

**Italian position**  
**on the consultation document of the Commission on the revision of the Energy Labelling Directive 92/75/EC**

The Energy Labelling scheme is the most powerful EU wide tool to address the energy efficiency of electric end-uses. The main positive elements of the EU energy label are its mandatory nature, (especially the red to green coloured arrows), the display at point of sale, and the simple message it gives.

We are in favour of continuing and enlarging the use of this valuable informative instrument, However, the current energy label does not give any longer the possibility to differentiate good models for most of the already labelled products and therefore some upgrading is needed to maintain the label's capacity of transforming the market towards a higher efficiency.

**Answers to questions**

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

A coherent and coordinated action between the different EU mandatory and voluntary policy tools (Eco-design, Energy Services, Building Efficiency and Energy Labelling directives on the mandatory side and the Eco-label regulation and the Energy Star Programme on the voluntary side) and ancillary product policies: RoHS, WEEE, Battery directives, etc. is of the utmost importance.

Co-ordination is necessary to assure that the outcome of the various directives is not in contradiction with the efforts towards an improved energy efficiency an environmental sustainability from both the set requirements/targets and implementation timeframe points of view. This does not mean that by principle the different instruments should merge. On the contrary the instruments can be seen as marketing tools that need to adapt to specific "markets", e.g. pulling the most efficient products or blocking the least efficient products, or serving consumers or the business to business market.

Coherence means that each instrument fits logically in the complete policy package to achieve EU and national energy efficiency/environmental targets.

*(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, a reinforced, updated and improved labelling scheme can contribute to the EU's objectives through EuPs market transformation.

*(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?*

As shown in the preliminary studies on several products promoted by the Commission within the eco-design framework directive, for *energy using products* the use phase is still responsible for more than the 80% of the environmental impact. For EuPs there will be little difference in result (when comparing products) between the energy consumption in the use phase and the global

environmental performance over lifetime and it is much more complex to calculate and enforce. We therefore think that the energy consumption/energy efficiency is the most appropriate indicator for energy using products.

- (4) *Are you in favour of adding CO<sub>2</sub> on the energy label? How could reliable information be assured in the light of different energy mixes in the 27 Member States?*

Although sharable in principle, the addition of CO<sub>2</sub> on the energy label is extremely complex and largely impracticable, since the CO<sub>2</sub> emissions depend on the national and even local energy production mix and the use of the EU average will only results in non-comparable results for Member States.

- (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?*

The same concern applies to the addition of the annual running costs, which depend on energy prices that vary in time at EU average level and throughout the Member States.

- (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 success of the energy labelling scheme is in favour of its extension to other household appliances and non-household energy consuming products, where the clear message of better efficiency is expected to be a successful marketing tool.

As far as non-energy products and services are concerned, the energy efficiency would have no relevance to them and therefore the energy labelling is not the most appropriate tool, other voluntary schemes are already in place at EU level for such products.

- (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 transition to a revised labelling classification should assure the minimum confusion for the consumers and distortion for the market, and should possibly be done only once. We are in favour of an open-ended scale, to be revised through the shortest EC procedure. The transition from the present to the new labelling scheme should be complemented by campaigns addressed to the retailers and the public accompanying the revised label in the shops.

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

No comments.

Rome, 15 February 2008