

30 January 2008

1. Introduction

- 1.1 LACORS is the Local Authorities Coordinators of Regulatory Services. It aims to promote and support quality regulation and related local authority services across the UK. LACORS' aims and objectives include providing advice and guidance to local authorities in the development and dissemination of good practice, supporting and promoting effective coordination, consistency, co-operation and collaborative arrangements between local authorities.
- 1.2 LACORS' current portfolio of local authority services encompasses: trading standards, animal health and welfare, food safety, product safety, alcohol and public entertainment licensing, gambling reform, civil registration services, health and safety, environmental protection and the rented housing sector.
- 1.3 LACORS sought the views of local authority trading standards services' environment advisers in order to help us to formally respond on behalf of councils to this consultation.

2. Background

- 2.1 The European Commission has asked for views on the revision of Energy Labelling Directive 92/75/EEC with a closing date for written comments of 22 February 2008. The Commission's consultation document and related papers can be downloaded at http://ec.europa.eu/energy/demand/legislation/domestic_en.htm#consultation
- 2.2 Details of the DEFRA consultation complete with a link to the European Commission's papers, can be obtained on <http://www.mtprog.com/ConsultationFDEnergyLabelling.aspx>
- 2.3 In order for the UK Government to give informed views at a Member States' stakeholder meeting in Brussels on 8 February DEFRA sought views from UK stakeholders by 1 February 2008.
- 2.4 This consultation considered how the Energy Labelling Directive (ELD)/Regulations have worked. The initial introduction states what the EU are looking at (i.e. saving planet, eco-design, performance benchmarks etc) and considers extending product labelling to existing mandatory instruments (EU Energy Label and Energy-Star or Eco-Label). The consultation refers to how the ELD has worked for 15 years and whether it should be extended and how (to other products). The EU seeks to save another 20% of energy across Europe and makes suggestions as to how this can be achieved. The consultation includes a table on policy options.

3. Consultation Questions and LACORS' Responses

- 3.1 **Question 1:** How do you suggest the Commission could best ensure coherent product policy?
- 3.2 LACORS' suggests that the Commission could best ensure coherent product policy by promoting better enforcement of the existing requirements, providing market incentives such as VAT/tax relief and developing more dynamic labelling with periodic reviews
- 3.3 **Question 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?
- 3.4 LACORS agrees to the general principle of reinforcing the use of energy labelling. We would stress that in order to ensure confidence in the scheme, there is a need to remove the wide tolerances within the standards, which can distort the scheme, and lead to misleading information being given to consumers. This also leads to unfair competition for some manufacturers.
- 3.5 **Question 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?

- 3.6 LACORS would favour the use of an 'eco - design' label to replace the current label. We believe that this would be more akin to the EUP regime and would promote best in class. Currently there is consumer confusion; not with the A - G ratings but that an efficient A+ machine that may appear on paper to be more eco friendly than a B rated machine but because of its size actually consumes more energy.
- 3.7 We therefore strongly believe that there should be an improved means of comparing products within product areas. We consider that this needs to be a comparative measure to enable consumers to make a value judgement not only in relation to how a particular appliance performs against others but also where it would be comparatively compared for their particular circumstances. We appreciate that the latter requirement is probably the more difficult to achieve, primarily as it will need to be a value that can be easily applied by consumers.
- 3.8 **Question 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?
- 3.9 No. LACORS is not in favour of adding CO2 on the energy label. In our opinion this would be meaningless to most consumers.
- 3.10 **Question 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?
- 3.11 No. Difficult to quantify because of different tariffs etc.
- 3.12 **Question 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)?
- 3.13 Yes. LACORS considers that the labelling Directive should be widened and should cover all household energy using products such as ICT (Televisions, personal computers, lap-tops etc.), water heaters, vacuum cleaners, cooking appliances (microwaves, kettles, hobs and grills).
- 3.14 **Question 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?
- 3.15 LACORS is of the view that it should be possible to introduce new criteria in any scheme with a 'use-by' date and have transitional periods when both run concurrently as currently is the case with BS/EN standards.
- 3.16 **Question 8:** Do you want to propose an alternative route beyond the considerations in this document?
- 3.17 No.

LACORS would like to thank Somerset County Council, Surrey County Council and Trading Standards South East for their assistance with this response.

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