

Stakeholder position from Regional Subsidiary of Bosch Thermotechnik GmbH in Portugal and Spain.

Dear Sir or Madam,

Please find below our opinion to the requested topics formulated in the questions of point 6 of “*CONSULTATION DOCUMENT on the revision of the Energy Labelling Directive 92/75/EEC of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances*”

Question 1

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

It is important to avoid that many legislative measures applicable to the same products. These measures should be adequate to all member states taking in consideration the specific needs.

Question 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?

Energy labelling is welcomed as a way of explicitly showing the end consumers the result of eco-design measures, enabling the correct choice to be made thus supporting the Union’s objectives on climate mitigation.

It is very important that this label is easily understandable.

It is better to have only one measure for boilers and water heaters.

Question 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?

CO2 is an emerging topic and the awareness of the end consumer will certainly grow in the near future, at national level, as well as globally.

If the European label is to carry this information this will cause distortions in national markets because the energy production mix varies very much from member state to member state. This will cause confusion, but as well incorrect information to be stated in a certain country.

Question 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 prices vary very much between all member states. This is a fact even in the case of Portugal and Spain that are neighbouring countries.

We do not see the possibility of informing the end consumers of annual running costs, in an European label.

This will cause not only confusion, but as well incorrect information to be stated.

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 distortion?

There are presently to classification scheme to Boilers and Water Heaters.

We would like to stress that is very important that rating of appliances using same energy sources must be carefully and correctly compared and stated.

Best regards,

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