

Contribution to the Public Consultation on the revision of the Energy Labeling Directive 92/75/EEC

Leonardo ENERGY acknowledges the great success of the current EU labelling scheme and its role on improving the performance of domestic appliances in use throughout Europe. The labelling scheme is also an important piece on the integrated policy to improve energy efficiency in Europe and meet the challenge of global warming.

In this sense, taking into account that Europe has set ambitious targets for emissions reduction and energy efficiency, a stronger and more ambitious labelling scheme is necessary.

Dynamic labelling

Technology results in constant efficiency and performance improvements of equipment. A labelling scheme needs to be flexible to follow and stimulate those improvements.

A dynamic labelling scheme, following the model recently proposed by CECED, together with stronger policies to regulate the phasing out of old low performing equipment is needed. Rather than requiring a revision of the label every time efficiency improvements are achieved, an open-ended scheme that allows dynamic updating would be much more beneficial and accommodates the continuous improvement of equipment.

Reliability of testing centres

Supporting the continuous improvement in equipment performance and in the light of increasing globalization, Europe needs to protect consumers and

validate manufacturing claims. Manufacturers and consumers must have confidence that the products placed into the market are not mislabelled. A solid and harmonized certification scheme for testing centres across Europe should be put in place.

Performance requirements

In order to have an effective and integrated policy supporting efficient products in the market, minimum performance requirements should be in place. These should have an appropriate level of ambition and should not be technology prescriptive. This way, the market itself would encourage stronger innovation where producers would compete for having their technology as the most efficient in the sector. (For example: rather than banning incandescent lamps, why not to set a minimum performance requirement in lumens per watt?)

Life Cycle approach

The environmental impact of an energy using product or equipment is, for most cases, much higher during its use phase than during its manufacturing phase. For this reason, the energy consumption/efficiency is a main indicator for any labelling system.

A lifecycle approach would be of great value. Taking into account the specific situation of a country, more environmental performance data over the lifecycle should be included. This data should focus on major relevant environmental impact categories, particularly on global warming potential, acidification potential or eutrophication potential.

Because the energy mix varies in the 27 MS the same product may have a very different environmental impact in different countries and that should be reflected in the label.

Labelling new products

The current labelling system has demonstrated great success contributing to the improvement of the efficiency of appliances placed on the market. The same philosophy applied to other dispersed equipment or systems would likely deliver similar results.

Nowadays, equipment like motors, motor systems, or other systems in industry or buildings are purchased on lowest price, mostly ignoring its energy and environmental performance. The application of a label and correct guidance on its interpretation can change this situation and give information, confidence and transparency to consumers concerning the

quality of the product they are purchasing or using. In turn, this would influence purchase decisions and stimulate a movement towards more efficient and environmentally friendly solutions.

Taxation as an incentive

If on one hand, the consumer dictates its choice by means of price and environmental performance of the product, on the other hand this can also be influenced by the market availability of more or less efficient products.

The adoption of a scheme that would favour manufacturers or distributors delivering to the market only high efficiency appliances would be most beneficial. For example, a scheme that would attribute tradable white certificates or a tax rebate to companies for the high efficiency solutions they deliver into the market provides a good incentive and contributes to increase the share of high efficiency products/services in the market.

It is essential that a new labelling scheme allows dynamic labelling and is applied to a broader range of products and even systems. This scheme should be accompanied and intrinsically linked with policy initiatives to phase out old and non-performant products and systems.

It is also important to integrate the producer and purchaser perspectives – provide incentives to producers to deliver high efficiency solutions to the market, and demonstrate to the consumer the benefits of purchasing these solutions.

Leonardo ENERGY is an initiative of the European Copper Institute.