

## Wirtschaftskammer Österreich - WKO

### Contribution to the Consultation on the revision of the Energy Labelling Directive 92/75/EEC

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

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- (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?

*Energy labelling can be an effective instrument to increase consumer awareness and push for technological innovation in order to reduce energy consumption. We agree therefore to reinforce and, where necessary, adapt the labelling scheme so as to take account of efficiency improvements of household appliances.*

- (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?

*We recommend keeping the focus on energy efficiency as we consider consumption at use to be a key indicator of a product's environmental performance. Further criteria would require a comprehensive system of life-cycle analyses based on a harmonised calculation methodology, the costs of which must be assessed against the (potential) added value of such environmental performance criteria.*

- (4) Are you in favour of adding CO<sub>2</sub> on the energy label? How could reliable information be assured in the light of different energy mixes in the 27 Member States?

*As mentioned above, a CO<sub>2</sub> indicator would have to reflect the national energy mixes, which in our view cannot adequately be captured on a product label. The green value of electricity is certified by the guarantees of origin scheme under the Directive 2001/77/EC on the promotion of electricity from renewable energy sources. Therefore we would not support the inclusion of a CO<sub>2</sub> value on the energy label.*

- (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?

*Again, considering the different energy mixes and prices it is difficult to see how a reliable indication of annual running costs could be established. A label showing comparatively low running costs could even turn out counter-productive as it reduces incentives to use the appliance efficiently.*

- (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)?

*We believe that the inclusion of further products to the scope of the Directive should be examined in-depth and in cooperation with all relevant stakeholders. Considering the experiences gained so far, an extension to other energy-using products could be useful, whereas services such as holiday packages would seem to be much more difficult to compare and classify according to energy efficiency criteria.*

- (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?

*The dynamic labelling scheme proposed by CECED appears to be a good starting point for a revised energy label. It essentially reverses the scale to an open-ended scheme allowing for necessary updates due to technological progress. At the same time, the 7-color-design would be kept in order to help consumers recognise the label, thereby ensuring continuity.*

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

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