

92/75 Stakeholder consultation – comments

From: Andrew Warren [mailto:andrew@ukace.org]

Sent: Friday, February 01, 2008 5:45 PM

To: BILOVA Tatana (TREN)

Cc: BRISAER Andre (TREN)

Subject: Stakeholder consultation meeting on the revision of the Energy Labelling Directive 92/75/EC

Dear Tatana

Please note that EuroACE:

endorses fully the proposal to use energy labelling more vigorously;

is concerned at the concept of marrying together both the eco-design and energy using products labelling;

recognises the desirability of including information on putative fuel consumption costs – but acknowledges how difficult this would be regarding differing fuel tariffs across the Union;

is concerned that different electricity mixes might distort the accuracy of any information on carbon emissions;

and would welcome the extension of the label to “energy relevant” services, like package holidays. This idea could be extended to cover some but not all energy conserving items, like glazing, where it **is** possible to discriminate between the efficiency of different products on the market place. We are unpersuaded that this can be done usefully for insulants, where the effectiveness of the product is entirely determined by the quantities used.

I should be pleased if I could be given time to make these points, preferably early in the proceedings, as I have to attend the IEA hearings at 11.00, as previously informed.

Andrew Warren

Senior Advisor

EuroACE (European Alliance of Companies for Energy Efficiency in Buildings)

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