

A review of the range of activity throughout Member States related to compliance with the EU Energy Label regulations in those countries

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- UK Department for Environment, Food and Rural Affairs Market Transformation Programme

Table of Contents

1 Introduction	2
1.1 Disclaimer	2
2 Summary	3
2.1 Compliance Problems Regarding Label Display in the Shops	3
2.2 Compliance Problems Regarding Test of Appliances	3
2.3 Key Barriers on Successful Implementation of the EU Energy Labelling Scheme and Options for Reducing the Barriers	4
3 The EU Energy Labelling of Domestic Appliances	5
3.1 Introduction of the Energy Labelling Scheme	5
3.2 Summary of the Label Scheme	5
3.3 Market Transformation Results	7
3.4 Problems in Compliance and in Achieving Real Energy Savings	7
3.5 Potential Barriers to Energy Efficiency for Household Appliances	8
3.6 Planned Revision of the Framework Directive	9
4 Presentation of the Study	10
4.1 Aim of the Study	10
4.2 Methodology	10
4.3 Main Project Phases	11
5 Current Status Based on the Interviews	14
5.1 Display of Labels	14
5.2 Test of Appliances	16
5.3 Information Campaigns and Educational Programmes	19
5.4 Activities and Views by the Consumer Organisations	20
6 Key Barriers on Successful Implementation of the EU Energy Labelling Scheme and Options for Reducing the Barriers	22
6.1 Key Barriers on Successful Implementation of the Energy Labelling Scheme	22
6.2 Options for Reducing the Barriers	24
7 Conclusions	28
Annex A List of Directives and Technical Standards	
Annex B References	
Annex C Questionnaires	

1 Introduction

The present report has been prepared under the ANEC, the European consumer voice in standardisation, and Defra MTP (the Market Transformation Programme under the UK Department for Environment Food and Rural Affairs) funded project “A review of the range of activity throughout Member States related to compliance with the EU Energy Label regulations in those countries”.

The study and the reporting have been carried out by the consultancy company Viegand & Maagøe (www.vmas.dk) (previously named Jan Viegand Analysis & Information).

Ms Nina Klemola, ANEC, and Mr Chris Evans, Defra MTP, was Project Manager and Project Advisor, respectively. The draft final report was presented to members of the ANEC Environment Working Group. We have received valuable comments from Ms Klemola, Mr Evans and the members of the Environment Working Group.

The study has been based on interviews with a number of representatives from EU Member State authorities, related organisations and consumer organisations. Without this contribution, the study could not have been performed.

We would like to express our grateful thanks to all persons, who have contributed to this study.

1.1 Disclaimer

We present data and information that we have collected during the interviews, which have covered a large range of areas. Most of the data and information have not been collected through official reports and therefore may not be fully correct in all quantitative details in spite of being qualitatively correct.

It should also be noted that the study approach has not been to collect and present detailed data on each Member State, but rather to get the overall picture of the situation for EU based on selected Member State cases.

2 Summary

The review is based on interviews with 11 governmental bodies in nine Member States and six consumer organisations in six Member States.

It disclosed several compliance problems of the EU energy labelling scheme, which may result in reduction of consumer confidence and involvement and eventually hampering a successful implementation of the label scheme and realisation of energy savings.

2.1 Compliance Problems Regarding Label Display in the Shops

The main compliance problems regarding label display in the shops are:

- Only three out of nine Member States interviewed could provide centrally reported figures of the shop inspection activities.
- In two Member States, up to 40 percent of appliances are regarded as unlabelled, while the remaining Member States report 20 to 30 percent unlabelled appliances. These figures might even be higher if all details regarding correct label display are considered.
- Five out of nine Member States interviewed do not follow up on compliance problems in the shops.
- Only one Member State reported further enforcement actions via the legal system.
- The situation in the new Member States state shows comprehensive compliance problems in display of labels in the shops.

2.2 Compliance Problems Regarding Test of Appliances

The main compliance problems regarding test of appliances are:

- Three out of nine Member States do not test appliances for enforcement purposes and only two do many tests and report them centrally. The reason reported is the high costs of the tests and re-tests.
- A few consumer organisations carry out tests but the tests are not carried out according to the EU label test standards, because the consumer organisations do not consider the test as suitable for the consumer interest and because of high test costs.
- Enforcement actions are either not taken or not reported in seven Member States.
- A key problem reported is that a large proportion of appliances (in some Member States one third of the tested appliances) only meet their label because a 15 percent tolerance on the measured energy consumption is allowed according to the test standards (or 10 percent as an average of three re-tests if measured consumption is greater than stated value plus 15 percent).

- Information sharing among energy authorities and related organisations seems to be extremely low all over the EU. In some major Member States, where the implementation of the labelling scheme is decentralised to local authorities, national information sharing is reported to be non-existent.

2.3 Key Barriers on Successful Implementation of the EU Energy Labelling Scheme and Options for Reducing the Barriers

The compliance problems observed can be summarised in a number of serious barriers towards a successful implementation of the EU energy labelling scheme including:

- Low overall priority by the governments and the energy authorities.
- High costs of testing that is difficult to finance for the regulatory bodies.
- Low enforcement of sanctions in case of irregularities.
- Low or no coordination and information sharing between and within the Member States.
- Lack of a clear, consistent and correct energy class labelling of the products.

Various options for reducing these barriers are provided in the report including:

- Increase obligations of the Member States regarding a specific number of inspections of the point of sales; a specific number of appliances to test per year and information activities.
- Increase cooperation and information sharing between and within Member States bilaterally or multilaterally regarding e.g. sharing test reports and manufacturer dialogue; coordination of tests and enforcement actions and of sanctions and use of common test laboratories to reduce test costs.
- Update the directives and the technical standards including revision of the scale; reducing or removing the tolerances allowed today; accommodating new energy consuming functions such as standby; basing the standards on current consumer behaviour, and reducing the complexity of the test standard and reporting procedures.
- Require the manufacturers to take more obligations regarding labelling of the appliances and third party testing of the products.
- Increase campaigns and information activities by more exchange of information between Member States and by allocating central funds for such activities.

3 The EU Energy Labelling of Domestic Appliances

3.1 Introduction of the Energy Labelling Scheme

In 1995, the EU compulsory energy labelling of domestic appliances was introduced in shops. Cold appliances were the first type of appliance to be labelled, while other appliances and lamps were included in the label scheme in the following years.

The labelling scheme was introduced to counteract the increase in energy consumption of household appliances by increasing consumer awareness on the real energy use.

The labelling scheme comprises the following household appliances, even where these are sold for non-household uses:

- Refrigerators, freezers and their combinations
- Washing machines
- Electric tumble driers
- Combined washer-driers
- Dishwashers
- Lamps
- Air-conditioners
- Electric ovens

The regulative background is:

- The framework council directive 92/75/EEC of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances
- Implementing directives introduced from 1994 to 2003 by for each type of appliance comprised (see above)
- Technical standards for each type of appliances

The complete list of directives and technical standards can be found in Annex A.

3.2 Summary of the Label Scheme

Household appliances offered for sale, hire or hire-purchase must be accompanied by a label and a fiche in product brochures providing information relating to the energy consumption. If the appliances are offered by catalogue or by other means whereby the potential customer is unable to see the appliance displayed, the essential information contained in the label or fiche must be provided to the potential customer before purchase.

The main responsibilities are as follows:

- Point of sales (dealers, retailers etc.):
 - Attach the specific labels to household appliances displayed.
- Suppliers:
 - Provide labels to point of sales free of charge.

- Provide a product fiche, contained in all the brochures relating to the product or, where these are not provided, in all other literature provided with the appliance.
- Establish technical documentation available for inspection purposes. Suppliers are responsible for the accuracy of the information contained in the labels and fiches that they supply and are deemed to have given their consent to the publication of the information. The technical documentation should be sufficient to enable the accuracy of the information contained in the label and the fiche to be assessed. This documentation must include:
 - a general description of the product;
 - the results of design calculations, where necessary;
 - test reports; and
 - where values are derived from those obtained for similar models, the same information for these models.

The supplier shall make the documentation available for inspection purposes for a period ending five years after the last product has been manufactured.

- Member States:
 - Ensure compliance by suppliers and point of sales of the directive.
 - Prohibit the display of other labels etc. relating to energy consumption which do not comply with the requirements of the directive and which are likely to cause confusion.
 - Ensure launch of educational and promotional information campaigns aimed at encouraging more responsible use of energy by private consumers.
- Energy Labelling Committee (members from Member States and chaired by the European Commission)
 - Give its opinion on draft of measures submitted by the European Commission to the Committee.

The implementing directives specify:

- the exact definition of the type of appliances to be included;
- the measurement standards and methods to be used in obtaining the information relating to energy consumption;
- details of the technical documentation required;
- the design and content of the label;
- the location where the label shall be fixed to the appliance;
- the content, and where appropriate, the format of the fiche, on which must be included the information appearing on the label; and
- the information details to be provided in the case of mail-order offers for sale.

The test standards specify, inter alia, how the energy consumption should be measured and the maximum tolerances on the measured value.

For most of the appliances, the tolerance is stated as follows: “The energy consumption measured shall not be greater than the value declared by the manufacturer plus 15 %. If the result of the test carried out on the first appliance

is greater than the declared value plus 15 %, the test shall be carried out on a further three appliances. The arithmetical mean of the values of these three appliances shall not be greater than the declared value plus 10 %.”

For ovens, the energy consumption with a load, the tolerance on the first appliance is 10 % plus 0.040 kWh and 6 % plus 0.040 kWh on the mean of the further three appliances.

3.3 Market Transformation Results

The introduction of the labelling scheme has resulted in a significant market transformation towards A labelled appliances apart from tumble driers, where requirements to qualify for energy class A typically require the use of heat pump technology, increasing production costs substantially.

An example of the market transformation achieved can be seen in a recent survey¹ that compares the market share for different energy labels for household appliances in Sweden, Italy, Denmark and the Netherlands over a five-year period. It shows a considerable transformation of the market towards a high proportion of A labelled appliances.

An example of this for refrigerators is illustrated in Table 1 below.

Year	Sweden	Denmark	Italy	The Netherlands
2000	15%	-	15%	54%
2001	32%	45%	25%	70%
2002	48%	60%	37%	71%
2003	63%	69%	45%	88%
2004	78%	83%	53%	87%
2005	85%	89%	62%	90%

Table 1: Market share of products in energy class A or better in Sweden, Italy, Denmark and the Netherlands¹.

3.4 Problems in Compliance and in Achieving Real Energy Savings

In spite of the market transformation impact achieved, there are still areas where surveys have indicated varying levels of activity and degrees in compliance and problems in achieving real energy savings.

One example of compliance problems is that only in October 1998, almost four years after the scheme, was the label directive on cold appliances implemented in all Member States. Furthermore, two and a half years after the directive should have been fully implemented, only 56 percent of cold appliances in the shops across the EU were fully labelled².

The problems of achieving real energy savings are based on the fact that the test standards allow up to 15 percent in tolerance, when measuring real energy consumption and comparing it with the declared value on the label. Surveys have found that many appliances only complied with the stated energy class when considering the tolerance.

¹ “Ten Years of Energy Labelling of Domestic Appliances 1995–2005”. Swedish Energy Agency. March 2006.

² “Rhetoric and reality in energy efficiency policy”. ECEEE Summer Study. Tina Fawcett. Environmental Change Unit, University of Oxford. 1999.

One example is energy tests carried by the UK Market Transformation Programme during 2003 and 2004³. The tests comprised 66 cold appliances, dishwashers and washing machines labelled as A. The results showed:

- 10 appliances (15 percent): Energy consumption measured was 15 percent or greater than claimed energy. These appliances were thus incorrectly labelled.
- 42 appliances (64 percent): Measured energy class worse than claimed energy class, but measured consumption within 15 percent of claimed consumption. These appliances were correctly labelled in spite of claiming a higher energy class than measured energy class.
- 14 appliances (21 percent): Measured energy class in claimed energy class.

3.5 Potential Barriers to Energy Efficiency for Household Appliances

The study focuses on the compliance problem as a barrier to energy efficiency. It should however be noted that realising real energy savings in household appliances rely on a chain of elements that all will impair the achieved results if not handled correctly.

This chain of elements is summarised in Table 2.

³ “BNXS40: Reducing the Impact of Tolerances within the Current EU Energy Labelling Scheme”. Briefing Note 418. Market Transformation Programme. June 2006.

Element	Potential Barriers	Key Players
Development of energy efficient products	Products may potentially be developed aiming at being in an energy efficient label class and having low measured consumption following the test standard rather than low real life consumption.	The manufacturers
Test standard	The standard might not fully simulate a typically usage. E.g. standby consumption is not included in the standard and the consumers' washing behaviours have changed since the standard was agreed.	The European Commission, the Member States and stakeholders
Manufacturer test measurement	The manufacturer may not perform the product tests fully according to the test standard.	The manufacturer
Product energy class categorisation	The manufacturer may not place the product in the correct energy class according to the test results combined with the product characteristics.	The manufacturer
Labelling of product	The point of sales may not attach the appropriate label as described by the directive.	The point of sales
Market functionality	There may be market deficiencies regarding transparency, availability and pricing of efficient products compared to other products etc.	The manufacturer, the point of sales, energy authorities and consumer organisations
Consumer purchase	The consumer may not have sufficient knowledge and awareness to consider purchasing efficient products and to do the actual purchase.	The consumer, the manufacturer, the point of sales, energy authorities and consumer organisations
Use and maintenance of product	The consumer may not use and maintain the product correctly in order to achieve the savings, e.g. by having a too low temperature in the cold appliances.	The consumer, the manufacturer, the dealer, energy authorities and consumer organisations

Table 2: Chain of elements influencing the realisation of energy savings.

3.6 Planned Revision of the Framework Directive

The European Commission is planning a revision of the framework directive. In the Action Plan for Energy Efficiency⁴, the European Commission states:

“To increase the informational value of the EU labelling scheme, the Commission will revise, beginning in 2007, Framework Directive 92/75/EC to enlarge its scope, if this is shown to reinforce its effectiveness, to include other energy-using equipment, such as commercial refrigeration. The existing labelling classifications will be upgraded and re-scaled every 5 years or when new technological developments justify it, based on eco-design studies, with a view to reserve A-label status for the top 10 – 20 % best performing equipment.

At Member State level, the eco-design requirements and the labelling scheme need to be implemented, monitored and enforced. The labelling scheme will, at the same time, provide a highly useful instrument to support national policies, including information campaigns, rebate schemes, public procurement guidelines and white certification schemes.”

⁴ “Action Plan for Energy Efficiency: Realising the Potential”. Communication from the commission. COM(2006)545 final. 19.10.2006

4 Presentation of the Study

4.1 Aim of the Study

The aim of the project is to:

- Identify reasons why different Member States have different levels of activity.
- Assess whether the test standards inhibit regulatory bodies to enforce regulation.
- Assess the level of consumer organisation interest and identify any reasons why different organisations place different levels of activity in this area.
- Examine whether implementing regulations have areas of concern for regulatory bodies.
- Assess the impact on the consumers regarding their purchase and use of the products.

As such, the study addresses the core elements of the framework directive, i.e. that each individual Member State shall take all necessary action to ensure:

- That appliances are labelled correctly at point of sales.
- That appliances are tested to ensure a correct label is used.
- That information campaigns and educational programs are implemented.

A cornerstone in implementation of the directive is that the individual Member States shall take enforcement action if for example display of labels is not satisfactory or if an appliance through tests shows higher energy consumption than indicated by the label attached to the appliance.

The study will identify to which extent such control activities are carried out and – if compliance problems occur – whether necessary action is taken and – if not – why compliance with the directive is not secured.

4.2 Methodology

Presently, no comparative status on how successful each individual Member State is in implementing the EU Energy Labelling Directive 92/75/EC is available. This was a challenge, as the project needed to be based on the current situation before addressing the specific and qualitative problems occurring in implementation of the directive and options for solving the problems.

Therefore, it was chosen first to do initial interviews for achieving an overview of the situation in a number of Member States. A status document on the situation was prepared together with a document on barriers and options to reduce the barriers. These documents were the basis for the qualitative case-oriented interviews.

4.3 Main Project Phases

Screening and Desk Study

A number of surveys and investigations have been carried out throughout the Member States regarding implementation of the labelling directives and we have collected and studied a number of these, which include:

- A recent survey on display of labels in Italy, France and Spain.⁵
- A ten year status on the labelling scheme in Sweden comparing the market transformation in Sweden, Italy, Denmark and the Netherlands.⁶
- A survey on the implementation of the labelling scheme with special attention to the Czech Republic, Bulgaria, Poland, Lithuania and Romania.⁷
- A number of papers, articles and other inputs on different elements of the labelling scheme from various sources.

See the reference list in Annex B.

Questionnaires and Interviews

We chose to base the information collection primarily on guided interviews rather than on the filling in of questionnaires, because our experience is that it is easier to get potential participants to commit, and more information can be obtained.

Target groups for the interviews were governmental bodies responsible for implementing the directives in each individual Member State and consumer organisations working with test of white goods for providing information to the consumers on the tested products and thereby guiding them for the purchase.

The governmental bodies were selected by the consultancy team together with ANEC and Defra MTP. The consumer organisations were mainly selected by ANEC and Defra MTP. All interviewed candidates were offered confidentiality.

The organisations and persons interviewed are the following:

- 11 governmental bodies in nine Member States:
 - Austria: BMWA (Federal Ministry of Economics and Labour)
 - Denmark: Danish Energy Authority
 - Denmark: Energy Label Secretariat
 - Finland: Ministry of Trade and Industry
 - France: Ademe on behalf of Ministry of Economy, Finance and Industry
 - Germany: Federal Ministry of Economics and Technology

⁵ "Environmental and Energy Labelling on Electrical Household Appliances. The Situation Today, the Road Ahead, and What Consumers Want". CLCV, Adiconsum, European Research into Consumer Research and CECU. 2004-2005.

⁶ "Ten Years of Energy Labelling of Domestic Appliances 1995–2005". Swedish Energy Agency. 2006.

⁷ "Overview of Sales and Trends for Main Appliances in Year 2004". GfK. 2005.

- Greece: Ministry of Development
- Italy: ENEA
- The Netherland: SenterNovem
- The Netherlands: FIOD/ECD
- United Kingdom: Defra (Department for Environment, Food and Rural Affairs)

An additional Member State was selected, but it was not possible to get a response from the responsible body within the timeframe of the project.

- Six consumer organisations in six Member States:
 - The Netherlands: Consumentenbond (Consumer Association)
 - Denmark: Forbrugerrådet (Consumer Council)
 - Germany: Energy & Environment
 - United Kingdom: WHICH?
 - France: CLCV
 - Finland: Motiva

In addition, an independent consultant, formerly with Danish Energy Authority and Danish Electricity Saving Trust, was interviewed.

Information was also provided by SEVEN, on the CEECAP project (Central and Eastern European Countries Appliance policy)⁸ supported by the EU Intelligent Energy Europe. Country reports and other information on Czech Republic, Bulgaria, Poland, Lithuania and Romania were included in the present study. See the list of reports in Annex B.

Main areas for interviews with regulatory bodies were:

- National implementation of the labelling scheme
- Current status regarding the use and display of labels
- Current status regarding testing
- Current status regarding information campaigns
- Comments on problems, barriers and drivers in implementing the label directive

Main areas for interviews with consumer organisations were:

- National implementation of the labelling scheme
- Current status regarding the use and display of labels
- Current status regarding testing
- Current status regarding information campaigns
- Consumer interest in the labelling scheme as assessed by the organisation
- Priority of the labelling scheme in the organisation
- Comments on problems, barriers and drivers in implementing the label directive

Special attention was given to possible enforcement actions, i.e. which actions are taken by the authorities, if labels are not displayed correctly and if appliances do not meet the energy class etc.

⁸ www.ceecap.org

In Annex C, the questionnaires are enclosed.

Thesis and Non-thesis

Based on the interviews, a status document on the situation in the interviewed Member States was prepared together with a document on barriers and options to reduce the barriers. These documents were the basis for the qualitative case-oriented interviews.

In-depth Case Interviews

The detailed interviews were carried out with Denmark, France, Germany and the Netherlands. One more Member State was selected, but it was not possible to carry out this interview within the timeframe of the project.

Conclusions and Reporting

The draft conclusions were presented to and discussed with members of the ANEC Environment Working Group at a meeting held in Brussels on 29 November 2006. Based on the comments at the meeting and comments by ANEC and Defra MTP on the draft report, the final report was prepared.

The project was initiated in June 2006 and finalised in January 2007.

5 Current Status Based on the Interviews

In this chapter, we provide the results of the interviews and the assessed information collected regarding:

- Display of labels
- Test of appliances
- Information campaigns and educational programmes
- Activities by the consumer organisations

The main part of the data and information has been collected during the interviews, which have covered a large range of areas. Most of the data and information have not been collected through official reports and therefore may not be fully correct in all quantitative details in spite of being qualitatively correct.

It should also be noted that the study approach has not been to collect and present detailed data on each Member State, but rather to get the overall picture of the situation for the EU, based on selected Member State cases.

5.1 Display of Labels

In Table 3 below, the current status on display of labels is presented.

Member State	Shop inspections 2005	Reported enforcement action
Finland	250 shops inspected	Compliance letters issued
Denmark	100 shops inspected	Compliance letters issued Control visits carried out Police reports filed
Germany	Yes – not reported centrally*	Not reported centrally
United Kingdom	Yes – not reported centrally*	Not reported centrally
The Netherlands	700 shops inspected	Compliance letters issued
France	A number of shops inspected through a study**	No actions
Austria	Yes – not reported	Compliance letters issued
Italy	Yes – not reported**	Not reported
Greece	Yes – report to be presented	Not reported
New Member States: - Czech Republic - Bulgaria - Poland - Lithuania - Romania	Inspections initiated in Bulgaria and Romania	Not reported

Table 3: Current status on display of labels in interviewed EU Member States.

* Shop inspections are carried out by local authorities with no central reporting

** Additionally, 30 shops inspections have been carried out by the consumer organisations CLCV (France) and ADICONSUM (Italy) in a project covering France, Italy and Spain⁹.

⁹ “Environmental and Energy Labelling on Electrical Household Appliances: The Situation Today, the Road Ahead, and What Consumers Want”. CLCV, ADICONSUM, European Research into Consumer Research and CECU. 2004/2005.

The main conclusions on the current status are:

- Only three (Finland, Denmark, the Netherlands) out of nine Member States could provide centrally reported figures of the activities.
- All nine EU-15 Member States interviewed (Denmark, Germany, the Netherlands, Finland, Italy, France, Greece, Austria, UK) reported shop inspection activities.
- Label display is at a fairly high level (about 70 to 80 percent) in seven (Denmark, Germany, the Netherlands, France, Greece, Austria, UK) out of nine Member States. This however also means that 20 to 30 percent of appliances are not labelled.
- Finland and Italy report display compliance problems. No exact numbers have been reported due to uncertainty on the statistical data, but up to around 40 percent of the products are regarded as unlabelled.
- Some surveys reported do not consider whether all display aspects are handled correctly. Therefore, the compliance level indicated above (70 to 80 percent) might be lower if all details regarding correct label display are considered.
- Almost all Member States have reported that large shops and chains in city areas comply with the label display while small shops in remote areas have compliance problems. However, in Germany, the opposite tendency is reported (small shops comply well, while large shops have problems). The reason was not known.
- Brochures and printed material are not controlled systematically in all countries. Often, the energy class in general is shown, except in brochures from kitchen manufactures, but not the label itself.
- It is generally reported that internet sales are lacking seriously behind regarding label display in almost all countries and first of all regarding display of B and C labels. This may be due to the interest of the internet shops to label products in energy class A, because many consumers demand A labelled products.
- In Denmark, Finland and Sweden one explanation on lack of labels was reported: Strips may disappear during unpacking of the appliances and it is too time consuming for the shops to ask for new strips. This will probably also concern the remaining Member States.
- Even though manufactures should provide label material for free, it was reported that shops had stated that it was expensive to ask for the material.

- It was also reported that black and white photocopies of labels are used in some cases, which can obstruct the recognition by the consumer.
- Compliance letters are issued on a regular basis in four (Finland, Denmark, the Netherlands, Austria) out of nine Member States. Compliance letters are letters sent from the regulatory body to the shop describing the problem identified and asking for correction of the problem. Thus, more than half of the Member States do not send compliance letters.
- Only one Member State (Denmark) reported further enforcement actions via the legal system due to lack of display.
- One Member State (Denmark) reported that in some cases it is difficult to identify the formal owner of the shop, which obstructs the enforcement actions.
- Reports describing the new Member States state comprehensive compliance problems:
 - High market share of imported C class appliances from Asia, which are not labelled.
 - Retail shops own some local manufactures and promote such products without label.
 - Products with performance label A (e.g. on washing quality) are often marketed as energy class A even though the actual energy class is lower.

Among the reasons are that the labelling scheme is still new and energy prices are still very low compared to EU average and therefore consumer interest in the labelling scheme is still quite low. Both energy prices and consumer interest may increase in near future.

5.2 Test of Appliances

In Table 4, the current status on test of appliances is presented.

Member State	Tests in 2005	Reported enforcement action
Finland	Few (< 10) appliances tested	No enforcement actions
Denmark**	Comprehensive tests (63 appliances and 10 A bulbs)	Reimbursement of costs of testing and handling
Germany	No testing*	No enforcement actions reported
United Kingdom	Few tests for enforcement*. Many tests by MTP and EST	No enforcement actions***
The Netherlands**	Comprehensive tests (100)	Compliance letters issued
France	No testing	Not reported
Austria**	No testing	No enforcement actions
Italy**	Few tests	Not reported
Greece	No testing	No enforcement actions
New Member States: - Czech Republic - Bulgaria - Poland - Lithuania - Romania	No testing	No enforcement actions

Table 4: Current status on test of appliances in interviewed EU Member States.

*Tests are carried out by local authorities with no central reporting

**Consumer organisations carry out additional tests, but not always according to the EU test standards.

***Presently (2006), enforcement procedures are tested for six appliances.

The main conclusions on the current status are:

- Only very few test activities are carried out by the regulatory bodies and therefore only a very limited part of the market is tested. Three (France, Austria, Greece) out of nine Member States do not test appliances and only two (the Netherlands and Denmark) do many tests and report them centrally.
- Enforcement actions are either not taken or not reported in seven Member States (all but the Netherlands and Denmark). One Member State (UK) has initiated test of enforcement actions for a few products.
- In a number of countries (including the Netherlands, Italy and Austria) consumer organisations carry out tests but most often these tests are not carried out according to the EU label test standards, because the consumer organisations do not consider the test as suitable for the consumer interest. Tests by consumer organisations also comprise additional appliance performance, safety aspects, user interfaces etc.
- In UK, the Defra MTP (Market Transformation Programme) carries out tests aiming at providing information for Defra on the performance across particular market areas. No enforcement actions were taken as a result, but suppliers were asked to explain to Defra, why differences in claimed and tested results occurred. In 2006, however, Defra funded product testing by TSO (local authority Trading Standards Officers) for compliance purposes and enforcement procedures are tested for six appliances.
- In UK, product tests are also conducted by the Energy Saving Trust (EST) that manages the Energy Saving Recommended Scheme (ESR). Failure to

meet the scheme requirements can result in products being removed from the scheme. Manufacturers are informed of their results, which are also forwarded to Defra.

- In some countries (among those Germany), the industry test competitors and inform the authorities if a product does not meet the energy label class. No information was reported on how systematically this is carried out, however, Germany considers it to be an important instrument in the future.
- Testing is all over the EU reported to be very expensive (mainly stressed by Denmark, Germany and UK) and only few Member States report to have sufficient budget for carrying out a sufficiently high number of tests, re-tests etc. and carrying out enforcement actions.
- From the tests carried out across the EU it is reported that a quite large proportion of appliances (in some Member States one third of the tested appliances) only meet their label because a 15 percent tolerance on the measured energy consumption is allowed according to the test standards (or 10 percent as an average of three re-tests if measured consumption is greater than stated value plus 15 percent). See also Section 3.4. This is reported as a key problem in several Member States (including Denmark, the Netherlands and UK).
- Information sharing among energy authorities and related organisations seems to be extremely low all over the EU. Results from tests in one country are not known in other countries and every test and enforcement action must be started from bare ground in each individual Member State.
- In some major Member States (including Germany and UK), where the implementation of the labelling scheme is decentralised to local authorities, national information sharing is reported to be non-existing. An appliance failing a test in one region may therefore be pursued by the local authority without providing information to local authorities responsible for other regions.
- Consumer organizations in a number of countries have started to share information in several areas through the ICRT cooperation (International Consumer Research & Testing Ltd¹⁰). However, the energy consumption is not measured according to the same technical standards as used in the labelling scheme and it is difficult to compare the energy performance of these products with products measured under the label scheme.
- In general, many technical difficulties are reported regarding testing:

¹⁰ ICRT is an association of 37 consumer organisations from 33 countries worldwide. It aims to promote co-operation in consumer research and testing among its members and other organisations concerned with consumer matters. ICRT also aims to develop better test methods for consumer goods and services, and to encourage the development of good consumer testing facilities. See further information on www.international-testing.org

- Change of test standards and late announcement of such changes (Denmark).
- For each test, the manufacturer must be contacted to identify the exact version of the test standard that was used during the original testing (Denmark).
- It is a comprehensive task to manage and to be up to date with all news and principles on how tests should be carried out (Denmark).
- Different test standards are used by different Member States and impairs cooperation (Denmark, Germany).
- Frequent changes of model types etc. impair tracing of products and information (UK).
- Test standards do not reflect consumer behaviour, especially regarding washing machines (Germany, the Netherlands).
- Test and three re-tests can delay enforcement action of up to two years in some cases, where public notice have to be given (Denmark)..

These technical difficulties might influence on the time needed for the tests and thereby the test price. This has not been further investigated as governmental bodies and consumer organisations and not test laboratories have been the target groups for the interviews.

5.3 Information Campaigns and Educational Programmes

In Table 5, the current status on information campaigns and educational programmes aimed at consumers and general public is presented.

Member State	Recent campaigns	Other activities promotion
Finland	Major campaigns in 2003	Website etc.
Denmark	Campaigns in 2005 and 2006	Website etc. Newsletters Subsidies
Germany	Limited campaigns	Websites etc.
United Kingdom	Frequent campaigns	Websites etc.
The Netherlands	Campaign in 2003	Websites etc. Subsidies
France	Not reported	Newsletters, websites etc.
Austria	Campaigns are carried out	Website etc.
Italy	Campaign in 2005	Website etc.
Greece	Campaign in 2006	Website etc.
New Member States: - Czech Republic - Bulgaria - Poland - Lithuania - Romania	Not reported	Not reported

Table 5: Current status on information campaigns and educational programmes in interviewed EU Member States.

The main conclusions on the current status are:

- After comprehensive campaigns during the first years of the labelling scheme, the pace has slowed down in several Member States even though comprehensive information is being spread via websites all over the EU. The

websites are typically established by the authorities or an organisation connected to the authority.

- Denmark and the Netherlands have carried out subsidy campaigns. Subsidies were provided by the state budget to the consumers buying the most efficient appliances.
- There is no clear picture in all Member States regarding which bodies are responsible for information campaigns and which have the budgets for such activities. Information activities may also be carried by various types of organisations:
 - Specialised energy saving organisations like the Danish Electricity Saving Trusts, which have carried out large campaigns, and the Energy Saving Trust in UK, which likewise carries out campaigns.
 - Electric utilities have carried out large campaigns for some years (Denmark, the Netherlands, UK), but currently their role is less clear.
 - Consumer organizations publish comprehensive and broad information regarding purchase and use of the appliances, but not focused on energy consumption. When the energy consumption is included, details may be fewer and energy consumption is typically not measured according to EU test standard.
- The use of A+ and A++ labels for cold appliances are reported to be confusing for the consumers in almost all countries (including Denmark, Germany, the Netherlands, UK, and Finland) and it has been stated to be a major problem for the labelling scheme.
- New Member States lag seriously behind in implementing information campaigns, but currently campaigns are planned in at least five of the new Member States as a part of the CEECAP project supported by the European Commission. Reasons may be manifold, including lack of staff, budget and interest.

5.4 Activities and Views by the Consumer Organisations

The consumer organizations interviewed stated that the labelling scheme is considered to be more and more important for the consumers. Increasing energy prices as well as massive focus on climate change issues in the media has increased the consumer interest towards lowering the energy costs and energy usage in general.

The six interviewed consumer organizations only carry out limited activities related to the energy labelling scheme:

- Only one consumer organization (Consumentenbond in the Netherlands) carries out tests of energy consumption.
- All consumer organizations are involved in information activities.

- No controls of display of labels are carried out.

Especially in those countries with many regulatory body activities to secure compliance with the labelling directive (the Netherlands and Denmark), consumer organizations argue that the current formulation of test standards and enforcement procedures etc. are problematic, when it comes to defending consumer rights due to the following reasons:

- The present test standards are too expensive to follow. Testing activities, carried out by Consumentenbond in the Netherlands, are performed by applying simpler methods.
- Some test standards are argued not to be representative for consumer usage of the products, in particular for washing machines.
- The allowed 15 percent tolerance is argued to be a major problem in defending consumer interests, because consumers cannot be sure that the product belongs to the claimed energy class.
- Test and three re-tests can result in a long procedure, which can be a problem regarding defending consumer rights.
- The added A+ and A++ labels are reported to be confusing by all the consumer organizations.

The consumer organizations stated that the international co-operation through ICRT (see Section 5.2) on sharing test information is an important issue for the organizations and that it may be a way to reduce test costs and share information in the future.

In Denmark, the consumer organization stated that it is no longer allowed to publish information in consumer magazines on failed tests after the first test by Danish Energy Authority. It is now required to wait for the re-tests before information on the test results can be published.

6 Key Barriers to Successful Implementation of the EU Energy Labelling Scheme and Options for Reducing the Barriers

The results provided in Chapter 5 showed various compliance problems, which may result in reduction of consumer confidence and involvement and eventually hampering a successful implementation of the label scheme and realisation of energy savings.

In this chapter, we provide an assessment of the main barriers on successful implementation and options for reducing them. The assessment is based on the interviews reported in Chapter 5 and the following in-depth interviews with Germany, the Netherlands, Denmark and France.

6.1 Key Barriers to Successful Implementation of the Energy Labelling Scheme

6.1.1 Low Overall Priority by the Governments and the Energy Authorities

It is the impression that the energy authorities in many EU Member States presently give low priority to the labelling scheme.

No regular and sufficient budgets are allocated to undertake testing; no enforcement actions are followed through at the very end and a complete revision of the scheme and the label classes has not taken place.

The result is that the labelling scheme after having provided impressive market transformation results in some Member States in the 1990s has lost momentum during recent years.

From many sides, it is stated that just a limited additional effort may increase awareness towards the scheme dramatically – for example a small number of regular test activities in some of the large Member States followed by enforcement actions. The risk of enforcement actions alone may strengthen the focus by the manufacturers and larger shops across the EU. This may also increase the awareness of the regulatory bodies in all Member States.

6.1.2 An Effectively Implemented Scheme Requires a High Cost Level that the Energy Authorities Have Difficulties in Financing

In all Member States interviewed it is reported that the labelling scheme is expensive to operate. It is expensive to test appliances and it is expensive to take enforcement actions due to extended procedures as well as the need to carry out several new tests.

Today, most of the Member States do not allocate budgets for more than just very limited test activities, if any. The result is that a very limited part of the market is tested.

The costs of the test may be high due to low volume testing at each laboratory and due to the formal procedures regarding reporting to the regulatory bodies etc.

An option used by at least one Member State (Denmark) is to require the manufacturers to reimburse costs of tests including handling of the test products etc. when an appliance fails a test. This is a very effective way to reduce testing costs as well as increasing manufactures awareness towards correct labelling of products.

6.1.3 Low Enforcement of Sanctions in Case of Irregularities

Several Member States issue compliance letters in case of irregularities, but only Denmark reported that sanctions were carried out by filing a police report. The fines are, however, low (about 1300 EUR) and the reimbursement of costs (mentioned in the previous section) is many times more expensive.

The reason of low enforcement may be that it requires many resources to go through the sanction procedures and that the legal system may give lower priority to these cases compared to other cases.

Member States may also be frightened by the fact that a model pursued in an enforcement sanction, may no longer be in the market, when a court case is completed. This is because it takes much time to carry out the first test, three re-tests and communication with the manufacturer on the test standards and specific test issues.

Low enforcement is an important barrier to keeping all stakeholders aware of the importance of correct labelling.

6.1.4 Low or No Coordination and Information Sharing Between and Within the Member States

The lack of coordination and information sharing between the Member States may result in double and inefficient work. Each time a test is taken, the laboratory and regulatory body needs to start from the beginning even though another organisation may have been through the same process.

This is also the case within some Member States (such as Germany and UK), where the labelling scheme is controlled by local authorities operating independently from each other. Such bodies are responsible for shop inspections, testing activities as well as enforcement actions if such are deemed necessary.

It is reported that these local actions are taken without any coordination and information sharing. As testing activities are expensive, the Member States mostly reports that no tests are carried out and no enforcement actions other than compliance letters after shop inspections are taken.

It must be considered as financially almost impossible to handle a total of approximately 2000 products across the EU involving more than 200 energy authorities and testing organisations, if these are to test and take action individually.

The technical documentation is supposed to help the regulatory bodies and the test laboratories, when testing appliances. However, the information is reported to be of very different quality across the manufacturers and does therefore not always fulfil the purpose.

6.1.5 Lack of a Clear, Consistent and Correct Energy Class Labelling of the Products

A very important barrier reported by most of the persons interviewed is the allowed 15 percent tolerance on the measured energy consumption compared to the claimed consumption.

This allowance results in a large number of products being categorised in a higher energy class than corresponding to the measured consumption. This impairs the performance of the labelling scheme significantly, because consumers cannot rely on the claimed energy class. Furthermore, the realised energy savings will be lower than in a situation with measured energy consumption corresponding to claimed consumption.

Tolerances of this size are assumed not to be needed today because the manufacturing process is quite accurate.

It is a further barrier that the energy classes have not been updated in spite of the achieved market transformation towards energy class A. Today, apart from a few product groups, most of the appliances are A labelled.

Another issue is that test laboratories have reported that it may be unclear, which version of the test standards to follow and therefore the same appliances are tested according to different versions of the standards in different Member States. The test should be performed following the same test standard the manufacturer used for the claimed energy consumption.

Finally, the test standards for some of the products may need a revision regarding the test methodology because consumer pattern (such as washing behaviour) and product functionalities (such as standby functions) have changed since the test standards were established.

6.2 Options for Reducing the Barriers

In the following, we provide various options for reducing the barriers:

6.2.1 Increase Obligations of the Member States

The framework and the implementing directives are not very specific in defining the actions the Member States need to take to ensure compliance. A revision of the directives could include an increase and a clearer specification of the Member State obligations.

The obligations could include:

- A specific number of inspections of the point of sales, which should include the type of point of sales (shops, internet shops and mail orders).
- A specific number of appliances to test per year according to the size of the market.
- Details on the information activities to be carried out.

6.2.2 Increase Cooperation and Information Sharing Between and Within Member States

An increase of the cooperation and information sharing between and within the Member States could make the implementation much more efficient.

Cooperation could either be bilateral between the individual Member States or multilateral through the European Commission. Many different models on various levels of cooperation could be applied including:

- Sharing of test reports and manufacturer dialogue on appliance compliance on a Member State to Member State basis or through a centralised body or information sharing unit.
- Coordination of tests to be carried out bilaterally or multilaterally.
- Coordination of enforcement actions and sanctions to be taken, also bilaterally or multilaterally.
- Use of common test laboratories to ensure volume of scale. E.g. framework contracts could be entered with a number of test laboratories that all the Member States could draw on. This could be implemented by a number of Member States cooperating or by all the Member States through the European Commission.

6.2.3 Update the Directives and the Technical Standards

An update of the directives and the technical standards is critical for the successful continuation of the label scheme. Many issues should be considered as part of the update including:

- Revision of the scale to maintain the A to G classes. One option is to include an automatic revision, e.g. every two years, according to market data, where class A should only include a fixed amount of the products on the market at the time of revision and so forth for the remaining energy classes.
- Updating the test standard in order not to allow the tolerances allowed today. An option is a zero tolerance policy by not allowing the measured value to be greater than the claimed value. This is seen for other products e.g. speedometers for cars. This will substantially increase consumer confidence and increase the energy savings.
- Updating of the test standard to accommodate new energy consuming functions such as standby.
- Updating of the test standard to reflect changes in consumer behaviour and to be closer or similar to test practice by the consumer organisations. An option is to test the appliances at typical user situations, e.g. for washing machines at 40 °C, 60 °C and 90 °C, however, this will increase the costs.

- Reducing the complexity of the test standard and reporting procedures to reduce test costs, which may attract the consumer organisations to use the same test standards.
- Reduce the number of units to be tested after the first test. E.g. by just requiring one re-test.
- Increasing the requirements on the technical documentation in order to make it more homogenous and require it to be public domain for easy access for regulatory bodies, test laboratories and consumer organisations.
- Make the enforcement procedures shorter in the individual Member States.

6.2.4 Require the Manufacturers to Take More Obligations

Some of the barriers may be removed by requiring the manufacturers to take more obligations. This will naturally result in additional costs that the consumer in the end will bear. However, the consumers will also pay costs of the retailers and of the regulatory bodies and it might be more cost efficient to have the manufacturers take more obligations.

At least these obligations may be solved more cost-effectively by the manufacturers:

- Labelling of the appliances. By having the labelling being part of the manufacturing process, a 100 percent display of correct labels at all points of sale should be secured. If the label is non-removable, it will also serve as energy class information throughout the life of the appliance. It would be very difficult for the manufacturer to label the products according to each language market of the EU and therefore the label design should be changed to not include any text, but only symbols and figures. An example of a language neutral label is a label for TV sets designed by EICTA members in a self-commitment agreement on consumer electronics.
- Third party testing: The manufacturers could be required to provide third party test reports for a number of appliances in each production series. The selection of the products to be tested should also be done by the third party organisation. By increasing the number of tests and by simplifying the handling issues, the prices would be reduced substantially.

6.2.5 Increase Campaigns and Information Activities

Campaigns and information activities have been demonstrated to be very useful for successful implementation in several Member States, but it is very difficult to regulate specific activities through directives.

It should however be possible to stimulate the campaign and information activities by both the Member States and the consumer organizations by:

- More exchange of information between Member States.
- Allocating funds for such activities, e.g. under existing EU support schemes which energy authorities and consumer organizations etc. could apply for.

7 Conclusions

The main conclusion of the study is that currently the EU energy labelling scheme is experiencing several compliance problems in many EU Member States regarding label display, test of appliances and correct energy class labelling.

This may result in reduction of consumer confidence in the scheme, which again may result in less interest in choosing appliances according to the energy class. If this is the case, further energy savings will not be realised and the savings already achieved may be lost, if consumers in future choose less energy efficient appliances.

In order to solve these compliance problems, many barriers should be reduced or removed. This requires an active effort by both the European Commission and the individual Member States.

Annex A List of Directives and Technical Standards

Directives

Council directive 92/75/EEC of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances

Commission Directive 94/2/EC of 21 January 1994 implementing Council Directive 92/75/EEC with regard to energy labelling of household electric refrigerators, freezers and their combinations

Commission Directive 95/12/EC of 23 May 1995 implementing Council Directive 92/75/EEC with regard to energy labelling of household washing machines

Commission Directive 95/13/EC of 23 May 1995 implementing Council Directive 92/75/EEC with regard to energy labelling of household electric tumble driers

Commission Directive 96/60/EC of 19 September 1996 implementing Council Directive 92/75/EEC with regard to energy labelling of household combined washer-driers

Commission Directive 96/89/EC of 17 December 1996 amending Directive 95/12/EC implementing Council Directive 92/75/EEC with regard to energy labelling of household washing machines (Text with EEA relevance)

Commission Directive 97/17/EC of 16 April 1997 implementing Council Directive 92/75/EEC with regard to energy labelling of household dishwashers

Commission Directive 98/11/EC of 27 January 1998 implementing Council Directive 92/75/EEC with regard to energy labelling of household lamps

Commission Directive 1999/9/EC of 26 February 1999 amending Directive 97/17/EC implementing Council Directive 92/75/EEC with regard to energy labelling of household dishwashers

Commission Directive 2002/31/EC of 22 March 2002 implementing Council Directive 92/75/EEC with regard to energy labelling of household air-conditioners

Commission Directive 2002/40/EC of 8 May 2002 implementing Council Directive 92/75/EEC with regard to energy labelling of household electric ovens

Commission Directive 2003/66/EC of 3 July 2003 amending Directive 94/2/EC implementing Council Directive 92/75/EEC with regard to energy labelling of household electric refrigerators, freezers and their combinations

The directives can be downloaded from ec.europa.eu/energy/demand/legislation/domestic_en.htm

Technical standards

EN 153 – Methods of measuring the energy consumption of electric mains operated household refrigerators, frozen food storage cabinets, food freezers and their combinations, together with associated characteristics

EN ISO 15502 – Household refrigerating appliances – Characteristics and test methods

EN 60456 – Clothes washing machines for household use - Methods for measuring the performance

EN 61121 – Tumble dryers for household use - Methods for measuring the performance

EN 50229 – Electric clothes washer-dryers for household use – Methods of measuring the performance

EN 50242 – Electric dishwashers for household use – Test methods for measuring the performance

EN 50285 – Energy efficiency of electric lamps for household use - Measurement methods

EN 14511 – Air conditioners, liquid chilling packages and heat pumps with electrically driven compressors for space heating and cooling.

EN 50304 – Electric ovens for household use – Methods for measuring the energy consumption

Annex B References

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Annex C Questionnaires

Questionnaire for Consumer Organisations

Country: Organisation: Name interviewed person: E-mail: Telephone: Confidentiality of name organisation, person and country (yes/no): Confidentiality of all information (yes/no):
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Implementation of the energy label scheme in your country

Are the energy labels in general considered as reliable by the consumers and by the manufacturers, suppliers and retailers?

How is the current status regarding the use and display of labels?

To which extent are labels displayed in shops and brochures etc.?

Do you carry out shop inspections on behalf of your organisation?

Do you have status reports and surveys from the inspections that we could see or could you provide figures on the display compliance?

Do you take any actions from the inspections and in that case how many and for which products?

Other comments

How is the current status regarding testing?

Do products on the market comply with the label energy class?

Do you test products on the market?

Do you have reports from these tests that we could see or could you provide figures on the label compliance?

Which actions do you take in case of non-compliance and in that case how many and for which products?

Other comments

How is the current status regarding information campaigns?

Do you carry out educational and promotional information campaigns on the energy labels?

Do you provide any general information to the consumers on the energy labels (brochures, web site etc.)

Other comments

How is the consumer interest in the labeling scheme?

Are energy costs and/or the energy label important when consumers purchase the products?

Are energy efficiency and climate change related to purchase of household products a topic in the news?

Are there any problems seen from a consumer point-of-view?

Other comments

How is the priority of the labeling scheme in your organisation?

Which activities are your unit responsible for?

Which activities are you carrying out regarding the labeling scheme?

Is the labeling scheme considered as an important consumer issue in your organisation?

Do you have resources for testing and other actions within the energy labeling?

Other comments

Comments on problems, barriers and drivers in implementing the label directive

Which are the main problems and barriers in implementing the directive?

What are your proposals for reducing the problems and barriers?

Which are the main drivers in supporting the labels?

Do you have any proposals for changing the energy label directive?

Other comments

Questionnaire for Regulatory Bodies

Country:
Organisation:
Name interviewed person:
E-mail:
Telephone:
Confidentiality of name organisation, person and country (yes/no):
Confidentiality of all information (yes/no):

How is the labeling scheme implemented in your country?

Which main organisations and bodies are involved?

What are their roles and responsibilities?

Who provide financial resources for handling of the scheme?

Who can take enforcement actions in case of non-compliance?

Are there any difficulties in this organisational set-up?

Are the energy labels in general considered as reliable by the consumers and by the manufacturers, suppliers and retailers?

Other comments

How is the current status regarding the use and display of labels?

To which extent are labels displayed in shops and brochures etc.?

Are shop inspections carried out?

Do you have status reports and surveys from these inspections that we could see or could you provide figures on the display compliance?

Do you carry out enforcement actions (compliance notices etc.) and in that case how many and for which products?

Other comments

How is the current status regarding testing?

Do products on the market comply with the label energy class?

Are products in the market tested and controlled according to label by the responsible organisation?

Do you have status reports and surveys from these tests that we could see or could you provide figures on the label compliance?

Do you carry out enforcement actions (compliance notices etc.) and in that case how many and for which products?

Do you know if consumer organisations also test products?

Other comments

How is the current status regarding information campaigns?

Do you carry out educational and promotional information campaigns on the energy labels?

Do you provide any general information to the consumers on the energy labels (brochures, web site etc.)

Other comments

Comments on problems, barriers and drivers in implementing the label directive

Which are the main problems and barriers in implementing the directive?

What are your proposals for reducing the problems and barriers?

Which are the main drivers in supporting the labels?

Do you have any proposals for changing the energy label directive?

Other comments