

6. QUESTIONS

- (1) How do you suggest the Commission could best ensure coherent product policy?

Primarily to find and achieve balance and harmony between Energy Labelling Directive and Eco-Design Directive, which certainly requires radical amendments in the Energy Labelling Directive and on a smaller scale amendments in the Eco-Design Directive.

- (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?

Energy label might be included and used in context of the Labelling Directive and eco-design label in context of the Eco-Design Directive.

- (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?

Data regarding CO₂ could be added on the eco-label using average EU indicator. However, there should be a reference to sources that provide more detailed information on CO₂ intensity in individual MS (in electricity generation).

- (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?

Annual running costs of the household appliances on the energy label are an excellent indicator for consumers, but apparently hardly to execute due to the different energy prices. Suitable indicator could be average energy price, but reference to sources with more detailed information might be added.

- (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)?

Only energy using products should be addressed in labelling directive. Requirements for other and non energy using products should be addressed in other legal acts. For non energy using products, voluntary schemes should be encouraged.

- (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?

Redesign the label and to implement revised ratings in energy label classes A to C (e.g. A++, A+, A, A-).

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

No.