

## Euro Coop responds to the consultation document of the European Commission on the revision of the Energy Labelling Directive 92/75/EC

*EURO COOP is the European Community of Consumer Cooperatives, whose members are the national organisations of consumer cooperatives in 17 European countries. Created in 1957, EURO COOP today represents over 3,200 local and regional cooperatives, the members of which amount to more than 23 million consumers across Europe.*

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### Introductory remarks

Euro Coop welcomes the consultation document of the European Commission on the revision of the Energy Labelling Directive 92/75/EC. We believe that this Directive has pushed the market towards more efficient products by helping consumers to choose more efficient energy appliances and by promoting an industrial policy geared towards more sustainable production and consumption. However we feel that its potential has not been fully exploited and that further energy savings could be achieved. In this respect, we agree with the objective stated in the document that any option chosen to make a better use of energy labelling has to contribute to a better regulation and the simplification of the regulatory environment for European business and citizens.

Proceeding to a more in-depth analysis of the EU energy label, we observe that its main strengths lay undoubtedly in its compulsory format, the display of the label at point of sale and the simple message it conveys, being "A" clearly identified as the most efficient choice and "G" being the least efficient. This label has therefore proved to be consumer-friendly and its success suggests that this has to be preserved.

Nevertheless, the label scheme has become partially outdated and therefore needs a revision to rise to the challenge of transforming the market with more efficient appliances. To this matter, Euro Coop is keen on sending its comments on this consultation document since a great number of its members have been for a long time frontrunners of energy efficiency practices in their countries and have therefore a long experience in the field. Here below are Euro Coop's answers to the specific questions put forward in the consultation.

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

In general terms, Euro Coop feels that any proliferation of different labels should be avoided to prevent consumers from getting confusing messages. More specifically, to ensure a coherent product policy it is fundamental that the technical basis adopted for one product policy is the same for 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?**

Several Euro Coop members are actively involved in activities linked to climate mitigation and therefore we welcome every initiative aimed at attaining the Union's objectives in this field. Regarding energy labelling, Euro Coop certainly sees an important role for a reinforced energy label in order to more vigorously contribute to the Union's objectives on climate mitigation, competitiveness and sustainable product policy. EU householders are actually increasingly aware of climate change and the fact that it is of anthropogenic nature. To help them act to decrease their carbon dioxide footprint, changes towards providing consumers with standardised and easily recognisable information are essential. Simplicity has proved to be one of the strengths of the current energy labelling system and therefore needs to be preserved or further improved.

**(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?**

Euro Coop likes the idea of an 'eco-design label' but believes that this concept is at a too early stage to be used. It is therefore advisable to concentrate in what it is already in place, i.e. energy labelling.

**(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?**

Euro Coop is in principle in favour of adding CO2 on the energy label, on the condition that certain, measurable and 'easy-to-understand' methodologies are found. Nevertheless, it is clear at this stage that these methodologies have not been fully developed yet and further research is needed in order to avoid confusing or misleading consumers.

**(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?**

Euro Coop is not in favour of adding annual running costs on the label as they are too dependent on energy prices that vary in time, throughout the EU and on consumer use of the appliance. On the contrary, the information on the label should be uniform and valid EU-wide. Running costs undoubtedly represent an important piece of information for the consumer, but given the "individual" character of energy prices, this information should be supplied in a more tailored way than the energy label can provide, e.g. through national websites.

**(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)?**

Given the success of the energy labelling scheme and the fact that the concept is known to the consumer, it seems logical to extend the scope of the energy labelling concept to non-household energy using, non energy using products and energy relevant products. This would be an important tool to exploit to reach the European Union's goals on energy efficiency and climate mitigation.

**(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?**

Euro Coop strongly supports innovation. Nevertheless, if a system of dynamic labelling has to be put in place, it should always keep a strong focus on consumers and therefore be effectively communicated. Dynamism and innovation are greatly appreciated but if changes occur in a too swift way, consumers might be misled and the main goal of the system, i.e. create an energy efficiency driven market, would not be achieved.

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

As the EU energy label has proved so effective we are reluctant to see a major change in the information and format in which it is presented to consumers. Euro Coop also wishes to stress that the European Union should be making progress with the manufacturers of electrical goods to ensure that these goods consume less electricity when on standby.

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