

22 February 2008

JBCE comments on the Consultation Document on the revision of the Energy Labelling Directive 92/75/EEC

1. Extension of scope

Extending the scope of the Energy Labelling Directive to additional household appliances and non-household energy using products would represent a significant and far-reaching change. JBCE therefore proposes that sufficient time should be allocated to discuss a series of important related issues, such as market trends concerning targeted products and the relationship of the revised Directive with other labelling requirements and schemes.

2. Relationship between the Energy Labelling Directive and CE marking

Article 5 of the EuP Directive prescribes that products covered by an Implementing Measure need to carry a CE conformity marking before being placed on the market and/or put into service, which will show conformity with the relevant minimum eco-design requirements. Particularly in view of the likelihood of certain products being covered by both the EuP Directive and the revised Energy Labelling Directive, JBCE requests a detailed explanation of the relationship between the CE marking and the current or future energy label.

3. Exempting products based on new technologies

JBCE is of the opinion that a revised energy labelling approach should be designed in a way that would not prevent the introduction of products based on new technologies. Therefore, we suggest that products that belong to a targeted product category but are based on new technologies should be exempted from the labelling requirements.

4. No interference with existing labelling schemes

JBCE suggests that neither the current nor a revised, future labelling approach should interfere with existing and well-functioning schemes, such as the Energy Star, which already covers products that are covered by the EuP lot 3 and lot 4 studies.

5. Additional product information on the label

Concerning additional product information on the label, such as CO₂ emissions or annual running costs, it is practically very difficult to indicate adequate values simply because the energy mix and energy costs vary widely between the EU's 27 Member States.