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ENERGY LABELLING FRAMEWORK PROPOSAL: DOES AND DON'TS FOR SUCCESS AND CREDIBILITY

In the view of the decisive trilogue meeting on the Commission proposal for a new Energy Labelling Framework Regulation to be held on 21 March 2017, the undersigning organisations recall the joint priorities of the affected industry in the interest of preserving the success, credibility and overall workability of this crucial EU policy instrument.

CECED, DIGITALEUROPE, LIGHTINGEUROPE and ORGALIME believe in “Energy Efficiency First” and Consumer Empowerment, including through reliable, simple and easy to understand energy efficiency information. Energy Labelling is one essential pillar in the EU’s energy policy acquis that no doubt delivered convincing results and where Europe translated into clear added value for its citizens as much as for the affected industry and the environment.

The label should continue to promote the progress achieved in energy efficiency and foster sustainable development and cost efficient innovations. These are essential for our industry to continue to develop in the EU and to provide new jobs, as we are doing today.

Therefore, we call on the European Institutions to take into account the following boundaries for any final deal on the energy labelling framework proposal:

- **PRODUCT DATABASE**

Notwithstanding improvements made throughout the legislative process, industry remains reserved against the introduction of a product database as a means to resolve (undisputed) market surveillance weaknesses.

Even if all numbers that are in the database appeared to be correct, this would not mean that all the products sold on the EU market were compliant. Some products may even have not been entered in the database deliberately. How this will be effectively controlled remains an open question to date. Responsible market operators need to be supported and a level playing field ensured.

Therefore, the real added value can only be provided by physical checks of products and no database could be an effective replacement for such market surveillance activities. On the contrary, market surveillance authorities would now also have to dedicate resources into verifying database entries in addition to physical checks of products.

In addition, the proposal for product database creates negative consequences and disproportionate risks for the EU manufacturers, including the risk of losing confidential business data, technological know-how and excellence to the detriment of Intellectual Property Rights. Requiring manufacturers to upload technical documentation is particularly sensitive in this respect.

Data security of any database and protection of the Intellectual Property Rights of European companies is a must.

- **RESCALING**

We support the proposal that rescaling should take place when justified by technological progress and population in the top classes. It should retain consumer confidence, sufficient promotion of top energy efficient products, sufficient stability and room for case by case implementation. We also support that the label should be stable for at least 10 years after rescaling.

Each rescaling/relabelling creates confusion for the consumer and market surveillance authorities. Delivering two labels, old and new, for each product during a transition phase is unrealistic at the level of practical implementation. It would require disproportionate efforts in retail shops to relabel, it risks giving rise to confusion for market surveillance and shop-owners and adds significant burden to the manufacturer where double testing would be needed.

The speed of technical progress however differs from product group to product group. Therefore, with regards to rescaling, a realistic timeline for manufacturers to adapt to the new energy label determined case by case for each product group appears indispensable to us. In addition, setting constraints on when and how products, which were legally placed on the market before and during the four-month “two-label period”, can be sold, places a disproportionate burden on both, suppliers and dealers.

- **A SIMPLE AND COMPREHENSIBLE LABEL**

A simple and comprehensible label should be established that is not overburdened by “supplementary information”, which does not contribute to providing clear and relevant information to consumers. The label should remain focused according to the title of this Regulation: “Setting a framework for Energy Labelling”.

IN CONCLUSION

The joint implementation of the existing Energy Labelling and Ecodesign Framework Directives are to realise almost half of the EU’s 2020 energy efficiency target, thus energy savings of around 175 Mtoe by 2020, equalling a saving of €465 per year on household energy bills for consumers.

We call on the European Institutions to support European industries through regulation that combines environmental with economic ambition, ensures data security in an increasingly digital environment, and ensures fair competition and consumer protection by combatting free riding.

CECED represents the home appliance industry in Europe. The total annual turnover of the industry in Europe is €50bn. Total employment as a result of the presence of the sector is approximately 1 million jobs. The sector contributes €1.4bn to research and development activities in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Groupe Atlantic, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. CECED's member Associations cover the following countries: Austria, Baltics, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, the Netherlands, Norway, Poland, Portugal, Romania, Russia, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom. Please visit our website for more information: <http://www.cec.eu>

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 61 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

LightingEurope is the industry association that represents the lighting industry in Europe. We are the voice of more than 1000 lighting companies who employ more than 100000 people over Europe. Our daily mission is to advocate and defend the lighting industry in Brussels while reconciling it with ongoing EU policy aims. In doing so, we are dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort and the health and safety of consumers. <http://www.lightingeurope.org/>

ORGALIME, the European Engineering Industries Association, speaks for 40 trade federations representing the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs some 10.9 million people in the EU and in 2015 accounted for more than €1,900 billion of annual output. The industry accounts for over a quarter of manufacturing output and a third of the manufactured exports of the European Union. <http://www.orgalime.org>