



Members of the European Parliament
European Parliament
Rue Wiertz
B – 1047 Brussels

Brussels, 4 May 2009

Energy labelling

Dear Member of the European Parliament,

With a view to the upcoming votes of the European Parliament on the draft Podimata report and draft energy labelling implementation measures for refrigerators and TVs, Orgalime is contacting you today to request your support for resolving, what in our view, are major issues in the establishment of the European Parliament's opinions on these matters.

1. Draft Podimata report on recast proposal for Energy Labelling Directive 1992/75/EC COM(2008)0778 final – 2008/0222(COD)

Orgalime as the European association of producers of the whole range of equipment that is today covered by this directive is particularly concerned with compromise amendments VII and VIII and amendments 7, 48 and 49 that propose a close A to G labelling scheme for the future and a mandatory three years validity period for the duration of label classifications.

- While Orgalime agrees that the main elements of today's label should be retained as the basis for the future label, a closed A to G scale would remove today's possibility to clearly identify top end products available on the market for the consumer. We do not believe that the recast should be the vehicle to reduce the level of information available to the consumer already today, nor a means to punish proactive players in the market. **Therefore, we request members of the European Parliament to reject compromise amendment VII and amendment 48. Amendment 62 could be supported.**
- Orgalime is also supportive to establishing dynamic labelling requirements evolving over time according to business impact assessment. However, stipulating at the level of a framework directive that the duration of labelling classifications shall not exceed a certain time limit risks overlooking the diversity of innovation paths and investment cycles for the many different product categories to be included in the scope of the directive in the future.

The European Engineering Industries Association

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Setting a somewhat artificial “one size fits all” validity period, which would be mandatory for any product group to be targeted in the future, is inappropriate since it would not allow taking into account technical evidence and market realities for a given product group. The consequences, however, can be severe for the competitiveness of European producers of energy using products. ***We consequently propose that the framework directive should continue to require implementation measures for individual product groups to determine the precise period of validity based upon scientific, technical evidence and market realities. We kindly ask you to reject compromise amendment VIII and amendments 49, 54, 55, 57 and 58.***

2. Resolutions for energy labelling requirements for refrigerators and TVs

In addition to the draft Podimata report, the European Parliament will also soon be voting on the **draft Resolutions for energy labelling requirements for refrigerators and TVs established under the existing energy labelling directive 1992/75/EC.**

While we understand the sensitivity of requesting the European Parliament to adopt its first reading position on the recast proposal and revised energy labelling requirements for such equipment under legislation that is currently reviewed, we believe that it would be a missed opportunity to await the outcome of the recast of the framework directive and not apply existing valuable tools that could meanwhile already help raising consumer awareness and driving markets towards more energy efficient products.

A rejection of the Commission’s respective draft implementation measures, as proposed by the ITRE draft resolution, would in our view, risk delay a more rapid market transformation towards more energy efficient products, which the European Parliament has consistently called for.

Considering the increased link between the Energy Labelling and Eco Design Directive, we are concerned that a rejection of the draft labelling implementation measures would at the same time weaken the further implementation process of the Eco Design Directive, which the European Parliament has just decided to extend to energy related products. This, we believe, would be a wrong signal for the market in general, while unnecessarily undermining the efforts of those companies of our industries that have proactively engaged and invested in the development and production of energy efficient products.

We therefore call upon Members of the Parliament to reject the draft ITRE Resolution and approve the Commission’s draft implementation measures for energy labelling of refrigerators and TVs based upon the existing directive 1992/75/EC.

We would once again like to stress the commitment of Orgalime industries to help achieving the EU’s ambitious energy and climate change objectives, we sincerely hope that the European Parliament will see fit to come forward with a position on the pending energy labelling proposals that strives for a win-win situation for the environment, consumers and industry alike.

We remain available for any further information that you may wish to obtain in the meantime.

Yours sincerely,



Adrian Harris
Secretary General