

Response 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?

We consider that coherent product policy is best ensured by keeping the strategy related to energy-in-use and through greater support for test protocols. The Commission should provide consistent tools through which the required market transformations will be achieved across the varying product sectors.

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?

Yes.

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?

Except in the rare cases where the greater part of the energy consumption of a product is embodied, we believe that focus should remain with energy in use. In our opinion, an eco-label would add additional complexity that would delay the labelling process. Many non-energy attributes are not as well understood or are more difficult to measure than energy attributes. As more data are gathered, an eco-label might be useful in the future.

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?

Not for electrical products, owing to differences in the CO₂ levels emitted through the differing fuel mixes of the member states. However, for non-electrical products, CO₂ could form the basis of the calculations on which energy ratings are given.

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?

No – we consider this too complicated, especially with respect to those states that have liberalized their energy supply markets.

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)?

Extend to all household appliances and to all relevant commercial appliances, especially where there is a degree of cross-over between what is *commercial* and what is *domestic*. Sticking, however, to energy using *products* – energy using *services* should be addressed separately so as not to complicate or undermine the value of the label.

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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?

We consider dynamic labelling to be essential to the continued success and credibility of the scheme. The labelling should be sufficiently dynamic: (a) to ensure that the average product in any given category remains as close as possible over time to a “D-rating”; (b) to accommodate any changes to the Energy Efficiency (EE) calculation criteria wherever any need is identified – for instance, the criteria could be adapted to better mirror typical appliance usage patterns (taking Washing Machines as an example, the scope of the EE calculation criteria could be extended from the existing single “60 degree cotton cycle” to the average efficiency over a greater range of wash cycles).

The rate of change of the label would be dynamic and depend upon the rate of market transformation in the various product categories. Clearly, manufacturers and retailers would need sufficient lead-time for this to be practical. To cause minimum distortions, a minimum and maximum period of review could be stipulated in the revised Directives.

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

Under the Energy Efficiency (EE) calculation criteria of the existing Directives there are situations whereby products having features that *increase* their overall energy consumption achieve better ratings. Examples include cooling devices, whereby “Frost Free” and “Built-in” are criteria that improve the chances of such a product receiving a better rating. We feel that the EE calculation criteria should do the *opposite* of this and reward features that *reduce* overall energy consumption, such as moisture sensor controls in tumble-driers, load sensors in washing machines, etc. Under the EE calculation criteria of the existing Directives, there are many cases in which the simplest way for manufacturers to achieve good ratings is to “super-size” their appliances. This, clearly, has serious implications for absolute energy consumption.

We propose that the labels be displayed more widely – not only on the products themselves, but also on any marketing literature, including advertisements for the products.

We think that consumers should be given financial encouragement to purchase “A-rated” appliances and suggest that one way of achieving this could be through an application to amend the V.A.T. Directive to allow for a Europe-wide exemption of V.A.T. on these products.

We feel that non-compliance should be policed more vigorously and that fines and penalties should be appropriately sized to provide a serious disincentive.

Finally, we feel the need for more regular reporting from the Commission on the effectiveness of the varying implementing Directives.

Contact

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