



Revised working document on energy labelling of televisions. Comments from eceee

2010-03-02

Summary of eceee's comments on proposed labelling requirements

eceee welcomes the revised proposal in the hope that we will soon have a EU labelling scheme established. In particular we welcome the change in the energy class requirements so that what was previously proposed to be A Class is now B. This reflects the fast development of TV energy efficiency, as has been observed in recent market analysis performed by TopTen as well as the Swedish Energy Agency. However, we still believe that the labelling requirements could be made even stricter so as to reflect coming market developments without risking the label to be out of date already when it is expected to be formally introduced next year.

In short, eceee would like to see the following changes

- The requirements for achieving class A should be made stricter than in the Commission's current proposal.
- As an alternative, if stricter requirements for attaining class A is not acceptable, the label should contain the A+ band already at the time of introduction instead of 2013, since there are TVs already meeting the proposed A+ requirement today.
- The bands between A and A+++ should be made more narrow, without compromising the level of A+++. This should be combined with an introduction of A+++ which is earlier than currently proposed. This would fit well with stricter requirements for attaining class A.

The problems with the current proposal and eceee's proposed solution

As we see it, the proposal has four main problems. We give a description of the problem and a proposed solution below:

1) Too many models would meet the highest class at the point of introduction

According to a survey of the Swedish market performed by Swedish Energy Agency, there are already several models in the A class with the current proposal, which would then be the highest class (see Annex).

More troublesome, there would already now, one year before the label is introduced, be at least one model, which already qualifies in the A+ class and more are expected in the coming year. Still this class would not be recognised by the label until 2013. We realise that a manufacturer would be allowed to mark its TV with A+ already now, but it seems

About the European Council for an Energy Efficient Economy (eceee)

eceee is a non-profit, membership-based European NGO. The goal of eceee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, eceee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of eceee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 people and offers governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.



much better that the label actually acknowledges this with the shortest green arrow representing A+ at the introduction of the label.

Solution:

- The requirements for achieving class A should be made stricter than in the Commission's current proposal.
- As an alternative, the label should contain the A+ band already at the time of introduction instead of 2013, with the shortest, dark green arrow indicating the most efficient class.

2) The lower end of the scale is not harmonised with the eco-design requirements

With the current Commission proposal, class G will be banned by eco-design requirements already before the label takes effect. This is because eco-design stage 1 requirements will remove certain G class models from the market already in August 2010.

Solution:

This is avoided by moving the scale up one step compared to today's proposed requirements, as proposed above. If G class would require $0.80 \leq \text{EEI}$, models rated "G" will still exist with our proposal until banned in stage 2.

3) Bands in the higher classes may be too wide

We believe that the bands may be too wide in the higher classes in the current Commission proposal. For instance, a 33% improvement in efficiency (as defined by a lower energy efficiency index) is needed to move from class A+ to A++, and a 50% improvement is required to move from A++ to A+++. We fear that these large steps will act as barriers for improvement.

Solution:

By tightening the requirements to reach class A, the step between each of the higher classes can be made narrower, without compromising the final level for A+++, which is $\text{EEI} < 0.10$. In combination with a more frequent updating of the bands and an earlier introduction date for A+++ (see point 4, below), the incentive for market introduction of TVs with better (=lower) EEI will be higher.

4) More frequent updating of the label is needed

We believe that the updating intervals are too infrequent. In the current proposal from the Commission, A+ would be introduced 2013, A++ 2016 and A+++ 2019. A point in time nine years from now is indeed very far away and we can have absolutely no idea how TVs will develop in that time period.

Solution:

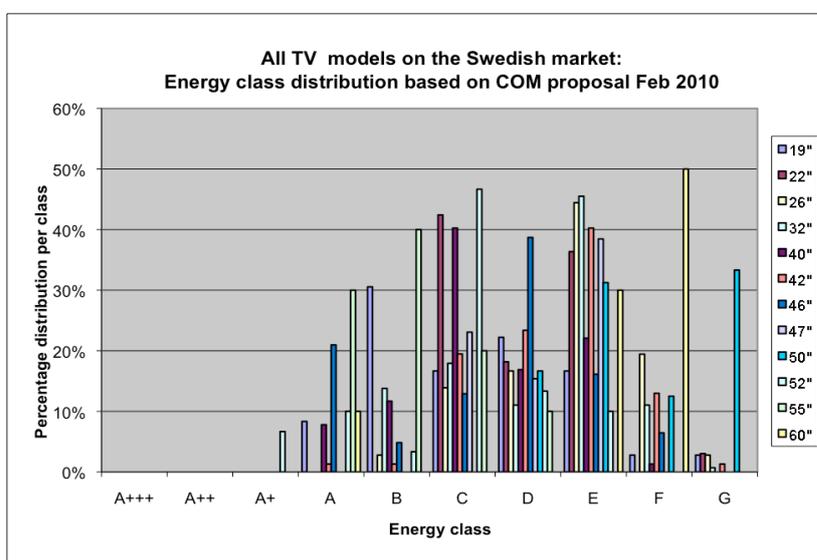
Either make the A class requirements stricter and introduce each new class in two year intervals, starting with A+ in 2012, or keep today's A class requirements and include the A+ class already when the label is introduced. The other classes will be introduced in two-year intervals.

Overview of label updates: Commission and ecee's two proposals

	Commission	ecee alternative 1	ecee alternative 2
A	2010	Stricter requirements to reach class A than today	Keep A Class requirements but introduce A+ on the label 2010
A+	2013-2015	2012-2014	2010-2012
A++	2016-2018	2015-2016	2012-2014
A+++	2019-	2017-	2015-

Annex

Market data from Sweden comparing today's Swedish TV market with the current proposal from the Commission.



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