



**Statement of European Environmental and Consumer NGOs  
(ECOS, EEB, WWF-EPO, INFORSE-Europe, ANEC, BEUC)**

**on the most recent Commission proposal for a revised Energy Label layout  
(Working document dated 6 February)**

On 6 February 2009, Member States will discuss a new Commission working document on the future layout of the EU Energy Label.

We consider the proposal to add classes A1, A2, A3... on top of the class A as **fundamentally inappropriate and misleading for consumers**. We believe that mixing the letter "A" with numbers and displaying them on blue coloured bands clearly undermines the simplicity of the message and creates confusion. In our view, this proposal seems to be nothing more than the numerical scale (proposed by industry) in disguise. This approach has several flaws and should therefore not become the standard evolution for the energy label.

Recent research<sup>1</sup> clearly shows that consumers find the A-G label easier to understand than a numerical scale or a double scale of numbers and letters. Moreover, research demonstrates that consumers expect the A-G classes to be downgraded regularly<sup>2</sup>.

**In light of these findings, we reiterate our support to maintaining the successful close-ended A-G scale, but updating the scale more frequently by changing the class thresholds.**

**This is the most logical, simple and unambiguous way** to ensure that the EU Energy Label continues to deliver the right incentives for consumers. So far we have not heard any convincing arguments contradicting this statement.

Moreover, we do not believe that the theoretical economic impact from re-labelling products (put forward by some manufacturers) has been substantiated. Close-ended energy labels have already been upgraded in other parts of the world without major difficulties.

**In conclusion, we call on European decision-makers to maintain the close-ended A-G scale and make it more dynamic through regular rescaling.**

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<sup>1</sup> MORI research conducted for ANEC, BEUC, the UK National Consumer Council, the UK Energy Savings Trust and the UK Government Department for Environment, Food and Rural Affairs, May 2008, <http://docshare.beuc.org/docs/2/BIEIKHABDGMOMCKKCGBDHKEAKPDBW9DBWBY9DW3571KM/BEUC/docs/DLS/2008-00801-01-E.pdf>.

<sup>2</sup> Research conducted by Ipsos MORI for the UK Government, Sweden and The Netherlands in December 2008 into EU consumers' understanding of the A-G energy label and, in particular, to understand how consumers react to the transition between an old and new label during revalorisations. See: <http://www.mtprog.com/cms/library-publications/>.