



consultation document on the revision of the Energy labelling Directive 92/75/EEC

Questions (1):

In order to contribute to a sustainable product policy, complementarities, consistencies and synergies between existing legislations (Energy labelling, Energy-Star, Eco-labelling, EuP, RoHS, WEEE, batteries Directive,...) should be looked at. This is crucial before introducing new or additional product (information) requirements. The ecodesign process and the labelling process have to take into account existing specific legislation for the involved product groups. In this regard a better dialogue between the different Commission DG's is necessary. Because DG ENV is responsible for the EU Consumption and Production Action Plan, it was a great surprise that DG ENV is not the leader (or co-leader) of the EuP Directive. This type of situation should be avoided in the future. Integrated Product Policy (IPP) needs a clear horizontal integration of the environmental aspects in all policies.

Questions (2):

In order to guarantee the success of the Energy Label, the first priority has to be given to the review of the existing energy classes. In second place broadening of the scope (products and environmental information) should be looked at. Furthermore product information and labelling are included in the EuP Directive, which already addresses a broader scope and all relevant environmental parameters during the whole life cycle of a product. For this reason it makes more sense to integrate labelling requirements into ecodesign measures. In this context it doesn't make sense to extend the mandate of the Energy Labelling regulatory Committees to also cover the Ecodesign Directive. This is only useful when the mandate of the Ecodesign Directive regulatory Committee is also extended to the Energy Labelling because of the synergies between both legislative instruments. In practice official representatives for both committees come often from different authorities, so we would like to have some clarification about this possible approach.

Policy options (1), (2), (3) and question (6):

The scope should be extended to other energy-using and non energy-using products. This should be done in synergy with the EuP Directive. Taking into account the EuP process, energy labelling will probably also be introduced for water heaters and boilers, electric motors... Some (installed) products are part of a more complex whole and other environment parameters in other life cycle phases could play a crucial role. This is a good reason to integrate labelling requirements into ecodesign measures.

Broadening of the scope to non-energy using products is envisaged for EuP, so the same approach is necessary for the energy label. A possible legal framework for energy labelling of other products should be established, but only when there are relevant criteria other products should be addressed. An impact assessment is necessary to know if this makes sense.

Policy options (5a), (5b) and questions (3), (4) and (5):

When it's relevant and useful, additional product information (beside energy) should be provided. The legal possibility has to be provided, but synergy between involved legislations (energy label, EuP, RoHS, WEEE, batteries Directive,...) has to be looked at.

The success of the energy label is due to the simplicity and transparency for the consumer, so the focus still has to lie on the energy performance of the products. In this regard priority has to be given at the review of the existing implementing directives.

Only when other environmental parameters in a certain phase of the life cycle are crucial (e.g. content of hazardous substances), this has to be communicated. This legal possibility already exists with EuP, so it would make sense to address this here. At the other hand EuP only addresses the manufacturer and not the retailers, which could be useful to provide the right information to the consumers.

Policy option (4):

Reinforcement of dynamic labelling is necessary. Due to the length of the current legislation process, it would be efficient to seek for alternative routes instead of amending directives.

First of all a good proposition is necessary in order to avoid that an adaptation of the legislation in the near future is necessary.