

Statement of members of the CEECAP project
regarding the consultation document of the Commission on the
Revision of the Energy Labelling Directive 92/75/EC
(January 30, 2008)

Introduction

The CEECAP project (Implementing EU Appliance Policy in Central and Eastern Europe) has been initiated to support the proper energy labelling of household appliances, to foster the legislation implementation, and responsible promotion of efficient appliances by retailers and manufacturers. The CEECAP project has partners in the Czech Republic, Romania, Bulgaria, Poland, Lithuania and Slovakia, as well as in Austria, France and the Netherlands.

This document has been elaborated under a cooperation with the EnR Labelling and Ecodesign Working Group members.

Summary: call for urgent action

The CEECAP project members believe that the Labelling Directive still has strong merits and a full use of its present potential can soon deliver significant results in further promotion of energy efficient appliances. The labelling 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 definitively in favour of keeping this valuable instrument.

However the label scheme has become obsolete, to a large degree even in the Central European conditions, and has lost part of 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).

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 the end of the year 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).
- 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).
- Introducing a label for water heaters and boilers (based on the results of the Ecodesign study lot 1 and 2).

In addition to these actions 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.



Central European situation

The expertise of the CEECAP project is located towards the Central European region with an aim to bring the best experience from the EU 15 countries to the new EU member states. It has to be noted however that the situation regarding the energy labeling of appliances in the NMS is not significantly different to those in the EU15 states:

- Several appliance types have been labeled even before the formal start of the EU membership accession process.
- Many appliance types are predominantly being sold in the energy class A, and the share of A labeled appliances sold is not much lower in CEE region than in the EU 15 states (in individual cases even higher in some CEE states than in the EU15 states). Therefore the label is losing part of its validity.
- Given the rapid development of markets and the increase in sales of appliances, it is essential that labelling is extended to more major energy-using products so that consumers can make rational choices.
- Checking the label accuracy is an issue that deserves more attention at national and European levels. Especially for many NMS, with smaller economies, it is essential that Europe facilitates international coordination in compliance checking as the current arrangement. (The goal to do this fully on national basis is clearly not working - not a single product tested in any of the NMS, and also not in most of the EU 15 states).
- The number of formal shop compliance controls is also limited and not systematic in most countries and an increased priority given to energy labeling would improve this situation.
- Similarly, a revision of the energy classes and the inclusion of new appliances into the labeling system would increase the public attention to this issue and could initiate several national public dissemination campaigns to be organized.



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 labeling

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.

(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 lay-out 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 in favour of considering to find forms of informing consumers about the annual running costs of appliances, for example by involving the retailers. It is clear that the operating costs can be a significant decision making argument for selecting a more efficient product. It is not clear, however, if the energy label could be the proper place for a standard running cost information, due to different prices in various regions and due to the price changes in time. A targeted effort to publish this type of information eg. through national websites or by retailers should be therefore considered. 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. It has to be kept in mind, however, that the energy labelling concept is a marketing tool and 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, A to G scale label, endorsement label).

(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 individual members of the CEECAP project. It has been elaborated in cooperation with the EnR Labelling and Ecodesign Working Group members.

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