

## **HHIC RESPONSE TO CONSULTATION ON THE REVISION OF THE ENERGY LABELLING DIRECTIVE 92/75/EEC**

The Heating and Hotwater Industry Council (HHIC) is the Trade Association for the UK domestic heating and hot water industry.

### **Responses to questions -**

#### **1. How do you suggest the Commission could best ensure coherent product policy?**

We feel that coherent product policy for heating and hot water would best be achieved by implementing energy labelling through the Eco-design of Energy Using Products (EuP) Directive rather than applying several different legislative measures to the same type of products.

#### **2. Do you agree to the general principle of reinforcing the use of energy labelling in order to more vigorously contribute to the Union's objectives on climate mitigation, competitiveness and sustainable product policy?**

We feel that the objectives of climate mitigation, competitiveness and sustainable product policy can best be achieved by integration of labelling into Eco-design measures. A labelling system based on the EuP Directive, and which is simple and user-friendly, will assist the consumer in making the correct choices and will help to achieve the desired objectives. A single measure, through the EuP Directive, would also make monitoring simpler for boilers and water heaters and would be preferred compared to the extension of the scope of the labelling directive.

Legislation should be regularly reviewed, but not more frequently than every 5 years, as this will allow take-up of new, more efficient technology as it is developed, while still allowing industry to plan R&D investment under known regulatory conditions.

#### **3. For energy using products, would you favour the use of an energy label focusing on the energy consumption at use or of an 'eco-design label', (near to the Eco-label showing the 'best') giving the global environmental performance of the product throughout its life-cycle?**

For boilers and water-heaters, energy consumption during use is dominant and this should be the main feature of the energy label. It should be recognised that the actual in-use energy consumption may differ from that shown on the label as this is dependent on consumer behaviour.

#### **4. Are you in favour of adding CO<sub>2</sub> on the energy label? How could reliable information be assured in the light of different energy mixes in the 27 Member States?**

We are not in favour of adding CO<sub>2</sub> emission information to the label as this will depend on the "energy mix" and generation technologies used in each Member State.

It would be difficult to show this in a single European label and any attempt to do this is likely to prove complex and very confusing to consumers.

**5. Are you in favour of adding annual running costs on the energy label? How could reliable information be assured in the light of different energy prices in the 27 Member States?**

Energy costs vary across the Member States and it would be difficult to show valid information in a single European label without adding complexity and confusing consumers.

**6. Would you like to add other products to the scope of the labelling Directive than those covered at present (household appliances only)? If yes, which products would you suggest (non-household or non energy-using products, 'energy-relevant' product, services such as holiday packages or other)?**

No response to this question

**7. In view of dynamic labelling, which approach would you suggest for the transition from an existing labelling scheme to a new labelling classification in order to cause minimum distortions?**

Any change to a labelling scheme should not be carried out without reasonable consultation with industry and a notice/transition period to allow industry time for implementation and consumers time to understand the change.

**8. Do you want to propose an alternative route beyond the considerations in this document?**

We do not wish to propose any alternative route other than the suggestion to implement labelling via the EuP Directive

*END OF RESPONSE*