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**Position of ECOS, EEB, Friends of the Earth Europe,
WWF EPO and INFORSE-Europe**

**on the updated Working Document
on Energy Labelling for Televisions**

(version of 11 February 2010)

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Environmental NGOs welcome the opportunity to provide comments before the Energy Labelling for televisions is adopted by the European Commission.

The initial discussions on this label date back from 2008, based on market data of 2007 that are now outdated. New models presented by manufacturers in consumer electronics fairs make us believe that the proposed label is seriously falling short of its objectives.

Moving the scale by two more classes up

Our main request is that the scale of the label should be moved by two additional classes up as compared to the current updated proposal from the European Commission.

Current Commission's proposal:

Energy Class	Energy Efficiency Index (EEI)
A+++	EEI < 0.10
A++	0.10 < EEI < 0.20
A+	0.20 < EEI < 0.30
A	0.30 < EEI < 0.40
B	0.40 < EEI < 0.50
C	0.50 < EEI < 0.64
D	0.64 < EEI < 0.80
E	0.80 < EEI < 1.00
F	1.00 < EEI < 1.20
G	1.20 < EEI

Already populated classes when label enters into force

Empty classes after 1 year (when EuP stage 2 enters into force)

Our alternative proposal:

Energy Class	Energy Efficiency Index (EEI)
A+	EEI < 0.10
A	0.10 < EEI < 0.20
B	0.20 < EEI < 0.30
C	0.30 < EEI < 0.40
D	0.40 < EEI < 0.50
E	0.50 < EEI < 0.64
F	0.64 < EEI < 0.80
G	0.80 < EEI

Our arguments:

➤ It would be inappropriate and misleading to introduce a new label for which **three classes would become empty and already pointless after only a year**. This is the situation we will face because the entry into force of the label has been delayed and will only appear in shops in mid-2011 at the earliest. This is only one year before the 2nd stage of the Ecodesign Implementing Measure for televisions enters into force (April 2012), which will empty 3 bottom classes.

➤ It is a shared opinion that the starting point for a new energy label should be the 7 class A-G scale, and the A+/A++... additional classes are only considered after some time if A is no more sufficient. This is what was applied in the past for fridges, laundry driers, etc. However, according to data gathered by the Euro-Topten project on efficient appliances¹, 16 TV models on the market today would already be A rated under the scale proposed by the Commission. **The current most efficient model on the market would even get an A+ and is 46% better than a B.**

¹ <http://www.topten.info/uploads/File/Recommendations%20TVs%202010.pdf>

This trend will be even more pronounced in a year when the label enters into force. It is expected that LED backlight will rapidly become a mainstream technology (as it is in line with the general development of LED products and is reinforced by the concerns on mercury use). Furthermore, the roll out of HD programs in several Member States together with major sports events to come will move the market very much beyond current sold models.

➤ On top of that, new US Energy Star specifications for televisions have been adopted and will go into effect in May 2010. Although the metrics and measurement conditions are not identical to the EU ones, these Energy Star 4.0 specifications seem to match the upper half of the proposed EU Energy Labelling scale. We all know from experience in other electronics that Energy Star becomes mainstream after a few years.

This reinforces our belief that rapid improvement potential is possible and **the bulk of TV sets will be positioned differently than what was expected when initially discussing the labelling scale** (based on 2007 market data). The same applies for new efficient plasma technologies.

➤ These arguments are all the more substantial after the weak political compromise on the revision of the Energy Labelling Directive in end 2009, leading to a system in which rescaling will be made virtually impossible until at least 2014.

An obvious counterpart is that **new energy labels should be made stringent enough from the start** to avoid that after some years most products are labelled in the upper classes and the label becomes confusing and not fulfilling its adequate purpose.

For all these reasons, we call the Commission to adopt our alternative proposal.

We also call the Commission to prepare the ground for a reinforced Ecodesign Implementing Measure as soon as possible, suggesting a next stage of minimum requirement equivalent to the level of Energy Star 4.0 and amending the Energy Efficiency Index calculation to discourage the trend towards ever larger screens.

END.