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**COMMISSION STAFF WORKING DOCUMENT**

**STAKEHOLDER FEEDBACK**

**on the**

**Proposal for a Regulation of the European Parliament and of the Council setting a  
framework for energy efficiency labelling and repealing Directive 2010/30/EU**

{COM(2015) 341}

## ***Introduction***

On 15 July 2015 the Commission made a proposal to the European Parliament and the Council for a Regulation setting a framework for energy efficiency labelling and repealing Directive 2010/30/EU.<sup>1</sup> In line with the Commission's Better Regulation Agenda<sup>2</sup>, stakeholders were given the opportunity to submit feedback on the proposal through the Your Voice website.<sup>3</sup>

The feedback received has been published on the European Commission's website<sup>4</sup> and summarised in this document, which aims to help and inform the European Parliament and the Council when they debate the Commission's proposal.

The Commission received ten contributions, all from non-governmental organisations (NGOs). Seven were from NGOs representing consumers' and/or citizens' interests, two were from NGOs dedicated to energy efficiency and one joint contribution was received from ten environmental NGOs. The responses came from Belgium (3), Germany (2), the United Kingdom (2), Greece (1), Portugal (1) and Sweden (1).

## ***Overall feedback***

All respondents welcome the proposal and support the Commission's decision to revise energy labelling. Several consumer NGOs add that the proposal is an excellent starting point for restoring the effectiveness of energy labelling and note that it will help meet the EU's goals of tackling climate change and improving energy security. Environmental NGOs consider the proposal a robust basis for future energy labelling, providing practical solutions to the problems identified during the review of energy labelling.

## ***A-G label and rescaling***

All respondents welcome scrapping the 'A plus' classes on the energy label and re-introducing the A to G scale. They point to mounting evidence that consumers find having A+++ less compelling than having an A at the top of the scale. They support periodically rescaling labels and re-labelling products on the market within short and limited transition periods.

Consumer NGOs point out that it is crucial to re-label all products once a new label has been introduced in order to avoid confusing consumers and to prevent fraud. They specifically support the proposal's suggestion for labels not to show classes that are no longer applicable due to Ecodesign regulations on the product. Environmental NGOs suggest showing the full energy label on all manufacturers' promotion materials, whereas the proposal requires only the energy class to be shown.

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<sup>1</sup> COM(2015)341.

<sup>2</sup> COM(2015)215.

<sup>3</sup> <http://ec.europa.eu/yourvoice/>

<sup>4</sup> <http://ec.europa.eu/transparency/regdoc/?fuseaction=feedbackreportpdf&docId=3079031>.

### ***Product database and market surveillance***

All respondents support setting up a product registration database to assist market surveillance authorities and provide market information to the Commission and to consumers. Respondents expect the cost of registration to be low.

Energy efficiency and environmental NGOs particularly welcome the Commission's support for cooperation among national authorities and for standard EU-wide safeguard procedures for dealing with non-compliant suppliers. Environmental NGOs suggest introducing procedures for dealing with non-compliant retailers. They also suggest publicly naming and shaming non-compliant suppliers, requiring surveillance authorities to consider notifications of potential non-compliances by non-governmental organizations, and obliging Member States to draw up market surveillance plans and issue annual reports.<sup>5</sup>

### ***Consultation and working plan***

Consumer NGOs are in favour of testing the design and content of labels for specific product groups on consumers, to ensure they are easily understood.

Environmental NGOs welcome the introduction of a working plan for the energy label. They suggest that the plan include a precise timetable for completing measures for specific product groups.

### ***Absolute energy consumption and supplementary information***

Consumer NGOs welcome the provision in the proposal to consider, when developing delegated acts, requiring larger appliances to meet higher energy efficiency levels in order to qualify for a given energy class. They consider it a positive step towards avoiding a situation in which larger appliances unintentionally qualify for a higher energy efficiency class than similar, smaller appliances. Environmental NGOs think it is disappointing that this is merely a possibility, not a requirement, and believe improvement is needed.

Several respondents remark that testing standards should better reflect consumer behaviour. One energy efficiency NGO adds that the same requirements should apply to different technologies so that the label brings real transparency to consumers and helps them identify the most efficient models.

Consumer NGOs welcome the fact that preparatory studies will look into the possibility of providing information on durability for specific product groups. Environmental NGOs say the proposal should not rule out other ways to improve resource efficiency, such as displaying information on the legal warranty period and on how easily the product can be repaired.

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<sup>5</sup> Regulation (EC) No 765/2008 of the European Parliament and of the Council setting out the requirements for accreditation and market surveillance relating to the marketing of products (OJ L 218, 13.8.2008, p. 30) (which Article 5(1) of the proposal cross-references), addresses complaints, Member States' market surveillance programmes and Member States' reviews and assessment reports on the functioning of surveillance activities.