



## EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR ENERGY AND TRANSPORT

DIRECTORATE D - New and Renewable Energy Sources, Energy Efficiency & Innovation  
**Energy efficiency of products & Intelligent Energy – Europe**

12.03.2008

### **Revision of the Energy Labelling Directive 92/75/EEC of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances**

Consultation of stakeholders

#### **Summary results**

European Commission DG Energy & Transport  
Unit D3 Energy Efficiency of products & Intelligent Energy-Europe

The main part of the public stakeholder consultation was a consultation workshop open to all stakeholders representing consumers, environmental NGOs, retailers, manufacturers and Member States. The meeting was held on 8 February 2008 in Brussels (see minutes of the meeting on [http://ec.europa.eu/energy/demand/legislation/domestic\\_en.htm](http://ec.europa.eu/energy/demand/legislation/domestic_en.htm)).

In addition to the workshop, a web based consultation was open on 20 December 2007 to 22 February 2008 and resulted in 67 written comments in total. Apart from including the same stakeholders present in the consultation workshop, a number of smaller organisational entities representing national or regional interests provided comments.

It is important to note that the 67 representatives of stakeholders range from organisations representing all EU consumers or hundreds of thousands of companies of most affected industry sectors with tenths of millions of employed people compared with contributions from individual companies or individuals.

#### Statistical Overview:

In total, 67 comments were received as follows:

National Governments and Administrations	11	16 %
European Associations and Groupings	24	36 %
Industry	16	25 %
Other <sup>1</sup>	16	24 %
<b>Total</b>	<b>67</b>	<b>100 %</b>

<sup>1</sup> CEECAP, Energy Saving Trust, Hauptverband des Deutschen Einzelhandels, Japan Business Council in Europe, KEPKA, Leonardo Energy, LACORS, Naidin Petre, UK Natinal Consumer Coucil, Oxford University, Reuse, TNO, University of Reading, WhisperGen, Vienna Ombudsoffice for Environmental protection, Wirtschaftskammer Österreich.

Summary of the main results of the public consultation:

<b>Question 1:</b>	<b>Response Rate %</b>
How do you suggest the Commission could best ensure coherent product policy?	65 %

Result: Stakeholders made, among others, following suggestions on how the Commission could best ensure coherent product policy:

- Each instrument should fit logically in the policy package to achieve EU and national energy efficiency / environmental targets
- Coherent product policy requires the right mix of policy instruments (voluntary and legislative)
- Coherent product policy has to ensure an optimal internal market
- Coherent product policy can be achieved by ensuring coordination between various policies and legislation concerning products e. g. Energy Labelling, Eco-labels, Eco-design, public procurement and standards (dialogue/coordination between different Commission DG's is very important)
- It is important to look into the whole life cycle of products and to have an adequate mix of policy instrument which avoid shifting environmental impacts from one phase of the product lifecycle to another one.
- Market surveillance is key to the success of the policy
- Dynamic labelling evolving with technological improvements is important.

<b>Question 2: Response Rate 70 %</b>	<b>Response distribution</b>	
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?	<b>Yes</b>	<b>No</b>
	100 %	0 %

Result: All stakeholders agreed to the general principle of reinforcing the use of the energy label.

<b>Question 3: Response Rate 45 %</b>	<b>Response distribution</b>	
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?	<b>Yes</b>	<b>No</b>
	5 %	95 %

Result: Close to all stakeholders prefer an energy label focusing on energy consumption at use.

<b>Question 4: Response Rate 73 %</b>	<b>Response distribution</b>	
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?	<b>Yes</b>	<b>No</b>
	10 %	90 %

Result: Most stakeholders are not in favour of adding CO<sub>2</sub> on the energy label. Five stakeholders find it a good idea but don't know how to implement this in a practical way. No stakeholder suggested ways of assuring reliable information on CO<sub>2</sub>.

<b>Question 5: Response Rate 61 %</b>	<b>Response distribution</b>	
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?	<b>Yes</b>	<b>No</b>
	7 %	93 %

Result: Nearly all stakeholders oppose the idea of adding annual running costs on the energy label. No stakeholder suggested ways of assuring reliable information on annual running costs.

<b>Question 6: Response Rate 72 %</b>	<b>Response distribution</b>	
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)?	<b>Yes</b>	<b>No</b>
	80 %	20 %

Result: The vast majority of stakeholders wish to extend the scope of the labelling Directive to energy-using products beyond household appliances (to cover also commercial and industrial sectors). The extension to a limited number of non-energy using but energy relevant products (like windows) was supported.

<b>Question 7:</b>	<b>Response Rate</b>
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?	
Total:	65 %

Result: Stakeholders made, among others, following suggestions/comments:

- Introduction of dynamic labelling (type of labelling not specified)
- Label should remain simple and indicate date of introduction
- Any upgraded label must be as clear as the present one
- Dynamic labelling scheme should facilitate the rating to shift as improvements in the market occur

- Consider dynamic labelling schemes based on self-regulation
- The transition to an upgraded labelling classification should ensure minimum confusion for the consumer and distortion for the market
- Any transition period should be as short as possible

<b>Question 8:</b> Response Rate 21 %	<b>Response distribution</b>	
Do you want to propose an alternative route beyond the considerations in this document?	<b>Yes</b>	<b>No</b>
Total:	0 %	100 %

Result: No stakeholder proposed alternative routes.

End of summary.