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By email

Swedish comments on the revised working document on energy labelling of televisions

Summary and proposals in short

Sweden welcomes the revised working document and acknowledges the change of the energy classes as a response to the rapid development of the TV energy efficiency that has taken place since last year. However, Sweden believes that the current proposal still has a few serious problems and would like to propose amendments to make the system more robust.

We would like to stress that we have discussed these proposals with the Swedish suppliers of TVs, which confirms that the current proposal is too unambitious. We believe that the current proposal does not reward the most efficient products, thus failing to stimulate the development and penetration on the market of new, more energy efficient products.

The problems with the current proposal

- 1) The current proposal has a too conservative approach to the rapid development of TV energy efficiency. This may lead to that higher classes will be overpopulated with models too soon. By the time the label takes effect, there is a great risk that there are models on the market that would qualify for labelling classes not yet introduced. For instance, a supplier with a model qualifying for A+ before 2013 would have to mark it with a label that has not yet taken effect. Even if the Commission supports this practice, it should not become a standard procedure. On the Swedish market there are already several models fulfilling the new proposed A class. Considering the rapid development of new imaging technologies and the fact that the label realistically will not be effective until 2011, we strongly believe that the requirements for Class A should be even stricter when the label is introduced (See annex A and B for our market data).
- 2) With the current Commission proposal, class G will be banned by eco-design requirements already before the label takes effect. By moving the scales

upwards, this is avoided and G class televisions will exist on the market until 2012.

- 3) We believe that the bands are too wide in the higher classes. For instance, to move from class A+ to A++, a 33% improvement in efficiency is needed, and to move from A++ to A+++ a 50% improvement is required. We fear that these large steps will act as barriers for improvement.
- 4) We believe that the updating intervals are too infrequent. 2019 for the introduction of A+++ appears to be a point in a very distant future, given our proven difficulty to forecast technology developments more than a few years in advance.

In summary we propose that:

- **The labelling scales should be moved further toward lower indexes for each class, i.e., class A should still be the highest class in the mandatory label when it takes effect, but a lower EEI should be required to attain A. See below for a revised table of classes and applicable EEI levels.**
- **The bands in Class A to Class A+++ should be narrower, with fewer index point improvements required to move to a better class.**
- **The validity of the label should be two years before its scheduled update, thus A+ should be introduced in 2013, A++ in 2015 and A+++ in 2017 (instead of 2019).**

Additional need for clarification

- The working document states (item 10 in the introduction) that suppliers may introduce higher classes, such as A++ or A+++ before the mandatory update of label has introduced these classes. However, it is not clear what is required for such a “premature” label class. Does the Commission intend the label design to be the official one for that class? Should the years of validity (e.g., 2013-2014) be printed even if this happens already in 2012? And should the colours reflect the best mandatory class or the class that the manufacturer chooses to introduce?

1. A case for stricter requirements for Class A

Swedish market data indicate that based on the proposal by the Commission already today, February 2010, there are a number of televisions that fulfil the requirements for class A, and a couple of TV:s that even fulfil the requirements for A+. When the label becomes effective, probably not until 2011, it is likely that even more models will have reached class A and A+. The technology to surpass class A is certainly already available, but there will be little incentive for manufacturers to introduce A+ models. (See Annex A for market data where common models are plotted against the Commission current proposed limits). Thus, we present a proposal for a revised classification where class A

requirements correspond to those of class A+ in the Commission's proposal (see table 1). According to our proposal, there would be no TV in class A+, but 2 models that fulfil the stricter requirements for class A (See Table 2 and figures 2a and 2b).

2. Tighter EEI bands between the classes A, A+, A++, and A+++, and more frequent updating

In the Commission proposal, a 25% improvement is needed to move from class A to A+ (from EEI <40 to <30, a 33% improvement is needed to move from class A+ to A++ (from EEI <30 to EEI <20) and a 50% improvement is needed to move from A++ to A+++ (from EEI <20 to EEI <10). We think it is a rather challenging requirement to ask a manufacturer to cut the energy consumption of product by half, in order to move it from the second best to the best class.

We thus propose tighter classes, but in return a more frequent updating of the label so the pressure to innovate is kept high.

3. Summary table of Sweden's proposed labelling classes

Table 1 - Sweden's proposal for mandatory TV labelling classes

Energy Efficiency class	Energy Efficiency Index (EEI)	
A+++	EEI < 0.10	highest class 2017-
A++	$0.10 \leq \text{EEI} < 0.16$	highest class 2015-2016
A+	$0.16 \leq \text{EEI} < 0.23$	highest class 2013-2014
A	$0.23 \leq \text{EEI} < 0.30$	highest class 2011-2012
B	$0.30 \leq \text{EEI} < 0.40$	
C	$0.40 \leq \text{EEI} < 0.50$	
D	$0.50 \leq \text{EEI} < 0.60$	
E	$0.60 \leq \text{EEI} < 0.70$	
F	$0.70 \leq \text{EEI} < 0.80$	EEI < 0.80 worst allowed product from 2012 (eco-design stage 2)
G	$0.80 \leq \text{EEI}$	Not allowed from august 2012
Eco-design stage 1 requirements will remove certain G class models from the market already in August 2010. However, G class rated models will still exist with our proposal.		

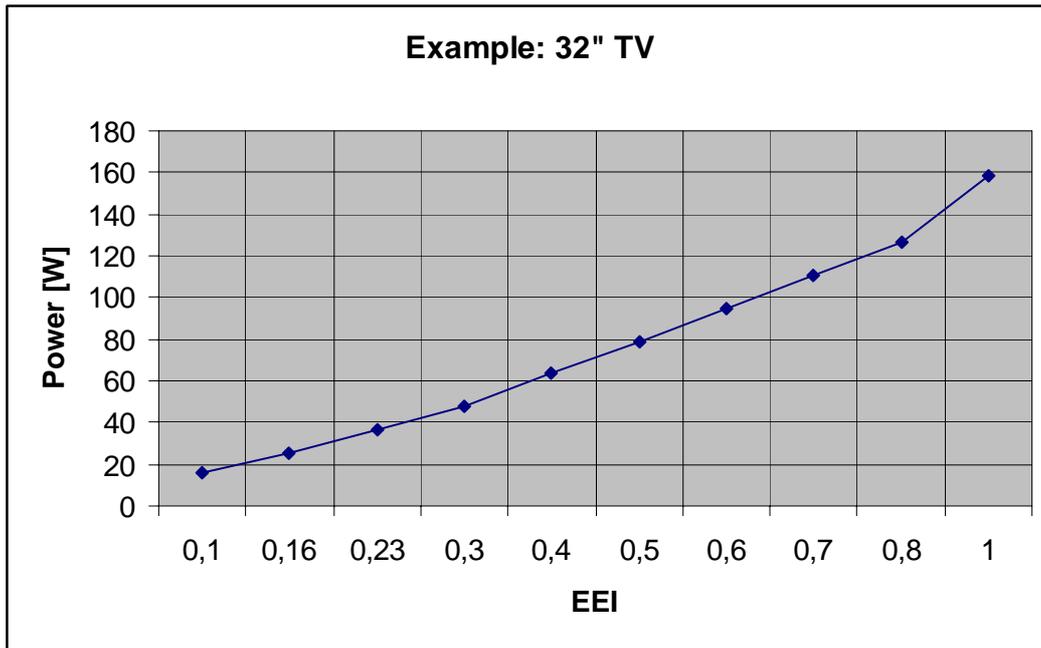


Figure 1. The distribution of all classes for a 32" TV, according to the Swedish proposal

