

<p style="text-align: center;"><b>CONSULTATION DOCUMENT</b> <b>on the revision of the Energy Labelling Directive 92/75/EEC</b></p>
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**Marcogaz answers**

**QUESTIONS**

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

A coherence and better co-ordination in the implementation of regulations and directives aiming at different goals (safety, environment, energy efficiency...) which apply to the same product is necessary. For example, products burning gas such as boilers or water heaters are concerned directly by the Gas Appliances Directive (90/396/EEC) or the Eco-Design of Energy Using Products (2005/32/EC) for safety and efficiency, and indirectly by the Energy Performance of Buildings Directive (2002/91/EC) or even the Construction Product Directive (89/106/EEC). And the conformity and surveillance procedures in case of several directives covering a single product are very different. A way for avoiding a confusing situation could be to determine a "leading" directive taking precedence over the other ones.

Tools should be developed for market surveillance once the labelling systems are in place. Possibly Notified Bodies and related Advisory Committees should be more involved and funds should be raised to make this market surveillance possible via web based systems/databases for example.

***(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, Marcogaz is in favour of developing simple and clear labels (A to G system) in order to inform the end consumers regarding technologies available and performances of gas appliances. This would help the consumers when buying appliances. But it has to be mentioned here that products such as boilers or water heaters which are part of a system, are proposed by installers who have a fundamental influence. Therefore schemes and procedures for labelling shall be not only understandable by all the market players, from the manufacturer over the laboratories/certifiers up to the end user, but also shall not give way to discussion on their quality.

We also think the data and methods used for the labelling shall not give any unfair advantage to a given energy or technology. For that reason, there is a need of harmonisation of standardization and certification procedures between the different energy sectors and a need to assess accuracy of measurement of laboratories. We also think that different labels shall be set up for different types of products and energies.

***(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?***

At the origin the Labelling Directive is aimed at assessing the energy consumption, and therefore the performance of a product.

Going beyond this scope to Life Cycle Analysis would alter significantly the objectives which were set originally and, more questionable, make measurements and controls far more complicated. Moreover consumers in the EU countries are not acquainted with such an environmental system and may show no interest for the corresponding label..

However it is advisable to have in parallel to labelling an information system (eg. on internet) that would give more sophisticated information. Calculation of energy efficiency taking into account especially the installation conditions, the system where the system is installed, the CO2 emissions, information on a LCA could be part of such an information system.

***(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?***

Regarding gas boilers, with regard to the European standards, calculation/measurement of efficiency and emissions are already part of the basic procedure and linked together.

Label and its dedicated information should be specific of the energy used by an appliance type, not trying to square the circle by comparing physical entities pertaining to different fields, especially gas (primary energy) and electricity (secondary energy).

Labelling by definition shall be simple and adding CO2 emissions can be a rather complex issue because of very different National energy situations (as mentioned in the question). However CO2 emission is a very important issue and end users are increasingly aware of the consequences of global warming and can soon integrate CO2 emission as a choice criteria. Therefore in order to show the benefits from CO2 emission reduction, we are in favour of investigating how CO2 could be integrated in labelling. If this is not possible for practical reasons, we would then highly recommend to include CO2 emissions integrated in the information system mentioned above with the flexibility to adapt the calculation to National/Regional situations.

***(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?***

By definition, in an open liberalised market, running costs are constantly changing and can not therefore be introduced in a permanent label. Labelling should refer only to technical performance requirements, not introducing economic issues that might be misleading. But as the economical issue are one of the main driving force for customer's choice, we suggest to include annual running costs to be part of additional information displayed by a dynamic information system.

***(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)?***

For the gas sector water heaters and boilers, already in the scope, are the main products for which the Labelling Directive apply. But advanced products such as gas heat pumps, micro-cogeneration devices or fuel cells could be envisaged.

***(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 labels should remain simple and identical to the one in application for some years now which start to be taken into account by customers: standard A to G scale. Any specific additions to the A to G scale (e.g: addition of +, ++, +++++++ or \*\*\*\*\* etc.....) shall be absolutely avoided.

But labelling shall be dynamic in order to promote the constant improvement of appliances efficiency and performances.

We are in favour of a separate label for different technologies and energies since it is very complex to compare very different heating or cooling systems. Appropriate information systems should enable to guide the consumer to a given technology and the label should help the customer make the choice for the technology selected.

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

No specific proposal

**Note** – The critical issue of unique and reproducible measurements tests and procedures is omitted in the above mentioned questions. It is a fundamental condition for a quality labelling system.