

21st Feb 2008: The Response of Eurofuel (the European Oil Heating Association) to the European Commission's Stakeholder Consultation on Revising the Energy Consumption Labelling Directive 92/75/EG

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

The Commission should avoid a duplication of labelling, and/ or legislative measures regarding the same products. As such, wherever feasible, all measures taken should be based on Art 95 of the Treaty, to respect the single market. In the area of Eurofuel's expertise (heating and hot water systems), the European Commission is currently consulting on the initial draft implementing measures for boilers and water heaters as part of the Energy-using Products (EuP) directive (the so-called "LOT 1" and "LOT 2" studies of EuP). Therefore, it would seem logical and appropriate to follow these proposals, once finalised, via discussions in the EuP Consultation Forum, with appropriate input from all relevant European institutions, for labelling of heating and hot water systems, rather than attempt to draft any separate measures for boilers and water heaters within the remit of the Energy Labelling Directive.

- (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?**

Eurofuel strongly supports the policy concept of energy labelling. To have the greatest impact on consumers and industry actors alike, a single measure contributing to the above-mentioned objectives would be preferable. For example, the integration of energy labelling into eco-design (Energy-using Products) measures would make sense. An appropriate user-friendly labelling system integrated into eco-design measures would assist consumers, installers and industry alike to make or facilitate better choices, and to contribute to the objectives of policies addressing climate change mitigation, competitiveness and sustainable products/ systems. Any proposed labelling system should be easy to understand by the consumer. A single measure has the benefit of allowing easy monitoring. For boilers and water heaters, which are installed products, and therefore rely on the expertise of the installer and specifier/ system designer, as well as the performance of the heating product *per se*, one specific eco-design measure is preferable to extending the scope of the labelling directive.

- (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?**

In its area of expertise (boilers, heating systems and fuels) [e.g., regarding LOT 1 and LOT 2 of current EuP implementing measures], Eurofuel favours utilising an energy label which focuses on the energy consumption of the boiler, and other practicably measurable components of the heating system, during the use phase.

- (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?**

No; Eurofuel does not support adding CO₂ to the energy label. This is because CO₂ emissions depend on the energy mixes in Member States, and the provenance/ sourcing of every fuel type used. Even where one type of energy source is used (e.g., gas or oil) it is difficult to quote one definitive CO₂ figure, owing to differences in geographical energy provenance, associated refining, transportation, blending and fugitive emissions of associated Greenhouse Gases (GHGs). To be objectively representative with regard to Greenhouse Gas (GHG) emissions, one should always cite full Life Cycle CO₂ equivalent figures, in any case. Full Life Cycle CO₂ equivalents should be quoted in line with the “Basket of GHGs”, as used in GHG reporting, in accordance with the Kyoto Protocol. It would be difficult to add such complex labelling, as referred to above, to a single European label. Another important point to note is that the Commission should ensure that any *national* CO₂ labelling schemes do not disturb the single market.

- (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?**

Eurofuel is not in favour of adding this information to the energy label. This is because energy prices depend on pricing policies and strategies in individual Member States. For the annual running costs to be objective, installation, maintenance, regional variables and constant comparative updating would have to be considered. As well as being an extremely onerous task, it would be difficult to add this information to a single European label.

- (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)?**

How the Commission might add additional products or services to the scope of the labelling Directive Products requires careful consideration, and consultation, with all relevant stakeholders. For example, those products which require installation by qualified, trained, skilled professionals necessitate additional attention regarding the scope of labelling, as witnessed in ongoing EuP discussions regarding boilers and water heaters (so-called “LOT 1” and “LOT 2”). Especially for larger-scale heating and hot water installations, the appropriate sizing and design of the heating/ hot water system, and installation and maintenance expertise, play an increasing role proportional to the size of the heating system concerned, and thus grade into the spectrum of a “service”, rather than solely a “product”.

- (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?

In Eurofuel's area of expertise, boilers and water heaters are not subject to any existing labelling scheme at EU level. For future classification of boilers and water heaters, it would be desirable to have *separate* labelling schemes for heating and hot water appliances which perform similar end functions, as designed, but which do so via the use of *different principal energy sources* (e.g., oil, gas, electricity, and solid fuels, etc).

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

Eurofuel would like to additionally comment that labelling, as applicable to products which utilise different sources of energy, should be of equal quality and repeatability. This is patently not the case at present with regard to the energy labelling of white goods, where an allowed 10% margin of error regarding random repeatability testing spans 2 energy labelling bands, thereby making a mockery of this labelling system. As such, the enforcement of standard for claimed labelling performance has to be tightened, and should be equally applied across all sectors and energy sources.

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Eurofuel's Members

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Belgium: Informazout, www.informazout.be

Finland: The Finnish Oil and Gas Federation, www.oil-gas.fi

France: Chauffage Fioul, www.chaleurfioul.com

Germany: IWO-Institute for economic oil heating, www.iwo.de

Republic of Ireland: via OFTEC (Oil Firing Technical Association), www.oftec.org

Luxembourg: Mazout-info Luxembourg ASBL (M.I.L.), www.mazoutinfo.lu

Norway: Norwegian Petroleum Industry Association (NP), www.np.no

UK: OFTEC (Oil Firing Technical Association), www.oftec.org

Switzerland (Associate Member): Union Pétrolière, www.erdoel.ch

UPEI (Associate Member): Union Pétrolière Européenne Indépendante, www.upei.org