

EURELECTRIC's Response to Energy Labelling Consultation

EURELECTRIC, representing the European Electricity Industry and its members, would like to submit the following answers to the specific questions in the consultation document on the revision of the Energy Labelling Directive.

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

We believe that energy labelling should be extended as broadly as possible to encourage energy savings throughout the Union's economy and to allow for coherence between consumer information and climate/energy policies.

When redesigning there is a need to focus on the fact that the existing system has found it difficult to deal with the development in energy efficiency in the market, therefore several countries has developed A+, A++ and the top runner concept to compensate for this weakness.

(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, there is good evidence that labelling where implemented has increased the take-up of energy efficient devices. Extending this should help with the actions required to meet the Union's Energy and climate change objectives.

However research has shown that the existing labelling scheme is weak in addressing the issue of standby consumption. Actually the consumer can easily buy an A label product and end up with one with a high standby consumption. We advocate a review of the labelling regime so that primary and standby consumption, where appropriate, are both used in determining the label.

(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?

Initially we prefer continued use of energy, at this stage the focus should be on implementation and improvement of the energy label directive. However, we would support gradual move towards an “eco-design” label.

(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, there should be 2 different labels given the variation in CO₂ rates from Member State to Member State. It is difficult to see how the addition of CO₂ information in the energy label would work. At this stage, rather than complicating the system the focus should be on implementation. We believe that CO₂ information could be introduced in the Eco-design label.

(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?

Yes, it should help increase take-up of products with low ratings. This should be done at a Member State level to ensure that price information is relevant – the information should be updated at least once per year.

(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)?

Yes, we support extending the scope. Our preferred option is to follow a transitional approach initially extending scope to a wider range of energy using products in the household sector – e.g. TVs and to energy using products in the public, commercial and industrial sectors where product sales volume would justify the labelling effort.

Equally the scope could be expanded to cover non-household energy-using products (i.e. electric motors). Danish experience from campaigns where labelling has been used as a part of the campaign clearly shows that there is a great benefit from labelling other products such as motors, pumps, fans, windows and so on.

However, that experience indicates, that if the number of products labelled is increased, the cost for running this enlarged labelling scheme should be compared to the value of the energy savings that it gives, here the “top runner” could be considered as an alternative to a more cost effective model.

(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 order to secure the optimum benefits from the labelling scheme, it might be considered to assess the labelling scheme every second year followed by an adjustment of the labelling scheme. The adjustment of the labelling scheme can secure that the most energy inefficient products could be phased out.

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

As many EU citizens use internet to search for information it would be beneficial to create and maintain a web site where all the labelling information is available including information about best available technology. To secure the costumers trust in the labelling scheme it is of utmost importance that it is protected against any use that might undermine this.