

Stakeholder Consultation on revision on Energy Consumption Labelling  
Directive92/75/EG

**Position of Buderus Italia srl – Bosch Group**

- (1) How do you suggest the Commission could best ensure coherent product policy? *We suggest to take measures based exclusively on the Art. 95 of the Treaty to avoid the proliferation of local measures applied on the same product typology which will fragmentize the EU Market.*
- (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 agree to the development of a single measure able to give a significant contribution to all of above mentioned objectives at the same time. An energy labelling according to the eco-design measures can achieve good results if it will be user friendly and easy to understand, giving thus a clear choice guide to the end consumer. Another advantage of such single measure is the easy monitoring of its effectiveness. For product categories such boilers and water heaters, which need installation, a specific procedure based on eco-design measure is preferable compared to an extension of the labelling directive.*
- (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? *An eco-design label, focusing the attention not only on the energy saving but also on the global environmental performance is to be preferred for a more objective information*
- (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? *The big differences on energy mixes of the Member States create an objective difficulty to indicate the global CO2 emissions.*
- (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? *Due to the differences in energy pricing, the same considerations as above are valid.*
- (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)? *It is necessary to think carefully to the consequences of an energy labelling on products, for whom the efficiency is strongly depending on the installation: for instance, the*

*global efficiency of a condensing boiler is strongly influenced by the system's temperatures. This will surely create an uncertainty*

- (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? *This will not affect boilers and water heaters, because there was no labelling until now. We suggest a specific procedure for energy labelling of such kind of products, which takes in account the installation way. Not discarding the fact that the same performance could be achieved using different kinds of energies.*