency

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, and it should form part of the scoring for the product's label class	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Yes, as a piece of information additional to the label class scale	1	0	2	0	0	0	2	9	3	0	1	4	0	3	8	33
No	2	2	3	1	0	2	6	1	22	5	0	9	2	1	4	60
No, but the information should be available on product fiches, QR codes or other mechanisms	2	1	3	0	1	0	1	1	1	0	0	1	1	0	0	12
Don't know	0	0	1	0	0	0	0	2	4	0	0	0	0	0	1	8

### 13.a Annual running costs (the costs of operating the product)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, and it should form part of the scoring for the product's label class	1	2	1	0	0	0	1	2	1	0	0	2	0	0	1	11
Yes, as a piece of information additional to the label class scale	1	0	3	0	0	0	5	3	4	1	0	4	1	2	3	27
No	2	1	4	0	0	2	1	1	20	3	0	7	1	1	3	46
No, but the information should be available on product fiches, QR codes or other mechanisms	1	0	2	0	1	0	1	7	1	1	1	1	1	1	5	23
Don't know	0	0	0	1	0	0	0	0	4	0	0	0	0	0	1	6

### 13.a Expected product life

	EA	Surv.Body	Gov.Body	Stand.Org	Test.Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, and it should form part of the scoring for the product's label class	0	0	2	0	0	0	0	3	2	0	0	1	1	0	0	9
Yes, as a piece of information additional to the label class scale	3	2	4	0	0	0	7	9	4	0	1	4	0	3	10	47
No	0	0	1	1	0	2	0	0	17	3	0	8	1	1	2	36
No, but the information should be available on product fiches, QR codes or other mechanisms	2	1	3	0	1	0	2	1	4	1	0	1	1	0	0	17
Don't know	0	0	0	0	0	0	0	0	3	1	0	0	0	0	1	5

13.a Other, please add:

13.a Please explain your answer

13.b To what extent do you agree or disagree with the following statements on the inclusion of additional information on the energy label:

13.b Two separate labels should exist, one for energy consumption and the second one for other environmental aspects

	EA	Surv.Body	Gov.Body	Stand.Org	Test.Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	2	0	0	0	0	1	2	0	0	1	0	0	1	7
Agree	0	0	0	0	1	1	1	0	0	0	0	0	0	0	1	4
Neither agree nor disagree	0	0	0	0	0	0	0	0	3	0	0	1	0	0	0	4
Disagree	3	2	6	1	1	0	7	10	8	1	1	5	2	4	9	60
Strongly disagree	1	1	2	0	0	1	1	2	21	4	0	5	1	0	2	41
Don't know	0	0	0	0	0	0	0	0	2	0	0	2	0	0	1	5

**13.b One single label should exist, including both energy consumption and other significant environmental aspects**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	1	2	2	1	0	0	1	2	0	0	0	0	0	0	0	4	13
Agree	2	0	3	0	1	0	6	8	4	0	1	2	2	4	6	39	
Neither agree nor disagree	1	1	1	0	1	0	1	2	4	1	0	2	0	0	0	14	
Disagree	0	0	2	0	0	1	1	0	5	2	0	3	0	0	1	15	
Strongly disagree	0	0	2	0	0	1	0	1	14	2	0	5	1	0	1	27	
Don't know	0	0	0	0	0	0	0	0	9	0	0	2	0	0	2	13	

**13.b Information on other environmental impacts should be provided on mandatory basis**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	3	1	0	0	0	1	0	0	0	0	0	0	0	4	9
Agree	2	2	3	0	1	0	2	9	1	0	1	1	0	4	5	31	
Neither agree nor disagree	1	0	3	0	0	0	1	1	5	0	0	2	0	0	1	14	
Disagree	0	1	1	0	1	1	6	2	6	3	0	3	2	0	2	28	
Strongly disagree	1	0	0	0	0	1	0	0	16	2	0	7	1	0	0	28	
Don't know	0	0	0	0	0	0	0	0	8	0	0	1	0	0	2	11	

**13.b Information on other environmental impacts should be provided on voluntary basis**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	0	1	0	0	0	0	2	0	0	0	0	0	0	0	3
Agree	0	0	3	0	0	1	1	3	6	1	0	2	1	0	2	20	
Neither agree nor disagree	0	1	2	0	1	0	1	1	4	0	0	2	0	0	1	13	

Disagree	1	2	3	0	1	0	5	0	3	2	0	4	1	1	3	26
Strongly disagree	3	0	2	0	0	1	1	9	12	2	1	5	0	3	6	45
Don't know	0	0	0	0	0	0	0	0	8	0	0	1	1	0	2	12

13.b Information on other environmental impacts should be provided in absolute terms (not in comparison with a benchmark or an index value)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	0	1	1	1	0	0	0	0	1	0	0	0	0	0	0	0	4
Agree	1	1	4	0	2	0	2	1	6	1	0	3	1	1	0	0	23
Neither agree nor disagree	3	0	2	0	0	0	5	10	4	2	1	3	0	3	7	40	
Disagree	0	0	1	0	0	1	1	0	3	2	0	1	0	0	0	9	
Strongly disagree	0	1	1	0	0	1	0	0	11	0	0	5	1	0	3	23	
Don't know	0	0	1	0	0	0	0	2	11	0	0	1	0	0	4	19	

13.b Please explain your answer

14. Some products that are labelled are required to have fiches. Fiches are technical information presented within any product brochures accompanying the labelled product and provide standard information on specific parameters relating to the product (e.g. annual water consumption for dishwashers). What do you think of the following changes to fiches?

14. Adding information on other environmental aspects

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	3	0	2	0	0	0	0	11	1	0	1	1	0	1	8	28	
Positive	0	2	5	0	2	0	3	0	1	0	0	2	3	3	1	22	
Neutral	0	1	2	0	0	0	5	2	3	1	0	3	0	0	2	19	
Negative	1	0	0	0	0	1	1	0	3	2	0	1	0	0	0	9	
Very negative	0	0	0	0	0	1	0	0	20	0	0	7	0	0	2	30	
Don't know	0	0	0	0	0	0	0	0	5	2	0	0	0	0	1	8	



14. Adding information on annual running costs (the costs of operating the product)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	2	2	0	0	0	0	5	1	0	0	0	0	0	0	1	12
Positive	1	1	2	0	1	0	2	7	3	0	1	3	1	3	6	31	
Neutral	1	0	3	0	1	0	5	1	1	1	0	1	1	0	2	17	
Negative	1	0	1	0	0	1	2	0	4	2	0	3	1	1	1	17	
Very negative	0	0	2	0	0	1	0	0	20	0	0	7	0	0	3	33	
Don't know	0	0	0	0	0	0	0	0	6	2	0	0	0	0	1	9	

14. Adding information focussed on business - to- business customers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	2	4
Positive	1	1	4	0	0	1	0	0	0	0	0	0	2	0	2	1	12
Neutral	1	2	3	0	1	0	7	3	4	1	0	1	1	0	5	29	
Negative	0	0	0	0	0	0	2	0	2	0	0	4	2	1	0	11	
Very negative	0	0	0	0	0	1	0	1	17	0	0	5	0	0	2	26	
Don't know	2	0	0	0	1	0	0	8	11	4	1	2	0	1	4	34	

14. Providing fiches online on a mandatory basis on all labelled products

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	4	1	5	0	0	0	6	10	0	0	1	1	0	1	10	39	
Positive	0	1	3	0	2	1	0	1	17	0	0	7	1	2	2	37	
Neutral	0	0	0	0	0	0	2	1	5	1	0	4	0	1	0	14	
Negative	0	1	2	0	0	0	0	0	2	0	0	0	1	0	0	6	
Very negative	0	0	0	0	0	0	0	0	3	0	0	2	0	0	0	5	
Don't know	0	0	0	0	0	0	0	1	7	4	0	0	0	0	1	13	

14. Providing fiches online on a mandatory basis on selected products that are not labelled

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	3	0	2	0	0	0	7	9	0	0	1	0	0	1	7	30	
Positive	0	1	1	0	2	0	1	0	5	1	0	3	1	2	1	18	
Neutral	0	0	2	0	0	1	1	2	4	1	0	3	0	0	0	14	
Negative	1	2	2	0	0	0	0	0	3	0	0	2	2	0	2	14	
Very negative	0	0	1	0	0	1	0	1	14	0	0	5	0	0	2	24	
Don't know	0	0	0	0	0	0	0	1	7	3	0	1	0	1	2	15	

14. Providing fiches as QR (bar) codes to labels to enable consumers to quickly access more detailed information on their smartphones (see picture)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	3	0	3	0	0	0	2	8	1	0	1	1	0	0	0	8	27
Positive	1	1	6	0	0	0	4	2	18	3	0	7	2	2	4	50	
Neutral	0	0	0	0	2	1	2	3	5	1	0	3	1	2	1	21	
Negative	0	2	0	0	0	0	1	0	0	0	0	1	0	0	0	4	
Very negative	0	0	1	0	0	1	0	0	3	0	0	1	0	0	0	6	
Don't know	0	0	0	0	0	0	0	0	7	1	0	1	0	0	1	10	

14. Removing the requirement for product fiches

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	1	10	0	0	3	0	0	2	16	
Positive	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2	
Neutral	0	1	0	0	0	0	1	1	3	1	0	2	1	0	0	10	
Negative	0	1	4	0	0	1	0	3	11	0	0	5	1	3	2	31	
Very negative	4	0	5	0	2	1	8	8	5	0	1	1	1	1	9	46	
Don't know	0	0	0	0	0	0	0	0	5	4	0	0	0	0	1	10	

14. Other, please insert:

14. Please explain your answer

15. Energy use by appliances is determined partly by consumer behaviour. For example, frequent opening of a fridge will lead to an increased energy use, regardless of the energy label. A smart appliance could provide feedback to the user, after observing the user's behaviour with the appliance in the user's home, as to how his behaviour affects the energy performance of the appliance. Would you welcome the introduction of such an advanced and IT-supported form of energy labelling?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	2	0	5	0	2	0	1	10	9	0	1	8	2	1	6	47	
No	0	3	1	0	0	1	6	2	6	4	0	4	2	1	6	36	
Don't know	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

15. Please explain your answer and provide further innovative ideas

- 16.a Have the energy labels been enforceable? If not sufficiently or not at all, what could be done to improve enforcement of energy labels?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, very much so	2	0	3	0	0	0	0	1	0	0	1	2	0	4	13		
Yes, to some extent	0	2	5	0	1	0	8	2	14	4	0	7	0	2	3	48	
No, not sufficiently	1	1	0	0	1	1	0	5	1	0	1	1	0	2	5	19	
No, not at all	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1		
Don't know	0	0	2	1	0	1	0	2	12	0	0	3	0	0	1	22	

- 16.a Please explain your answer

- 16.b How effective do you think the following options for improving enforcement would be?

## 16.b An EU-Wide market surveillance authority covering the internal market

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	2	1	0	0	0	5	2	3	0	0	1	0	0	0	5	19
Effective	0	0	2	0	2	2	3	1	14	1	1	8	0	0	2	36	
Not very effective	2	1	0	0	0	0	0	0	2	1	0	0	1	1	1	9	
Not effective at all	0	0	3	0	0	0	0	0	1	0	0	4	1	1	1	11	
Don't know	2	0	2	1	0	0	0	6	6	2	0	0	1	2	4	26	

## 16.b An EU-wide mandatory product database

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	3	1	4	0	0	0	2	8	1	0	1	1	1	2	8	32	
Effective	1	2	2	0	1	0	2	1	5	1	0	5	1	1	2	24	
Not very effective	0	0	2	1	1	1	4	0	5	2	0	4	0	1	2	23	
Not effective at all	0	0	0	0	0	0	0	0	9	0	0	2	0	0	1	12	
Don't know	0	0	2	0	0	1	0	0	5	1	0	1	1	0	0	11	

## 16.b An EU-wide transparent complaint procedure

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	2	0	2	0	0	1	3	7	4	1	1	1	0	2	7	31	
Effective	0	1	3	0	1	0	2	1	5	0	0	8	0	2	2	25	
Not very effective	1	2	1	1	1	1	3	1	10	3	0	1	1	0	2	28	
Not effective at all	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	3	
Don't know	1	0	3	0	0	0	0	0	6	0	0	3	1	0	1	15	

**16.b MS-based transparent complaint procedure**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	2	0	1	0	0	0	4	7	2	1	1	2	0	1	6	27	
Effective	1	1	3	0	1	1	3	1	5	0	0	2	1	3	3	25	
Not very effective	0	2	1	1	1	0	1	1	10	2	0	4	0	0	2	25	
Not effective at all	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2	
Don't know	1	0	4	0	0	1	0	0	7	1	0	5	2	0	2	23	

**16.b Other, please describe:**

**16.b Please explain your answer**

**17. Are incorrectly or non-labelled products a significant problem, i.e. large numbers of these products are sold, in the following product groups covered by labelling requirements?**

**17. Overall, across all product groups**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products with significantly lower energy efficiency being sold	0	0	0	0	1	0	1	1	0	0	0	3	1	0	2	9	
Yes, but the impact on new product energy efficiency is low	0	0	3	0	1	0	1	1	5	0	0	2	0	1	0	14	
No	1	2	1	0	0	0	0	0	0	0	0	1	0	1	2	8	
Don't know	2	1	4	1	0	1	7	11	21	5	1	6	1	2	8	71	

## 17. Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products with significantly lower energy efficiency being sold	2	0	0	0	0	0	2	8	0	0	1	1	1	1	1	4	20
Yes, but the impact on new product energy efficiency is low	0	1	0	0	0	0	0	0	2	0	0	2	1	0	0	0	6
No	1	0	2	0	0	0	0	0	0	0	0	0	0	0	2	2	7
Don't know	1	0	3	1	0	0	0	2	9	0	0	4	0	1	1	1	22

## 17. Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products with significantly lower energy efficiency being sold	1	0	2	0	0	1	1	8	0	0	1	1	0	2	5	22	
Yes, but the impact on new product energy efficiency is low	1	0	1	0	0	0	1	1	2	0	0	2	0	0	0	8	
No	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	
Don't know	1	1	4	1	0	0	0	1	9	0	0	4	1	2	1	25	

## 17. Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products with significantly lower energy efficiency being sold	0	0	1	0	0	0	0	1	0	0	0	1	0	0	0	0	3
Yes, but the impact on new product energy efficiency is low	1	0	1	0	0	0	2	0	3	0	0	3	0	0	0	2	12
No	1	0	0	0	0	0	0	0	0	0	0	0	2	2	1	1	6
Don't know	2	1	3	1	0	0	0	9	8	0	1	3	0	2	4	4	34

## 17. Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products with significantly lower energy efficiency being sold	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	2
Yes, but the impact on new product energy efficiency is low	1	0	2	0	0	0	2	0	2	0	0	3	0	0	1	1	11
No	1	0	0	0	0	0	0	0	1	0	0	0	1	2	1	1	6
Don't know	2	1	3	1	0	0	0	9	8	0	1	3	0	2	5	5	35



17. Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products with significantly lower energy efficiency being sold	0	1	0	0	0	0	0	1	0	0	0	1	0	0	0	0	3
Yes, but the impact on new product energy efficiency is low	1	0	2	0	0	0	2	0	2	0	0	3	0	0	0	0	10
No	1	0	0	0	0	0	0	0	0	0	0	0	2	2	2	2	7
Don't know	2	0	3	1	0	0	0	9	9	0	1	3	0	2	5	5	35

17. Domestic laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products with significantly lower energy efficiency being sold	0	0	1	0	0	0	1	1	0	0	0	1	0	1	0	0	5
Yes, but the impact on new product energy efficiency is low	0	0	1	0	0	0	1	0	2	0	0	3	0	0	0	0	7
No	1	0	0	0	0	0	0	0	0	0	0	0	1	1	1	1	4
Don't know	3	1	3	1	0	0	0	9	9	0	1	3	0	2	6	6	38

17. Electrical lamps (part of 'electrical lamps and luminaires')

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						

Yes, and this results in products with significantly lower energy efficiency being sold	1	1	1	0	0	0	1	7	2	0	1	0	2	2	4	22
Yes, but the impact on new product energy efficiency is low	0	0	1	0	0	0	0	0	2	0	0	2	0	0	0	5
No	1	0	1	0	0	0	1	1	0	0	0	0	0	1	2	7
Don't know	2	0	2	1	0	0	0	2	8	0	0	5	0	1	1	22

17. Please explain your answer

### Ecodesign directive

18. Ecodesign implementing measures or voluntary agreements have been developed or are being developed for the following range of product groups. For each of the following product groups, please indicate if these were the most appropriate product groups to be selected.

18. Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	4	1	9	0	1	1	9	12	10	1	1	8	1	4	11	73	
No	0	1	0	1	0	1	0	0	9	0	0	3	1	0	1	17	
Don't know	0	1	0	0	0	0	0	0	10	2	0	2	0	0	1	16	

18. Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	4	1	9	0	0	1	9	12	13	1	1	9	2	4	12	78	
No	0	1	0	1	1	1	0	0	9	0	0	2	0	0	1	16	
Don't know	0	1	0	0	0	0	0	0	7	2	0	2	0	0	0	12	

## 18. PCs and servers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	1	9	0	0	0	8	11	15	0	1	4	1	4	12	70	
No	0	1	0	0	0	1	0	0	2	0	0	1	1	0	1	7	
Don't know	0	1	0	1	1	0	0	0	9	2	0	6	0	0	0	20	

## 18. Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	2	9	0	1	1	8	11	17	0	1	4	2	3	12	75	
No	0	1	0	0	0	0	0	0	0	0	0	1	0	1	1	4	
Don't know	0	0	0	1	0	0	0	0	9	2	0	6	0	0	0	18	

## 18. Stand-by and off-mode losses of EuPs

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	8	0	1	1	7	11	17	0	1	4	1	4	12	75	
No	0	0	0	0	0	1	0	0	1	0	0	1	0	0	1	4	
Don't know	0	0	0	1	0	0	1	0	8	2	0	6	1	0	0	19	

18. External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	7	0	1	0	5	11	18	0	1	4	1	4	12	72	
No	0	0	0	0	0	1	0	0	0	0	0	2	0	0	1	4	
Don't know	0	0	1	1	0	0	3	0	9	2	0	5	1	0	0	22	

18. Tertiary lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	2	8	0	0	0	5	11	16	0	1	2	0	2	12	64	
No	0	0	0	0	0	1	0	0	2	0	0	2	1	1	1	8	
Don't know	0	1	1	1	1	0	3	0	8	2	0	7	1	1	0	26	

18. Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	9	0	1	2	7	11	16	0	1	6	1	4	12	78	
No	0	0	0	0	0	0	0	0	2	0	0	1	1	0	1	5	
Don't know	0	0	0	1	0	0	1	0	8	2	0	4	0	0	0	16	

18. Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	5	2	8	0	1	1	7	11	13	0	1	5	1	3	11	69	
No	0	0	0	0	0	1	0	0	2	0	0	1	1	0	1	6	
Don't know	0	1	1	1	0	0	1	0	11	2	0	5	0	1	1	24	

18. Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	5	2	8	0	1	1	6	11	5	0	1	4	1	3	11	59	
No	0	0	0	1	0	1	0	0	3	0	0	1	1	1	1	9	
Don't know	0	1	0	0	0	0	2	0	18	2	0	6	0	0	1	30	

18. Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	5	2	8	0	0	1	6	11	5	0	1	3	0	3	11	56	
No	0	1	0	1	0	1	0	0	3	0	0	1	1	0	1	9	
Don't know	0	0	0	0	1	0	2	0	18	2	0	7	1	1	1	33	

18. Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	9	0	1	0	8	11	19	0	1	6	2	4	12	81	
No	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2	
Don't know	0	0	0	1	0	1	0	0	7	2	0	4	0	0	0	15	

18. Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	9	0	1	0	8	11	19	0	1	6	2	4	12	81	
No	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2	
Don't know	0	0	0	1	0	1	0	0	7	2	0	4	0	0	0	15	

18. Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	9	0	1	0	8	11	19	0	1	6	2	4	12	81	
No	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2	
Don't know	0	0	0	1	0	1	0	0	7	2	0	3	0	0	0	14	

18. Laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	2	9	0	1	0	8	11	18	0	1	6	2	4	12	79	
No	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2	
Don't know	0	1	0	1	0	1	0	0	7	2	0	3	0	0	0	15	

18. Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	8	0	1	0	6	10	17	0	1	5	0	3	12	71	
No	0	0	0	0	0	0	0	0	0	0	0	2	2	1	1	6	
Don't know	0	0	1	1	0	1	2	1	9	2	0	4	0	0	0	21	

18. Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	2	7	0	0	0	6	11	15	0	1	3	1	4	12	66	
No	0	1	0	0	0	0	0	0	0	0	0	1	1	0	1	4	
Don't know	0	0	1	1	1	1	2	0	11	2	0	6	0	0	0	25	

18. Non-directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	3	8	0	1	1	6	11	17	0	1	4	1	4	12	73	
No	0	0	0	0	0	0	0	0	2	0	0	1	0	0	1	4	
Don't know	0	0	1	1	0	0	2	0	8	2	0	5	1	0	0	20	

18. Directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	3	8	0	0	1	7	11	17	0	1	4	0	4	12	72	
No	0	0	0	0	0	0	0	0	2	0	0	1	0	0	1	4	
Don't know	0	0	1	1	1	0	1	0	8	2	0	5	1	0	0	20	

18. Water pumps

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	3	9	0	1	0	6	10	13	0	1	4	0	4	12	67	
No	0	0	0	1	0	0	0	0	0	0	0	1	1	0	1	4	
Don't know	1	0	0	0	0	1	2	1	13	2	0	5	1	0	0	26	



18. Complex set-top boxes (voluntary agreement)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	8	0	0	1	6	9	3	0	1	3	0	3	11	53	
No	0	0	0	0	0	0	0	1	2	0	0	1	1	0	1	6	
Don't know	0	0	1	1	1	0	2	1	20	2	0	6	1	1	1	37	

18. Imaging equipment (voluntary agreement)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	3	7	0	1	1	6	9	4	0	1	1	0	2	12	52	
No	0	0	0	0	0	0	0	1	2	0	0	0	0	1	1	5	
Don't know	0	0	2	1	0	0	2	1	20	2	0	8	2	1	0	39	

18. Please explain your answer

19. Has the correct level of ambition in minimum ecodesign requirements been set for implementing measures and voluntary agreements for the following product groups, taking into account economic technical potential, innovation and market developments?

19. Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2	
Correct ambition	0	0	5	0	0	0	1	0	7	0	0	2	1	0	0	16	

Too low ambition	3	0	3	0	0	0	2	10	0	0	1	0	0	3	7	29
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	2	1	1	0	1	2	2	13	2	0	4	0	0	3	31

## 19. Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	1	0	0	1	0	0	0	0	0	0	1	0	0	0	0	3
Too high ambition	0	0	0	1	0	0	1	1	2	1	0	2	0	0	0	0	8
Correct ambition	1	0	5	0	0	1	0	7	6	0	1	5	1	3	4	34	
Too low ambition	1	0	1	0	0	0	4	1	1	0	0	0	0	0	2	10	
Much too low ambition	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	
Don't know	1	1	1	0	0	0	1	1	9	0	0	5	0	1	1	21	

## 19. Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	1	0	0	0	0	0	0	1	0	0	1	0	0	0	0	3
Too high ambition	0	0	0	1	0	0	1	1	7	1	0	2	0	0	0	0	13
Correct ambition	0	0	3	0	0	1	0	0	8	0	0	7	1	1	1	22	
Too low ambition	2	0	2	0	0	0	4	8	1	0	1	0	0	2	5	25	
Much too low ambition	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	2	
Don't know	1	1	1	0	0	0	1	1	7	0	0	3	0	1	1	17	

## 19. PCs and servers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Correct ambition	0	0	3	0	0	0	1	0	1	0	0	2	0	0	0	0	7
Too low ambition	3	0	3	0	0	0	3	10	0	0	1	1	0	2	5	28	
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	2	
Don't know	0	1	1	1	0	0	2	1	13	1	0	7	1	1	1	30	

## 19. Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	1	1	1	0	0	0	1	0	1	0	0	1	1	1	1	0	8
Too low ambition	0	1	4	0	0	0	4	2	0	0	0	1	0	1	1	14	
Much too low ambition	3	0	1	0	0	0	0	8	0	0	1	0	0	2	6	21	
Don't know	0	0	1	1	0	0	2	1	13	1	0	8	0	0	1	28	

## 19. Standby and off-mode losses of EuPs

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	3	2	5	0	0	0	1	8	3	0	1	3	0	3	5	34	

Too low ambition	0	0	0	0	0	0	4	2	0	0	0	1	0	1	1	9
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	1	1	0	1	1	1	11	1	0	6	1	0	1	25

19. External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Correct ambition	2	2	4	0	0	0	0	8	6	0	1	2	1	2	4	32	
Too low ambition	1	0	1	0	0	0	4	2	0	0	0	1	0	1	2	12	
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	1	1	0	0	2	1	13	1	0	7	0	1	1	28	

19. Tertiary lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Correct ambition	1	1	4	0	0	0	0	1	7	0	0	2	0	0	1	17	
Too low ambition	1	0	1	0	0	0	0	7	1	0	1	1	0	2	3	17	
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	1	1	1	0	0	3	3	12	1	0	7	1	2	3	36	

## 19. Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	2	1	2	0	0	1	0	0	2	0	0	4	1	0	1	14
Too low ambition	1	1	3	0	0	0	5	9	0	0	1	0	0	3	5	28
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	1	0	0	1	2	12	1	0	5	0	1	1	25

## 19. Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Correct ambition	2	2	3	0	0	0	0	8	6	0	1	2	1	2	5	32
Too low ambition	1	0	2	0	0	0	0	1	0	0	0	1	0	1	0	6
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	1	1	0	0	3	2	13	1	0	7	0	1	1	30

## 19. Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	3
Correct ambition	0	0	3	0	0	0	0	0	1	0	0	0	2	1	1	0	8
Too low ambition	1	0	2	0	0	0	0	0	2	0	0	0	1	0	0	2	8
Much too low ambition	1	0	0	0	0	0	0	0	8	0	0	1	0	0	2	3	15
Don't know	1	1	1	0	0	0	3	1	13	1	1	0	7	0	1	1	30

## 19. Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2
Correct ambition	2	1	5	0	0	0	0	8	1	0	1	1	2	0	2	5	27
Too low ambition	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	2
Much too low ambition	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Don't know	0	0	1	0	0	0	3	2	13	1	1	0	7	1	2	1	31

## 19. Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	1	1	3	0	0	0	1	0	3	0	0	0	3	1	0	1	14
Too low ambition	3	1	2	0	0	0	4	10	0	0	1	0	0	2	5	28	
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	2
Don't know	0	0	1	1	0	0	1	1	11	1	0	0	6	0	1	1	24

## 19. Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Correct ambition	0	2	3	0	0	0	1	0	2	0	0	0	3	1	0	1	13
Too low ambition	3	0	2	0	0	0	4	10	0	0	0	1	0	0	2	5	27
Much too low ambition	1	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	3
Don't know	0	0	1	1	0	0	1	1	11	1	0	0	6	0	1	1	24

## 19. Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Correct ambition	0	2	3	0	0	0	1	0	2	0	0	0	3	1	0	1	13

Too low ambition	3	0	2	0	0	0	4	10	0	0	1	0	0	2	5	27
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	2
Don't know	1	0	1	1	0	0	1	1	11	1	0	6	0	1	1	25

19. Laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	1	1	2	0	0	0	0	0	3	0	0	2	1	1	1	12
Too low ambition	1	0	3	0	0	0	5	1	0	0	0	1	0	0	1	12
Much too low ambition	2	0	0	0	0	0	0	8	0	0	1	1	0	2	4	18
Don't know	0	1	1	1	0	0	1	2	11	1	0	6	0	1	1	26

19. Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	1	1	3	0	0	0	3	9	3	0	1	4	0	2	5	32
Too low ambition	1	0	2	0	0	0	1	1	0	0	0	1	0	0	1	7
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	1	1	1	0	0	2	1	11	1	0	5	1	1	1	27



## 19. Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	1	2	5	0	0	0	1	7	1	0	1	1	0	3	4	26	
Too low ambition	0	0	0	0	0	0	3	2	0	0	0	1	0	0	1	7	
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	2	0	1	1	0	0	2	2	14	1	0	8	1	1	2	35	

## 19. Non-directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	7	0	0	0	0	0	0	0	7
Correct ambition	2	2	4	0	0	0	4	1	1	0	0	2	0	0	2	18	
Too low ambition	1	0	1	0	0	0	1	8	1	0	1	1	0	3	4	21	
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	1	1	0	0	1	2	12	1	0	7	1	1	1	28	

## 19. Directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	0	2
Correct ambition	1	2	4	0	0	0	2	1	1	0	0	2	0	0	1	14	

Too low ambition	1	0	1	0	0	0	3	8	1	0	1	0	0	3	5	23
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	1	1	0	0	1	2	12	1	0	7	1	1	1	29

## 19. Water pumps

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
Correct ambition	1	2	3	0	0	0	0	0	1	0	0	2	0	0	1	10	
Too low ambition	2	0	2	0	0	0	0	7	0	0	1	1	0	2	4	19	
Much too low ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	1	0	0	0	3	4	13	1	0	7	1	2	1	33	

## 19. Complex set-top boxes (voluntary agreement)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	0	1	2	0	0	0	0	0	1	0	0	1	0	0	0	5	
Too low ambition	0	0	2	0	0	0	0	1	0	0	0	1	0	1	0	5	
Much too low ambition	2	0	1	0	0	0	4	8	0	0	1	0	0	2	6	24	
Don't know	1	1	1	1	0	0	2	2	13	1	0	8	1	1	1	33	

19. Imaging equipment (voluntary agreement)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Much too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Too high ambition	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Correct ambition	0	1	3	0	0	0	0	0	1	0	0	1	0	0	0	0	6
Too low ambition	1	0	1	0	0	0	0	8	0	0	1	1	0	2	5	19	
Much too low ambition	1	0	0	0	0	0	4	1	0	0	0	0	0	0	0	1	7
Don't know	1	1	1	1	0	0	2	2	13	1	0	8	1	2	1	34	

19. Please explain your answer

20. Requirements on energy use in Ecodesign implementing measures and voluntary agreements are based primarily on energy efficiency - the energy use per specific service/capacity unit, for example for televisions the power consumption per screen size expressed in W/dm<sup>2</sup>, rather than on the absolute energy consumption. What should be the basis of such requirements in implementing measures and voluntary agreements in the future?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Only on energy efficiency	0	0	0	0	0	1	0	1	6	0	0	4	0	1	1	14	
Mainly on energy efficiency	0	0	2	0	0	1	1	2	16	4	0	3	1	0	3	33	
On both energy efficiency and energy consumption	4	2	6	0	2	0	3	8	2	0	1	5	1	3	7	44	
Mainly on energy consumption	1	0	1	0	0	0	5	2	2	1	0	1	0	0	1	14	
Only on energy consumption	0	0	0	0	0	0	0	0	1	0	0	2	0	0	0	3	
Others: please specify	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	
Don't know	0	0	0	0	0	0	0	0	8	0	0	0	0	0	0	8	

20. Please explain your answer

21. The Ecodesign implementing measures adopted so far focus primarily on the impacts in the use phase of a product, which is in most energy-using products responsible for the largest share of the overall impact. Does the Ecodesign Directive or its implementation need to be changed to more proportionately address impacts in other life-cycle phases (including production and disposal) other than the use phase? If yes, how should it be changed? If no, why not?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	2	2	4	0	1	0	5	10	5	0	1	7	0	3	8	48	
No	1	1	3	0	1	1	2	2	31	2	0	8	1	1	5	59	
Don't know	0	0	2	0	0	1	2	1	2	3	0	1	1	0	1	14	

21. Please explain your answer

- 22.a To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU manufacturers:

- 22.a Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2
Positive	1	0	4	0	1	1	2	11	2	1	0	1	2	3	4	33	
Neutral or no impact	1	0	0	0	0	0	0	0	0	0	0	2	0	0	0	3	
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	2
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	2	4	0	0	0	5	2	23	4	1	7	0	1	5	54	

## 22.a PCs and servers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	1	0	0	0	0	1	1	0	0	4
Neutral or no impact	1	0	0	0	0	0	0	0	2	0	0	0	0	0	2	0	5
Negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	1	0	0	0	8	11	0	1	4	0	2	5	37

## 22.a Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Positive	0	0	1	0	0	0	0	1	1	0	0	0	1	1	0	0	5
Neutral or no impact	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	3	0	1	0	0	0	8	11	0	1	4	0	2	5	36

## 22.a Standby and off-mode losses of EuPs

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	1	0	2	0	0	0	0	2	2	0	0	3	0	1	0	11
Neutral or no impact	2	0	0	0	0	0	0	7	0	0	0	0	0	2	3	14
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	1	0	1	1	9	0	1	2	1	1	2	21

## 22.a External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	2	0	1	0	0	0	0	8	0	0	0	1	1	2	3	18
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	3	0	0	0	1	1	11	0	1	4	0	1	2	24

## 22.a Tertiary lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	2
Positive	1	0	1	0	0	0	0	8	0	0	0	1	0	1	3	15	
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3	
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	3	0	0	0	1	1	9	0	1	4	1	2	2	24	

## 22.a Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
Positive	1	0	2	0	0	1	1	7	1	0	0	3	1	2	3	22	
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2	
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	2	0	0	0	0	1	9	0	1	2	0	2	2	19	

## 22.a Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	1	0	1	0	0	0	1	7	0	0	0	0	1	1	3	3	18
Neutral or no impact	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	3	0	0	0	0	2	10	0	0	1	4	0	1	2	23

## 22.a Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Positive	0	0	1	0	0	0	1	1	0	0	0	0	1	1	1	1	7
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	2
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	1	0	0	0	0	0	0	1	0	0	0	2
Don't know	1	0	3	0	0	0	0	8	10	0	0	1	4	0	3	4	34



## 22.a Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	2	0	0	0	0	0	0	0	8	0	0	0	0	0	1	2	13
Positive	0	0	1	0	0	0	1	1	1	0	0	0	1	0	1	1	6
Neutral or no impact	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	3	0	0	0	0	1	10	0	0	1	4	1	2	2	24

## 22.a Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	1	0	2	0	0	0	1	7	2	2	0	0	3	1	3	3	23
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	2
Negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	1	8	0	0	1	2	0	1	2	17

## 22.a Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
Positive	2	0	2	0	0	0	1	7	2	0	0	0	3	1	3	3	24
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	2
Negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	1	8	0	0	1	2	0	1	2	17

## 22.a Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
Positive	2	0	2	0	0	0	1	7	2	0	0	0	3	1	3	3	24
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	2
Negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	1	8	0	0	1	2	0	1	2	17

## 22.a Laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
Positive	2	0	2	0	0	0	1	7	2	0	0	0	3	1	2	3	23
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	3

Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	0	0	0	0	1	8	0	1	2	0	1	2	17

## 22.a Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	1	0	0	0	0	1	0	1	1	5
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	1	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	3	0	0	0	0	8	10	0	1	4	1	2	3	34

## 22.a Non-directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Positive	1	0	1	0	0	0	1	8	0	0	0	1	0	1	3	16
Neutral or no impact	1	0	0	0	0	0	0	1	1	0	0	0	1	1	0	5
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	3	0	0	0	0	1	9	0	1	4	1	2	2	23

## 22.a Directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Positive	1	0	1	0	0	0	1	8	0	0	0	0	1	0	1	3	16
Neutral or no impact	1	0	0	0	0	0	0	1	1	0	0	0	1	1	0	0	5
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	3	0	0	0	0	1	9	0	1	4	1	2	2	2	23

## 22.a Imaging equipment

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	0	0	0	1	0	0	1	0	3
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	1	0	1	8	10	0	1	4	1	4	4	4	39

## 22.a Complex set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	1	1	0	0	0	1	0	0	0	0	4
Neutral or no impact	2	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	4

Negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	3	0	1	0	0	8	10	0	1	4	1	3	4	36

**22.a Please explain your answer**

**22.b To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU SME (Small and Medium Enterprises, firms with less than 250 employees and turnover <50million euros/annum) manufacturers:**

**22.b Overall, across all product groups**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Positive	0	0	2	0	0	1	1	1	2	1	0	0	1	1	0	10
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	2	0	1	1	6
Negative	0	0	1	0	0	0	0	0	1	0	0	2	0	0	2	6
Very negative	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2
Don't know	1	2	5	0	1	0	5	11	23	4	1	8	1	2	7	71

**22.b PCs and servers**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	2
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	2
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	3	0	0	0	1	8	8	0	1	4	0	3	5	35

## 22.b Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	1	0	0	0	0	1	0	0	3
Neutral or no impact	2	0	0	0	0	0	0	6	0	0	0	0	0	2	2	12
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	3	0	0	0	1	2	8	0	1	4	0	2	3	24

## 22.b Standby and off-mode losses of EuPs

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	1	0	0	1	0	1	0	5
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	1	0	2	0	0	0	1	8	7	0	1	3	1	2	5	31

## 22.b External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	1	0	0	0	1	1	1	0	6
Neutral or no impact	1	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	1	0	2	0	0	0	1	7	8	0	0	1	3	0	2	5	30

## 22.b Tertiary lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	2	0	1	0	0	0	0	0	5	0	0	0	0	0	1	2	11
Neutral or no impact	0	0	0	0	0	0	0	0	1	1	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	3	0	0	0	1	2	7	0	0	1	4	1	2	3	24

## 22.b Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	0	1	0	0	1	1	0	0	5
Neutral or no impact	1	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	1	0	2	0	0	1	1	8	7	0	1	3	0	3	5	32	

## 22.b Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	0	0	0	0	1	1	1	0	5
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	1	0	2	0	0	0	1	8	8	0	1	3	0	2	5	31	



## 22.b Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	0	0	0	1	1	1	0	5
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	2
Don't know	1	0	2	0	0	0	1	8	8	0	1	3	0	2	5	31

## 22.b Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	2
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	2
Negative	1	0	0	0	0	0	0	6	1	0	0	0	0	1	2	11
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	1	0	3	0	1	0	1	2	8	0	1	4	1	1	3	26

## 22.b Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	1	0	0	1	1	0	0	5
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	3

Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Don't know	2	0	2	0	0	0	1	8	7	0	1	3	0	2	5

## 22.b Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	1	0	0	1	1	0	0	5
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	2	0	0	0	1	8	7	0	1	3	0	2	5	31

## 22.b Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	1	0	0	1	1	0	0	5
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	2	0	0	0	1	8	7	0	1	2	0	2	5	30

## 22.b Laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	2	0	0	0	0	0	1	0	0	0	1	1	0	0	5
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	0	2	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	2	0	2	0	0	0	1	8	7	0	1	3	0	2	5	5	31

## 22.b Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Neutral or no impact	1	0	0	0	0	0	0	1	0	0	0	0	0	0	2	0	4
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	1	0	3	0	1	0	1	8	8	0	1	4	1	2	5	5	35

## 22.b Non-directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
Positive	2	0	1	0	0	0	0	5	0	0	0	0	0	1	2	2	11
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	1	1	2	0	0	5

Negative	0	0	0	0	0	0	0	0	2	0	0	0	0	0	2
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Don't know	0	0	3	0	0	0	1	2	7	0	1	3	1	1	22

## 22.b Directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1
Positive	2	0	1	0	0	0	0	5	0	0	0	0	0	0	1	2	11
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	1	1	2	0	0	5
Negative	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	2
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	0	0	3	0	0	0	1	2	7	0	1	3	1	1	1	3	22

## 22.b Imaging equipment

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	0	2	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	2	0	3	0	0	0	1	8	8	0	1	4	1	2	5	5	35

## 22.b Complex set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
Neutral or no impact	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	2	0	3	0	1	0	1	8	8	0	1	4	1	2	5	36

## 22.b Please explain your answer

22.c To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on the competitiveness of EU importers:

22.c Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	1	2	0	1	1	0	0	1	0	0	1	0	1	1	9
Neutral or no impact	1	1	0	0	0	0	0	1	2	0	0	3	0	1	1	10
Negative	0	0	1	0	0	0	1	2	1	1	0	1	0	0	0	7
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Don't know	2	0	5	0	1	0	5	10	23	4	1	9	1	2	8	71

## 22.c PCs and servers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	1	0	0	0	0	0	0	1	0	0	1	0	1	1	5
Neutral or no impact	1	0	0	0	0	0	0	0	2	0	0	0	0	0	1	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	0	0	1	7	8	0	0	1	3	0	2	4	31

## 22.c Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	1	0	0	0	0	0	0	1	0	0	1	0	1	1	5
Neutral or no impact	1	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	0	0	1	7	8	0	0	1	3	0	2	4	31

## 22.c Standby and off-mode losses of EuPs

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	1	0	2	0	0	0	0	0	0	2	0	0	1	0	1	1	8
Neutral or no impact	1	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3

Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	2	0	0	0	0	1	7	7	0	1	3	1	2	4	29

## 22.c External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	1	0	2	0	0	0	0	0	1	0	0	1	0	1	1	7
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	1	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	1	7	8	0	1	3	0	2	4	29

## 22.c Tertiary lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	1	0	1	0	0	0	0	0	1	0	0	1	0	1	1	6
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	1	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	3	0	0	0	1	7	8	0	1	3	1	2	4	31

## 22.c Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	2	0	0	1	0	0	2	0	0	0	1	0	1	1	8
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	0	1	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	0	1	7	7	7	0	1	3	0	2	4	29

## 22.c Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	2	0	0	0	0	0	1	0	0	0	1	0	0	1	5
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	0	1	7	8	8	0	1	3	0	3	4	31



## 22.c Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	2	0	0	0	0	0	0	1	0	0	1	0	0	1	5
Neutral or no impact	1	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	0	1	7	8	0	1	3	0	3	4	31	

## 22.c Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	0	1	0	0	1	0	1	1	5
Neutral or no impact	1	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	3
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	0	0	1	7	8	0	1	3	1	2	4	32	

## 22.c Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	2	0	0	0	0	0	0	2	0	0	1	0	1	1	7
Neutral or no impact	1	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	3

Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	0	1	7	7	0	1	3	0	2	4	29	

## 22.c Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	2	0	0	0	0	0	2	0	0	1	0	1	1	7
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	0	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	0	1	7	7	0	1	3	0	2	4	29

## 22.c Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	2	0	0	0	0	0	2	0	0	1	0	1	1	7
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	0	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	0	1	7	7	0	1	3	0	2	4	29

## 22.c Laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Positive	0	0	2	0	0	0	0	0	2	0	0	0	1	0	1	1	7
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	2	0	0	0	1	7	7	0	1	3	0	2	4	29	

## 22.c Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	1	0	0	1	0	1	1	1	5
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	1	0	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	0	0	1	7	8	0	1	3	1	2	4	32	

## 22.c Non-directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	1	0	1	0	0	0	0	0	1	0	0	1	0	1	1	1	6
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	1	0	1	0	0	5

Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	3	0	0	0	1	7	8	0	1	2	1	2	4	30

## 22.c Directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	1	0	1	0	0	0	0	0	1	0	0	1	0	1	1	1	6
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	1	1	1	0	0	6
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	3	0	0	0	1	7	8	0	1	2	1	2	4	4	30

## 22.c Imaging equipment

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	1	0	0	1	0	0	0	1	4
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	1	1	1	0	5
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	0	0	1	7	8	0	1	3	1	3	4	4	33

22.c Complex set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Positive	0	0	1	0	0	0	0	0	1	0	0	0	1	0	0	0	3
Neutral or no impact	1	0	0	0	0	0	0	2	0	0	0	0	0	0	1	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	3	0	0	0	1	7	8	0	1	3	1	3	4	4	33

22.c Please explain your answer

22.d To the extent that the following product groups have been covered by the Directive to date, what kind of impact has Ecodesign had on innovation:

22.d Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	3	0	1	0	0	0	1	1	2	2	9
Positive	0	0	2	0	0	0	3	9	13	1	1	2	1	3	9	9	44
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	1	0	0	1	3	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
Don't know	0	0	4	0	0	0	2	3	11	4	0	6	0	0	0	0	30

## 22.d Boilers and combi-boilers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	1	0	0	0	2	1	2	1	0	1	0	1	2	11	
Neutral or no impact	0	0	1	0	0	0	0	1	8	0	0	2	0	0	0	12	
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	2	0	0	0	0	10	9	0	1	4	1	2	3	32	

## 22.d Water heaters and hot water storage appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	2	0	0	0	2	1	4	1	0	2	0	1	2	15	
Neutral or no impact	0	0	1	0	0	0	0	1	7	0	0	3	0	0	0	12	
Negative	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	1	0	0	0	0	10	7	0	1	2	1	2	3	27	

## 22.d PCs and servers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	1	0	0	0	1	1	1	0	0	1	1	0	1	7	
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	0	0	1	1	3	

Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	0	10	9	0	1	5	0	2	3	32

## 22.d Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2
Positive	0	0	1	0	0	0	1	1	1	0	0	1	1	1	1	8
Neutral or no impact	0	0	1	0	0	0	0	7	6	0	1	0	0	2	4	21
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	0	3	8	0	0	5	0	0	0	18

## 22.d Standby and off-mode losses of EuPs

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2
Positive	0	0	3	0	0	0	1	8	3	0	1	2	0	3	5	26
Neutral or no impact	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	0	0	0	0	3	7	0	0	3	1	0	0	15

## 22.d External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	2	0	0	0	1	8	1	0	1	1	1	2	5	22	
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	2	
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	1	0	0	0	0	3	8	0	0	4	0	1	0	17	

## 22.d Tertiary lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	1	0	0	0	1	8	2	0	1	1	0	2	5	21	
Neutral or no impact	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2	
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	2	0	0	0	0	3	7	0	0	5	1	1	0	19	



## 22.d Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	2	0	0	0	1	0	2	0	0	0	2	1	1	2	11
Neutral or no impact	0	0	1	0	0	0	0	8	0	0	1	1	0	1	3	15	
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	0	0	0	0	3	7	0	0	0	3	0	1	0	15

## 22.d Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	2	0	0	0	1	8	7	0	1	1	1	1	2	5	28
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	2
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	0	0	0	0	3	8	0	0	0	4	0	1	0	17

## 22.d Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	2
Positive	0	0	2	0	0	0	1	1	1	0	0	0	1	1	0	2	9
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	2

Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	0	0	0	0	10	8	0	1	4	0	3	3	30

## 22.d Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	7	1	0	1	0	0	1	3	14
Positive	0	0	2	0	0	0	1	1	1	0	0	1	0	1	2	9
Neutral or no impact	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	0	3	8	0	0	5	1	1	0	20

## 22.d Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	1	1	0	0	0	0	1	0	4
Positive	0	0	2	0	0	0	1	1	3	0	0	2	1	0	2	12
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	1	0	1	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	0	0	0	0	9	6	0	1	3	0	1	3	24

## 22.d Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	1	0	3
Positive	0	0	2	0	0	0	1	2	3	0	0	0	2	1	0	2	13
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	0	0	0	0	9	6	0	1	3	0	1	3	3	24

## 22.d Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	1	1	0	0	0	0	0	1	0	4
Positive	0	0	2	0	0	0	1	1	3	0	0	0	2	1	0	2	12
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	0	1	0	1	0	3
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	1	0	0	0	0	9	6	0	1	3	0	1	3	3	24

## 22.d Laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	2	0	0	0	1	1	3	0	0	0	2	1	1	1	12
Neutral or no impact	0	0	1	0	0	0	0	7	0	0	1	1	0	2	3	3	15

Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1
Don't know	0	0	1	0	0	0	0	3	6	0	0	3	0	0	1	14

## 22.d Vacuum cleaners

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	2	0	0	0	1	1	3	0	0	5	1	1	2	16	
Neutral or no impact	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	1	0	0	0	0	10	6	0	1	2	0	2	3	25	

## 22.d Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	2	0	0	0	1	1	1	0	0	1	0	1	2	9	
Neutral or no impact	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Don't know	0	0	2	0	0	0	0	10	8	0	1	5	1	1	3	31	

## 22.d Non-directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2
Positive	0	0	1	0	0	0	1	7	7	0	1	1	0	3	4	25
Neutral or no impact	0	0	1	0	0	0	0	1	1	0	0	0	1	0	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	0	3	7	0	0	5	1	0	1	19

## 22.d Directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2
Positive	0	0	1	0	0	0	1	7	2	0	1	1	0	3	4	20
Neutral or no impact	0	0	1	0	0	0	0	1	1	0	0	0	1	0	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	0	3	7	0	0	5	1	0	1	19

## 22.d Imaging equipment

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2
Positive	0	0	1	0	0	0	1	0	0	0	0	1	0	0	2	5
Neutral or no impact	0	0	1	0	0	0	0	1	0	0	0	0	0	1	0	3

Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	0	10	8	0	1	5	1	2	3	32

**22.d Complex set-top boxes**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very positive	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Positive	0	0	1	0	0	0	1	0	1	0	0	0	1	0	0	1	5
Neutral or no impact	0	0	1	0	0	0	0	1	0	0	0	0	0	0	2	0	4
Negative	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Very negative	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1
Don't know	0	0	2	0	0	0	0	10	8	0	1	5	1	1	1	4	32

**22.d Please explain your answer**

**23.a How has the Ecodesign Directive affected the prices of the following regulated product groups, compared to how they might otherwise have been?**

**23.a Overall, across all product groups**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are higher	1	1	0	0	1	0	1	1	2	1	0	0	2	2	1	1	14
Prices have not been impacted	1	0	3	0	1	0	1	2	1	0	0	0	4	0	1	6	20
Prices are lower	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	0	5	0	0	1	3	10	25	4	1	7	0	2	4	64	

## 23.a Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	1	1	1	1	4
Prices have not been impacted	1	0	2	0	0	0	1	9	0	0	1	0	0	2	5	21	
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	0	0	0	1	7	0	0	5	0	0	0	15	

## 23.a Standby and off-mode losses of EuPs

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	1	0	0	1	3	
Prices have not been impacted	1	0	2	0	0	0	0	9	0	0	1	0	0	2	5	20	
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	0	0	1	1	7	0	0	4	1	1	0	17	

## 23.a External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are higher	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	2
Prices have not been impacted	0	0	2	0	0	0	0	2	0	0	0	0	0	0	0	2	6
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	1	8	7	0	1	5	0	3	4	32	

## 23.a Tertiary lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are higher	0	0	0	0	0	0	0	1	1	0	0	0	0	1	0	0	3
Prices have not been impacted	0	0	2	0	0	0	0	1	0	0	0	0	0	0	0	2	5
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	1	8	7	0	1	5	1	2	4	32	



## 23.a Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	0	1	1	0	3
Prices have not been impacted	0	0	2	0	0	0	1	2	0	0	0	0	0	0	0	3	8
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	1	0	8	7	0	1	5	0	2	3	30	

## 23.a Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	2
Prices have not been impacted	0	0	2	0	0	0	0	1	0	0	0	0	0	0	0	2	5
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	1	9	7	0	1	5	0	3	4	33	

## 23.a Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	2	0	0	0	0	1	0	0	3
Prices have not been impacted	0	0	2	0	0	0	0	1	0	0	0	0	0	0	0	2	5

Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	1	9	6	0	1	5	0	3	4	32

### 23.a Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2
Prices are higher	1	0	0	0	0	0	0	8	1	0	1	0	0	0	2	2	15
Prices have not been impacted	0	0	2	0	0	0	0	1	0	0	0	0	0	0	0	2	5
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	1	1	7	0	0	0	4	1	1	2	19

### 23.a Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are higher	0	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	3
Prices have not been impacted	1	0	2	0	0	0	1	9	0	0	1	1	1	0	2	5	22
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	1	7	0	0	0	4	0	0	1	15

## 23.a Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	2
Prices have not been impacted	1	0	2	0	0	0	1	9	0	0	1	1	0	3	5	23
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	1	7	0	0	4	0	0	1	15

## 23.a Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	3
Prices have not been impacted	1	0	2	0	0	0	1	9	0	0	1	1	0	2	5	22
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	1	7	0	0	4	0	0	1	15

## 23.a Laundry dryers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	1	1	0	3
Prices have not been impacted	1	0	2	0	0	0	1	8	0	0	1	1	0	2	5	21

Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	0	0	2	0	0	0	0	2	7	0	0	4	0	0	1	16

## 23.a Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Prices have not been impacted	1	0	2	0	0	0	0	9	0	0	1	0	0	2	5	20	
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	0	0	1	1	7	0	0	5	1	1	1	19	

## 23.a Non-directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Prices are much higher	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	2
Prices are higher	1	0	1	0	0	0	1	8	1	0	1	0	0	3	3	19	
Prices have not been impacted	0	0	1	0	0	0	0	1	0	0	0	1	0	0	1	4	
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	0	0	2	0	0	0	0	1	6	0	0	4	1	0	1	15	

## 23.a Directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test.Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	1	0	0	0	1	0	0	2
Prices are higher	0	0	0	0	0	0	1	1	1	0	0	0	0	2	1	6
Prices have not been impacted	0	0	2	0	0	0	0	1	0	0	0	1	0	0	1	5
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	0	8	6	0	1	4	1	1	3	27

## 23.a Imaging equipment

	EA	Surv.Body	Gov.Body	Stand.Org	Test.Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Prices have not been impacted	0	0	2	0	0	0	0	2	0	0	0	0	0	1	3	8
Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	1	8	7	0	1	5	1	2	3	31

## 23.a Complex set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test.Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Prices are much higher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are higher	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	1
Prices have not been impacted	0	0	2	0	0	0	0	2	0	0	0	0	0	2	3	9

Prices are lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Prices are much lower	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	1	0	2	0	0	0	1	8	7	0	1	5	1	1	3	30

23.a Please explain your answer

24.a For you, or your organisation, do you think that the benefits of the Ecodesign regulations and voluntary agreements outweigh their costs?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, high overall benefits	4	1	3	0	1	1	8	11	1	0	1	0	0	4	10	45	
Yes, low overall benefits	0	0	2	0	0	0	0	0	2	0	0	0	1	0	1	6	
Benefits and costs about the same	0	0	0	0	1	1	0	0	4	0	0	2	0	0	0	8	
No, benefits are less than costs	0	0	0	0	0	0	0	0	3	0	0	4	0	0	1	8	
No, costs are significantly higher than benefits	0	0	0	0	0	0	0	1	3	0	0	5	0	0	0	9	
Don't know	0	1	1	0	0	0	1	1	22	5	0	4	1	0	2	38	

24.a Please explain your answer

24.b For EU society as a whole, do you think that the benefits of Ecodesign regulations and voluntary agreements outweigh their costs?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, high overall benefits	4	1	4	0	0	1	7	12	3	1	1	1	1	1	4	10	50
Yes, low overall benefits	0	1	3	0	2	0	0	0	1	0	0	1	0	0	0	0	8
Benefits and costs about the same	0	0	0	0	0	1	0	0	4	0	0	3	0	0	0	0	8
No, benefits are less than costs	0	0	0	0	0	0	0	0	2	0	0	3	0	0	2	7	
No, costs are significantly higher than benefits	0	0	0	0	0	0	0	1	2	0	0	1	0	0	0	4	
Don't know	0	0	0	0	0	0	0	0	23	4	0	5	0	0	1	33	

24.b Please explain your answer

25. Should the possibility of laying down Ecodesign requirements in voluntary agreements – rather than mandatory requirements – be maintained?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and these should continue to be prioritised over mandatory regulations	0	1	0	0	0	0	1	1	18	1	0	3	0	0	3	28	
Yes, but these should not be prioritised over mandatory regulations	1	1	7	0	0	1	1	6	7	0	0	8	1	4	3	40	
No	3	0	1	0	2	0	7	6	7	0	1	1	1	0	8	37	
Don't know	1	0	0	0	0	1	0	0	3	4	0	2	0	0	0	11	

25. Please explain your answer

26.a To what extent do you agree or disagree with the following potential changes to the method of setting specific minimum requirements in the Ecodesign Directive?

26.a Go beyond the Least Life Cycle Cost Approach (LLCC) when setting minimum requirements, i.e. to aim for a staged approach towards the highest feasible energy efficiency level while at the same time ensuring that the life cycle costs of products are not getting higher for the consumer compared to the base case (considering also what room this would leave to energy labelling). The revised Methodology for Ecodesign of Energy-related Products (MEErP) already refers to this efficiency point as “Break Even Point“.

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	2	0	3	0	0	0	0	8	0	0	1	0	0	2	6	22	
Agree	0	0	2	0	0	0	0	2	3	0	0	2	0	0	2	11	
Neither agree nor disagree	0	0	2	0	0	1	4	1	1	0	0	2	0	0	1	12	
Disagree	1	1	0	0	0	0	1	1	14	1	0	3	0	1	2	25	
Strongly disagree	0	1	1	0	0	1	0	0	13	0	0	5	0	0	1	22	
Don't know	1	0	0	0	1	0	3	0	4	4	0	3	2	0	2	20	

26.a Involve a check on what would it mean to go beyond LLCC by identifying the “Break Even Point” in the preparatory studies.

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	3	0	3	0	0	0	1	8	0	0	1	0	0	2	7	25	
Agree	1	1	4	0	0	0	5	4	19	1	0	6	0	1	2	44	
Neither agree nor disagree	0	1	0	0	0	0	0	0	0	0	0	2	0	0	1	4	
Disagree	1	0	0	0	0	1	0	0	10	0	0	3	0	0	1	16	
Strongly disagree	0	0	1	0	0	0	0	0	2	0	0	1	0	0	0	4	
Don't know	0	0	0	0	1	1	2	0	4	4	0	3	2	0	2	19	

26.a Strive for more ambitious requirements not by going beyond LLCC cost but rather to make life cycle cost calculations more realistic by applying “learning curves” (consideration of decreasing production costs over time)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	2	0	2	0	0	0	0	8	0	0	1	0	0	1	6	20	
Agree	2	2	3	0	0	0	5	1	15	0	0	3	1	2	3	37	
Neither agree nor disagree	0	0	0	0	0	0	0	1	1	0	0	4	0	0	1	7	
Disagree	0	0	0	0	0	1	1	2	13	1	0	3	0	0	1	22	
Strongly disagree	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2	
Don't know	1	0	3	0	0	1	2	0	5	4	0	4	1	0	2	23	



**26.a Keep the present practice of life cycle calculation**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	1	0	0	0	0	0	0	2	0	0	1	0	0	2	6
Agree	2	1	1	0	0	1	0	0	0	19	0	0	3	1	0	3	31
Neither agree nor disagree	0	1	4	0	0	0	4	2	4	4	0	0	7	0	1	1	24
Disagree	1	0	1	0	0	0	0	2	1	0	0	0	1	0	1	1	8
Strongly disagree	2	0	0	0	0	0	0	7	0	0	1	0	0	0	1	5	16
Don't know	0	0	1	0	0	1	4	1	9	5	0	0	2	1	0	2	26

**26.a Give benchmarks a more powerful role as targets. They should serve as starting point for setting new MEPS at the time of revision, while still respecting the rules of Article 15 of the Ecodesign Directive**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	1	0	1	0	0	0	5	1	0	0	0	0	1	0	0	4	13
Agree	2	0	5	0	0	0	0	8	7	0	1	1	1	1	3	4	32
Neither agree nor disagree	1	2	2	0	0	0	0	0	5	0	0	0	3	0	0	2	15
Disagree	1	0	1	0	0	1	0	0	4	0	0	0	0	0	0	1	8
Strongly disagree	0	0	0	0	0	0	0	0	5	0	0	0	3	0	0	1	9
Don't know	0	0	0	0	0	1	2	3	14	5	0	0	4	1	0	2	32



99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
99	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

27. Are products that are non-compliant with Ecodesign requirements a problem, i.e. large numbers of these are sold in the following regulated product groups?

27. Overall, across all product groups

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	0	0	1	0	0	1	3	0	0	3	0	0	1	10	
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	1	0	0	0	2	1	0	1	6	
No	1	2	1	0	0	0	0	0	0	0	0	0	0	1	1	6	
Don't know	2	0	5	0	0	1	7	11	27	5	1	7	1	3	10	80	

27. Televisions

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2	
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	
No	1	1	0	0	0	0	0	0	0	0	0	0	0	0	1	3	
Don't know	2	0	3	0	0	0	1	9	6	0	1	3	1	3	5	34	

## 27. Standby and off-mode losses of EuPs

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	2
No	1	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	4
Don't know	2	0	3	0	0	0	1	9	7	0	1	2	1	2	5	33	

## 27. External power supplies

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	1	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2
No	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2
Don't know	2	0	3	0	0	0	2	9	7	0	1	3	1	2	5	35	

## 27. Tertiary lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	2
No	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Don't know	3	1	3	0	0	0	1	9	7	0	1	3	1	2	5	36	

## 27. Room air conditioning appliances

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	1	0	0	1	0	0	1	0	0	0	1	4
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	0	0	0	0	0	1	0	0	0	1	0	0	0	0	2
No	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	3	1	4	0	0	0	1	8	7	0	1	3	1	2	4	35	

## 27. Electric motors

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2
Yes, but the impact on the average energy efficiency of new products on sale is low	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2
No	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	2	1	4	0	0	0	1	9	7	0	1	3	1	2	6	37	

## 27. Ventilation fans

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	1	0	0	0	1	0	0	1	0	0	0	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2
No	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	3	1	4	0	0	0	1	9	6	0	1	3	1	2	6	37	

## 27. Circulators in buildings

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	2	0	0	1	0	0	0	0	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
No	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Don't know	3	1	4	0	0	0	1	9	7	0	1	3	1	2	5	5	37

## 27. Domestic refrigerators and freezers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	2
No	1	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	4
Don't know	2	0	3	0	0	0	1	9	7	0	1	2	1	2	5	5	33

27. Domestic washing machines

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	2
No	1	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	4
Don't know	2	0	3	0	0	0	1	9	7	0	1	2	1	2	5	5	33

27. Domestic dishwashers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	2
No	1	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	4
Don't know	2	0	3	0	0	0	1	9	7	0	1	2	1	2	5	5	33



27. Laundry dryer

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	2
No	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	3
Don't know	3	0	3	0	0	0	1	9	7	0	1	2	1	2	5	5	34

27. Simple set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
No	0	1	0	0	0	0	0	0	0	0	0	0	1	0	0	1	3
Don't know	3	0	3	0	0	0	1	9	7	0	1	4	1	2	5	5	36

## 27. Directional lighting

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	1	0	2	0	0	0	0	0	0	0	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1
No	0	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	2
Don't know	3	1	4	0	0	0	0	9	6	0	1	3	1	2	6	6	36

## 27. Imaging equipment

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
No	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	3	1	3	0	0	0	1	9	7	0	1	4	1	2	6	6	38

27. Complex set-top boxes

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Yes, but the impact on the average energy efficiency of new products on sale is low	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1
No	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Don't know	3	1	3	0	0	0	1	9	7	0	1	4	1	2	6	38	

27. Please explain your answer

28. To what extent do you agree or disagree with the following statements about Ecodesign:

28. Ecodesign has led to lower production costs for manufacturers

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Strongly agree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Agree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Neither agree nor disagree	1	0	0	0	0	1	1	1	7	0	0	0	0	0	2	2	15
Disagree	0	1	1	0	1	1	1	9	1	0	0	9	2	0	1	28	
Strongly disagree	0	0	0	0	0	0	0	0	3	0	0	2	1	0	1	7	
Don't know	2	1	6	0	0	0	6	11	10	3	1	4	0	2	9	55	

28. Ecodesign has led to improved profit margins on regulated products

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Agree	0	0	2	0	1	0	1	0	0	0	0	0	0	2	2	1	9
Neither agree nor disagree	1	1	0	0	0	1	1	1	7	0	0	0	2	1	0	2	17
Disagree	0	0	0	0	0	1	1	1	3	1	0	0	7	0	0	2	16
Strongly disagree	0	0	0	0	0	0	0	0	1	0	0	0	2	0	0	0	3
Don't know	2	1	5	0	0	0	4	11	18	3	1	4	0	2	8	59	

28. The Ecodesign regulations unduly restricted the range of products on the market

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Strongly agree	0	0	0	0	0	0	0	0	3	0	0	0	2	0	0	0	5
Agree	0	0	0	0	0	0	1	1	10	1	0	0	2	2	0	1	18
Neither agree nor disagree	0	0	1	0	1	2	0	0	5	0	0	0	4	0	0	0	13
Disagree	2	1	3	0	0	0	1	1	2	0	0	0	3	1	3	2	19
Strongly disagree	1	0	2	0	0	0	5	10	2	0	1	1	1	0	1	10	33
Don't know	0	1	1	0	0	0	1	1	8	3	0	0	3	0	0	0	18

28. Please explain your answer

## Rulemaking procedure

29. Please rate the effectiveness of the following phases in the legislative procedure for laying down Energy Labelling and Ecodesign requirements for products? Effectiveness in the procedure relates to achieving useful results in a timely manner.
29. Ecodesign working plan

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	1	0	0	0	5	0	2	0	0	0	0	0	0	2	10
Effective	2	1	4	0	0	1	1	1	6	0	0	5	0	2	2	2	25
Neutral	2	0	2	0	0	1	0	6	19	1	1	6	1	2	5	46	
Ineffective	0	1	0	0	0	0	0	1	4	0	0	0	0	0	2	8	
Very ineffective	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0	3	
Don't know	0	0	1	1	1	0	2	3	3	4	0	4	1	0	2	22	

29. Preparatory study

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	1	0	0	0	5	0	1	0	0	0	0	0	0	1	8
Effective	1	1	4	0	0	1	1	1	2	0	0	3	0	2	3	19	
Neutral	0	1	2	0	0	0	0	1	5	0	0	2	0	1	3	15	
Ineffective	3	0	0	0	0	0	0	6	22	1	1	6	0	1	5	45	
Very ineffective	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0	3	
Don't know	0	0	1	1	1	0	2	3	4	4	0	4	1	0	1	22	

## 29. Consultation forum

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	3	0	0	0	5	0	3	0	0	0	0	0	0	3	14
Effective	3	2	4	0	0	1	1	9	20	2	1	5	0	3	8	59	
Neutral	0	0	0	0	0	0	0	0	6	0	0	1	0	0	1	8	
Ineffective	1	0	0	0	0	1	0	0	3	0	0	2	0	1	0	8	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2	
Don't know	0	0	1	1	0	0	2	3	4	3	0	4	1	0	2	21	

## 29. Impact assessment and draft regulation

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	1	0	0	0	0	0	2	0	0	0	0	0	0	0	3
Effective	1	2	4	0	0	1	6	1	1	0	0	1	0	3	3	23	
Neutral	0	0	1	0	0	0	0	1	21	2	0	3	0	0	5	33	
Ineffective	2	0	0	0	0	0	0	7	7	0	1	4	0	1	4	26	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	2	0	0	1	3	
Don't know	1	0	1	1	0	0	2	3	5	3	0	4	1	0	1	22	

## 29. Member State expert group on labelling

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	2	0	0	0	0	0	2	0	0	0	0	0	0	0	4
Effective	0	1	4	0	0	2	5	1	13	2	0	1	0	1	4	34	
Neutral	3	0	1	0	0	0	0	7	8	0	1	6	0	2	5	33	

Ineffective	1	0	0	0	0	0	0	1	2	0	0	2	0	0	1	7
Very ineffective	0	0	0	0	0	0	0	0	1	0	0	1	0	0	1	3
Don't know	0	1	1	1	0	0	3	3	10	3	0	4	1	1	2	30

29. Regulatory Committee vote

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	1	0	6	0	0	0	0	0	1	0	0	1	0	0	1	10	
Effective	3	2	1	0	0	1	5	8	16	1	1	3	0	3	9	53	
Neutral	0	0	0	0	0	1	0	1	13	0	0	4	0	1	1	21	
Ineffective	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	2	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2	
Don't know	0	0	1	1	0	0	3	3	5	3	0	4	1	0	1	22	

29. WTO notification process

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Very effective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Effective	0	1	2	0	0	1	5	0	7	2	0	3	0	0	2	23	
Neutral	3	0	2	0	0	1	0	7	17	0	1	4	0	3	7	45	
Ineffective	0	1	1	0	0	0	0	0	1	0	0	1	0	1	0	5	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	3	1	0	0	3	5	10	3	0	6	1	0	4	37	

29. Scrutiny/Objection by European Parliament and Council

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Very effective	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	2
Effective	0	1	2	0	0	1	5	1	6	0	0	0	1	0	2	1	20
Neutral	3	1	5	0	0	1	0	7	21	0	1	4	0	2	9	54	
Ineffective	0	0	0	0	0	0	0	0	3	0	0	3	0	0	0	6	
Very ineffective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Don't know	1	0	1	1	1	0	3	4	5	4	0	6	1	0	3	30	

29. Please explain your answer

30.a Does the involvement of Member State authorities need to be changed in the preparatory and adoption process of delegated acts and implementing measures for Ecodesign and Energy Labelling in order to ensure their views are taken into account, their rights respected and their administrative burden is reduced to the necessary minimum? If yes, how?

30.a Ecodesign

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	0	1	0	1	0	2	0	0	0	13	0	0	4	0	0	1	22
No	4	2	7	0	1	0	1	11	11	1	1	4	1	3	9	56	
Don't know	0	0	2	0	0	0	6	2	10	2	0	7	1	1	3	34	



### 30.a Energy Labelling

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	3	1	6	1	0	2	1	9	13	0	1	6	0	3	7	53	
No	1	2	1	0	1	0	1	2	10	1	0	2	1	0	3	25	
Don't know	0	0	2	0	0	0	5	2	10	2	0	7	1	1	3	33	

### 30.a Please explain your answer

**30.b Does the involvement of stakeholders (industry, retailers/distributors, environmental and consumer organisations) need to be changed in the preparatory and adoption process of delegated acts and implementing measures for Ecodesign and Energy Labelling in order to ensure their views are taken into account, their rights respected and their administrative burden is reduced to the necessary minimum? If yes, how?**

### 30.b Ecodesign

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	0	0	0	1	1	1	1	2	15	2	0	8	0	1	2	34	
No	4	3	6	0	0	1	5	10	17	1	1	4	2	3	9	66	
Don't know	0	0	2	0	0	0	1	1	4	2	0	2	0	0	1	13	

### 30.b Energy Labelling

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	0	0	0	1	0	1	6	3	8	2	0	8	1	1	4	35	
No	4	3	6	0	1	1	1	10	17	3	1	4	1	3	7	62	

Don't know	0	0	2	0	0	0	1	0	11	0	0	2	0	0	1	17
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**30.b Please explain your answer**

**31.a How will the administrative burden for the European Commission to implement Ecodesign and the Energy Label change in the future, assuming:**

**31.a No change in the framework, no loss in the effectiveness of the implementation and taking into account the number of energy-related products already covered and to be covered?**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Large increase	0	0	0	0	1	0	0	0	0	0	0	2	0	0	1	4
Increase	1	2	2	0	0	1	0	0	7	0	0	1	1	1	3	19
Remain about the same	1	0	3	0	0	1	2	8	16	2	1	4	0	2	6	46
Decrease	1	0	0	0	0	0	0	1	1	0	0	0	0	0	1	4
Large decrease	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Don't know	0	1	1	0	0	0	2	4	7	3	0	5	0	0	0	23

**31.a The scope was extended to non-energy-related products and means of transport**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Large increase	1	1	4	0	0	1	1	0	20	4	0	3	0	0	5	40
Increase	2	1	3	0	0	0	1	9	5	0	1	2	0	3	5	32
Remain about the same	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	2
Decrease	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1
Large decrease	0	0	0	0	0	0	0	1	2	0	0	0	0	0	0	3
Don't know	0	1	0	0	1	1	2	3	5	1	0	6	2	0	0	22

**31.a Environmental impacts other than resource use were shown in the label, and ecodesign shifted focus to production phase impacts?**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Large increase	1	2	1	0	0	1	1	0	22	4	0	5	0	0	0	5	42
Increase	1	0	5	0	0	0	1	2	2	0	0	1	0	2	1	15	
Remain about the same	1	0	0	0	1	0	0	7	0	0	1	1	0	1	5	17	
Decrease	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	
Large decrease	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	2	
Don't know	0	1	0	0	0	1	2	3	5	1	0	5	2	0	0	20	

**31.a Please explain your answer**

**31.b How could the administrative burden of the Commission in developing implementing measures and delegated acts be decreased so as to allow a faster development and review of measures and acts?**

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
by introducing a fast track method for reviewing existing measures, where the level of the revised requirements would be determined in a partly automatic procedure based on technological progress achieved in the meantime	3	1	3	0	2	1	4	8	2	0	1	3	0	2	10	40	
by shortening the adoption procedure through carrying out certain consultations in parallel	2	0	2	0	1	1	0	8	6	0	1	3	0	2	6	32	
by other means, namely: [please describe]	1	0	2	0	0	0	1	5	14	2	0	2	0	1	6	34	

**31.b Please explain your answer**

32.a Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities and ensure reliability of the Energy Label?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	1	3	0	1	1	2	8	20	2	1	4	1	2	6	56	
No	0	2	1	0	1	0	6	1	0	0	0	1	0	0	3	15	
Don't know	0	0	4	0	0	0	1	4	13	3	0	7	2	2	2	38	

32.a Please explain your answer

32.b Does the market surveillance regulation (EC) no 765/2008 and the Commission proposal COM(2013) 75 amending it, provide national authorities with adequate competences and powers to carry out market surveillance activities on Ecodesign Directive?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	1	3	0	2	1	1	8	21	0	1	4	1	2	6	55	
No	0	1	1	0	0	0	6	0	0	0	0	1	0	0	2	11	
Don't know	0	1	4	0	0	1	1	5	13	4	0	8	2	2	1	42	

32.b Please explain your answer

33.a Have appropriate and effective mechanisms for cooperation in market surveillance between administrations been established for Energy Labelling and Ecodesign Directives?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	0	1	3	0	0	0	1	3	8	2	0	1	1	0	2	22	
No	3	2	1	0	2	1	7	9	13	0	1	9	0	2	10	60	
Don't know	0	0	5	0	0	1	0	1	11	3	0	3	2	2	0	28	

33.a Please explain your answer

33.b Do Member States provide sufficient resources for national market surveillance activities for Energy Labelling and Ecodesign?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	0	2	3	1	0	0	1	2	7	2	0	1	0	1	1	21	
No	5	1	4	0	2	2	7	11	23	1	0	12	1	3	11	83	

33.b Please explain your answer

33.c Should the Commission or other EU bodies be more involved to ensure enforcement activities for the Energy Labelling and Ecodesign Directives, considering for example the EU product notification system in place under the cosmetic products regulation (2009/1223/EC, Article 13) or in form of an EU-wide complaint system or other?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	4	2	3	0	0	1	8	10	8	0	1	5	2	2	9	55	
No	1	1	5	1	1	1	1	3	18	5	0	6	0	1	2	46	

33.d Should the Energy Labelling Directive be changed to include a conformity assessment procedure (like the Ecodesign Directive has)?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	4	2	4	0	2	1	5	7	3	0	1	3	1	3	7	43	
No	1	1	2	0	0	1	1	2	18	3	0	1	0	0	3	33	
Don't know	0	0	3	0	0	0	2	4	11	2	0	9	1	1	2	35	

33.d Please explain your answer

33.e Is the conformity assessment procedure in the Ecodesign Directive appropriate?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	5	2	5	0	2	1	1	7	13	1	0	3	1	2	6	49	
No	0	1	1	0	0	0	0	1	3	0	0	2	0	1	1	10	
Don't know	0	0	3	0	0	1	4	4	14	4	0	7	1	1	4	43	

33.e Please explain your answer

34. What else could be improved with regard to market surveillance?

35. Have effective harmonised energy performance testing standards been developed for the product groups regulated under the Energy Labelling and Ecodesign Directives?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	2	2	1	0	1	1	2	1	13	1	0	3	1	2	2	2	32
No	3	1	4	1	0	0	2	8	3	0	1	5	0	1	6	6	35
Don't know	0	0	3	0	1	1	1	3	13	3	0	5	1	1	2	2	34

35. Please explain your answer

36.a Should the scope of the Energy Labelling Directive be expanded to non ErP (non Energy related Products – which are products that do not influence energy consumption during use, but have other environmental impacts due e.g. to their manufacturing, such as foodstuffs, clothing and furniture)?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	3	0	1	0	0	0	1	9	1	0	0	4	1	1	5	5	26
No	1	3	7	1	1	2	6	4	35	5	0	7	1	2	9	9	84
Don't know	0	0	1	0	1	0	1	0	6	0	1	5	1	1	1	1	18

36.a Please explain your answer

36.b Should the scope of the Ecodesign Directive be expanded to non ErP (non Energy related Products)?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Yes	2	0	3	0	0	0	5	9	0	0	1	4	1	3	9	9	37
No	2	3	5	1	2	2	2	3	32	4	0	7	1	1	6	6	71
Don't know	0	0	1	0	0	0	1	1	8	1	0	5	1	0	1	1	19

36.b Please explain your answer

37. Should the scope of the Energy Labelling Directive and the Ecodesign Directive be limited to energy/resource use in the use phase, while a set of other legal instruments applying to other significant environmental aspects (e.g. material efficiency, pollution) is adopted?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	2	2	2	0	0	1	2	2	2	16	1	0	5	1	2	2	38
No	0	0	5	0	2	1	5	2	5	0	0	0	4	0	1	7	32
Don't know	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

37. Please explain your answer

38. Should the Energy Labelling Directive's scope be extended to cover buildings, technical building systems and other systems, thus ensuring uniform EU rules for the labelling of such systems, instead of the current approach where Member States set the labelling rules in the national transposition of the Energy Performance of Buildings Directive and in other national legislation?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.						Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
								Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Yes	2	1	3	0	1	0	6	7	7	3	0	1	2	0	2	7	35
No	1	1	6	1	1	2	1	2	2	29	3	0	5	0	1	7	60
Don't know	1	1	0	0	0	0	2	4	4	4	2	0	5	2	1	2	24

38. Please explain your answer



39. Do you see opportunities for synergies between all EU legislation relevant to product groups? For example: merging all required documents and information into a single form, or merging certain Directives into one (Ecodesign, Energy Star, Energy labelling, and Tyre labelling).

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Yes	2	3	6	0	1	0	8	10	8	0	1	7	0	2	12	60	
No	2	0	1	0	0	0	0	1	15	0	0	1	1	1	2	24	
Don't know	0	0	1	1	1	2	1	2	8	5	0	7	2	1	1	32	

39. Please explain your answer, with reference to the specific changes and their feasibility

## Primary energy factor

42.a Location selection. Please select your country:

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.	Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG	Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
Austria	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	3
Belgium	0	0	0	0	0	0	2	3	14	0	0	2	0	0	4	25	
Bulgaria	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	1	
Croatia	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	
Denmark	2	0	0	0	0	0	0	2	0	0	0	0	0	0	1	5	
Finland	0	0	0	0	0	0	0	0	1	0	0	1	0	0	1	3	
France	2	1	0	0	0	0	0	4	0	1	12	1	2	8	31		
Germany	2	0	2	0	0	0	2	1	5	0	0	12	1	3	6	34	
Greece	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	
Italy	0	0	0	0	0	0	0	0	0	0	0	2	0	1	0	3	
Netherlands	0	0	0	0	0	0	0	0	0	0	0	2	0	0	1	3	
Portugal	0	0	0	0	0	0	1	1	0	0	0	1	0	0	0	3	
Spain	1	0	0	0	0	0	0	0	0	0	0	0	0	0	2	3	
Sweden	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	
United Kingdom	1	0	0	0	0	0	0	1	0	0	1	0	2	3	8		
Non EU 28	0	0	1	0	0	0	0	0	3	0	0	1	0	0	1	6	

42.b What is your affiliation?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals	
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
I work for an energy agency	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10
I work for a surveillance body	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
I work for a government body other than an energy agency or a surveillance body	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	3
I work for a standardisation organisation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
I work for a test laboratory	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
I work for an intergovernmental organisation (incl. multilateral banks)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
I work for an interest group	0	0	0	0	0	0	5	8	29	0	1	0	0	0	0	0	43
I work for an individual manufacturer	0	0	0	0	0	0	0	0	0	0	0	35	0	0	0	0	35
I work for an individual retailer	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	2
I work for a research institute or consultancy	0	0	0	0	0	0	0	0	0	0	0	0	0	9	0	0	9
Other, namely	0	0	0	0	0	0	0	0	0	0	0	0	0	0	28	0	28

43.a Please specify type of interest group:

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals	
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG						
Consumer interest group	0	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0	5
Environmental interest group	0	0	0	0	0	0	0	8	0	0	0	0	0	0	0	0	8
Industry interest group	0	0	0	0	0	0	0	0	29	0	0	0	0	0	0	0	29
Retailers' interest group	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Other interest group	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1

44 Contributions received to this consultation, together with the identity of the contributor may be published by the Commission, unless the contributor objects to the publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case, the publication may be published in anonymous form. The contributor may also object to the publication of his contribution, but should be aware that he may later be requested to provide justification in accordance with the exceptions provided under Regulation 1049/2001 regarding public access to European parliament, Council and Commission documents. Do you object the publication of your personal data and/or your contribution?\* (compulsory)

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
My contribution may be published	5	0	1	0	0	0	4	6	24	0	1	11	0	3	18	73
I object to the publication of my personal data (publication in anonymous form)	4	1	1	0	0	0	1	2	5	0	0	20	1	6	6	47
I object to the publication of my contribution	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	2

- 46 In principle, with the help of the primary energy factor, products having the same functionality but using either electricity or primary energy sources can be compared to each other in labelling, and / or be subject to minimum requirements in ecodesign resulting in equivalent primary energy use for a given functionality. In which cases is this approach applicable?

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
We have the following views on the validity of the approach: (click to show options)	9	1	3	0	0	0	5	8	29	0	1	27	2	9	24	118
The question is irrelevant to us, as all the products we produce/sell use one energy source.	0	0	0	0	0	0	0	0	0	0	0	6	0	0	2	8
We do not know.	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1

#### 46.a In Labelling

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Should be the rule	6	1	1	0	0	0	3	8	9	0	0	4	2	8	13	55
Should be applied on a case-by-case basis	2	0	0	0	0	0	0	0	9	0	1	1	0	1	1	15
Should not be applied	1	0	2	0	0	0	0	0	10	0	0	20	0	0	9	42

#### 46.a In Ecodesign

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
Should be the rule	6	1	1	0	0	0	3	8	9	0	0	4	2	7	13	54
Should be applied on a case-by-case basis	1	0	0	0	0	0	0	0	9	0	1	1	0	2	1	15
Should not be applied	1	0	2	0	0	0	0	0	10	0	0	20	0	0	9	42

**47.a** Should the same average primary energy factor be applied to electricity-using products regardless where they are sold in the EU, or should the primary energy factor vary by Member State, to take into account the local energy mix? Note that the latter option would mean that ecodesign and labelling requirements would also vary by Member State.

	EA	Surv.Body	Gov.Body	Stand.Org	Test Lab.	Int.Gov	Interest G.					Indiv.Manu.	Indiv.Ret.	Research	Other SH	Totals
							Consumer IG	Environ. IG	Industry IG	Retailer IG	Other IG					
The same primary energy factor should be applied to electricity-using products regardless where they are sold in the EU.	8	0	1	0	0	0	5	7	19	0	1	25	2	8	21	97
The primary energy factor applied to electricity-using products should vary by Member State, to take into account the local energy mix.	2	1	0	0	0	0	0	1	3	0	0	5	0	1	4	17
We do not know.	0	0	0	0	0	0	0	0	3	0	0	3	0	0	1	7

## Annex B Short survey results – closed questions

## Annex B Short survey results - closed questions

### General Questions

#### 0. Location selection - Please select the country of your response

	Consumer	Ind. Retail	Ind. Manu	Totals
Austria	4	0	0	4
Belgium	7	0	0	7
Bulgaria	1	0	0	1
Czech Republic	7	0	0	7
Estonia	1	0	0	1
Finland	7	0	4	11
France	40	0	3	43
Germany	18	38	16	72
Ireland	1	0	0	1
Italy	2	0	1	3
Latvia	1	0	0	1
Lithuania	1	0	0	1
Netherlands	4	0	0	4
Non EU-28	6	0	1	7
Poland	2	0	0	2
Portugal	12	1	0	13
Spain	6	0	1	7
Sweden	3	0	0	3
United Kingdom	4	1	4	9

#### 0. In what function do you respond to this survey?

	Consumer	Ind. Retail	Ind. Manu	Totals
As a consumer and EU citizen	127	0	0	127
I work for an individual retailer	0	40	0	40
I work for an individual manufacturer	0	0	30	30

#### 0.a Please specify the main product type(s) that concern your organisation's activities:

	Consumer	Ind. Retail	Ind. Manu	Totals
0	0	0	0	0
Domestic lighting (general lighting equipment)	0	0	4	4
Domestic and commercial hobs and grills	0	0	2	2
Domestic dishwashers	0	0	1	1
Boilers and combiboilers	0	0	1	1
Domestic lighting (general lighting equipment); Directional lighting	0	0	5	5
Directional lighting	0	0	1	1
Tertiary Lighting; Directional lighting	0	0	1	1
Refrigerating and freezing equipment	0	0	2	2
Boilers and combiboilers; Water heaters	0	0	1	1
Machine tools	0	0	1	1
Commercial refrigerators and freezers	0	0	2	2
Local room heating products; Domestic and commercial ovens; Domestic and commercial hobs and grills	0	0	1	1
Non-tertiary coffee machines	0	0	1	1

Other	0	0	3	3
Boilers and combiboilers; Water heaters; Room air conditioning appliances; Residential ventilation and kitchen hoods; Circulators in buildings; Central heating products (other than CHP)	0	0	1	1
Domestic refrigerators and freezers; Domestic washing machines; Domestic dishwashers; Laundry driers; Domestic and commercial ovens; Domestic and commercial hobs and grills	0	0	1	1
Water heaters; Room air conditioning appliances; Residential ventilation and kitchen hoods; Domestic lighting (general lighting equipment); Local room heating products	0	0	1	1

**0.c This survey asks questions related to both the Energy Labelling and Ecodesign Directives. Please indicate your interest:**

	Consumer	Ind. Retail	Ind. Manu	Totals
I would like to answer questions on both Energy Labelling and Ecodesign	112	0	0	112
I would like to answer questions only on Energy Labelling	9	0	0	9
I would like to answer questions only on Ecodesign	6	0	0	6

**0.c This survey asks questions related to both the Energy Labelling and Ecodesign Directives. Please indicate your interest:**

	Consumer	Ind. Retail	Ind. Manu	Totals
I would like to answer questions on both Energy Labelling and Ecodesign	0	0	29	29
I would like to answer questions only on Energy Labelling	0	0	1	1

**0.c This survey asks questions related to both the Energy Labelling and Ecodesign Directives. Please indicate your interest:**

	Consumer	Ind. Retail	Ind. Manu	Totals
I would like to answer questions on both Energy Labelling and Ecodesign	0	20	0	20
I would like to answer questions only on Energy Labelling	0	20	0	20

## Energy Labelling Directive & Ecodesign Directive

**0.c [no questions]**

## Energy Labelling Directive

**1. To what extent do you agree or disagree with the following statements regarding energy labels:**

**1. I / consumers feel more informed about product energy use since the introduction of the EU energy labels**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	37	4	11	52
Agree	65	22	8	95
Neither agree nor disagree	6	5	1	12
Disagree	10	5	6	21

Strongly disagree	2	2	2	6
Don't know	0	2	1	3

1. I / consumers understand the EU energy labels

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	16	3	3	22
Agree	66	11	10	87
Neither agree nor disagree	14	9	6	29
Disagree	12	14	6	32
Strongly disagree	9	2	4	15
Don't know	3	1	0	4

1. I / consumers understand the difference between the energy classes

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	22	4	4	30
Agree	49	16	9	74
Neither agree nor disagree	19	10	7	36
Disagree	17	5	5	27
Strongly disagree	7	2	3	12
Don't know	4	3	0	7

1. The energy classes were set at ambitious levels

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	7	1	3	11
Agree	18	8	10	36
Neither agree nor disagree	34	12	8	54
Disagree	31	7	5	43
Strongly disagree	16	8	1	25
Don't know	12	4	1	17

1. I / consumers understand the difference between energy efficiency and energy consumption

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	13	1	0	14
Agree	34	6	6	46
Neither agree nor disagree	14	7	5	26
Disagree	40	15	12	67
Strongly disagree	15	8	4	27
Don't know	1	3	1	5

1. EU energy labels have led to improvements in the energy efficiency of products on the market

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	22	5	6	33
Agree	61	17	10	88
Neither agree nor disagree	20	8	6	34
Disagree	9	3	6	18
Strongly disagree	3	5	0	8
Don't know	3	2	0	5



**1. EU energy labels have led to lower energy consumption of new products**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	22	4	3	29
Agree	52	23	16	91
Neither agree nor disagree	23	7	5	35
Disagree	13	2	3	18
Strongly disagree	3	2	0	5
Don't know	6	2	1	9

**1. I / consumers use energy labels when making a product purchase decision**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	41	2	4	47
Agree	55	23	18	96
Neither agree nor disagree	15	7	5	27
Disagree	5	4	0	9
Strongly disagree	3	3	0	6
Don't know	1	1	1	3

**2.a Energy Labels are currently (or soon to be) mandatory for the following range of product groups. For each of the following product groups, please indicate if these were the most appropriate product groups to select for Energy Labelling.**

**2.a Boilers and combi-boilers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	89	20	16	125
No	18	8	5	31
Don't know	12	11	6	29

**2.a Water heaters and hot water storage appliances**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	90	25	18	133
No	17	8	5	30
Don't know	12	6	4	22

**2.a Televisions**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	104	19	18	141
No	11	13	1	25
Don't know	3	7	6	16

**2.a Room air conditioning appliances**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	101	27	23	151
No	12	9	1	22
Don't know	6	3	3	12

**2.a Domestic refrigerators and freezers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	112	35	24	171
No	7	3	0	10
Don't know	0	1	3	4

## 2.a Domestic washing machines

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	107	31	24	162
No	10	6	0	16
Don't know	0	2	3	5

## 2.a Domestic dishwashers

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	110	32	24	166
No	9	6	0	15
Don't know	0	1	2	3

## 2.a Domestic laundry dryers

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	106	33	24	163
No	9	4	0	13
Don't know	4	2	2	8

## 2.a Vacuum cleaners

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	89	13	15	117
No	24	19	4	47
Don't know	6	7	7	20

## 2.a Electrical lamps (part of 'electrical lamps and luminaires')

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	98	19	23	140
No	17	15	2	34
Don't know	2	5	2	9

## 2.a Luminaires (part of 'electrical lamps and luminaires')

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	89	18	17	124
No	23	16	8	47
Don't know	6	5	3	14

## 2.a Domestic ovens

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	99	25	17	141
No	13	14	2	29
Don't know	5	1	8	14

## 2.b In retrospect, which other product groups (if any) should have been labelled:

### 2.b PCs and servers

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	79	13	11	103
Yes, but labelling is no longer relevant	7	4	1	12
No, and still should not be labelled	18	12	6	36

No, but should now be labelled	5	2	1	8
Don't know	9	7	6	22

## 2.b Imaging equipment

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	46	9	8	63
Yes, but labelling is no longer relevant	7	4	2	13
No, and still should not be labelled	27	14	4	45
No, but should now be labelled	4	0	1	5
Don't know	30	9	9	48

## 2.b External power supplies

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	51	11	4	66
Yes, but labelling is no longer relevant	6	4	1	11
No, and still should not be labelled	27	14	8	49
No, but should now be labelled	3	1	1	5
Don't know	28	7	11	46

## 2.b Electric motors

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	70	8	10	88
Yes, but labelling is no longer relevant	4	5	2	11
No, and still should not be labelled	21	14	7	42
No, but should now be labelled	6	0	0	6
Don't know	12	9	5	26

## 2.b Ventilation fans

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	77	9	10	96
Yes, but labelling is no longer relevant	6	5	2	13
No, and still should not be labelled	16	14	5	35
No, but should now be labelled	6	0	0	6
Don't know	11	9	7	27

## 2.b Circulators in buildings

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	62	13	9	84
Yes, but labelling is no longer relevant	5	4	3	12
No, and still should not be labelled	20	11	5	36
No, but should now be labelled	6	0	1	7
Don't know	20	9	6	35

## 2.b Electric pumps

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	66	11	8	85
Yes, but labelling is no longer relevant	5	4	5	14
No, and still should not be labelled	23	14	5	42
No, but should now be labelled	3	0	1	4
Don't know	17	8	6	31

## 2.b Complex set-top boxes

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	56	6	5	67
Yes, but labelling is no longer relevant	2	3	2	7
No, and still should not be labelled	23	13	7	43
No, but should now be labelled	6	0	1	7
Don't know	27	16	10	53

## 2.b Simple set-top boxes

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	53	6	5	64
Yes, but labelling is no longer relevant	5	3	1	9
No, and still should not be labelled	23	13	8	44
No, but should now be labelled	5	0	1	6
Don't know	27	16	10	53

## 2.b Motors and variable speed drives

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	66	6	6	78
Yes, but labelling is no longer relevant	3	2	2	7
No, and still should not be labelled	20	15	8	43
No, but should now be labelled	3	1	1	5
Don't know	21	13	7	41

## 2.b Lighting installations

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and should still be labelled	74	10	10	94
Yes, but labelling is no longer relevant	8	2	3	13
No, and still should not be labelled	24	14	6	44
No, but should now be labelled	2	1	1	4
Don't know	9	11	5	25

## 3. Please rank the following aspects in their importance in a typical purchase decision for a labelled product, [1 most important, 7 least important, must number all].

### 3. Price

	Consumer	Ind. Retail	Ind. Manu	Totals
1	52	12	13	77
2	34	22	9	65
3	14	3	6	23
4	9	1	1	11
5	2	0	0	2
6	4	0	0	4
7	3	0	0	3

### 3. Product design, style, colour, external dimensions

	Consumer	Ind. Retail	Ind. Manu	Totals
1	20	13	6	39
2	30	13	10	53
3	28	9	6	43
4	12	3	4	19

5	12	0	2	14
6	13	1	0	14
7	4	0	1	5

3. Product with high energy efficiency

	Consumer	Ind. Retail	Ind. Manu	Totals
1	39	5	5	49
2	29	12	5	46
3	22	11	8	41
4	12	8	3	23
5	5	1	4	10
6	9	1	4	14
7	2	0	0	2

3. Product with low environmental impact

	Consumer	Ind. Retail	Ind. Manu	Totals
1	28	2	3	33
2	25	3	5	33
3	17	15	2	34
4	18	11	5	34
5	13	2	7	22
6	7	2	1	10
7	10	3	5	18

3. Product operating cost

	Consumer	Ind. Retail	Ind. Manu	Totals
1	37	3	5	45
2	31	12	4	47
3	16	14	9	39
4	17	3	6	26
5	11	3	3	17
6	3	2	1	6
7	4	1	0	5

3. Size (capacity, output)

	Consumer	Ind. Retail	Ind. Manu	Totals
1	24	4	3	31
2	30	14	10	54
3	28	11	4	43
4	16	4	2	22
5	9	3	4	16
6	5	1	4	10
7	5	0	2	7

3. Functionalities (extras such as a drink distributor or a fresh food compartment in a refrigerator)

	Consumer	Ind. Retail	Ind. Manu	Totals
1	17	9	9	35
2	20	17	6	43
3	27	8	4	39
4	11	4	3	18
5	14	1	4	19
6	15	0	1	16
7	13	0	2	15

**4.c Labels also provide information on other product- specific parameters. Please rate the overall usefulness of this information:**

**4.c Noise (for Washing Machines and Dishwashers)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Very useful	69	12	11	92
Useful	41	21	10	72
Neutral	10	1	3	14
Not useful	1	4	0	5
Not useful at all	0	1	1	2
Don't know	0	0	1	1

**4.c Water use (for Washing Machines and Dishwashers)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Very useful	92	17	14	123
Useful	21	16	9	46
Neutral	4	2	1	7
Not useful	2	3	0	5
Not useful at all	0	2	1	3
Don't know	1	0	1	2

**4.c Capacity / Size**

	Consumer	Ind. Retail	Ind. Manu	Totals
Very useful	50	5	5	60
Useful	45	19	15	79
Neutral	21	13	3	37
Not useful	3	0	1	4
Not useful at all	0	3	1	4
Don't know	1	0	1	2

**4.c Product specific output efficiency (i.e. spin-drying efficiency class)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Very useful	49	7	4	60
Useful	41	12	10	63
Neutral	19	13	7	39
Not useful	8	2	3	13
Not useful at all	1	5	0	6
Don't know	1	1	2	4

**5. Energy labelling currently focuses primarily on energy efficiency – as the rating and scale is based on an index of energy use per specific service/capacity unit, i.e. X kWh/standard wash cycle. Energy consumption is also currently displayed on labels as a numeric (X kWh/year) value. What should the focus be in future?**

	Consumer	Ind. Retail	Ind. Manu	Totals
Only on energy efficiency	3	0	2	5
Mainly on energy efficiency (existing focus)	5	8	5	18
On both energy efficiency and energy consumption	86	20	12	118
Mainly on energy consumption	16	5	6	27
Only on energy consumption	5	1	1	7
Don't know	6	5	2	13

**7.a What do you think of the following statements regarding the effectiveness of the scale of the EU energy label:**

**7.a I understand the current (A-G) + 3 (A+++, A++, A+) class system**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	37	10	13	60
Agree	47	15	7	69
Neither agree nor disagree	9	7	1	17
Disagree	13	5	4	22
Strongly disagree	10	2	2	14
Don't know	1	1	1	3

**7.a An A-G class scale is easier to understand than the A+++-D class scale**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	68	15	9	92
Agree	28	9	8	45
Neither agree nor disagree	11	5	5	21
Disagree	5	7	3	15
Strongly disagree	6	1	0	7
Don't know	1	2	1	4

**7.a Current energy label classes provide a clear and useful differentiation of product energy efficiency**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	16	2	4	22
Agree	44	15	10	69
Neither agree nor disagree	20	8	5	33
Disagree	26	6	6	38
Strongly disagree	11	6	3	20
Don't know	2	3	0	5

**7.a The current classifications need to be changed**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	42	11	5	58
Agree	28	7	9	44
Neither agree nor disagree	25	8	6	39
Disagree	14	6	5	25
Strongly disagree	4	3	1	8
Don't know	5	3	2	10

**7.b What do you think of the following potential improvement options for the current A-G, A+++ scales of the energy labels:**

**7.b Adding further + classes, i.e. A++++**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	6	3	2	11
Agree	5	2	0	7
Neither agree nor disagree	4	5	2	11
Disagree	36	8	17	61
Strongly disagree	64	21	7	92
Don't know	1	1	0	2

**7.b Resetting all classes to an A-G scale, e.g. current A class becomes F class, B becomes G and new, more ambitious class limits set for A-E**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	43	8	6	57
Agree	35	11	3	49
Neither agree nor disagree	7	5	5	17
Disagree	13	3	5	21
Strongly disagree	11	10	6	27
Don't know	4	2	2	8

**7.b Resetting all classes to an A-G scale with an overlap in the market between old 'A' and new 'A' label**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	9	3	0	12
Agree	14	8	4	26
Neither agree nor disagree	17	5	1	23
Disagree	34	6	10	50
Strongly disagree	33	14	12	59
Don't know	5	3	0	8

**7.b Resetting all classes to an A-G scale with a dated (year) reference on the label**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	23	2	3	28
Agree	34	5	6	45
Neither agree nor disagree	17	9	3	29
Disagree	14	5	6	25
Strongly disagree	16	13	8	37
Don't know	6	4	0	10

**7.b Resetting all classes to a 1-7 scale that takes over from A-G to avoid overlap in the market, i.e. between 'new' and 'old' A classes if the A-G scale was retained but rescaled**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	11	4	6	21
Agree	23	5	3	31
Neither agree nor disagree	17	8	3	28
Disagree	25	3	5	33
Strongly disagree	28	15	7	50
Don't know	5	4	1	10

**7.b Introducing an A-'X' label with less than 7 classes**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	1	2	3	6
Agree	13	4	2	19
Neither agree nor disagree	23	8	4	35
Disagree	37	5	8	50
Strongly disagree	24	15	6	45
Don't know	8	5	4	17

**7.b Introducing a dynamic class rating system, which automatically adjusts over time**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	32	5	3	40
Agree	29	9	7	45
Neither agree nor disagree	18	5	5	28



Disagree	11	2	4	17
Strongly disagree	14	14	5	33
Don't know	5	3	1	9

## 7.b Moving to an open ended scale

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	10	5	1	16
Agree	8	2	2	12
Neither agree nor disagree	19	5	6	30
Disagree	34	7	9	50
Strongly disagree	28	14	6	48
Don't know	10	3	2	15

## 7.b Removing or indicating on the label the energy classes that are empty of products

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	28	1	3	32
Agree	31	5	6	42
Neither agree nor disagree	19	11	7	37
Disagree	7	3	3	13
Strongly disagree	9	8	4	21
Don't know	14	10	4	28

## 7.b Removing the entire labelling system

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	6	13	3	22
Agree	1	2	1	4
Neither agree nor disagree	3	8	3	14
Disagree	19	8	8	35
Strongly disagree	83	8	11	102
Don't know	1	1	1	3

## 9.a How has the Energy Labelling Directive affected, or is expected to affect, the prices of the following regulated products, compared to how they might otherwise have been?

### 9.a Overall, across all product groups

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	1	1
Prices are higher	0	17	17	34
Prices have not been impacted	0	12	5	17
Prices are lower	0	0	0	0
Prices are much lower	0	0	0	0
Don't know	0	7	4	11

### 9.a Boilers and combi-boilers

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	2	2
Prices are higher	0	6	7	13
Prices have not been impacted	0	5	2	7
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	22	14	36

## 9.a Water heaters and hot water storage appliances

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	1	1
Prices are higher	0	7	7	14
Prices have not been impacted	0	5	2	7
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	20	15	35

## 9.a Televisions

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	1	1
Prices are higher	0	6	5	11
Prices have not been impacted	0	9	6	15
Prices are lower	0	1	1	2
Prices are much lower	0	0	0	0
Don't know	0	17	12	29

## 9.a Room air conditioning appliances

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	2	2
Prices are higher	0	7	6	13
Prices have not been impacted	0	9	6	15
Prices are lower	0	0	0	0
Prices are much lower	0	0	0	0
Don't know	0	17	11	28

## 9.a Domestic refrigerators and freezers

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	4	1	5
Prices are higher	0	19	12	31
Prices have not been impacted	0	9	3	12
Prices are lower	0	0	0	0
Prices are much lower	0	0	0	0
Don't know	0	5	9	14

## 9.a Domestic washing machines

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	3	0	3
Prices are higher	0	14	9	23
Prices have not been impacted	0	10	6	16
Prices are lower	0	0	0	0
Prices are much lower	0	0	0	0
Don't know	0	9	11	20

## 9.a Domestic dishwashers

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	3	0	3
Prices are higher	0	13	10	23
Prices have not been impacted	0	11	5	16
Prices are lower	0	0	0	0
Prices are much lower	0	0	0	0

Don't know	0	8	11	19
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## 9.a Domestic laundry dryers

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	3	0	3
Prices are higher	0	13	10	23
Prices have not been impacted	0	9	5	14
Prices are lower	0	0	0	0
Prices are much lower	0	0	0	0
Don't know	0	8	11	19

## 9.a Vacuum cleaners

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	1	0	1
Prices are higher	0	7	5	12
Prices have not been impacted	0	7	7	14
Prices are lower	0	0	1	1
Prices are much lower	0	0	0	0
Don't know	0	18	12	30

## 9.a Electrical lamps (part of 'electrical lamps and luminaires')

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	2	1	3
Prices are higher	0	10	10	20
Prices have not been impacted	0	5	8	13
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	16	7	23

## 9.a Luminaires (part of 'electrical lamps and luminaires')

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	4	1	5
Prices are higher	0	8	14	22
Prices have not been impacted	0	5	7	12
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	17	5	22

## 9.a Domestic ovens

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	3	1	4
Prices are higher	0	15	9	24
Prices have not been impacted	0	11	4	15
Prices are lower	0	0	0	0
Prices are much lower	0	0	0	0
Don't know	0	7	12	19

**9.b To what extent do you agree or disagree 'that a higher energy label class ranking results, or will result, in a price premium for better performing products':**

**9.b Overall, across all product groups**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	19	7	6	32
Agree	35	14	12	61
Neither agree nor disagree	21	2	3	26
Disagree	23	4	2	29
Strongly disagree	9	2	1	12
Don't know	7	7	3	17

**9.b Boilers and combi-boilers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	17	1	4	22
Agree	29	8	7	44
Neither agree nor disagree	11	1	4	16
Disagree	19	2	1	22
Strongly disagree	6	2	0	8
Don't know	12	16	9	37

**9.b Water heaters and hot water storage appliances**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	15	1	4	20
Agree	28	10	6	44
Neither agree nor disagree	12	1	3	16
Disagree	18	2	2	22
Strongly disagree	7	2	0	9
Don't know	11	15	10	36

**9.b Televisions**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	11	2	2	15
Agree	27	8	6	41
Neither agree nor disagree	13	2	6	21
Disagree	24	4	4	32
Strongly disagree	7	2	0	9
Don't know	8	12	7	27

**9.b Room air conditioning appliances**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	13	1	3	17
Agree	29	9	9	47
Neither agree nor disagree	13	1	5	19
Disagree	18	4	2	24
Strongly disagree	8	2	0	10
Don't know	10	14	6	30

## 9.b Domestic refrigerators and freezers

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	16	9	4	29
Agree	30	13	11	54
Neither agree nor disagree	9	2	4	15
Disagree	21	4	1	26
Strongly disagree	7	2	0	9
Don't know	8	5	3	16

## 9.b Domestic washing machines

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	15	6	3	24
Agree	33	14	9	56
Neither agree nor disagree	9	1	4	14
Disagree	18	4	1	23
Strongly disagree	7	2	0	9
Don't know	8	7	7	22

## 9.b Domestic dishwashers

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	16	8	3	27
Agree	31	13	11	55
Neither agree nor disagree	10	1	4	15
Disagree	19	4	1	24
Strongly disagree	7	2	0	9
Don't know	8	7	6	21

## 9.b Domestic laundry dryers

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	15	6	3	24
Agree	33	13	12	58
Neither agree nor disagree	8	1	4	13
Disagree	19	4	1	24
Strongly disagree	8	2	0	10
Don't know	8	7	5	20

## 9.b Vacuum cleaners

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	14	3	3	20
Agree	23	7	6	36
Neither agree nor disagree	16	1	5	22
Disagree	19	3	3	25
Strongly disagree	7	2	1	10
Don't know	12	15	6	33

## 9.b Electrical lamps (part of 'electrical lamps and luminaires')

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	17	4	5	26
Agree	22	6	8	36
Neither agree nor disagree	20	4	6	30
Disagree	18	3	1	22
Strongly disagree	8	2	0	10

Don't know	7	12	6	25
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**9.b Luminaires (part of 'electrical lamps and luminaires')**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	15	4	5	24
Agree	26	6	12	44
Neither agree nor disagree	16	3	4	23
Disagree	20	4	1	25
Strongly disagree	8	2	0	10
Don't know	7	13	5	25

**9.b Domestic ovens**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	12	6	3	21
Agree	26	11	10	47
Neither agree nor disagree	13	3	3	19
Disagree	21	4	1	26
Strongly disagree	9	2	0	11
Don't know	10	8	8	26

**12. To what extent do you agree or disagree with the following statements about the energy label:**

**12. The information on the label is accurate and reliable**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	9	3	2	14
Agree	50	15	6	71
Neither agree nor disagree	18	6	7	31
Disagree	9	3	5	17
Strongly disagree	5	1	1	7
Don't know	21	9	6	36

**12. The information reflects real-life use of the product**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	3	0	0	3
Agree	32	8	5	45
Neither agree nor disagree	27	9	4	40
Disagree	19	8	8	35
Strongly disagree	8	3	5	16
Don't know	21	9	5	35

**12. Energy labels are usually displayed in appropriate places in retail stores and showrooms**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	11	5	3	19
Agree	52	15	16	83
Neither agree nor disagree	15	5	3	23
Disagree	17	3	2	22
Strongly disagree	1	5	1	7
Don't know	14	4	1	19

**12. Energy labelling for distance selling (e.g. selling via internet) should be improved**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	35	7	3	45
Agree	45	12	10	67
Neither agree nor disagree	17	3	9	29
Disagree	3	3	2	8
Strongly disagree	0	3	0	3
Don't know	11	9	2	22

**12. I have scanned a QR code before (see figure)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	26	9	6	41
Agree	19	10	9	38
Neither agree nor disagree	5	1	1	7
Disagree	23	6	4	33
Strongly disagree	32	7	6	45
Don't know	6	5	1	12

**12. It would make sense to allow for the use of QR-codes in the label in order to display information about the product on consumers' smartphones or on smart meters.**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	25	6	3	34
Agree	36	10	13	59
Neither agree nor disagree	24	4	3	31
Disagree	12	4	4	20
Strongly disagree	12	8	4	24
Don't know	5	6	1	12

**12. Energy labelling has unduly restricted the range of products on the market (by making the less energy efficient products unprofitable to produce)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	7	4	3	14
Agree	17	12	5	34
Neither agree nor disagree	19	6	6	31
Disagree	22	3	5	30
Strongly disagree	33	4	5	42
Don't know	13	8	3	24

**13.a For Energy Labelling, should additional information be displayed on the label on:**

**13.a Other environmental aspects (e.g. CO2 emissions)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and it should form part of the scoring for the product's label class	47	1	5	53
Yes, as additional information on the label	31	7	9	47
No	16	17	10	43
No, but the information should be available on product fiches, QR codes or via other mechanisms	20	9	2	31
Don't know	2	4	2	8
Don't know	2	4	2	8

**13.a Whole product life cycle energy consumption – current information on labels only covers when the product is in use, it does not include the energy in manufacture, distribution or disposal, whole product life cycle would also include these other phases**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and it should form part of the scoring for the product's label class	40	1	3	44
Yes, as additional information on the label	27	8	4	39
No	17	17	12	46
No, but the information should be available on product fiches, QR codes or via other mechanisms	28	9	6	43
Don't know	4	3	2	9
Don't know	4	3	2	9

**13.a Whole product life cycle resource efficiency**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and it should form part of the scoring for the product's label class	36	1	4	41
Yes, as additional information on the label	27	8	4	39
No	18	16	13	47
No, but the information should be available on product fiches, QR codes or via other mechanisms	29	7	6	42
Don't know	5	6	1	12
Don't know	5	6	1	12

**13.a Expected product life**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and it should form part of the scoring for the product's label class	50	7	10	67
Yes, as additional information on the label	46	7	11	64
No	5	12	6	23
No, but the information should be available on product fiches, QR codes or via other mechanisms	14	7	1	22
Don't know	2	5	0	7
Don't know	2	5	0	7

**13.b To what extent do you agree or disagree with the following statements on the inclusion of additional information on the energy label:**

**13.b Two separate labels should exist, one for energy consumption and the other to adress other environmental aspects**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	20	0	3	23
Agree	21	3	0	24
Neither agree nor disagree	15	3	5	23
Disagree	41	15	10	66
Strongly disagree	17	18	8	43
Don't know	1	0	0	1



**13.b One single label should exist, including both energy consumption and other significant environmental aspects**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	26	6	5	37
Agree	40	12	9	61
Neither agree nor disagree	9	9	5	23
Disagree	26	4	5	35
Strongly disagree	10	7	2	19
Don't know	2	1	0	3

**13.b Information on other environmental impacts should be provided on a mandatory basis**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	43	4	2	49
Agree	39	7	5	51
Neither agree nor disagree	13	8	3	24
Disagree	10	8	9	27
Strongly disagree	8	9	6	23
Don't know	3	2	1	6

**13.b Information on other environmental impacts should be provided on a voluntary basis.**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	7	6	5	18
Agree	19	12	12	43
Neither agree nor disagree	6	6	3	15
Disagree	42	5	3	50
Strongly disagree	36	5	2	43
Don't know	4	3	1	8

**13.b Information on other environmental impacts should be provided in absolute terms (i.e. not in comparison with a benchmark or an index value)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	16	1	2	19
Agree	27	10	5	42
Neither agree nor disagree	21	8	9	38
Disagree	26	6	5	37
Strongly disagree	14	5	2	21
Don't know	11	6	3	20

**14.x Some products that are labelled are required to have fiches (see example in Figure 1). Fiches are technical information presented within any product brochures accompanying the labelled product and provide standard information relating to the product (e.g. annual water consumption for dishwashers). Have you ever seen and used a fiche?**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	54	0	0	54
No	54	0	0	54
Don't know	9	0	0	9

**14.x Do consumers find fiches useful?**

	Consumer	Ind. Retail	Ind. Manu	Totals
Very useful	15	3	0	18
Useful	27	10	0	37
Neutral	2	5	0	7
Not useful	5	16	0	21

Don't know	4	6	0	10
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14. What do you think of the following changes to fiches?

14. Adding information on other environmental aspects

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	49	5	3	57
Positive	39	7	9	55
Neutral	15	12	8	35
Negative	4	3	3	10
Very negative	3	4	1	8
Don't know	3	6	0	9

14. Adding information on annual running costs i.e. the costs of operating the product

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	52	4	5	61
Positive	43	17	11	71
Neutral	11	8	5	24
Negative	5	1	2	8
Very negative	0	3	2	5
Don't know	3	4	0	7

14. Adding information focussed on business- to- business customers

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	15	3	2	20
Positive	30	4	7	41
Neutral	41	15	10	66
Negative	9	5	2	16
Very negative	2	4	1	7
Don't know	15	6	2	23

14. Providing fiches online on a mandatory basis on all labelled products

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	48	5	2	55
Positive	32	9	12	53
Neutral	19	12	8	39
Negative	7	3	2	12
Very negative	2	2	0	4
Don't know	5	4	0	9

14. Providing fiches online on a mandatory basis on selected products that are not labelled

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	29	4	0	33
Positive	37	8	10	55
Neutral	23	14	8	45
Negative	7	2	4	13
Very negative	4	3	1	8
Don't know	10	5	2	17

14. Providing fiches as QR (bar) codes to labels to enable consumers to quickly access more detailed information on their smartphones (see picture below)

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	30	5	2	37
Positive	27	8	8	43
Neutral	34	14	6	54
Negative	9	4	4	17
Very negative	6	3	1	10
Don't know	7	4	2	13

14. Removing the requirement for product fiches

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	5	8	1	14
Positive	2	4	1	7
Neutral	13	12	6	31
Negative	27	5	7	39
Very negative	52	4	7	63
Don't know	11	5	2	18

15. Energy use and efficiency by appliances is determined partly by consumer behaviour. For example, frequent opening of a fridge will lead to an increased energy use, regardless of the energy label. A smart appliance could provide feedback to the user, after observing the user's behaviour with the appliance in the user's home, as to how his behaviour affects the energy performance of the appliance. Would you welcome the introduction of such an advanced and IT-supported form of energy labelling?

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	71	17	15	103
No	36	14	8	58
Don't know	13	8	2	23

- 16.a Have the energy labels been enforceable? If not sufficiently or not at all, what could be done to improve enforcement of energy labels?

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, very much so	0	8	2	10
Yes, to some extent	0	19	7	26
No, not sufficiently	0	2	8	10
No, not at all	0	3	0	3
Don't know	0	8	7	15

- 16.b How effective do you think the following options for improving enforcement would be?

- 16.b an EU-Wide market surveillance authority covering the internal market

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	0	2	8	10
Positive	0	1	4	5
Neutral	0	9	5	14
Negative	0	7	6	13
Very negative	0	11	1	12
Don't know	0	6	1	7

**16.b an EU-wide mandatory product database**

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	0	6	4	10
Positive	0	7	10	17
Neutral	0	7	3	10
Negative	0	4	6	10
Very negative	0	5	1	6
Don't know	0	7	2	9

**16.b an EU-wide transparent complaint procedure**

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	0	4	6	10
Positive	0	6	11	17
Neutral	0	8	4	12
Negative	0	5	4	9
Very negative	0	7	0	7
Don't know	0	6	1	7

**16.b MS-based transparent complaint procedure**

	Consumer	Ind. Retail	Ind. Manu	Totals
Very positive	0	2	5	7
Positive	0	7	8	15
Neutral	0	11	5	16
Negative	0	3	4	7
Very negative	0	7	2	9
Don't know	0	5	2	7

**17. Are incorrectly or non-labelled products a significant problem? i.e. large numbers of these products are sold, in the following product groups covered by labelling requirements.**

**17. Overall, across all product groups**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products with significantly lower energy efficiency being sold	0	5	4	9
Yes, but the impact on new product energy efficiency is low	0	3	5	8
No	0	20	4	24
Don't know	0	7	11	18

**17. Televisions**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products with significantly lower energy efficiency being sold	0	3	2	5
Yes, but the impact on new product energy efficiency is low	0	2	4	6
No	0	19	4	23
Don't know	0	10	13	23

**17. Room air conditioning appliances**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products with significantly lower energy efficiency being sold	0	3	5	8
Yes, but the impact on new product energy efficiency is low	0	2	2	4
No	0	20	3	23
Don't know	0	8	13	21

**17. Domestic refrigerators and freezers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products with significantly lower energy efficiency being sold	0	7	3	10
Yes, but the impact on new product energy efficiency is low	0	6	4	10
No	0	20	5	25
Don't know	0	2	11	13

**17. Domestic washing machines**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products with significantly lower energy efficiency being sold	0	8	3	11
Yes, but the impact on new product energy efficiency is low	0	3	4	7
No	0	20	4	24
Don't know	0	3	12	15

**17. Domestic dishwashers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products with significantly lower energy efficiency being sold	0	9	4	13
Yes, but the impact on new product energy efficiency is low	0	5	4	9
No	0	20	3	23
Don't know	0	2	11	13

**17. Domestic laundry dryers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products with significantly lower energy efficiency being sold	0	8	3	11
Yes, but the impact on new product energy efficiency is low	0	3	4	7
No	0	20	3	23
Don't know	0	3	13	16

**17. Electrical lamps (part of 'electrical lamps and luminaires')**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products with significantly lower energy efficiency being sold	0	5	5	10
Yes, but the impact on new product energy efficiency is low	0	1	6	7
No	0	19	4	23

Don't know	0	8	7	15
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## Ecodesign Directive

x. To what extent do you agree or disagree with the following statements regarding energy labels:

x. I / consumers know about Ecodesign

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	9	0	1	10
Agree	24	0	4	28
Neither agree nor disagree	9	3	3	15
Disagree	51	10	12	73
Strongly disagree	17	7	5	29
Don't know	2	0	0	2

x. Minimum energy performance standards for products are a good thing

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	65	2	7	74
Agree	37	11	14	62
Neither agree nor disagree	4	1	2	7
Disagree	2	4	2	8
Strongly disagree	5	1	0	6
Don't know	1	1	0	2

x. Minimum energy standards should get stricter over time

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	62	1	6	69
Agree	30	7	10	47
Neither agree nor disagree	11	3	7	21
Disagree	6	5	1	12
Strongly disagree	4	2	1	7
Don't know	1	2	0	3

x. Minimum energy standards should be challenging for manufacturers to meet

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	24	2	6	32
Agree	29	10	7	46
Neither agree nor disagree	25	3	6	34
Disagree	25	4	5	34
Strongly disagree	8	1	1	10
Don't know	3	0	0	3

23.a How has the Ecodesign Directive affected the prices of the following regulated product groups, compared to how they might otherwise have been?

23.a Overall, across all product groups

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	0	0
Prices are higher	0	8	11	19
Prices have not been impacted	0	3	2	5
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	7	8	15

## 23.a PCs and servers

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	0	0
Prices are higher	0	4	5	9
Prices have not been impacted	0	5	3	8
Prices are lower	0	1	1	2
Prices are much lower	0	0	0	0
Don't know	0	7	11	18

## 23.a Televisions

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	0	0
Prices are higher	0	5	7	12
Prices have not been impacted	0	4	1	5
Prices are lower	0	1	1	2
Prices are much lower	0	0	0	0
Don't know	0	7	11	18

## 23.a Standby and off-mode losses of energy-using products (horizontal regulation)

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	0	0
Prices are higher	0	2	5	7
Prices have not been impacted	0	5	3	8
Prices are lower	0	1	1	2
Prices are much lower	0	0	0	0
Don't know	0	9	11	20

## 23.a External power supplies

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	0	0
Prices are higher	0	2	5	7
Prices have not been impacted	0	5	3	8
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	9	12	21

## 23.a Tertiary Lighting

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	1	0	1
Prices are higher	0	4	8	12
Prices have not been impacted	0	4	0	4
Prices are lower	0	1	0	1
Prices are much lower	0	0	1	1
Don't know	0	7	11	18

## 23.a Room air conditioning appliances

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	1	1	2
Prices are higher	0	4	8	12
Prices have not been impacted	0	4	1	5
Prices are lower	0	1	0	1

Prices are much lower	0	0	0	0
Don't know	0	7	10	17

## 23.a Electric motors

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	1	0	1
Prices are higher	0	2	8	10
Prices have not been impacted	0	4	1	5
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	9	11	20

## 23.a Ventilation fans

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	1	0	1
Prices are higher	0	2	7	9
Prices have not been impacted	0	4	2	6
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	9	11	20

## 23.a Circulators in buildings

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	1	0	1
Prices are higher	0	3	6	9
Prices have not been impacted	0	4	0	4
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	8	13	21

## 23.a Domestic refrigerators and freezers

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	2	0	2
Prices are higher	0	5	10	15
Prices have not been impacted	0	4	0	4
Prices are lower	0	1	1	2
Prices are much lower	0	0	0	0
Don't know	0	5	9	14

## 23.a Domestic washing machines

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	2	0	2
Prices are higher	0	5	10	15
Prices have not been impacted	0	4	1	5
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	5	8	13



## 23.a Domestic dishwashers

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	2	0	2
Prices are higher	0	5	11	16
Prices have not been impacted	0	4	0	4
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	5	9	14

## 23.a Laundry dryers

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	2	0	2
Prices are higher	0	5	10	15
Prices have not been impacted	0	4	0	4
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	5	10	15

## 23.a Simple set-top boxes

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	1	0	1
Prices are higher	0	3	5	8
Prices have not been impacted	0	4	2	6
Prices are lower	0	1	1	2
Prices are much lower	0	0	0	0
Don't know	0	8	12	20

## 23.a Non-directional lighting

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	3	3
Prices are higher	0	3	13	16
Prices have not been impacted	0	4	1	5
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	9	5	14

## 23.a Directional lighting

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	1	1
Prices are higher	0	3	15	18
Prices have not been impacted	0	4	1	5
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	9	6	15

## 23.a Imaging equipment

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	0	0
Prices are higher	0	4	6	10
Prices have not been impacted	0	5	3	8
Prices are lower	0	1	1	2
Prices are much lower	0	0	0	0

Don't know	0	7	10	17
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**23.a Complex Set-Top Boxes**

	Consumer	Ind. Retail	Ind. Manu	Totals
Prices are much higher	0	0	0	0
Prices are higher	0	3	5	8
Prices have not been impacted	0	5	2	7
Prices are lower	0	1	0	1
Prices are much lower	0	0	0	0
Don't know	0	8	12	20

**27. Are products that are non-compliant with Ecodesign requirements a problem? i.e. large numbers of these are sold, in the following regulated product groups.**

**27. Overall, across all product groups**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	8	9
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	2	3
No	0	6	1	7
Don't know	0	10	8	18

**27. PCs and servers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	3	4
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	1	2
No	0	6	1	7
Don't know	0	8	15	23

**27. Televisions**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	3	4
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	3	4
No	0	6	1	7
Don't know	0	8	12	20

**27. Standby and off-mode losses of energy-using products (horizontal regulation)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	2	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	2	5	7
No	0	5	1	6
Don't know	0	8	11	19

**27. External power supplies**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	2	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	3	4
No	0	6	1	7
Don't know	0	8	13	21

**27. Tertiary Lighting**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	4	5
Yes, but the impact on the average energy efficiency of new products on sale is low	0	2	3	5
No	0	5	1	6
Don't know	0	8	11	19

**27. Room air conditioning appliances**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	3	4
Yes, but the impact on the average energy efficiency of new products on sale is low	0	2	4	6
No	0	5	1	6
Don't know	0	8	11	19

**27. Electric motors**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	3	4
Yes, but the impact on the average energy efficiency of new products on sale is low	0	2	4	6
No	0	5	1	6
Don't know	0	8	11	19

**27. Ventilation fans**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	2	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	2	3	5
No	0	5	1	6
Don't know	0	8	13	21

## 27. Circulators in buildings

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	3	4
Yes, but the impact on the average energy efficiency of new products on sale is low	0	2	1	3
No	0	5	1	6
Don't know	0	8	14	22

## 27. Domestic refrigerators and freezers

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	5	6
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	3	4
No	0	6	1	7
Don't know	0	8	10	18

## 27. Domestic washing machines

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	5	6
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	3	4
No	0	6	1	7
Don't know	0	8	10	18

## 27. Domestic dishwashers

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	6	7
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	2	3
No	0	6	1	7
Don't know	0	8	11	19

## 27. Laundry dryers

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	5	6
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	2	3
No	0	6	1	7
Don't know	0	8	11	19

**27. Simple set-top boxes**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	2	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	2	3
No	0	6	3	9
Don't know	0	8	12	20

**27. Non-directional lighting**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	5	6
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	5	6
No	0	6	1	7
Don't know	0	8	9	17

**27. Directional lighting**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	6	7
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	4	5
No	0	6	1	7
Don't know	0	8	9	17

**27. Imaging equipment**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	3	4
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	0	1
No	0	5	2	7
Don't know	0	8	13	21

**27. Complex Set-Top Boxes**

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes, and this results in products that perform significantly below the minimum requirements reaching the market	0	1	2	3
Yes, but the impact on the average energy efficiency of new products on sale is low	0	1	2	3
No	0	6	2	8
Don't know	0	8	13	21

**28.a To what extent do you agree or disagree with the statement that Ecodesign regulations, or voluntary agreements under Ecodesign, have unduly banned or will unduly ban products from the market in the following categories?**

**28.a Overall, across all product groups**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	4	0	0	4
Agree	10	4	4	18
Neither agree nor disagree	19	4	4	27
Disagree	34	2	6	42
Strongly disagree	23	0	1	24
Don't know	19	8	5	32

**28.a PCs and servers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	1	0	0	1
Agree	5	2	2	9
Neither agree nor disagree	14	4	1	19
Disagree	22	3	4	29
Strongly disagree	22	0	0	22
Don't know	18	7	10	35

**28.a Televisions**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	1	0	1	2
Agree	8	2	1	11
Neither agree nor disagree	11	4	2	17
Disagree	24	3	3	30
Strongly disagree	20	0	1	21
Don't know	17	7	9	33

**28.a Standby and off-mode losses of energy-using products (horizontal regulation)**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	2	0	1	3
Agree	10	2	0	12
Neither agree nor disagree	12	4	3	19
Disagree	20	2	3	25
Strongly disagree	19	0	0	19
Don't know	19	8	10	37

**28.a External power supplies**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	1	0	1	2
Agree	8	2	0	10
Neither agree nor disagree	10	4	2	16
Disagree	20	3	3	26
Strongly disagree	20	0	0	20
Don't know	20	7	11	38

**28.a Tertiary Lighting**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	4	0	2	6
Agree	9	3	2	14
Neither agree nor disagree	11	4	2	17
Disagree	22	2	4	28
Strongly disagree	17	0	0	17

Don't know	17	7	7	31
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**28.a Room air conditioning appliances**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	2	0	0	2
Agree	9	3	3	15
Neither agree nor disagree	11	4	1	16
Disagree	20	2	4	26
Strongly disagree	19	0	0	19
Don't know	20	7	9	36

**28.a Electric motors**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	2	0	0	2
Agree	6	3	2	11
Neither agree nor disagree	12	4	2	18
Disagree	23	2	3	28
Strongly disagree	19	0	0	19
Don't know	20	7	10	37

**28.a Ventilation fans**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	0	0	0	0
Agree	8	3	2	13
Neither agree nor disagree	14	4	2	20
Disagree	23	2	3	28
Strongly disagree	18	0	0	18
Don't know	19	7	10	36

**28.a Circulators in buildings**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	2	0	0	2
Agree	8	2	1	11
Neither agree nor disagree	13	5	2	20
Disagree	23	2	4	29
Strongly disagree	17	0	0	17
Don't know	19	7	9	35

**28.a Domestic refrigerators and freezers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	4	0	0	4
Agree	9	3	2	14
Neither agree nor disagree	10	4	1	15
Disagree	22	2	6	30
Strongly disagree	21	0	0	21
Don't know	16	7	8	31

**28.a Domestic washing machines**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	4	0	0	4
Agree	9	3	2	14
Neither agree nor disagree	12	4	1	17

Disagree	19	2	5	26
Strongly disagree	21	0	0	21
Don't know	16	7	9	32

**28.a Domestic dishwashers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	3	0	0	3
Agree	8	3	2	13
Neither agree nor disagree	13	4	1	18
Disagree	20	2	6	28
Strongly disagree	21	0	0	21
Don't know	16	7	9	32

**28.a Laundry dryers**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	2	0	0	2
Agree	8	3	2	13
Neither agree nor disagree	13	3	1	17
Disagree	21	2	3	26
Strongly disagree	19	0	0	19
Don't know	18	7	11	36

**28.a Simple set-top boxes**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	0	0	0	0
Agree	6	2	1	9
Neither agree nor disagree	13	4	1	18
Disagree	24	2	4	30
Strongly disagree	18	0	0	18
Don't know	19	8	11	38

**28.a Non-directional lighting**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	4	0	5	9
Agree	10	3	3	16
Neither agree nor disagree	11	4	1	16
Disagree	22	2	4	28
Strongly disagree	18	0	1	19
Don't know	17	7	4	28

**28.a Directional lighting**

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	5	0	2	7
Agree	7	3	7	17
Neither agree nor disagree	11	4	1	16
Disagree	23	2	4	29
Strongly disagree	18	0	1	19
Don't know	17	7	3	27



## 28.a Imaging equipment

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	3	0	0	3
Agree	4	3	2	9
Neither agree nor disagree	10	4	2	16
Disagree	25	2	4	31
Strongly disagree	20	0	0	20
Don't know	20	7	9	36

## 28.a Complex Set-Top Boxes

	Consumer	Ind. Retail	Ind. Manu	Totals
Strongly agree	1	0	0	1
Agree	4	2	1	7
Neither agree nor disagree	13	4	1	18
Disagree	21	2	3	26
Strongly disagree	21	0	0	21
Don't know	21	8	12	41

## Rulemaking Procedures

### 33.b Do Member States provide sufficient resources for national market surveillance activities for Energy Labelling and Ecodesign?

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	0	10	2	12
No	0	6	17	23
Don't know	0	22	8	30

### 33.c Should the Commission or other EU bodies be more involved to ensure enforcement activities for the Energy Labelling and Ecodesign Directives, considering for example the EU product notification system in place under the cosmetic products regulation (2009/1223/EC, Article 13) or in form of an EU-wide complaint system or other?

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	0	9	14	23
No	0	19	5	24
Don't know	0	11	5	16

## Scope Expansion

### 36.a Should the scope of the Energy Labelling Directive be expanded to non ErP (non Energy related Products – which are products that do not influence energy consumption during use, but have other environmental impacts due e.g. to their manufacturing, e.g. clothes, food and drink, services)?

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	0	3	10	13
No	0	28	15	43
Don't know	0	7	2	9

### 36.b Should the scope of the Ecodesign Directive be expanded to non ErP (non Energy related Products)?

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	0	3	7	10
No	0	11	12	23
Don't know	0	4	7	11

39. Do you see opportunities for synergies between all EU legislation relevant to product groups? For example: merging all required documents and information into a single form.

	Consumer	Ind. Retail	Ind. Manu	Totals
Yes	0	7	7	14
No	0	13	9	22
Don't know	0	18	10	28

# ECOFYS

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