



Responsible person concerning Stakeholder
consultation on the revision of Energy Label-
ling Framework Directive 1992/75/EEC

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Dear Madame or Sir,

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

- (1) How do you suggest the Commission could best ensure coherent product pol-
icy?

We believe that under the aspect of a single market within the EU it will
be very important to avoid a further growth and the danger of varied in-
terpretations of legislative measures concerning the same products. Fol-
lowing the process and results e. g. of the different implementation
measures of the EPBD-Directive within the EU-Memberstates we are of
the opinion that for ensuring coherent product policy it will be necessary
to base future measures on Article 95 of the Treaty.

- (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 would recommend a single measure contributing to the above mentioned objectives.

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So we tend to agree that the integration of energy labelling into e. g. the measures of the Eco-Design Directive would make sense provided that this label should be easy to understand by the customer. This will be assisting the customers to make a correct decision between the different product offers and features under respect of their own wishes and targets.

Nevertheless it is important to consider the differences between the product groups. On the one hand there are any kind of plug-in products (like dishwashers, TV, PC, battery-recharger a. s. o.), which are easily to label and cover by an extension of the labelling directive. On the other hand you find products for installing in buildings like water heater or central heating boiler for which a specific ecodesign measure should be preferred instead that extension.

- (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?
- (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?

Considering the current situation within the EU we can not recommend adding any kind of national energy-mix related information on the label.

- (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?

Considering the current situation within the EU we can not recommend to add any kind of national energy-prices related information on the label.

Even if we neglect the fact of different prices, adding annual running costs could be possible only for a small group of products provided that the impact of e. g. the user (or other outside influences) is insignificant. But in most of the cases we found significant influences like user, national different climatic conditions a. s. o.

- (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)?

Regarding the adding of other products to the scope of the directive it seems very important to consider the differences between product groups ("plug-in" or "to installed" like mentioned under question 2), but



also the difficulties concerning the outside influences on energy using products.

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- (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?

This question does not apply to boilers and water heaters. It would be appropriate to have a specific scheme for boilers and water heaters which would not necessarily be based on existing schemes.

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

No.

Best regards

Bosch Thermotechnik GmbH

gez. Gero Frischmann

gez. Michael Pittner