Energy Labelling Directive (92/75/EEC) Consultation – the position from the European digital technology Industry Sector

Brussels, 25 February 2008

EICTA[1] welcomes the opportunity to participate in the consultation process on the review of the Energy Labelling Framework Directive (92/75/EEC).   On behalf of our members we are pleased to become involved and like to provide our opinion and basic position on the European product policy in general and energy labelling in particular.

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

EICTA believes that the European Commission should ground its product policy firmly on the philosophy that the goals for economic competitiveness, energy saving and environmental protection should and could be promoted simultaneously.   In pursuing regulatory measures on products, it is important for the Commission to introduce measures that can lead to continued innovation and expanded consumer choice.   Thus, EICTA urges for product policies that are performance-based, flexible and based on globally harmonised standards as much as possible.

Furthermore, EICTA requests clarification from the Commission on the use of the multiple policy instruments for our industry (e.g. Minimum efficiency regulation, Energy Label, Eco Flower Label, ENERGY STAR, etc) and how synergies will be created rather than conflicts or duplications.

(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?

EICTA understands the successes of the use of energy labelling for major household appliances and recognises the potential of the reinforced use of energy labelling for further energy efficiency improvement and climate mitigation.   However, **EICTA calls upon the European Commission to avoid a "one-size-fit-all" approach.**

Every product, depending upon its industrial sector, has different technical characteristics and consumer behaviour patterns. Some product categories show a stable development in terms of product functions and therefore are easy to regulate.   Other product categories are still in the process of rapid change and development.   Furthermore, some product categories or features are increasingly being integrated.   This constant and rapid development makes it very difficult for the industry to develop standards that could be used to compare both products features and energy efficiency. EICTA urges the Commission to take into account these differences between products from various sectors in deciding to which products energy labelling should be applied.

EICTA, however, recognises that there is a general need for meaningful pre-sale "product energy consumption" information to consumers (end users), and that such information provision needs to be standardised.

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[1] EICTA is the voice of the European digital technology industry, which includes large and small companies in the Information and Communications Technology and Consumer Electronics Industry sectors.

EICTA's preference is that energy consumption information (e.g. on-power, stand-by power, and possibly annual consumption) is provided in the product catalogues, brochures or on documents publicly available on company's web sites so that consumers or consumer organizations can get accurate information on product energy consumption.[2]   Many global manufacturers are already providing such information, but not always in a standardised format.

We would like to note that the ENERGY STAR programme contains globally recognised energy consumption declaration standards for External Power Supplies, Imaging Equipment and Computers.   EICTA is aware that the ECMA International[3] is trying to refine some of these standards further in partnership with U.S. Environmental Protection Agency (EPA).   Further, several mobile phone manufacturers have developed a star rating system for the energy efficiency of   the External Power Supplies as part of the Voluntary Agreement under the Integrated Product Policy.[4]   EICTA calls upon the European Commission to fully take into account these standardization activities and voluntary initiatives in developing a solution for standardized energy information declaration.

In addition to the energy information disclosure, a system may be needed that could allow top-performing products to be easily recognised by consumers and be coupled to financial incentives where deemed necessary.   For IT products such as computers, monitors, printers, and copiers, an energy labelling scheme for top-performing products already exist: The ENERGY STAR.   A new energy label for IT products different from ENERGY STAR would result in working with double standards.   Adhering to double standards increases administrative burdens for those within the supply chain. Thus **EICTA would appreciate the continuing support from the European Commission for using the ENERGY STAR label to designate energy efficient IT equipment.**

For CE products, especially televisions, EICTA recognises an increasing demand for a form of energy labelling scheme at the point of sale allowing consumers to easily compare the energy efficiency of products.   EICTA is prepared to discuss how to meet this demand as soon as possible, but wants to emphasize that the current A-G energy labelling system may not be the best solution for a technically complex and multi-functional product like televisions.   It should be also noted that televisions will most likely be subject to the minimum efficiency standard under the Energy-using Products (EuP) Directive (2005/32/EC); thus one of the goals of energy labelling (discouraging the purchase of really bad products in terms of energy efficiency) will be already fulfilled by other policy instrument.

Under this situation, a much simpler energy labelling scheme with a limited number of scales and icon-based information (avoiding multiple language requirements) is preferred.   The simplicity will also help accommodating the dynamism needed for television energy labelling; It may be necessary to upgrade energy efficiency standards for the energy labelling scale frequently considering the fast pace of technology development in the sector.

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[2] For business-to-business (B2B) products like office equipment, energy consumption information is provided as
    part of the purchasing contract, so there is no need for additional regulation.
[3] ECMA International –http://www.ecma-international.org
[3]   Details of the IPP projects for mobile phones can be found a thttp://ec.europa.eu/environment/ipp/mobile.htm

EICTA commits their support to the Commission in developing an easy to administer and cost-effective energy labelling system for television, which will reward energy efficient products and related investments.

(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?

EICTA supports the use of an energy label focusing on the energy consumption and other information directly related to energy consumption as originally envisioned in the Energy Labelling Framework Directive (92/75/EEC). **EICTA believes that focus and simplicity is important for successful product labelling, and therefore urges the European Commission to rely on other policy instruments for the disclosure of non energy-related environmental aspects.**

We request the Impact Assessment address the additional benefits of this proposal in terms of market transformation.

(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?

EICTA strongly does not support the addition of CO_2 values added to the energy label. First of all, CO_2 emission is a rather arbitrary measure of product energy efficiency since it is based upon the assumption on the mix of energy sources and the efficiency of electricity generation. Further, the addition of CO_2 values on the energy label will result in administrative and financial burdens for manufacturers to differentiate information per country. Finally, energy mixes in the 27 Member States are not within the control of manufacturers, therefore there should be no requirement to add CO_2 emissions in the product label as part of their legal obligation.

(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?

EICTA is not in favour. We would like to use the same arguments above and we note that actual electricity cost can vary very much depending on the use patterns of individual consumers as well as electric utilities they use.

(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' products, services such as holiday packages or other)?

EICTA does not support the inclusion of non household products or non energy-using products in the scope of the Directive.

(7) In views 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?

EICTA does not have a particular view on this matter because ICT and CE products are not currently regulated by the existing labelling scheme. However, as a matter of principle, EICTA support a sufficient transition period so that the need for re-labelling is minimised.

In case of TV energy labelling a dynamic labelling would be indispensable due to the rapid development of product functions and energy technologies. EICTA recognises that it may be difficult to understand how such a dynamic scheme would practically work without disadvantaging older, formerly "good" products. EICTA would be prepared to cooperate with the Commission and other stakeholders to find a solution to this.

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

EICTA calls upon the Commission to continue supporting well-functioning global standards such as ENERGY STAR and seek further harmonization of energy efficiency standards by engaging other governments in different regions in the discussion on global standards. EICTA is prepared to support the Commission in such dialogues and negotiations.

EICTA MEMBERSHIP

[1]About EICTA:

EICTA, founded in 1999 is the voice of the European digital technology industry, which includes large and small companies in the Information and Communications Technology and Consumer Electronics Industry sectors. It is composed of 57 major multinational companies and 40 national associations from 27 European countries. In all, EICTA represents more than 10,000 companies all over Europe with more than 2 million employees and over EUR 1,000 billion in revenues.

The membership of EICTA:

Company Members:
Adobe, Agilent, Alcatel-Lucent, AMD, Apple, Bang & Olufsen, Brother, Canon, Cisco, Corning, Dell, EADS, Elcoteq, Epson, Ericsson, Fujitsu, Hitachi, HP, IBM, Infineon, Intel, JVC, Kenwood, Kodak, Konica Minolta, Lexmark, LG Electronics, Micronas, Microsoft, Motorola, NEC, Nokia, Nokia Siemens Networks, Nortel, NXP, Océ, Oki, Oracle, Panasonic, Philips, Pioneer, Qualcomm, Research In Motion, Samsung, Sanyo, SAP, Sharp, Siemens, Sony, Sony Ericsson, STMicroelectronics, Sun Microsystems, Texas Instruments, Thales, Thomson, Toshiba, Xerox.

National Trade Associations:
Austria: FEEI; **Belgium**: AGORIA; **Bulgaria**: BAIT; **Cyprus**: CITEA; **Czech Republic**: ASE, SPIS; **Denmark**: ITEK, IT-Branchen; **Estonia**: ITL; **Finland**: TIF; **France**: ALLIANCE TICS, SIMAVELEC; **Germany**: BITKOM, ZVEI; **Greece**: SEPE; **Hungary**: IVSZ; **Ireland**: ICT Ireland; **Italy**: ANIE, AITech-ASSINFORM; **Latvia**: LIKTA; **Lithuania**: INFOBALT; **Malta**: ITTS; **Netherlands**: ICT-Office, FIAR; **Norway**: ABELIA, IKT Norge; **Poland**: KIGEiT, PIIT; **Slovakia**: ITAS; **Slovenia**: GZS; **Spain**: AETIC, ASIMELEC; **Sweden**: IT Företagen; **Switzerland**: SWICO, SWISSMEM; **Turkey**: ECID, TESID, TÜBISAD; **Ukraine**: IT Ukraine; **United Kingdom**: INTELLECT.