



## ANEC/ BEUC POSITION ON ENERGY LABEL REQUIREMENTS FOR TELEVISIONS

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## Summary

In 2008, the EU proposed improving the energy efficiency of televisions by introducing mandatory eco-design requirements. In addition, the Commission saw a need to better inform consumers about the energy efficiency of TVs by introducing an Energy Label.

ANEC and BEUC welcomed both measures. In this position paper we give comments regarding the need to provide simple and comparable information to consumers at the point of sale.

As manufacturers will have to comply with Ecodesign requirements based on the same calculation formula as the Energy label later this year, we see a possibility to introduce the Energy Label much more quickly than foreseen in the draft legislation.

We call for placing only a few of the most energy efficient products in class "A" as otherwise the criteria would be outdated as soon as they enter into force.

We argue that changing the colour code without giving a validity period on the label will be confusing for consumers as they will not be able to easily identify the most energy efficient products on the market.

Moreover, we call for all pictograms on the label to be clear.

To ensure market surveillance, we ask that the technical documentation is available up to 10 years after the last models have been placed on the market and that penalties are applied in case of non-compliance.

We ask to review the impact of the label on consumer understanding and to revise the label layout if needed.

## Introduction

With the introduction of new technologies and increasing TV screen sizes, the energy consumption related to television increased tremendously in recent years.

Therefore, in 2008, the European Commission made a proposal to phase out the most energy consuming TVs from the market through mandatory Ecodesign requirements and to better inform consumers about the energy consumption of TVs by introducing an Energy label for TVs.

While TVs have to meet minimum energy efficiency requirements from 20 August 2010 onwards<sup>1</sup>, the Energy Label criteria still have to be agreed on.

In this position paper, ANEC and BEUC comment on the working document from the European Commission with regard to energy labelling of televisions<sup>2</sup>.

### 1. Consumers need comparable and simple information about the energy consumption of TVs

ANEC and BEUC welcome the introduction of an Energy Label for TVs<sup>3</sup>. There are three reasons why consumers urgently need better information about the electricity consumption of TVs. First, televisions differ considerably with regard to the energy they use. While a large plasma TV with a screen size of 107 cm may consume 430 Watt, a LCD TV of the same size consumes only 130 Watt<sup>4</sup>. Second, the energy efficiency of TVs can be considerably improved through using new technologies. By using for instance LED-backlights the energy efficiency of TVs could be decreased by up to one third. Third, the TV market is highly dynamic as manufacturers place new models on the market at least once a year<sup>5</sup>.

Because of these differences in technology and the considerable electricity costs deriving from the use phase, consumers should be clearly informed about the energy consumption of TVs at the point of sale.

As the information provided to consumers has to be comparable and clear, the A-G Energy Label is considered as the best option forward.

### 2. Label should be introduced as soon as possible

The draft working document requires manufacturers to comply with the labelling requirements 12 months after the legislation enters into force and for retailers to show the label to consumers in shops 16 months after the legislation enters into force. This timeframe is far too long considering the need to better align ecodesign and labelling requirements of this highly dynamic product group.

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<sup>1</sup> Based on Regulation (EC) No 642/2009 with regard to ecodesign requirements for televisions.

<sup>2</sup> Our comments relate to the working draft as distributed to stakeholders on 11 February 2010.

<sup>3</sup> See also ANEC/BEUC position 'Consumer relevant eco-design requirements for televisions', <http://www.anec.eu/attachments/ANEC-PT-2008-EuP-029final.pdf>.

<sup>4</sup> See Stiftung Warentest: Voll im Trend, test Spezial Fernsehgeräte, 1.12.2009, [www.warentest.de](http://www.warentest.de).

<sup>5</sup> ibidem

As the Energy Label requirements and the Ecodesign requirements will be based on the same calculation formula, manufacturers are already aware of the calculation formula and how to test the energy efficiency of TVs according to the Ecodesign requirements. Therefore, the Energy Label could be introduced very quickly after the legal requirements have been formally adopted. A transition period of 6 months should be sufficient to show the Energy Label to consumers in shops.

### **3. Only a few of the best products should be labelled "A"**

As the Energy Label for TVs will be introduced for the first time, we see a particular need to provide clear, comparable and legible information to consumers. As in the case of refrigerating appliances where consumers perceived classes on top of "A" as unclear, we see an urgent need ensure that only some of the most energy efficient TVs will be grouped into class "A".

Considering that the energy consumption of TVs<sup>6</sup> in standby and on-mode is decreasing due to legal requirements and technological innovations, the draft criteria of 2008 are outdated. We therefore welcome the proposal of the Commission to make the requirements more stringent. However, we recommend setting the labelling class "A" at an Energy Efficiency Index of at least  $0.20 \leq EEI < 0.30$  (this corresponds to class A+ in the updated Commission's proposal). Taking into account recent market data, e.g. from the Eco Top Ten campaign<sup>7</sup>, it may even be justified to shift the scale two more classes upwards compared to the Commission's updated proposal instead of only one class, i.e. to set the requirements for class "A" at an EEI of  $0.10 < EEI < 0.20$  (this corresponds to class A++ in the updated Commission's proposal).

### **4. Changing colour code will confuse consumers**

In line with the draft framework legislation for the Energy Label, the Commission proposal foresees changing the colour code of the label for TVs every couple of years. This means the label will shift upwards over time, e.g. in the first stage consumers would be provided with an A-G label and thereafter with an A+ to F label etc. ANEC and BEUC have always raised strong concerns with regard to this approach as changing the colour code will confuse consumers.

With regard to the current approach we see several sources of consumer confusion.

First, as there will not be a validity period on the label, the consumer cannot be sure in a transition period which background label is the latest version. Second, as cost related information and advertisements only have to give the energy efficiency class, it will be unclear for the consumer to which background label the energy efficiency class refers.

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<sup>6</sup> ibidem

<sup>7</sup> TVs: many models are better than planned class „A“, <http://www.topten.info/uploads/File/Topten%20Focus%20Feb2010%20TVs.pdf>

## **5. Pictograms have to be clear**

We welcome the intention to inform consumers about the average electricity consumption per year in bold font which is shown prominently on the label. Although the actual consumption may differ because of different use patterns, the overall electricity consumption allows for an absolute comparison of TV sets. When finalising the measure, it must be ensured that the box informing about the electricity consumption will be shown at least in the same proportion as in the current draft.

Moreover, we welcome informing consumers about the availability of a hard-off switch on the label. However, as we doubt that the pictogram will be sufficiently clear to consumers, we suggest indicating the power consumption in off-mode in Watts on the label for all TVs.

To ensure coherence of the information on all labels, we suggest specifying where the EU Eco-label may be attached to the EU Energy Label. As the Eco-label awards the most environmentally friendly products on the market, we believe it most appropriate to always position the EU Eco-label in the top right corner of the Energy Label.

As Automatic Brightness Control (ABC) has a potential for energy savings, we suggest adding information about the availability of this function to the label.

## **6. Technical documentation must be available after last model has been placed on the market**

For reasons of consumer safety we see a need for market surveillance authorities to have access to the technical documentation even several years after the last TV of a certain model has been placed on the market. As it is likely that consumers use a TV for more than e.g. five years, the documentation should be available up to 10 years after the last model has been placed on the market.

## **7. All forms of distance selling should show full label**

We see a need to show the whole label to consumers in cases where the consumer is not able to see the product, such as all forms of distance selling. Only indicating the energy efficiency class will not be sufficient to allow for a well-informed purchase decision.

## **8. Implementing measure should refer to penalties**

The framework legislation leaves the setting of penalties to Member States as it is in their competence to carry out market surveillance. However, we see a need to also state in the product specific delegated acts that Member States are obliged to monitor the market and to take measures, including financial penalties, in case they detect non-compliant products on the market.

## **9. Impact of the measure on consumers must be analysed**

The current draft framework legislation foresees a review of the effectiveness of the delegated acts, taking into account consumer understanding of the label, no later than 31 December 2014. It will be important to change the label layout for all product groups in case consumers do not understand the new label as well as the closed A-G scale label and in case the new label is less effective in transforming markets towards more energy efficient appliances.

We therefore see a need to include the TV label in the revision process and to make changes, if needed, before the last two stages (foreseen for 1 January 2016 and 1 January 2019) enter into force.

Ends