



**Statement of members of the EⁿR Labelling and Ecodesign Working Group
regarding the consultation document of the Commission on the**

Revision of the Energy Labelling Directive 92/75/EC

(February 20, 2008)

Summary: call for urgent action

We believe the Labelling Directive still has strong merits and a full use of its present potential can soon deliver real results. The scheme forms an indispensable part of a broad energy-efficiency policy. The main asset of the EU energy label is its mandatory lay-out (especially the A-G scale and the coloured arrows) and display at point of sale, and the simple message it gives: *A is the most efficient*. So we are certainly in favour of keeping this valuable instrument.

However the label scheme has become obsolete and has lost its informative value to the consumer. Therefore it urgently needs an update and a revision to resume its role in transforming the market towards more efficient appliances. Furthermore, a revised energy label scheme is needed to complement minimum efficiency standards (implemented via the ecodesign directive).

Since the first discussions on the revision of the label – dating back to 2001 – a lot of time has lapsed. Facing the challenges of realising the EU energy savings potential, we must act now by way of short term and medium term actions.

Therefore we ask the Commission to take the following actions:

A) on short term (adoption by the Commission before Summer 2008):

- Upgrading the label for cold appliances (based on the results of the Ecodesign study lot 13): revising directive 2003/66/EC by removing the A+ and A++ classes and redefining the A-G scale so that appliances in the A class must have an index of 20 or less.
- Introducing a label for televisions (based on the results of the Ecodesign study lot 5).
- Introducing a label for water heaters and boilers (based on the results of the Ecodesign study lot 1 and 2).

- Including tighter tolerances for the measurements and a date for review in the revised and new directives.

B) on the medium term (adoption by the Commission in 2009):

- Upgrading the label for airconditioners (based on the results of Ecodesign study lot 10).

We support the extension of energy labelling requirements to other energy using products; however we have to agree on the best way to cover other appliances now outside the scope of the Labelling Directive. Therefore we see a need to explore how the energy label and the information instruments under the ecodesign directive can be better co-ordinated. A study resulting in concrete proposals could start in the beginning of 2009. The results could then be used in the first revisions of the ecodesign implementing measures and revisions of the energy label.

Answers to questions

(1) Ensure coherent product policy

The basis for a coherent product policy is that the technical basis for product policy is the same for all policy instruments (labels, minimum efficiency standard, etc.). It does not mean that by principle instruments should merge. On the contrary the instruments can be seen as marketing tools that need to adapt to specific “markets”, e.g. pulling the most efficient products or blocking the least efficient products, or serving consumers or the business to business market. Coherence means that each instrument fits logically in the complete policy package to achieve EU and national energy efficiency/environmental targets.

(2) Reinforcing the use of energy labelling

Yes, we certainly see an important role for a reinforced energy label in order to more vigorously contribute to the Union’s objectives on climate mitigation, competitiveness and sustainable product policy.

Therefore we also support implementation of tighter tolerances, improved enforcement (including use of the energy label in internet sales) and better protection of the label against unauthorised use.

(3) Energy label versus ecodesign label

As the ecodesign studies show *for energy using products* there will be no or little difference in result (when comparing products) between energy consumption in use and global environmental performance throughout the life-cycle. The reason is that energy consumption during use is the main environmental aspect of energy using products. So for energy using products we favour the use of an energy label.

(4) Add CO₂ on the energy label

We are not in favour of adding CO₂ on the energy label (for energy using products) for a number of reasons. The first is that as indicated above for the current products in the scope of the labelling directive energy consumption during use is the main environmental aspect. So adding CO₂ would not provide different results, Secondly, the CO₂ indication could not be but based on an EU average energy production mix, which is a) very difficult to establish, b) varies in time and c) provides unreliable results for Member States that have a deviant energy mix.

However, it could well be that a label for non-energy using products having the same basic layout as the current energy label, would have CO₂ as a basis for the “environmental” rating A-G.

(5) Add running costs on the label.

We are not in favour of adding annual running costs on the label. Running costs depend on energy prices that vary in time and throughout the EU (and in Member States), whereas the information on the label should be “timeless” and valid EU wide.

Certainly, running costs are important information for the consumer, but given the “individual” character of energy prices, this information should be supplied in a more tailored way than the energy label (or any EU wide label) can provide, e.g. through national websites or by retailers. A website has a further advantage that user behaviour that influences the running costs, e.g. actual use, can be taken into account.

(6) Extend the scope to other products

Given the success of the energy labelling scheme, including the fact that the concept is known to the consumer, it seems logical to extend the scope of the energy labelling concept to other products: non-household, non energy using products and energy relevant products. However, keeping in mind that the energy labelling concept is a marketing tool it should be considered carefully per product whether this tool is an appropriate instrument given the target group and how the instrument would fit in the complete package (e.g. Ecodesign minimum standards, information requirements).

(7) Transition

The transition to a revised labelling classification could follow the same route as the implementation of a new directive. When the revised directive is adopted by the Commission stakeholders can estimate the date the provisions of the directive come into force. Since this will be about two years after the adoption, there should be enough time to prepare for and implement the transition.

The transition to a revised labelling classification should be complemented by informing the public (and retailers) on the revised labels around the time these labels should appear in the shops.

Signatories

This statement expresses the view on the consultation document on the 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 of the following members of the European Energy Network (EⁿR) Labelling and Ecodesign Working Group:

- Ademe (France)
- ARCE (Romania)
- Energy Saving Trust (UK)
- KAPE (Poland)



- SenterNovem (The Netherlands)
- SEVEN (Czech Republic)
- Swedish Energy Agency (Sweden)

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20 February 2007