

Consultation on the revision of the Energy Labelling Directive 92/75/EEC

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

Mandatory energy labelling should be introduced across a wider and more diverse range of products. This would ensure that energy efficiency is increased and greater environmental benefits are realised. It would also enable consumers to make more informed decisions when purchasing products to reduce energy consumption, enable retailers to simply and clearly provide information to their customers, and assist manufacturers by clearly demonstrating what was required in the development of more efficient products.

Furthermore, if energy labelling is introduced across more products, consumers and manufacturers will become more familiar with the system, resulting in labelling being welcomed more readily, and further increasing the environmental benefits.

(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?

Yes. The experience with those product types that already have mandatory labelling schemes in place has shown that energy labelling has significantly contributed to improving energy efficiency.

If the UK Government is to achieve the target outlined in the Climate Change Bill of reducing emissions by 60% by 2050, and the EU is to achieve its targets of reducing Carbon Emissions by 20% by 2020, new measures must be introduced to help minimise energy consumption.

Therefore, extending energy labelling to include further products would significantly benefit the environment and help achieve Government targets. In particular, televisions should be added to the scope of the labelling Directive. As has been indicated, this would not require amendment of the Directive, but would have a significant impact on energy consumption.

The Fraunhofer report, commissioned under the Energy Using Products (EuP) Directive, estimated that energy consumption from televisions would increase by 115% by 2020 if measures to improve energy efficiency were not introduced. This is due to the increasing number of TVs per household and increasing screen size. However, if a minimum standard for on-mode power consumption; a minimum standard for standby power consumption; and most crucially a mandatory energy labelling scheme were introduced, the likely growth in energy consumption from TVs could be reduced by 85%.

The report concludes that these measures could be introduced by utilising numerous different technologies. These include Reflective Polarizer film, which

can reduce energy consumption from LCD TVs by up to 30%, by reducing the number of bulbs required to produce the same picture brightness and quality. Fraunhofer states that by utilising these existing technologies improvements could be achieved at a limited cost, and in some cases no cost at all.

Furthermore, the National Consumer Association has indicated in its report *Information Blackout: why electronics consumers are in the dark* that "there is an almost complete lack of information for consumers who want to make green choices [when purchasing consumer electronics]." This is especially true for televisions.

Consumers are largely unaware of the differing energy consumption from competing TV technologies (eg CRT, LCD, Plasma), and the impact other factors affecting consumption, such as the number of bulbs in use or screen size. Introducing mandatory labelling for televisions would ensure that consumers are provided with clear, reliable and accurate information enabling them to compare products and make informed choices to reduce energy consumption. As has been shown by existing models it will also encourage manufacturers to develop even more efficient products.

- (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?**

Whilst reducing the environmental impact from the entire life cycle is important, by far the most significant factor is the energy consumed by a product during use. For instance, it is estimated that for a 32" LCD TV, usage accounts for around 85% of total greenhouse gas emissions over the life-cycle of the product. Similarly energy consumption from use is estimated to account for over 80% of total energy consumption over all life-cycle phases.

For these reasons we favour the use of an energy label focusing on the in-use energy consumption of a product.

- (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?**

As has been indicated the differing energy mixes in the 27 member states make this largely impractical. Instead, greater steps should be taken to ensure that the energy label provides an accurate indication of energy efficiency, which in turn gives an indication of the likely CO2 impact of the product.

- (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?**

The constantly varying energy costs across the 27 member states make this proposal largely impractical. Again, greater steps should be taken to ensure that the energy label provides an accurate indication of energy efficiency, as this would allow consumers to make more informed choices on reducing personal energy consumption and energy bills.

- (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)?

Energy labels are easy to understand and have been shown to have a significant impact in improving energy efficiency. Therefore, labelling should be introduced more widely. However, introducing labelling schemes for products not covered by the current Directive would involve a relatively length legislative process.

This should not be allowed to delay the introduction of labelling for additional household products, such as televisions, that do not require the Directive to be amended. These should be introduced at the very earliest opportunity to ensure that the significant potential environmental benefits can be realised.

(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?

The introduction of dynamic labelling is preferable, as it provides further encouragement for manufacturers to continue to develop ever more efficient products. However, the current A-G system is immediately recognised, and easily understood by consumers. Therefore, to be effective, any replacement system must be similarly clear.

A 1-8 rating system (with 8 indicating the most efficient products) would be easily understood, and also provides scope for further efficiency improvements (9, 10 etc). However, to ensure the success of the system manufacturers, retailers, national governments, the Commission and interested NGOs should be encouraged to advertise to make consumers aware of the changes.

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

No. It is clear that mandatory labelling has made an important impact in reducing energy consumption from household products. The European Commission report has concluded that a similar impact would result if mandatory labelling was introduced for TVs, without a detrimental impact on consumers, retailers or manufacturers. It is also clear that due to the lack of information currently provided by manufacturers, and the lack of awareness amongst consumers, that a voluntary scheme would not be effective. Therefore, TVs should be included within a mandatory labelling scheme at the earliest opportunity.

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http://solutions.3m.com/wps/portal/3M/en_CN/vikuiti/home/ProdInfo/Product/

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