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Position of ECOS, EEB, WWF EPO, Friends of the Earth Europe, CAN Europe and INFORSE Europe on the EC Working Document on the *Ecodesign and Energy Labelling of Domestic Coffee Machines*

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Overall comments

We welcome the publication of this document, incorporating some interesting issues concerning the environmental impacts of coffee machines. We however, **regret the unclear division into 2 proposals** that are presented as completely independent whereas **in reality good ideas of each could be picked up and merged**. The political ambition and scope on the one hand as well as the measurement method to be used on the other should be better defined and elaborated for further clarity. We would also like to highlight the **lack of information provided on market data** (i.e. what's the average and distribution of products today in terms of performance); the benchmarks reported are based on estimations. Further refinement of these is required to ensure the adoption of an ambitious measure.

A holistic approach to coffee machines

It is imperative that the provisions under the Ecodesign Directive concerning impacts other than energy consumption, are taken into account. In the case of coffee machines, apart from energy consumption, the indirect energy related to the production and use of consumables (capsules, filters, pads etc), as well as the associated options at the end of life should be considered. **Resource efficiency and recyclability has to be promoted in the design phase** by reducing the amount of raw materials used in the production of consumables and **ensuring the maximum recycling potential for these**.

We call upon the European Commission to include a generic Ecodesign requirement which would:

- forbid design options that prevent or further complicate good recycling practices (for instance a machine that would require capsules of a certain type or material only, as is currently the case).
- promote the easiest-to-recycle materials (for example through a bonus/malus scheme on materials used or a related indication on the energy label).

- inform consumers about recycling options on the packaging of the consumables via associated websites.

Further inspiration can be drawn from the voluntary agreement on imaging equipment and the associated consumables (ENER Lot 3).

Although the coffee production and associated energy use is a significant issue (as highlighted in the studies put forward by the EC), **we fear that it will shift the scope of a future regulation away from its main focus: energy consumption of domestic coffee machines and that associated to the production of consumables.**

Integrated design options of coffee machines, giving consumers the flexibility to produce coffee in different ways should be also promoted (such as the possibility of using powder coffee or capsules in the same machine).

Ambition and timing of the requirements

We welcome the long term signal sent to the manufacturers by setting a **minimum energy efficiency requirement** at the BAT level by 2018. A review should be however set before this date, to assess whether the BAT would have to be further adapted. In general, the review date of all the proposed requirements as such should be **maximum 5 years after entry into force** and not 10 years.

Moreover, an **ambitious power management** framework has to be set, especially with respect to levels for standby and auto power-down. For **standby**, the values according to the Regulation (EC) No 1275/2008 (**currently 1W and 0.5W from 2013** shall apply). Regarding **auto power down** default settings, they should be set at a more stringent level, covering all coffee machines, as follows:

- Portioned: 15 min
- Drip filter: 30 min
- Fully automatic: 30 min

Concerning **energy classes** these should be stringent enough, for several years before additional classes are inserted. Setting a more stringent labelling scale from the start would avoid a premature introduction of additional classes (as is currently in the proposal). A+ should therefore be set 3-4 years after the entry into force of the delegated Regulation. These classes should be set only **after the round robin tests have been finalised.**

State of the art measurement method

A robust measurement method should be set, such as the IEC 60661 standard, currently being revised, incorporating however the energy consumption related to the production and procurement of consumables. Consistency has to be ensured throughout this methodology.

Regarding consumables, taking reference values for the calculation of embedded energy related to the use of capsules, filters etc does not promote use of other, less energy intensive primary materials, nor does it incentivise manufacturers to strive for alternatives. This approach has to be rethought.

END.