

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 CO<sub>2</sub> 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.