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Towards A new Energy Labelling Framework: Industry Priorities for Finalising the Draft Report of Rapporteur Tamburrano

The European Parliament's ITRE committee is currently finalising its report on a new energy efficiency labelling framework. Orgalime as the voice of European energy efficiency technology providers calls on members of the European Parliament to strive for a committee report that further rewards top performers for their considerable investments in energy efficiency research through a **simple, stable, credible and trustworthy energy label for consumer products**.

We particularly mind setting in place a **future framework that supports European global energy efficiency technology leadership** through:

- a preservation of European Intellectual Property Rights, confidential business data and know how.
- a determined market surveillance and enforcement programme that effectively combats free riding and unfair competition.
- a preservation of the functioning of the Internal Market for products with fully harmonised requirements at EU level.
- a sufficiently generic and flexible EU framework that allows taking account of the inherent different product characteristics and efficiency potentials of the various products in scope according to their specific impact assessment studies.
- a maximum of legal stability and planning certainty.
- a maximum of consumer confidence in the label.

In concrete terms, we kindly seek the support of MEPs for the following way forward:

- **Improving market surveillance through physical checks of products via a new transparency platform** that stirs Member States' enforcement activities and more cooperation will be by far more effective than a product database of a public interface and a compliance interface. These latter will be costly and bureaucratic, including for Member States, as they would add on additional burden to their already not accomplished national market surveillance and enforcement work. In addition, industry continues to seriously challenge the proposal for a database against the risk of releasing confidential business information and know how – European energy efficiency intelligence and Intellectual Property Rights must not be compromised. We stress that the real added value of market surveillance which we require comes from physical checks only, that no database can replace.
- **Rescaling** should be triggered through technology advancement: it should happen when duly justified by product specific impact assessments and the top class is saturated. The label should be stable for at least 10 years after a rescaling.

Orgalime, the European Engineering Industries Association, speaks for 42 trade federations representing the mechanical, electrical, electronic, metalworking & metal articles industries of 24 European countries. The industry employs some 10.3 million people in the EU and in 2014 accounted for more than €1,800 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.

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The framework regulation should not require classes A & B to be empty for all product groups, but allow this to be determined on a case by case basis in the individual product specific implementing measures.

- **The simpler the transition period, the higher the acceptance of the label** will be: There should be one specific moment in time after which new products placed on the market need to bear the new label rather than weeks of double labelling (old and new). Products legally placed on the market need to be allowed to bear the existing label so as to prevent retroactive obligations, retesting of products, or requirements on dealers to request new labels for products in their stocks.
- Existing product specific implementing measures already set review dates case by case: **No additional, conflicting implementation timelines** should be established, such as through possible new provision on the working plan.
- **A coherent communication framework** that ensures consumers fully understand that it is the label that has been rescaled but not the product having become less efficient: **New and old labels should visually clearly differ from each other.**
- The energy efficiency label should not be overburdened with supplementary information or a label of “Made in EU”.
- Member States should not be given the possibility to introduce or maintain national energy labels where harmonised at EU level.
- Harmonised standard to be developed should not be required to be available free of charge, as it would upset the current financing structure of European standardisation organisations.

As a true believer in energy efficiency, Orgalime hopes that the ITRE Committee will see fit arrive at a report that combines environmental with economic ambition so that the global competitiveness and leadership position of European technology manufacturers can be maintained.

For further information, please contact:

Sigrid Linher, Energy and Environment Manager: sigrid.linher@orgalime.org



The European Engineering Industries Association

ORGALIME aisbl | Diamant Building | Boulevard A Reyers 80 | B1030 | Brussels | Belgium
 Tel: +32 2 706 82 35 | Fax: +32 2 706 82 50 | e-mail: secretariat@orgalime.org
 Ass. Intern. A.R. 12.7.74 | VAT BE 0414 341 438