

Response to Consultation on revision of Energy labelling directive 92/75/EEC

Q1 Coherent product policy

There needs to be information at point of sale which helps the buyer to make an informed decision about the product he wishes to buy which should include its environmental as well as its resource impact. This information should stimulate a dialogue between seller and buyer so that the buyer can buy a product best suited to his needs. If the product requires a skilled person to install it then this dialogue is likely to take place between the installer and the buyer. The installer needs to have sufficient information supplied by the manufacturer in order to advise the buyer on the most suitable product. Minimum standards of energy efficiency are essential to remove inefficient appliances from the market and likewise the environmental impact of products should also be limited.

Q2 Reinforcing use of energy labelling

Yes, this should be reinforced and the time frame in which decisions are made speeded up. This is of particular importance for heating and heating/cooling systems where the choice has now become much larger with small scale renewable sources now competing with fossil fuel boilers.

Q3 EU energy and eco label

There is a need for both types of label, one being primarily energy in origin and the other environmental. The label should always be accompanied by the information fiche to provide the additional information as described in Q1.

Q4 Adding CO2 emissions to energy label

This is essential as each country has to meet a CO2 reduction target and so labelling the CO2 emissions helps individuals to decide what they can do to help reduce emissions of greenhouse gases. Each country should use the national average of CO2 per kWh(e).

Q5 Running cost

This is very desirable as the buyer is likely to be interested in how much money he can save rather than how much CO2. The cost should include electricity, water and detergent using national average prices. This was successfully trialled in 1996/1997 by Scottish Hydro-Electric

Q6 Extending product scope

The scope should be extended from household appliances to energy relevant products – it is already being used by Member States for cars and housing.

Q7 Dynamic labelling

Energy labelling should be implemented through regulation rather than directive to save time and costs. The thresholds for the various classes should be adjusted periodically and maybe it is possible to specify a gradual increase of % per year.

Q8 Product labelling strategy

A timetable needs to be of no more than 5 years for labelling all major energy using products or energy saving products. This strategy should also decide which products should receive the energy label and which the eco-label. Maybe the best solution would be to set up a Product Labelling Agency whose remit is to label products and to undertake the necessary revisions to maintain these labels.

Rayner Mayer
School of Construction Management and Engineering
University of Reading/Sciotech Projects
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