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International Network for Sustainable Energy - Europe



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**Comments from ECOS, EEB, INFORSE-Europe,
WWF European Policy Office and Friends of the Earth Europe**

On the revision of the EU Energy Labelling layout

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Environmental NGOs note the current political deadlock on the revision of the EU Energy Labelling layout. The recent votes from the European Parliament show that this institution has severe doubts about the impact on consumers of the revision proposed by the European Commission and backed by Regulatory Committees in end of March 2009.

The core disagreement lies with the concept of opening the A-G scale at the top and adding new classes with sophisticated names (like “A-20%”, “A-40%”).

We have always expressed a preference for the option of rescaling the close-ended A-G scale by changing the class boundaries and retaining the A class as an absolute reference for the very best products only. We have also requested - without success so far - a serious and robust comparison of the options in terms of consumer perception, economic and environmental impacts.

Environmental NGOs suggest the following to move forward on this issue:

1. All new labels should start with an A-G scale

- The European Commission should quickly come back (in September 2009) with a revised proposal for the label on televisions, starting with a simple A-G scale for 3 years (which was supported). There is no need to adopt right now a layout for further steps.
- The European Commission should propose to start with a simple A-G scale for 4 years for boilers, water heaters and air-conditioners. (The A class should correspond to the excellence: efficient renewable-assisted equipment.)
- The European Commission should prepare the introduction of energy labels for vacuum cleaners, coffee machines, relevant electronics (to be defined) and energy-related products (windows, doors, insulation materials). The starting point should always be a 7-class A-G label.

2. Revising the label on lamps

- The European Commission should propose a revised A-G energy scale for domestic lamps, based on a full scope (including directional lighting) and updated class boundaries.

3. Suspension of the revised labels for white appliances

- The EU institutions should refrain from implementing the current controversial measures to update the labels on refrigerating and washing appliances, until the revision of the Energy Labelling Directive is over and a clear political decision has been reached on the layout.
- The European Commission should immediately launch a test on consumers of the several label design options, as well as a robust and independent feasibility study and economic impact assessment of the rescaling option (taking into account international experience). **We strongly believe that these studies are (more than ever) a prerequisite to advancing this debate.**
- The Commission, Council and Parliament should prepare the ground for a final compromise on the label layout, in the context of co-decision on the revision of the Energy Labelling Directive, to be adopted by mid-2010. This compromise should use the findings of the above studies.
- Measures for white appliances could be adopted just after, thus leading to implementation during 2011. These new labels would set the scene for the future revision of other labels.

We firmly believe that the above approach would improve the framework for discussing the revision of Energy Labelling and is the only way to prevent any delay in the introduction of new labels.