

## **Comments of RREUSE on the revision of Energy Labelling Framework Directive 1992/75/EEC**

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

For a coherent product policy, it is important to focus on the whole life cycle of products and to have an adequate mix of policy instrument in place to influence all parts of the cycle. For household appliances, this should mean that minimum requirements for design and production should be addressed by the instruments defined in the EuP directive, while the necessary information to allow for intelligent consumption decisions should be provided inter alia by the energy- and the eco-label. For the end-of-life phase, appropriate instruments should be defined within the WEEE directive or other relevant waste legislation.

As far as the availability of information about products is concerned, provisions should be made to assure that these are provided in a coherent scheme, thus e.g. the information requirements in the WEEE directive for reuse and recycling should be supplemented by information about energy demand and environmental burden necessary for sustainable product reuse.

- (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. Energy consumption is an important aspect for buying decisions, from an economic as well as an ecological point of view. Therefore it is necessary to provide clear and comprehensible information for the consumer on this aspect. The energy label can be seen as very successful in this respect.

- (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?

Both. The energy label informs about the most important single feature of a product from an economic and ecological point of view and should be obligatory for all household appliances. The eco-label, on the other hand, should distinguish the ecologically best performing appliances, taking into account the total environmental burden of production, use and disposal of the product.

- (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?

No. This kind of information depends on the local circumstances under which the products are used, and a general calculation with certain "mean values" of an European energy mix does not give additional information and may be misleading.

- (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?

No. For the same reason as in Question 4, general values do not make sense. Furthermore, in many cases annual running costs cannot be calculated without taking into account the cost of other resources or consumables, and this should not be mixed up with the energy labelling. It would be much better to have additional means of information in place which can take into account the real conditions under which products are used, e.g. provided by local retailers.

- (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. Wherever energy consumption is an important factor for product use, or wherever the product can influence energy consumption in an important way, the use of energy labelling should be considered. The scope should at least cover all energy consuming products, including non-household products and non-energy-using products such as windows and tyres.

- (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?

For a dynamic labelling scheme, it is important to keep in mind that the lifespan of household appliances can last some ten years, and may include several changes in ownership and reselling processes. Therefore it is important that the information contained in the label is available over the whole lifespan and can be used at any time. On the other hand, the efficiency classes termed A to E are very straightforward and well established, and it will probably reduce the expressiveness of the label to replace them with simple figures which in themselves give no hint on whether these mean high or low quality. Therefore it might be a better solution to indicate in the label the year when the classification was done, and to provide information on the actual classification at the point of sale where appliances with older labels are sold.

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

No.