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## **WhisperGen Limited's response to the European Commission's Consultation Paper on the revision of the Energy Labelling Directive**

### ***About WhisperGen Limited***

WhisperGen Limited is an innovative company using smart technology and creative thinking to address the World's need for cleaner and more efficient energy use.

The first commercial fulfilment of our vision is the Stirling engine-based AC WhisperGen® micro combined heat and power system (mCHP) - a smarter way to provide home heat and power with the added benefit of reduced environmental impact.

The WhisperGen® mCHP system is distributed by e.on UK in Great Britain and we have recently announced a joint venture with a major European manufacturer to develop and mass manufacture an AC micro-CHP system suitable for the continental European market. Currently we have a number of partners throughout continental Europe who are undertaking large scale pre-commercial trials prior to the mass-manufactured unit being available to them in Q4 of 2008.

### ***Revision of the Energy Labelling Directive***

WhisperGen Limited welcomes the Commission's proposals for revision of the Energy Labelling Directive, which we believe represents a sensible approach to amending the legislation to reflect changes in technology, product ranges available and the increased importance that consumers now place on energy efficiency.

In particular, WhisperGen asks the European Commission to consider the following points when revising the Directive:

#### **Ensure a coherent product policy? (Questions 1 & 6)**

WhisperGen supports the option of broadening the scope of the Labelling Directive to include other household energy using products, including boilers and micro-CHP units.

Such an approach would allow for the extension of a scheme that is already familiar to consumers and would apply equivalent measures to all products that fell within the scope of the revised Directive.

It is important, therefore, that unnecessary duplication and complication is avoided. A mandatory energy labelling scheme that covered boilers and micro-CHP units should replace, rather than be in addition to, other energy efficiency labelling schemes such as the proposed HRE (Dutch) label for equipment sold in the European Union.

### **Energy labelling's contribution to the EU's objectives on climate mitigation, competitiveness and sustainable product policy? (Question 2)**

We strongly support the principle of extending and reinforcing the use of energy labelling in order to give consumers a clear way of assessing and comparing products' energy performance.

### **Energy labelling compared to eco-design labelling (Question 3)**

WhisperGen believes that the existing system of mandatory energy labelling strikes an appropriate balance between giving consumers the information that is needed to make an informed choice when buying energy-using products whilst still presenting it in a clear and simple format.

We believe that extending this to an eco-design label would risk either making the label too complicated to be effective or removing the focus on energy efficiency by giving a single rating to cover what would in reality be a wide range of different measures.

### **Adding CO<sub>2</sub> and energy costs to the energy label (Questions 4 & 5)**

Whilst we support the principle of adding CO<sub>2</sub> to the energy label, WhisperGen can not see any way that this could be done accurately across 27 Member States given the differences in energy mixes that the Commission correctly identifies. Another complicating factor would be the differing energy efficiency performance of equipment depending on the circumstances and location in which it is used. It might be necessary for labelling schemes to allow for additional ratings to be indicated that are peculiar to one or more Member States.

It is important that any CO<sub>2</sub> labelling scheme, or any indicator that included carbon efficiency in setting a rating, should include total energy efficiency. In the case of micro-CHP units, this must include all usable energy output – both heat and electricity generated.

Similarly, varying energy prices between, and within, Member States would make it very difficult to implement a meaningful cost-savings indicator.

Yours faithfully,



Glenn Keen  
General Manager/Europe