

Bosch Thermotechnology Ltd answers to questions.

1) How do you suggest the Commission could best ensure coherent product policy?

Question 1

Coherent product policy for Boiler and Water Heaters would be best achieved by ensuring that any requirement for energy labelling is implemented from within the implementing regulations of the Eco-design Directive. This will simplify the regulatory environment for business.

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?

Question 2

The review of legislation in relation to further potential energy savings should be regular but not more frequent than every 5 years. This allows legislation to encourage the take up of more efficient technologies by consumers as they become commercially viable. At the same time allowing business to plan investment in research within a stable regulatory environment.

(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?

Question 3

For Boiler and Water Heaters the energy label should focus on general guidance of energy consumption during use of the appliance.

The actual amount of energy used to meet the requirements of a specific consumer in their use of the product may / will vary from the guidance on the label.

(4) Are you in favour of adding CO₂ on the energy label? How could reliable information be assured in the light of different energy mixes in the 27 Member States?

Question 4

CO₂ emission arising electricity used in heating or hot water appliances will vary depending upon the energy mix.

This energy mix varies between member states.

The alternatives are:-

to take an EU average and use this

or

label using country specific values (which may not be possible under an article 95 directive)

In both cases consumers may be confused by a change in this average mix and stated CO₂ emission as the energy mix across Europe changes with time.

Until a more reliable and realistic method of calculating CO₂ emission for the same product across Europe then Bosch Thermotechnology Ltd is not in favour of adding CO₂ onto the energy label.

(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?

Question 7

There must be a reasonable amount consultation and notice (transition period) for changes to the targets that arise from a dynamic labelling scheme.

No comments on questions 5, 6 and 8.