



# Revision of the Energy Labelling Directive

**ELC Position 080222**

**Q1: How do you suggest the Commission could best ensure coherent product policy?**

- For lighting, the most effective, practicable and rapid way to ensure that consumers choose and have the choice of more efficient products such as lamps is a legislative phase-out of the least efficient products .
  - This is being achieved through the EU's EuP Directive where a specific Implementing Measures for domestic and professional lamps are currently under discussion.
- We also believe that effective market surveillance is a fundamental condition to ensure that legislation that aims to set standards for products does not result in market distortion and incentives to free-ride the legal requirements.
- Energy label should continue to make it easier for consumers to distinguish between efficient & less efficient lamps/products.

**Q2: 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 EU Energy Label is a highly visible and successful tool which has EU/International wide recognition.
- The label appears to be suitable for products of which eco-aspects are confined to the product itself, but which are independent of non-product related criteria, e.g. a product which is ready for use as sold.
  - Products of which its use depends on how they are installed should not carry such label because it cannot give the correct information.
- We also recognize that the knowledge of end-consumers regarding this classification tool and decision support has increased in the last years.
  - Nevertheless, should any major change happen to be implemented, new communication and explanation campaigns initiated by the Commission would be necessary to increase acceptance.
- The label should be dynamic so as to stimulate manufacturers to innovate and to show in an accurate way the state of product development.
- Due to the constant innovation drive of the lamp manufacturers and the growing offering of energy efficient products, it is important to adapt the existing scale in order to simplify the increasing need for differentiation at the “top of the table”.

**Q3: 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?**

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- ELC has serious concerns about the En Label revision as it has strong influence on our business so this process has to be managed carefully.
  - The content and meaning of the label should be transparent and understandable to the end consumer. This would probably entail that the current design format is maintained.
  - ELC currently does not see a specific requirement for an **eco-design label**.
  - In the event that an extended eco design label is foreseen, this label should be defined on environmental relevant aspects and not on application relevant aspects.
  - Arbitrary weighting factors should be avoided as much as possible.

**Q4: 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?**

- Lamps differ considerably to that of other products, particularly those which require energy or electricity to function. Whereas for most products, the greatest environmental impact occurs during resource use, production, transport and disposal phase, lamps create most of their greenhouse gas emissions (up 90% depending on the lamp type) during their use phase, i.e. when they are switched on or illuminated.
- Energy efficiency and energy saving are the core messages, CO2 reduction is a consequence. Only simple messages should be used to communicate clearly to consumers.
- Providing additional information on CO2 would be counterproductive and may complicate the message for consumers

**Q5: 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?**

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- No need to inform about running costs because they are different in all countries.
  - Reason being that this will be too confusing for consumers.

**Q6: 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)?**

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- Yes the ELC would like to add other products to the scope of the labelling directive.
  - We will shortly define which products should be included (household energy using products) and excluded.
  - Label is intended to inform the end user who is buying products in the retail business and that principle should be kept.
  - In the professional (non-household) market, the choices are made by knowledgeable people and therefore such a label is of no added value in this sector.
  - For domestic lighting applications one may envisage adding the energy label to:
    - Consumer luminaires, as a means to inform the consumer upon initial purchase
    - High or low voltage adapters, that feed the light sources from the mains.

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- The list of the products in the scope of the labelling directive needs to be reviewed on a regular basis in consultation with industry in order to take into consideration the innovation on the market of light sources for domestic products.

**Q7: 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?**

- Yes the ELC supports a dynamic labelling system.
- A dynamic label should:
  - Consist of a defined number of levels (with adequate consideration given to packaging space)
  - ‘Open at the top’ only, so that the newly defined threshold levels remain unchanged over time. Otherwise problems with changing packaging and wrongly labelled stock will occur.
  - Needs to be harmonised across product sectors.
  - Realistic implementation period needed to adapt new products in the supply chain to the new labelling scheme
  - Products already on the market should not have to be remarked

**Q8: Do you want to propose an alternative route beyond the considerations in this document?**

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- No thank you
  - It is worth re - emphasising that effective market surveillance is a fundamental condition to ensure that legislation that aims to set standards for products does not result in market distortion and incentives to free-ride the legal requirements.
  - ELC Participants for future discussions on this issue:
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