

The UK welcomes the opportunity to share our initial views with you on the options available for the Revision of Framework Directive 92/75/EEC on the Energy labelling of Household Appliances.

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

The UK considers that if product policy is to be made more coherent we need to adopt a consistent approach to policy instruments that impact on products. This includes the need to ensure that existing legislation such as the Eco-design for Energy Using Products Framework Directive and this legislation move forward together. We also need to encourage evidence based decision making so that the technical basis for product policy is aligned across all policy instruments.

***(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?***

The UK considers that mandatory energy labelling has been very helpful, not only in raising public awareness of energy efficiency and in enabling buyers to make an informed choice but also in establishing energy efficiency as a competitive issue for manufacturers. Indeed, we feel that this policy instrument has provided a powerful influence on the whole supply chain, steering innovation and investment towards delivery of our energy policy objectives. In our view the provision of reliable public domain information by manufacturers and retailers about the environmental impacts of the products they procure and sell is an essential prerequisite for effective product policy.

This, taken together with the similar positive experiences in other countries where they have introduced product labels, would seem to confirm the effectiveness of this policy approach. Therefore, our firm opinion is that this policy should continue to be maintained, extended and refined.

However, we also believe **that a range of labels and product information will be needed**, for example while graded labels such as the "A to G" label may be appropriate where consumers only need limited information to make informed choices in other situations where more detailed or complex information is required e.g. for installers or professional procurers of commercial appliances, the provision of information via a public searchable database may be more appropriate. Thus decisions on the most appropriate approach will need to be taken on a product by product basis as we review existing labels and expand into new product areas.

***(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?***

The UK believes that the EU Energy Label should continue to focus on the energy used by products during their “in use” phase rather than throughout their whole life cycle. We consider that actions already being proposed via measures such as the Eco-design for Energy Using Products Framework Directive (EuP) and a revised EU Eco-labelling Scheme are more appropriate for dealing with wider energy life cycle issues.

***(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?***

The UK does not support the inclusion of estimated carbon dioxide emissions on the energy label. In our view such information would not be meaningful in any one Member State as it would need to be based on the average EU energy mix which will not reflect the CO2 emissions generated from the energy mix in any one Member State nor for the primary energy used by any one product group. While providing information about carbon dioxide emissions may be desirable in the longer term we do not believe that the necessary mechanisms are in place at present and would only serve to delay the process of updating existing labels which we believe are a suitable proxy for the time being.

***(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?***

While the UK considers that it is important for consumers to be made aware of the running costs of the appliances they purchase and of the potential savings that can be made by purchasing energy efficient appliances we do not believe that the EU energy label or standardised information is the best way of providing such information as this will not reflect the individual circumstances of the consumer. We believe that such information is likely to be much more useful to the consumer if it is provided at national level and reflects individual consumer needs – in the UK such information would be for the Energy Saving Trust to communicate.

We do not therefore support the inclusion of estimated annual running costs on the energy label. In our view this information could only be provided based on an indicative energy cost and indicative usage patterns which will not reflect energy costs in any one Member State or how individual consumers use their appliances in reality. Continued volatility of energy prices will also only serve to make such information even less meaningful to consumers as it becomes increasingly out of date.

***(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)?***

The UK strongly supports the expansion of the scope of the current Energy Labelling Framework Directive. It is our view that the scope should be revised so that it has at least as wide a scope as the current Framework Directive for the Eco-design of Energy Using Products (EuP) i.e. all energy using products except means of transport. In particular those products currently subject to EUP proposals e.g. ICT and motors, for implementing measures should be priorities for consideration.

We also believe that existing labelling schemes should be maintained, updated and revised to cover the whole product sector, where that is not already the case (e.g. all forms of household lighting products); this is important to stop schemes stagnating and becoming discredited in the market through being incomplete or out-of-date.

The UK also strongly supports the revision of the framework directive to ensure that energy labels/information are required to be displayed wherever the relevant product is being sold e.g. internet and distance sales. We would also like to see the scope of the directive extended to include all forms of product information (e.g. labels, fiches, and the publication of information in a form which encourages and helps the use of search engines etc.) to ensure the maximum effectiveness and flexibility of this policy instrument. The criterion for determining information requirements in this regard should refer explicitly to the need to achieve competition on the most important eco-design issues.

**(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 introduction of dynamic labelling should be a first order priority for the revision of Directive 92/75/EEC. In order to be effective any scheme must be capable of being regularly updated in order to stimulate innovation and to avoid the current problem where stagnation of the standards means that for long periods of time the large majority of products are in the 'best' category. Both the age of many of the existing product "A to G" energy labels and the saturation of A rated products in some markets means that a revision to both the scheme and specific thresholds for existing labels is long overdue. Without such a revision the ability of labelling schemes to provide meaningful information to consumers and supply chains will be seriously undermined.

The review of existing product label directives and the introduction of a transparent mechanism to signal future intentions to uplift the criteria for the label categories are important if we are to ensure that we effectively communicate to industry our policy ambitions to raise standards and thus to stimulate their timely response. We should also signal clearly that we intend to establish the most energy efficient class at levels equivalent to best international performance levels.

While we accept that revalorising existing labels may not be straightforward we do not believe that this is an insurmountable problem if adequate notice is given and suitable transitional arrangements are provided. However, we also

recognise that we need to develop a scheme which is capable of being regularly updated if we are to avoid the long periods of time where the large majority of products being in the best category. In all cases, the utmost care should be taken to ensure the enforceability of implementing measures.

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

Not at present.