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Mr. Andre Brisaer  
European Commission  
Directorate-General for Energy and Transport  
Energy efficiency of products & Intelligent Energy - Europe  
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## **ecee position on the possible redesign of the EU energy label**

Dear Mr. Brisaer,

We have welcomed the opportunity for a representative of ecee to participate in the three meetings of the Working Group on the design of the EU energy label under the Energy Labelling Directive 92/75/EEC. The full range of stakeholders were able to present their views and we feel that all sides were able to make valuable contributions to the approach that needs to be taken next. Everyone took this seriously, understanding the value of an effective labelling scheme. Unfortunately, not everyone agreed and there was no consensus in the end. This leaves it to the Commission to be the final arbiter.

Our board met recently and there was agreement that the current A-G system should continue, based on all the evidence. First, we believe that it is important to have commonality amongst all labelling schemes and the A-G approach is widely used for the energy certification of buildings and the labelling of new passenger cars, to name but two areas that are outside the labelling Directive. It would be a mistake to have different systems because it would create confusion for the consumer.

Second, we feel that the consumer research undertaken by the UK and presented at the June 2<sup>nd</sup> meeting provided compelling evidence that across all the countries surveyed the consumer really has accepted the A-G scheme and again it would be a mistake to change.

Third, we feel that the A-G label can be used in a dynamic situation and can “reward” innovation through giving the consumer an indication of the best-available appliances.

### ***About the European Council for an Energy Efficient Economy (ecee)***

ecee is a non-profit, membership-based European NGO. The goal of ecee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, ecee 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 ecee’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 participants from a wide range of backgrounds. ecee and its summer study offer governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.

ecee promotes the understanding and application of energy efficiency in the energy research, policy and commercial organisations. It offers membership for both individuals and organisations.

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The labelling scheme cannot be left to stagnate as it has in the past. But, the policy environment has changed since the early 1990s and there is no doubt that there will be greater emphasis on and monitoring of impact.

We have tried to keep an open mind throughout this process and we are keeping an open dialogue with CECED officials. We understand industry's reservations but also feel that they can be overcome by effective support. We know that European industry has been a world leader in innovation and will do everything within our means to support that. But, the bottom line is that it is the consumer who has to react to different marketing signals and the A-G approach is a powerful one.

Finally, on a related issue, as we have stated in the Working Group previously, the fast update of Directive 92/75/EEC is urgently needed to move the existing scales to make them more realistic to today's technology developments. The current scales are almost meaningless, since in too many cases more than 90 per cent of products sold are A or better. This can be done relatively quickly and can bring about important benefits.

We remain ready to participate in whatever way we can to help the Commission deliver a world-class and effective label.

Sincerely,

*Peter Bach*  
President

*Nils Borg*  
Executive Director