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Consultation on the revision of the Energy Labelling Directive 92/75/EEC

The Oil Firing Technical Association "OFTEC" is an industry association representing the domestic oil fired heating and cooking industry in the United Kingdom. As such the comments made represent only those that we consider would be of direct interest to our members activities.

In recent months OFTEC has been deeply involved in considering the implications of the Eco Design of Energy using Products Directive. Our responses to the specific questions asked in this consultation document consider the many similar objectives of these two directives.

Responses to specific questions raised in the consultation paper with specific regard to Oil Fired Boilers Hot Water Heaters and Cookers

Question 1

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

The EuP is about to publish the initial draft implementing measures for boilers and water heaters these measures will include proposals for labelling of products based on their energy use in operation where the majority of energy with these products is consumed.

Boilers and water heaters are already within the scope of the Labelling Directive but are not covered by an implementing directive. It does not appear to be worthwhile to bring about measures for labelling under Energy Labelling Directive when the only real difference will be that under this directive there will be an obligation on the installer to make the label available to the end user.

In practice if the end user were sufficiently motivated to make enquiries as to the labelling of a boiler or water-heating product then he would be able to access the information that will be made available to installers and specifiers under the EuP.

If there were no motivation on the part of the end user then when the information becomes available on the day of installation it would be impracticable to make a different choice.

The Commission can best ensure a coherent policy by using the measures to be introduced under the EuP together with robust standards that enable notified bodies to make accurate and repeatable measurements.

Question 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 mitigation, competitiveness and sustainable product policy?

While OFTEC generally supports the policy of energy labelling it believes that any necessary labels for boilers and water heaters can be introduced through the Energy Using Products Directive.

Question 3

For energy using products, would you favor 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?

For boilers and water heaters the work undertaken by VHK in support of the EuP has already established that the majority of the lifecycle energy is taken up with the in-use situation. Given the accuracy and complexity of establishing the remaining energy in the product lifecycle OFTEC strongly supports an energy label focusing on the in use condition.

This type of label will present clear unambiguous information for the majority of the energy consumed.

Question 4

Are you in favor 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?

Adding CO₂ to the energy label is not supported. The complexity of energy supply across the member states will prevent the label presenting a clear unambiguous message. This is further complicated with boilers and water heaters where gas, oil and electricity have to be considered.

The discussions already taking place regarding the 40% facture (gas/oil to electricity) proposed by VHK for electrical energy production for the EuP has demonstrated the weakness of this approach when the diversity of electrical energy production across Europe is considered.

Question 5

Are you in favor 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?

OFTEC already attempt to demonstrate the relative running costs between fuels in the UK. Even this relatively simple task is complicated when the constant changes to energy costs as well as installation, maintenance, and regional variables are considered.

Any European attempt to label appliances as to their running cost would be extremely complicated and always in danger of being out of date as well as having to consider so many variables as to appear unmeaningfull to the average consumer.

For these reasons OFTEC do not support the addition of running costs to the label.

Question 6

Would you like to add other products to the scope of the labeling 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)?

No Comment

Question 7

In view of dynamic labeling, which approach would you suggest for the transition from an existing labeling scheme to a new labeling classification in order to cause minimum distortions?

For OFTEC the only existing label is the national "SEDBUK" classification for boilers. It would seem logical to run any existing label in parallel to the SEDBUK label for a period of time.

Question 8

Do you want to propose an alternative route beyond the considerations in this document?

No

END

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