



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR ENERGY AND TRANSPORT

DIRECTORATE D - New and Renewable Energy Sources, Energy Efficiency & Innovation
Energy Efficiency

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**

Working Document

presented by the Directorate General for Energy and Transport

6. QUESTIONS

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

We suggest that the Commission should avoid taking too much regulation for the same product. Article 95 of the Treaty should be taken as a reference.

- (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?

We would favour a single, simple procedure , easy to monitor, integrated into the eco-design measures , to be easy understood by the consumer and to help the consumer in making the right decision.

- (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?

--- no comment --

- (4) Are you in favour 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?

It is difficult to add and unify CO₂ emissions on the energy label, as each country has its own energy structures .

- (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?

It is difficult to carry out such a measure, as energy prices are different among state members.

- (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)?

Probably the plug-in appliances should be taken into consideration for a extension of the scope. On the other hand, products that require installation, such as heating boilers, do need additional thinking. The Commission should not hasten when it comes to adding other products to the scope of the labelling Directive.

- (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?

We would be interested in having a specific procedure for heating equipment, as they are not subject to any existing prescriptions. The above question does not cover boilers and water heaters.

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