

MINISTRY OF EMPLOYMENT AND THE ECONOMY

Energy Department / H. Vuori-Karvia

Revision of the Energy Labelling Directive 92/75/EEC

Comments of Finland on the Commission Consultation Document

Q1. How do you suggest the Commission could best ensure coherent product policy?

- Coherent product policy can be achieved by ensuring coordination between various policies concerning products e.g. energy labelling, eco-labels, EuP implementign measures, public procurement and standards.

Question/Policy Option	Yes	No
Q2. Do you agree to the general principle of <u>reinforcing the use of energy labelling</u> in order to more vigorously contribute to the Union's objectives on climate mitigation, competitiveness and sustainable product policy?	X	

- The energy labelling scheme has proven to be an effective tool to improve the energy efficiency of household appliances. The strength of the energy label is in it that it is mandatory. Energy labelling should be reinforced with periodic reviews and rescaling.

Question/Policy Option	Yes	No
Q6. Would you like to <u>add other products</u> to the scope of the labelling Directive than those covered at present (household appliances only)?	X	
P1. Extending labelling to <u>additional household</u> appliances displayed in shops/outlets, such as televisions, water heaters, boilers ...	X	
P2. Extending labelling to <u>non-household energy-using</u> appliances, such as electric motors		
P3. Extending labelling to <u>non-energy using</u> products, such as windows, tyres or services		

- **Q6.** We support extending labelling to additional household appliances.
- **P2.** To extend labelling to non-household energy-using products needs more consideration. The present energy label gives consumers information at the point of sale. The situation with business to business-products is different. For professional buyers the information could be provided in other ways than labels. Some kind of tool to provide information is needed to rank products e.g.for the qualification of public procurement.

- **P3.** It would perhaps be good to make it possible in the Framework Directive to label 'energy-relevant' non-energy using products. If the possibility was opened, it should be used only in carefully selected cases.

Question/Policy Option	Yes	No
Q3. For energy using products, would you favour the use of an energy label focusing on the <u>energy consumption in use</u> or of an 'eco-design label', (near to the Eco-label showing the 'best') giving the global environment performance of the product throughout its life-cycle?	X	X
P5b. <u>Replace the energy label</u> by an 'eco-design' label combining several significant environmental parameters		X
Q4. Are you in favour of <u>adding CO₂</u> on the energy label? How could reliable information be assured in the light of different energy mixes in the 27 Member States		X
P5a. Provision of additional <u>product information</u> on the energy label, such as CO ₂ emissions or annual running costs		X
Q5. Are you in favour of <u>adding annual running costs</u> on the energy label?		X

- **Q3.** The energy label should focus on the energy consumption in use.
- **P5b.** The need for an 'eco-design label' is something that could be considered only in the long term when there are good enough tools for good life-cycle analyses and comparison of different product qualities. What we need now are quick measures concerning energy labelling (rescaling, adding new products).
- **Q4.** Adding information on CO₂ on the energy label is difficult because of the different energy mixes of the member countries. The label should be as clear and simple as possible.
- **Q5.** Annual running costs depend on energy prices, which vary in different countries. Information on annual running costs would be useful and could be provided in each country e.g. on national websites.

Question/Policy Option	Yes	No
P10. Implementation through <u>Regulation</u> rather than Directive	X	
P7. Tighter <u>tolerances</u> in the measurement standards	X	
P8. <u>Better enforcement</u> of the labelling requirements in respect of both manufacturers meeting the set standards and retailers displaying correct information	X	

- **P7.** The experiences during the time that the energy labelling directive has been in force show that tighter tolerances in the measurement standards are needed.

- Measurement standards should reflect the actual use of the appliance, so monitoring of real energy consumption is needed at regular intervals.

Question/Policy Option	Yes	No
P6a. Reinforce provision of labels on internet sales	X	
P6b. Reinforce provision of labels in the context of other type of sales and advertising: www-pages, newspaper and TV adds ...	X	
P6c. Provision of information on energy consumption (apart from labelling) in media and advertising: www-pages, newspaper, magazines and TV adds ...	X	
P9. Legal protection of the label	X	

- **P9.** It would be useful to specify under which conditions the Member States or third parties could use the label outside of the EU legislation. If there is no EU legislation, it should be possible to use national labels resembling the EU-label – like the Finnish label for windows and energy certificate for buildings.

Question/Policy Option	Yes	No
Q8. Do you want to propose an alternative route beyond the considerations in this document?		X

- We do not propose an alternative route at the moment because we find it important to develop the energy labelling scheme and implement the EuP-directive. The Top Runner approach is one alternative tool to improve products - it might be worthwhile to study if it would work in the EU.
- We think EU could benefit from wider international co-operation with third countries.

Question/Policy Option	Yes	No
Q7. 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?		
P4. Reinforce dynamic labelling with periodic reviews and rescaling of the ratings, including a possible redesign of the label and upgrading of the existing Directive	X	

- **P4.** The existing A-G scale could be maintained, but the rescaling should be made easier than it is now. Regular updating is important in order to make the labelling scheme dynamic. A smooth dynamic procedure for updating based on technical progress could increase transparency for manufacturers and decrease bureaucracy of the formal process.

- Energy label and ecolabelling (EU-flower, Blaue Engel, Swan) schemes should "communicate with each other" for example in developing criteria and in marketing.