



EUROPEAN COMMISSION

*Brussels, 18.12.2015  
C(2015) 9578 final*

*Dear President,*

*The Commission would like to thank the Senato della Repubblica for its Opinion concerning 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 final}.*

*As part of the Energy Union strategy, the Commission presented in July 2015 proposals to deliver a new deal for energy consumers, to launch a redesign of the European electricity market, to update energy efficiency labelling and to revise the EU Emissions Trading System. The package is an important step towards implementing the Energy Union strategy with a forward-looking climate change policy, launched as one of the political priorities of the Juncker Commission in February 2015.*

*The Commission welcomes the Senato della Repubblica's broad support for the aims of the proposal and notes its concerns that energy labels introduced only recently might be rescaled too soon. The Commission would like to clarify that, while all existing labels would be reviewed within five years of the entry into force of the Regulation, the product groups to be rescaled first would be those where products on the market are concentrated in the top classes. The Commission trusts that this will allay the Senato della Repubblica's concerns. In response to the more technical comments in the Opinion the Commission would like to refer to the attached annex.*

*The points made in this reply, including the specific comments in the Annex, are based on the initial proposal presented by the Commission, which is currently in the legislative process involving both the European Parliament and the Council in which the Italian government is represented. The Council is expected to reach a general approach under the Luxembourgish Presidency and the European Parliament is expected to deliver its opinion in the first half of next year. The Commission remains hopeful that an agreement will be reached in the course of the upcoming year – under the Dutch Presidency.*

*Mr Pietro GRASSO  
President of the Senato della Repubblica  
Piazza Madama, 1  
IT – 00186 ROMA*

*The Commission hopes that these clarifications address the issues raised by the Senato della Repubblica and looks forward to continuing our dialogue in the future.*

*Yours faithfully,*

*Frans Timmermans  
First Vice-President*

*Miguel Arias Cañete  
Member of the Commission*

## ANNEX

*The Commission has carefully considered each of the issues raised by the Senato della Repubblica in its Opinion and is pleased to offer the following clarifications.*

*Concerning the Senato della Repubblica's suggestion to exclude products that are covered by the Construction Products Regulation<sup>1</sup> from the scope of the proposal (Article 1 of the proposal), the Commission would like to emphasise that the Energy Labelling Regulation and the Construction Products Regulation have different objectives. The Construction Products Regulation lays down common technical language to assess the performance of construction products. However, the development of an energy label cannot be done in the framework of the Construction Products Regulation. For certain products falling under the scope of the Construction Products Regulation an energy label can be useful for consumers and help achieve energy efficiency objectives. This is for example the case for local space heaters, for which an energy labelling regulation was adopted in April 2015<sup>2</sup>.*

*With regard to the Senato della Repubblica's concerns about the proposed delegation of power to the Commission to adopt product-specific regulations for an indeterminate period of time (Article 13 of the proposal), instead of a five-year renewable delegation as in Directive 2010/30/EU, the Commission would like to highlight that this is one of the legal options available for the exercise of the delegation and it would remove any doubt on continuity that might exist in the case of a five-year tacit renewal.*

*As regards the Senato della Repubblica's observations on energy labels, the Commission would like to stress that "Energy Efficiency First" is a central principle of the Energy Union Strategy because it is an effective way to cut emissions, bring savings to consumers, and reduce the EU's fossil fuel import dependency. Since its introduction twenty years ago, the success of energy labelling has encouraged the development of ever more energy efficient products. As a result, the energy labels need updating as many models are in the highest classes, providing no differentiation for consumers. In the revision of the Energy Labelling Directive in 2010 the addition of A+, A++ and A+++ classes to the A-G label scale was meant to address this issue. Review has shown that these classes are less effective in persuading consumers to buy more efficient products than the A-G scale.*

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<sup>1</sup> Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products, Official Journal of the EU, L 88, 4 April 2011, p. 5.

<sup>2</sup> Commission Delegated Regulation (EU) 2015/1186 of 24 April 2015 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of local space heaters, Official Journal of the EU, L 193, 21 July 2015, p. 20.

*Therefore, the Commission proposes returning to the original A to G energy label scale and to rescale it periodically. In addition, the proposal addresses non-compliance through the establishment of a product registration database in which suppliers would register their product information and compliance data. The Commission's proposed revision of the energy labelling framework would safeguard coherence and continuity as well as ensuring that consumers are able to make more informed choices that would help them save energy and money.*