AUSTRIAN ENERGY AGENCY

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Austrian comments on self regulatory initiative concerning eco-design of energy using products for medical imaging equipment

General comments

Based on the current experiences regarding the first proposals for voluntary agreements which have been presented within the EUP framework we strongly recommend the following supporting measures for an efficient process:

- ***Definition of a transparent procedure for the preparation, evaluation and implementation of voluntary agreements***

It is important that a transparent procedure is defined and communicated describing how Member States are involved in the development of the voluntary agreements respectively in the evaluation and decision process regarding such agreements. The role and involvement of the Consultation Forum and Committee in this context should be defined more clearly. According to the Forum meeting the Regulatory Committee has no official role in this context. A sufficient involvement of Member States and other independent parties in the process is highly recommended to guarantee the development of effective and broadly accepted agreements.
The first concepts which have been presented for such agreements recently rather give the impression that there is a relatively high risk for development and implementation of rather ineffective measures if no standards for the development process are defined.

- ***Adequate preparation of voluntary agreement based on significant market and technology evaluation***

An effective voluntary agreement requires adequate preparation in some respects similar to preparatory work for a regulatory measure. The first voluntary agreement concepts which have been presented show that the preparatory work is not done or not presented in a way that allows a serious judgement of the proposals by independent experts. Information on market, energy consumption, energy saving potentials and technology so far is not sufficient to draw solid conclusions.
It is therefore strongly recommended that parties developing voluntary agreements are motivated to provide the same elements of information as required in the preparatory studies for EUP respectively that they follow the basic structure of preparatory studies. This does not necessarily mean that the depth of the most comprehensive preparatory studies has to be achieved.

Scope and added value of voluntary agreement for *Medical Imaging Equipment*

COCIR has defined the scope for the voluntary agreement involving five product groups of medical imaging equipment. However to date no information of overall market size, energy consumption and energy saving potentials is provided. This information is needed to allow an assessment of the overall energy saving potential and the relative relevance of the product group in terms of energy savings. Partial information provided for the product segment of ultrasound equipment does not yet underline a high relevance in terms of energy savings due to both relatively small market and low saving potentials indicated. Reported annual sales are about 20000 products. Annual energy consumption of the products sold is reported to be 15 GWh. COCIR estimates that only 6% of this consumption can be saved by Eco-design measures by 2012. Thus savings would be below 1 GWh/year. This roughly corresponds to the average annual energy consumption of 250 households indicating that the proposed energy savings are small for an EU-level action. No data on stock has been provided so far. If the average life time of the equipment could be estimated to 10 years for example within 10 years ten times higher annual savings will be achieved by a total replacement of the stock. These figures would propose that it is not necessarily justified to implement a bigger framework instrument at EU-Level to address the rather low energy saving potentials.

Nevertheless it certainly would make sense that COCIR and industry continue to address eco-design of their products in the future.

To get a better basis for evaluation COCIR should try to provide as soon as possible more comprehensive data on market and potentials for all product groups they are going to address. This should be feasible as COCIR according to information provided so far is doing market statistics for more than 10 years and is dealing with energy efficiency and eco-design for several years already.

The added value of the proposed voluntary agreement would be due to the fact that this is a completely voluntary approach as currently no regulatory measure is planned for this product group. However if the proposed agreement can provide significant value in terms of energy savings strongly depends on the definite energy saving targets as well as on market size.

Concrete requirements for energy savings

Target levels for companies

Apart from the fact that the percentage of potential savings indicated so far (6%) seems low the formal approach for setting and monitoring the goals should be further evaluated and optimised. A 6% goal across the group of companies participating in the agreement probably will not be very effective as there would be no clear responsibilities and clear targets for the individual participants. Thus at least a definition of individual targets for the fleet of products of the individual companies would be necessary to guarantee some effectiveness of the approach. Otherwise the risk is high that the time until 2012 is lost due to a lack of concrete commitments.

The concept form COCIR provided so far suggests that the equipment addressed provides different operation modes (e.g. off, standby, on active etc.). It is recommended to evaluate if especially the low power modes provide some room for general requirements at product level apart from the overall energy saving target.

Information, communication and monitoring

In order to allow a reasonable monitoring of the success of the agreement and to support customer information on energy efficient equipment it will be necessary that manufacturers provide standardised information on energy consumption and possibly additional eco-design aspects for the individual products (e.g. in the technical product documentation, on data sheets or web-sites). Such comprehensive product information is a central requirement for all EUP regulations and should also be a central criterion for any voluntary agreement. If this aspect is lacking the success of the agreement can not be verified and the agreement is of very limited value regarding customer information. This essential issue should be clarified with the participating industry before the development of the concept is continued.

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