



2015-09-04

To the European Commission
DG-Energy

eccee position statement on the European Commission proposal for a Regulation of The European Parliament and of The Council setting Framework for Energy Efficiency Labelling and repealing Directive 2010/30/EU

Dear European Commission representatives,

Thank you for the opportunity to express our opinion on the draft proposal for the revision of the Directive 2010/30/EU on energy labelling.

Energy labels are rightly considered to be one of the most successful tools in bringing consumers' attention to energy efficiency and in moving the market towards more energy efficient products.

eccee, the European Council for an Energy Efficient Economy, is a membership-based non-profit association and the Europe's largest and oldest NGO dedicated to energy efficiency, which pays long term attention to the energy labelling and product efficiency matters.

Due to this, we would like to express the following statement concerning the Directive 2010/30/EU proposal by the European Commission:

eccee supports the European Commission proposal and recommends its implementation into formal legislation

eccee considers the growing share of energy efficient products on the EU's market to be a result of the energy labelling and ecodesign legislation, which is supported by manufacturers' innovation, consumer awareness campaigns, and market surveillance activities. We consider the new legislation proposal to be in line with the EU specific goals in the area of:

- Improving the competitiveness of the EU economy,
- Achieving the energy efficiency targets,
- Protecting consumer rights, and
- Protecting the environment.

We particularly support and recommend to approve the following new aspects designed within the energy efficiency labelling legislation:

1. **A single energy labelling scale from 'A to G'**: The A plus energy efficiency classes do not ensure consumers' full orientation within the energy efficiency class scale and only the uniform A to G class among all product categories, including the removal of the empty classes from the label, ensures the best motivation towards purchasing the most efficient products.
2. **A digital database for new energy efficient products**: Since the database would only contain information and documents already being compulsory, and since similar databases exist in most other relevant economies, it can become to be the



effective tool in ensuring future label updates and better market surveillance around the EU.

3. **Continued support for market surveillance:** we support the European Commission's continued support in market surveillance on the European level, including the cooperation among member states' authorities, exchange of experience and activities, and sharing of individual compliance verification results.

Due to the above listed features designed for implementation into the new framework directive on energy efficiency labelling of products, we support the Commission's proposal and recommend its uptake and implementation.

eccee also recommends that products are tested in standards more closely reflecting consumer usage habits and that the same requirements and efficiency definitions should apply to different technologies or types, so that the Label can bring real transparency to consumers, showing which are the most efficient models.

Thank you for your consideration,

Sincerely Yours,

Peter Bach

Nils Borg