

# Public Consultation on the revision of the Energy Labelling Directive

Statement of the “Vienna Ombudsoffice for Environmental protection” (Wiener Umweltanwaltschaft)

## ANSWERS TO THE QUESTIONS GIVEN UNDER “6. QUESTIONS” IN THE COMMISSION WORKING DOCUMENT ON STAKEHOLDER CONSULTATION

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

>> In the field of energy efficiency we believe that it is necessary to ensure specific regulations on the energy labelling valid for all member states.

(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?

>> Yes, we agree.

(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?

>> We think that the “energy consumption at use” is a good indicator for it leads directly to energy costs which have to be paid by the user (in most cases). Nevertheless, the performance in the life-cycle will be an increasingly important information, since the relevance of the overall impact on the environment gets more and more into consciousness (e.g. EU Building Directive, ..). We would therefore prefer both.

(4) 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?

>> No, we are not in favour, for the different energy mixes even within a certain country

(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?

>> No, we are not in favour.

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

>> Yes, we would like to add other products, above all non-household and non energy-using products.

- (7) 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?

>> Similar as “TCO”-labels we would suggest that energylabel will be run dynamically by adding the year of release to the energy label, e.g. “dish-washer A (2008)”

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

>> No.

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