

Federal Public Service Economy, S.M.E., Self-Employed and Energy – Belgium
Directorate general Energy

Table on policy options:

	Action to be taken	Policy options considered	Comments
1	Extending labelling to additional <u>household</u> appliances displayed in shops/outlets, such as televisions, water heaters, boilers...	Can be done without amending the Energy Labelling Directive.	We agree with this action.
2	Extending labelling to <u>non-household</u> <u>energy-using</u> appliances, such as electric motors	Requires an amendment of the Energy Labelling Directive to address manufacturers, or the amendment of the Eco-design Directive to address retailers. Important to coordinate with Eco-label. New information delivery methods may be needed for 'business to business' products.	We believe it is not opportune to label this kind of appliances at short term, unless the affected industry sector is in favour of labelling.
3	Extending labelling to <u>non-energy using</u> products, such as windows, tyres or services	Requires an amendment of the Energy Labelling Directive or the Eco-Design Directive. Only <u>energy related</u> products (e.g. for energy conservation) are considered within the context of the Labelling Directive.	We believe it is not opportune to label this kind of appliances at short term, unless the affected industry sector is in favour of labelling.
4	<u>Reinforce dynamic labelling</u> with periodic reviews and rescaling of the ratings, including a possible redesign of the label and upgrading of the existing Directives.	Upgrading of existing energy labels is possible under the current Energy Labelling Directive and review dates can be included in the implementing Directives based on potential for improvements and technological progress.	We support CECED's proposal, with predefined void cages in the upper classes.
5a	Provision of additional <u>product information</u> on the energy label, such as CO2 emissions or annual running costs.	Use of other resources than energy (e.g. water) is possible under the current Energy Labelling Directive. Adding other information such as running cost or CO2 emissions would require an amendment of either the Energy Labelling or the Eco-design Directive.	We are not in favour of adding this information on the energy label. It gives no added value. Besides, this information depends on the electricity costs and the way electricity is produced, which is different for each Member State.
5b	<u>Replace the energy label</u> by an "eco-design" label combining several significant environmental parameters	Would require an amendment of the Energy Labelling Directive or of the 2005/32/EC Eco-design Directive.	We believe this action is premature. Some environmental parameters are still uncertain for a lot of products.
6a	Reinforce provision of labels on <u>internet sales</u>	Reinforcing the provision of information through other means than the label or the fiche would require amending the Energy Labelling Directive or the Eco-design Directive.	We are not in favour of this action. The origin of the appliances is rarely known. So it is difficult to check the exactness of the information.
6b	Reinforce provision of labels in the context of other type of sales and advertising: www-pages, newspaper and TV adds...	Would require amending the Energy Labelling Directive or the Eco-design Directive.	Ditto

6c	Provision of information on energy consumption (apart from labelling) in media and advertising: www-pages, newspaper, magazines and TV adds...	Would require amending the Energy Labelling or the Eco-design Directive.	Ditto
7	Tighter <u>tolerances</u> in the measurement standards	Difficult to include in sectoral legislation but could also be part of the Commission mandate to the European Standardisation organisations. Thus, no amendment of the existing legislation would be necessary.	Yes, especially concerning the variances between test laboratories.
8	Better <u>enforcement</u> of the labelling requirements in respect of both manufacturers meeting the set standards and retailers displaying correct information	The proposed regulation on market surveillance ¹ could help to improve enforcement by introducing new provisions applying to all Community harmonising 'product' legislation, including the Energy Labelling and Eco-design Directives. Thus, no amendment of the existing legislation would be necessary.	We support this action. However, the measurement standards need to be simplified concerning the choice of the test equipment.
9	Legal protection of the label	Could be useful to specify under which conditions the label could be used by Member States or third parties outside of the EU legislation.	No comment.
10	Implementation through <u>Regulation</u> rather than Directive	Would help to avoid transposition cost and delays. Would ensure harmonised approach across the internal market (simplification of EU legislation).	Regulation could be if Member States are free to organise their own market surveillance system.