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 From : Karolien Peeters
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 Annex(es): **Powerpoint presentations of the meeting (<https://www.eco-lifts.eu/eco-lifts-en/content/documents.php>)**
 To : Cesar Santos; Stakeholders
 Copy : Project team

Minutes of stakeholder Meeting for Ecodesign Preparatory Study on Lifts - Third Stakeholder meeting on 11/03/2019

DG Grow: 11/03/2019, Avenue d’Auderghem 45, B-1040 Etterbeek, Brussels

Participants

European Commission

DG GROW Cesar Santos (CS)

Project Team

ISI Fraunhofer	Antoine Durand (AD)
ISI Fraunhofer	Simon Hirzel (SIM)
ISI Fraunhofer	Clemens Rohde (CR)
Waide Strategic Efficiency Ltd	Paul Waide (PW)
ISR University of Coimbra	Joao Fong (JF)
VITO	Karolien Peeters (KP)

Registered stakeholders for the meeting

Organization	firstname	lastname	acronym
ANACAM	Luca	Incoronato	ANACAM
ECOS	Rolf	Tieben	ECOS_RT
ECOS	Nerea	Ruiz Fuente	ECOS_NR
ELCA	Luc	Rivet	ELCA_LR
European Federation for Elevator Small and Medium-sized Enterprises (EFESME) aisbl	Luciano	Faletto	EFESME_LF
Hydroware AB	Kjell	Johansson	Hydroware_KJ
Kollmorgen Steuerungstechnik GmbH	Björn	Kollmorgen	Kollmoregen_BK
Schindler Elevators Ltd.	Roger	Beuret	Schindler_RB
KONE	Hanna	Uusitalo	KONE_HU
ThyssenKrupp	Paula	Casares	Thyssen_PC
UK	Adrian	Barker	UK

EFESME	Elettra	Bilibio	EB
Matrix Liften	Tom	Essel	Matrix_TE
Danfoss	Michael	Müller	Danfoss_MM
ELA	Luca	Pezzini	ELA_PZ
ubeon	Hugo	Verstraeten	HV
DG Grow C1	Michael	Bennet	DG GROW_MB
DG Grow C3	Vesa	Katasisto	DG GROW_VK

Objective of the meeting

The meeting is the third stakeholder meeting for the Ecodesign preparatory study for Lifts. The purpose of this meeting was to discuss with stakeholders the implementation of the stakeholder feedback on Tasks 1-5 and the initial findings on Tasks 6 and 7. Stakeholders can provide comments on the draft reports of task 6 and 7. The draft reports of Task 6 and 7 are available at <https://www.eco-lifts.eu/>.

Note: complementary to this minutes of the meeting the meeting powerpoint presentation can be consulted on <https://www.eco-lifts.eu/>

Agenda

10:45 – 11:00	Arrival of participants
11:00 – 11:20	Welcome and round of introductions Cesar Santos, European Commission
11:20 – 11:50	Updates of Task 1, 2, 3, 4 and 5 Antoine Durand/Simon Hirzel/Paul van Tichelen/João Fong Fraunhofer ISI/VITO/ISR
11:50 – 12:20	Presentation of preliminary results of Task 6: Design Options Simon Hirzel, Fraunhofer ISI
12:50 – 14:00	Lunch
14:00 – 14:20	Presentation of preliminary results of Task 7: Scenarios Antoine Durand, Fraunhofer ISI
14:20 – 14:50	Discussion of Task 7 Antoine Durand, Fraunhofer ISI
14:50 – 15:30	Wrap-Up on Discussion Clemens Rohde, Fraunhofer ISI
15:30 – 15:45	Further proceeding and schedule, other issues Clemens Rohde, Fraunhofer ISI
15:45	Closing Cesar Santos, European Commission

Main discussion points:

- Definition of a 'new lift' and what the stock/data represents.
- Lifetime: 25 years for the LCA should be reconsidered. The assumption of 60 years lifetime of the lift for the stock model depends on the building category. Question to differentiate between building types.
- Unclear where the assumption that the Base-Case is class C comes from. Data in task 4 and 5 have been criticized due to the outdated information.
- According to stakeholders, Base-Case (average product) is not a class C lift, but a class B lift. The study team will recalculate the results.
- Table 6.2. Sources for the energy saving potentials are not clear. Wrong underlying assumptions but no objection of the assumed energy consumption of the BAT level.
- Costs: When we try to improve the cost for the owner due to a reduced yearly energy consumption, the maintenance cost will be much higher.
- Lack of data leads to inaccurate results: stakeholders are encouraged to still deliver data.
- Resource efficiency: according to some stakeholders, focus should be rather on the production of the materials than the energy use phase. The task 5 results contested by one of the stakeholders and focus of the study should shift to material use. Modularity is an important work area.

Minutes

Welcome and Short presentation of participants (all)

The project officers Cesar Santos (CS) opened the meeting. He welcomed the stakeholders and explained that this is the last stakeholder meeting of the preparatory study. We are in the final part of the study. Stakeholders can comment on the reports. Stakeholders have at least six weeks to comment on the draft reports. Afterwards the study will be concluded between the study team and the EC. The contract of the study runs till August, but the consultants will submit their reports mid-June, after which the Commission can ask for further clarifications.

The timing after the preparatory study is unclear because there will be a new Commission taking office normally in November. After the study, the Commission Services will check if a regulatory intervention is necessary and what type of intervention. The main input for this is the report and the stakeholder comments. The Commission Services will prepare the decision at administrative level, but the next Commission will take the political decision to go ahead or not with an Ecodesign Regulation. For various reasons, the legislation cannot include an Energy Labelling Regulation. If a regulation will be put in place, it will be an Ecodesign Regulation. If the Commission decides to go ahead with the regulatory intervention, the details of this intervention will be discussed many more times with the Stakeholders.

Clemens Rohde (CR) welcomes the participants and presented the agenda for today's meeting.

The powerpoint presentations can be downloaded from the project website: <https://www.eco-lifts.eu/eco-lifts-en/content/documents.php>.

Updates of task 1, 2, 3, 4 and 5

The list of the comments and how we dealt with them has been provided through email.

Antoine Durand (AD) presented Task 1 (see powerpoint).

AD asked for clarification on the forseen update of the PCR. We lack information on the status of the update and don't have any draft. If stakeholders have more information on this, please provide it to the study team.

Karolien Peeters (KP) presented Task 2 (see powerpoint).

Task 3: Users: no update

Joao Fong (JF) presented Task 4: Technologies (see powerpoint)

The new Base-Cases (average products) were presented, including the Bill-of_Materials (BOM).

Karolien Peeters (KP) presented Task 5: Environment and economics (see powerpoint)

Afterwards a discussion took place (combined discussion on update of task 1-5):

abbr.	Comment/answer
Kollmorgen_BK	What was the reason for exempting the non-lift Directive lifts from the study?
AD/SH	For several reasons: <ul style="list-style-type: none"> - Focus of the study (it is already challenging to cover the lifts covered by the Lift Directive); - Stock consists mainly out of lifts covered by the Lift Directive; - Energy consumption is covered in a different way for lifts not covered by the Lift Directive; - No data available about the number of lifts in this group, also no data on energy consumption.
ECOS_NR	ECOS asks for at least a figure/estimation on the energy consumption of both lift groups.
DG GROW_VK	What is the definition of a 'new lift', taking into account that lifts undertaking a modernisation can be considered as new lifts?
AD	The understanding of a new lift was based on the definition of the Lift Directive (see Task 1).
DG GROW-VK	The Lift Directive does not give a definition on when a lift in service again becomes a new lift. The decision whether a product will become a new product or not is formed case by case. If it is a new product, then the Lift Directive applies. In order to correctly understand the statistics/provided numbers, it is important to understand on which basis they are calculated, only completely new lifts or also modernisations considered as new lifts.
CS	Who decides whether a repaired or refurbished lift must be considered as a new lift in the Lift Directive Framework?
DG GROW_VK	This is decided case by case. It is not only the Lift Directive Framework, which applies. You can find guidance in the Blue Guide.
AD	It is decided case by case and also depends on the national legislation.
DG GROW_VK	This is true, but it is not for the Member states to decide whether the Lift Directive applies or not.
KONE_HU	It is easy to study a completely new building and new lift installation. Then the study considers buildings without a lift to be renovated and a shaft being built and lift being installed. That is a new lift as well. But anything that you are considering now in your renovation scenario, whatever is in that grey area, needs to be defined. The stock market of existing buildings without lift is much smaller than what you are considering today, even in your accelerated renovation scenario. It is very important to define this in an understandable manner.
EFESME_LF	It is not clear why the 25 years life cycle time of the lifts is kept, only because it is mentioned in the PCR for lifts. The PCR for lifts is not a verified document by the market.

	Lifts last for more than 40 years in real life. The study should reconsider this assumption.
AD	In the EPD from many manufacturers, a lifetime of 25 years is used.
Schindler_ RB	The EPD mentions the designed lifetime.
AD	For the LCA calculation, a lifetime of 25 years has been used. In task 7 (scenarios), the sales of the lifts should match the stock (= total number of lifts in operation in the EU). This is the case when a lifetime of 60 years is considered. Accordingly, 60 years as technical lifetime for a lift has been assumed in Task 7. It means also, in Task 7, after 60 years a completely new lift will be reinstalled.
EFESME_LF	It depends on the type of lifts. There are building categories for which this assumption is far from real life. The difference in the building categories should be taken into account in order not to discriminate. Some lift types would be heavily adversely affected by the implementation of such assumptions.
CS	<p>CS explains how an eventual Ecodesign Regulation might affect repaired or refurbished lifts. The Blue Guide says that when the initial performance of the product has been significantly changed, it should be considered as a new product. It is not evident to capture this spirit in a legislation. There is a grey area and in the end it are market surveillance inspectors who decide whether the refurbished product should be considered as a new product and comply to the Ecodesign Regulation requirements.</p> <p>There is a good Blue print for the power transformers. The amending legislation includes a provision that says what you need to do with a transformer that has been repaired to be able to consider it as a new product that must comply to all applicable regulations.</p> <p>Regulations in principle are not intended to persuade economic operators not to repair products. A regulatory intervention in principle is neutral.</p> <p>In the case of transformers the technical committee from CENELEC provided the input. If you replace the core and the windings, it must be considered as a new product. We should find something similar for lifts and normally that knowledge comes from the standardisation authority.</p>
GROW_VK	<p>This knowledge should come from the coordinating crew (the Member States together with the Commission). The standardisation body is a private independent third party body.</p> <p>When a product is refurbished or repaired, not only the energy efficiency is important, but also the new materials/components. Therefore it is important to understand what the concept of a new product is in this framework.</p>
EFESME_LF	<p>When an existing lift undergoes a modification which makes it to be considered as a new lift, all the other assumptions that you have to produce a lot of new items is do not apply. It is not a new lift going through a full cycle, it is just a modification, for which only that part of production/installation applies. This is something also to be taken into account.</p> <p>The implementation of the circular economy should change the indications given in the PCR. The PCR is based on a certain assumed number of life cycle years, which might be suitable for comparing solutions. Taking into account the need to make products which last longer due to the possibility of replacing/recycling items should bring to the need to revise the PCR.</p> <p>Lifts lasted much longer in the past. It cannot be accepted that new lifts last less long than old lifts.</p>
CS	Conclusion of the discussion: If there was an Ecodesign Regulation for lifts and there were provisions on repair/refurbishment of lifts, it should be very clear to economic operators when certain intervention results in the lift having to comply with the Ecodesign Regulation for Lifts. It should be done in coordination with all other applicable Regulations.
GROW_VK	Remark on task 5 presentation: 'distribution' of a lift is not a correct terminology. The lift is assembled at its location. Rather use the terminology 'logistics'.

Simon Hirzel (SH) presented Task 6: Design options (see powerpoint)
Afterwards a discussion took place:

abbr.	Comment/answer
KONE_HU	Some further explanation on table 6.2 is required (slide 10). What are the sources for the mentioned saving potentials? For example traction elevator Base-Case 1A. For regeneration you need to consider that your typical difference in height is 3 to 6 meters. How much time do you have in 3 m drop for a small car (450 kg) to regenerate. Please explain in physics what is possible.
SH	There are two ways of regeneration. First thing is short term storage (condensator). If you use a regenerative drive, you have also the connection where you can install something in short term. And you have the option to feedback to the grid. The values are estimates. We welcome feedback and will take it into consideration.
KONE_HU	Asks Danfoss_MM (drives expert) what the possibility is for regeneration in a 3 m travel. Also the question is raised to comment on table 6.3, which mentions that these options come with no extra costs.
MM	No concrete numbers available here. In theory, the regenerative energy which could be available is max 50% on traction lifts. There are also additional losses to be considered when feeding the energy back to the grid. On a small elevator (450 kg) it might indeed not be attractive to apply regeneration.
KONE_HU	In BREEAM (requires certain number of design choices reducing the energy consumption) regeneration used to be mandatory, but it has now been removed from the list with mandatory design choices for the small category of lifts. In low rise, regeneration is just an extra cost. The situation is of course different for Base-Case 4.
AD/SH	Please remark that the saving potential only applies to the running consumption, not of the overall consumption.
KONE	1% of reduction would be fair, not 20%.
EFESME_LF	The problem does not occur for regenerative drive applied to hydraulic lifts of category 1 and 2. You might get some regeneration. However, it is not considered cost effective. The number of cycles is very low. We suggest not to consider some of the options for category 1 and 2 lifts as they would not give any practical benefits We insist on the fact that the PCR and ISO tend to cover the worldwide market. There are markets where the distribution of buildings is completely different. The hydraulic lifts perform much better in a specific market segment compared to traction lifts.
CS	CS asks the stakeholders for other feedback on the figures in table 6.2.
Kollmorgen_BK	The table states that 35% energy reduction is possible by using low energy equipment. What is the basis for comparison?
SH	We started with class C as a Base-Case. We have indications that A is possible on the website of some manufacturers. In addition, it was stated before that it is possible to reduce energy by 5 times compared to E4. So class A is something that can be achieved with the current technology. Then we broke down the consumption values and based on what our expertise allocated them to the different improvement options. We did not use a bottom-up

	approach, but a top-down approach, starting with the assumption that it is possible to achieve a class A lift.
Kollmorgen_BK	In slide 20 (of task 6 presentation) you show the priority of measures. This picture is wrong. Is this based on the possible reductions mentioned in the E4 study? if you assume that 35% can be reduced and our products are already so highly efficient today that it is not possible anymore, do we have to expect a 35% reduction threshold.
SH/JF	Our starting point is a class C lift. 35% reduction applies to the class C lift. We did not use the E4 values. We got comments that some energy consumptions figures are 5 times to high.
Thyssen_P C	How do you know that A class is achievable for these Base-Cases? It might not be possible for the elevators mentioned here.
KONE_HU	Website do not always mention if it is class A according to VDI or ISO. All claims based on VDI should be neglected here because VDI is under estimating the energy consumption (compared to ISO). In addition, the way the energy consumption of lighting is calculated is different.
KONE_HU	To get proof of class A for use in this study, you need to find claims based on configurations using exactly the same number of floors, ropes.... It should be available for more than one manufacturer and should be measured at the end consumer. Please check the specifications (load, travel, speed) mentioned on the website. If they are not available, you have to start programming yourself using laws of physics.
Kollmorgen_BK	What has not been done in this exercise is looking at the available technology as it stands on itself. A measure from Ecodesign saying that you have to save 35% is impossible, because the products are already very efficient. The way the percentages are deducted is not correct and they are far from reality.
CR	An Ecodesign Regulation would not say that you have to save 35% compared to what you currently sell. If you only sell C elevators or worse, than this would be the case.
Hydroware_KJ	Seven design options are mentioned here and none of them has to do with the materials. Ecodesign should not only look at energy consumption during use phase. The most important design option is modularity. Reuse of materials following circular economy principles and adaptiveness was also mentioned.
Schindler_RB	Discussion on saving potential. Fundamental weaknesses in the concept: <ul style="list-style-type: none"> - The data much reassembles E4 (although you say it is not); - 'Saving potential' is used, but this should be 'efficiency increase'. Saving potential gives the wrong impression that there is a lot to gain. An elevator is a system. There are several system aspects that come together.
CS	Do you agree that there is saving potential?
Schindler_RB	Yes there are some, but not as large as pointed here. The options come with extra costs. This is not correctly captured in the tables. In addition you have to be careful that you do not look at the old technologies. Light boxes for examples are already regulated and removed.
SH	Even within LED you have saving options.
Schindler_RB	There is a conceptional weakness in the MEErP. Lifts are not a standard product. You have to look at the entire system and the product is unique.
Thyssen_P C	The assumptions that class A is possible for all the Base-Cases is not true.
CS	CS asks what the study team will do with all these comments and challenges.
CR	Detailed data are not available. This is the solution applied to overcome this problem. If you can provide data on what is achievable for which classes, the proposed assumptions will be corrected.
JF	JF asks what is wrong in the applied methodology:

	<ul style="list-style-type: none"> Is it the starting point, being that we assume that a class C elevator is the current elevator or; Is it the end point, being that class A is achievable. <p>We know the reduction you get when going from a class C lift to an A class. These numbers are fixed, so one of the above assumptions has to be wrong.</p>
Kollmorgen_BK	<p>The failure is to consider C as the standard lift.</p> <p>Another failure is that the energy use of a lift is not based on a single measure, it is based on a whole system.</p>
KONE_HU	<p>You have incorrectly referred to the assumption of an A class lift.</p> <p>You need to point out the reference points you found on the websites that fit your Base-Cases.</p> <p>ISO method is a system level measurement (running, idle, 5min, 30 min are correctly defined). You have to play with all those system level figures to see where you can go.</p> <p>Worried about the simplification.</p>
Schindler_RB	<p>Agrees that system level is important.</p>
CS	<p>CS explains how possible ecodesign requirements might work.</p> <p>Ecodesign requirements are minimum requirements that would push installations to a certain average at a reasonable cost. For those installations that are already above the minimum requirement the regulation would not have an effect. It means that minimum requirements for energy efficiency would be defined in absolute terms or relative terms (energy efficiency index).</p> <p>We look for requirements that push the market to a certain minimum level. We do not try to push products to the top of the market (this is the aim of Energy Labelling).</p>
Schindler_RB	<p>We provided a statement in our position paper.</p>
Kollmorgen_BK	<p>The provided criticism is on how we get there. The analytics are misleading us and do not start from the right assumptions.</p>
CS	<p>CS asks if there are similar reservations for other percentages in table 6.2.</p>
KONE_HU	<p>An optimized machine and power unit typically goes hand in hand with regenerative drive. If you don't use regenerative drive, you do not have a machine and power unit</p> <p>The friction depends highly on installation quality (high variance on installation quality).</p>
AD	<p>The ecodesign methodology requires to look first at each design option individually. We agree that some of the options make no sense on their own. In the system approach, the savings are not simply added (see slide 22).</p>
KONE_HU	<p>When we sell lifts, we start with the customer value. Main value is typically transport of people in most optimal manner. Here the building type and space saving is important. Also grouping of lifts to optimize transportation as much as possible is applied. Afterwards the design options the customer wants are discussed: digitalization, look and feel. After this selection you know which class is reachable.</p>
PW	<p>You mention that the system currently applied to determine classes is not normalizing for all of the factors it needs to normalize for. Efficiency is energy use per service delivered and you have to normalize to the service delivered. You were mentioning screens, marble floors, which sounds like you are taken into account the commissioning situation. Are these not factored into the ISO methodology?</p>
KONE_HU	<p>Yes they are considered in the weight of the moving masses which greatly affects the energy consumption.</p> <p>ISO is not yet recognizing lift systems in the building and travel patterns in the building. Human behaviour is not captured.</p>
EFESME_LF	<p>Supports most of the comments.</p>

	Depending on the type of building, number of floors the same lift can be another performance class.
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Antoine Durand (AD) presented Task 7: Policies

Currently we have one letter from ELA stating the options they want to support. Self-regulation is not an option for ELA. ELA suggests in its letter to set a MEPS which is our assumption of the average product on the market (C-level).

ELCA_LR mentioned that also ELCA sent a letter, opposing lifts to be included in the Ecodesign Directive.

Afterwards a discussion took place:

abbr.	Comment/answer
Kollmorgen _BK	In the beginning of your presentation you mentioned the letter of ELA. The letter asks for a minimum level of C. Later in your presentation you said that following this the assumption for the average lift is class C. This is the wrong assumption. The average technology is currently much better than class C.
AD	If we assume C would be the average technology, then a MEPS with C would not affect the outcome.
Kollmorgen _BK	The gap is much lower than 27%.
CR	Is the C class representing the average market wrong and too low for the average product?
Kollmorgen _BK	I'm stating that ELA has provided a minimum target and has not given information about the average product available.
AD	The assumption of class C came from task 6, not from the ELA letter. We assumed the base case is class C according to our work in task 4 and task 5. Later, we got the letter from ELA, showing that we obviously had not the same assumptions for the average energy efficiency level of new lifts on the market, but we didn't took the assumptions for the Base-Case from the letter ELA provided.
Kollmorgen _BK	But where is your assumption of class C coming from?
AD	From the work done in task 4 and 5.
Kollmorgen _BK	Indeed, but we criticized this due to the outdated information. The data background for this assumption is unclear.
AD	The definition of the Base-Case says it should represent the average product on the market.
Thyssen_P C	Some lifts are class D to meet consumer requirements.
CR	If we assume a Gauss distribution of the market, the market average is better than class C.
Kollmorgen _BK	Yes, the logic would follow this.
CS	This is how the Ecodesign Regulation works. Manufacturers will be given time to adapt. The intervention pushes manufacturers to improve at a reasonable cost.
Kollmorgen _BK	We understand and accept that. The issue is that we have an impact assessment that is showing an impact that is not there. The impact is less, by taking C as the standard for BAU you are widening the gap.
CR	We will adapt our BAU scenario, and adapt it to a B class.

	We can have a scenario where C is the minimum scenario.
Schindler_ RB	Question on the installation cost graph. Why is the installation cost reduced so dramatically? Where is this assumption coming from?
AD	The graph is not starting at zero. It zooms in to better show the trend.
KONE_HU	Now that you revisited the Lift Directive on what is a new lift, what do you expect to be the results?
AD	In Task 7, a new lift is a lift installed due 1) to the increased stock of lifts or due 2) to the fact, that an existing lift reached 60 years and has to be replaced. It is not a lift undergoing a deep renovation after 25 years.
KONE_HU	So the information on your volumes will not change?
AD/CR	We didn't get in much detail on what is a new lift. These figures have been taken from task 2 on markets. It is not a new assumption, but it has been taken from the previous tasks.
KONE_HU	Could you work through this? If you have a change in the stock because of the definition of a new lift, could you then reconsider the calculations?
CS	But we discussed in the morning that there is not clear guidance on when a lift that is being repaired is a new lift.
KONE_HU	There are currently elevators on the market today, which do not comply with the lift directive. When it is modernized (substantially), it becomes a new lift. You will need to add several components, which are safety related. If the lift was a B class, it can become C when you modernize it. You add so many new safety and electrical components.
DG GROW_VK	It is not only the energy consumption during use that should be considered. It is also what is invested as production input for manufacturing of components, transportation. This has to be taken into account. Do the energy savings during the use really pay back?
CR	In Ecodesign we don't look at what the product was before. If it would be a new product and in the scope of the Ecodesign Regulation, it has to comply with the requirements. Would it be possible for this lift to reach the MEPs set down in the Directive? It is more a political question.
CS	The stock model is conservative, because it does not take deep renovation into account. This is because there is no clear guidance on when a lift is to be considered as new. This is a limitation of the stock model, it underestimates the energy saving potential. Another discussion is the trade-off between safety and energy efficiency. Before class C is made the minimum requirement, we must take into account that there might be trade-offs with safety. This is something for the impact assessment and has little to do with the way the stock model is built.
EFESME_LF	We are talking only about energy efficiency while this should be an ecodesign project. The cost of maintenance is higher compared to the cost of energy. When we try to improve the cost for the owner due to a reduced yearly energy consumption, the maintenance cost will be much higher.
CR	We noted this and it will be considered in the process.
Schindler_ RB	Maintenance is a national regulation and it is not under our control. Some countries have weak regulations, other have strict regulations which drive up the cost
Schindler_ RB	The sections 7.5.1 to 7.5.3 are missing in the report. It may have impact on some of the following tables.
AD	This section will be written in the report, but today we wanted to discuss the scenarios and level of impact. Based on your comments we will write the missing section
Schindler_	Please reconsider the table with 'O' and '+'. For example the statement 'no excessive

RB	administration burden on manufacturers'. If you look into a scenario with technical information, it might be quite a burden to proof some things for every single installation after it has been installed, this might be quite a burden.
CR/CS	In principle: no third party verification. It is a self-declaration checked by market surveillance.
Hydroware_KJ	Why do we look only at the energy in usage into consideration? In a residential building, (residential with 6 stops), ¾ of the environmental impact comes from the production of the lift.
CS	What requirements would save materials throughout the life cycle?
Hydroware_KJ	That is the modularity. A lift is a function of the building and you have to look at the lifetime of the building, not at the lifetime of the lifts. It is not possible to replace the lift 3 times in the lifetime of the building.
CR	Figures come from task 5, use phase is important in.
ECOS_NR	<p>We are very surprised that ELA does not want a voluntary agreement.</p> <p>We don't think we should the legitimacy of the letter as more important than any other arguments put on the table</p> <p>We are disappointed that we are still struggling with fundamental questions in the third stakeholder meeting. I wonder, whether there is still room to improve the data. If stakeholders are not providing data we fully support the study doing some assumptions.</p> <p>We also want to move beyond energy efficiency. Our proposal is also to go to more ambitious requirements on resource efficiency.</p> <p>Repair/maintenance and durability measures could be very useful here.</p> <p>There are many products as unique as yours and they have their Ecodesign Regulation. The industry survived and we have better products in the markets.</p> <p>This is the third stakeholder meeting and we are wondering what we are going to do next. Are we going to provide data?</p>
Hydroware_KJ	<p>The LCA is wrong. Table 5.5 shows there is a difference of 1 ton in material weight in a small 450 kg lift. Producing 1 ton of steel consumes 10 000 kWh. The usage in an old hydraulic lift in a residential building is 800 kWh per year. How can the evaluation of this LCA show that these two are equal?</p> <p>Circular economy is important now, reuse is important. Lifts should be made modular.</p>
DG GROW_VK	<p>The study has a certain scope. It concerns the use of the lift. I also agree with the points highlighted by Sweden.</p> <p>Also the impact of dismantling and recycling should be considered.</p>

CR: we hope to improve our data especially for the latter tasks.

Deadline for commenting is 12th of May (not 30th of April as announced during the stakeholder meeting).

Question on missing chapters: when will they be available? AD: not sure it is worth to do it before we have feedback on the previous tasks.

Cesar Santos thanked the participants and closed the meeting.

Next steps:

- **12th of May (update):** deadline for stakeholder comments (not on 30th of April as announced during the stakeholder meeting).
- June: final report

Afterwards the EC decides whether a Regulation is necessary or not, that would not happen before the autumn, draft regulation not before second quarter 2020.

There will be a public consultation as well. All assumptions underlying this study will be checked by impact assessment team. This will be done by another team and data will be double checked.

Annex

The powerpoint presentation of the meeting are available at the project website: <https://www.eco-lifts.eu/eco-lifts-en/content/documents.php>