



CEECAP –
Implementing EU Appliance Policy in Central and Eastern Europe
National Verification and Enforcement Plan – Poland
- List of problems and their potential solutions

The Polish National Energy Efficiency Agency (KAPE), www.kape.gov.pl

Introduction

The Intelligent Energy Europe (IEE) project CEECAP – Implementing EU Appliance Policy in Central and Eastern Europe was developed with the aim to support Central and Eastern European countries, including Poland, in creating suitable conditions for implementing appliance labelling and efficiency policies in accordance with EU Appliance efficiency legislation and programmes.

The aim of CEECAP project is to increase experience of the government experts, responsible persons of energy agencies, other institutions regarding the implementation of legislation, the control and verification on the market introduction aspects, also to increase the interest of appliances manufactures, appliances importers and retailers, regarding the promotion and sales of the energy efficient appliances.

Main activities are: identification of the national experts and decision making leaders, their training, design and preparation of national appliance labelling and efficiency actions, set-up of national multi-disciplinary committees as a forum for discussion about best practices, cooperation opportunities and knowledge transfer.

The results will be an improved policy infrastructure for appliance labelling and efficiency and the future EU policies; a verification infrastructure for product and retailer compliance; collaborative activities to increase the consumer response to labels; and the establishment of a platform for information exchange and transfer.

This document – the proposal of the National Verification and Enforcement Plan, lists the main issues related to the energy labelling of appliances from the state institution's point of view. It discusses the main current issues at stake and proposes solutions to the problems which are observed. Its goal is to introduce possible solutions, practical advice and best practice experience related to these problems and provide assistance on behalf of the CEECAP project to all involved partners with the goal to promote energy labelling and more energy efficient appliances.

In the year 2008 this document will be followed by an Implementation Document, which will list concrete activities undertaken by CEECAP partners, government institutions and other market players.

SUMMARY TABLE

The following table summarises the problems and activities suggested by CEECAP project organizers to handle these problems within the system of energy labelling in Poland:

<i>Target activity or target group</i>	<i>Goals (of CEECAP and in general towards labels promotion)</i>	<i>Proposed activity</i>
Shop visits	Increase the number of visits in shops	Monitor retailers activities related the implementation of the label system, support increased number of shop visits, increase motivation of control organization
Appliance tests	Collection data about results of tests in other countries and exchange information	Exchange information on tests with the other institutions from the European countries. Promotion and dissemination of tests results
New legislation	Support adoption and implementation of new legislation	Promotion of new legislation, provide information about new legislation
Promotion campaigns	Monitor existing and support new ones	To support the organization of promotion campaign and the increased motivation of retailers for involvement, provide with best practices
Manufacturers	Monitor activities and support higher promotion involvement	Support proper labelling and increase involvement in promotion of labels
Retailers	Monitor compliance and support proper promotion	Inform about proper usage of labels and higher involvement in promotion towards customers
Consumer groups and NGOs	Support the label system promotion	Cooperate on promotion activities

MAIN DISCUSSION POINTS

Legislation:

Current situation

Poland as a new member of the European Union provides the driving force for harmonization of product related legislation on a national level with the EU internal market regulations and policies. Before joining the EU, the main part of the energy labelling legislation was in force in Poland.

Main national legal requirements in terms of labelling, standardization and efficiency requirements, in comparison with EU are:

Act of 10 April 1997 Energy Law (with amendments) - Art. 52.2 of the act says that producers and importers of equipment offered on the market shall inform of their energy efficiency on labels and in technical specifications.

Ordinance of the Minister of Economy and Labour of 20 May 2005 on requirements concerning technical documentation, application of labels and technical specifications and specimens of labels.

The Ordinance concerns following appliances:

- refrigerators, freezers and combinations thereof,
- washing machines,
- combined washer-driers,
- tumble driers,
- dishwashers,
- ovens,
- lamps,
- air conditioners.

This Ordinance implements within the scope of its regulation, the Directives of the European Communities.

Act of 30 August 2002 on the system of evaluation of accordance (with amendments) as a base for implementation UE directives, i.a. Directive 96/57/EC.

Ordinance of the Minister of Economy, Labour and Social Policy of 2 December 2003 on requirements for the consumption of energy by cooling appliances

The Ordinance concerns refrigerators, freezers and combinations thereof and implements Directive 96/57/EC of the European Parliament and of the Council of 3 September 1996 on energy efficiency requirements for household electric refrigerators, freezers and combinations thereof.

Proposed improvement

In Poland, the current legislation in place is in accordance with the EU labelling legislation and similar with the legislation of other new EU member states. This relates to the list of labelled appliances, institutions enforced to control the mechanism of labelling, system of potential

actions to be taken to enforce the labelling. Poland will update national legislation in accordance with all new EU legislation in the future.

Activities to be taken

In the present, the majority of the appliances are of energy class A and B on the Polish market. The activities that contribute to the increasing sales of energy-efficient appliances: legislation, information campaigns, active monitoring and control of labelling on the market, should be continued in the future. The main activity is to increase the degree of controls in the shops, test appliances and take further consequent steps.

Target: full fulfilment of legislation and early adoption of new legislation

Within the CEECAP project we will:

- **Support the increased involvement of the state energy and control inspectorate and other government bodies in the verification of labelling system**
- **Distribute the examples of best practice activities to these organizations**
- **Exchange of information between governmental organizations on the international level, and between state and private organizations**
- **Sustain collaboration between state and private organizations in fulfilment of legislation**

National energy strategy:

Key document reflecting the objectives of Polish energy efficiency policy is Energy Policy of Poland until 2025 from January 2005. Improvement of energy efficiency is one of the key elements of Polish sustainable energy policy and requires actions in the decreasing energy intensity of goods at the stages of designing, manufacturing, use, and disposal. Energy intensity of goods is determined at the stage of their designing. There are plans to commence the production of devices with the highest parameters of energy efficiency, and to conduct information campaigns in order to increase consumer awareness of the expediency and profitability of using the most efficient devices. It is also important to design goods in such a way, as to be able to recover as much raw material as possible at the end of these goods' lifespan.

Proposed improvement

The Energy Policy of Poland until 2025 and Energy Law give a priority for the improvements of energy efficiency in the household sector, but there is a lack of specific actions taken by government organizations in improving energy efficiency of household labels. It is necessary to involve the governmental organizations in promoting energy-efficient appliances.

Activities to be taken

Close cooperation with responsible persons of governmental organizations for increasing activities in promotion legislation, other useful information on energy labelling of appliances, support with information from other countries of the CEECAP project partners, support in organization activities to promote energy-efficient appliances.

Target: to ensure the adoption of formal targets from policy documents to practical activities

Within the CEECAP project we will:

- **Help the governmental authorities by increasing their knowledge on energy labelling**
- **Help the governmental authorities by informing on energy labelling from other countries, CEECAP project partners**
- **Support in organization activities to promote energy efficient appliances**

Control organizations:

Current situation

The Trade Inspectorate controls labels in shops and checks the accuracy of information on the labels. The Inspectorate has in its tasks also consumer guidance. It consists of Main Inspectorate, 16 Regional Inspectorates and 34 Representations of Trade Inspectorate. The Inspectorate has also a network of testing laboratories.

Proposed improvement

The control activities will be targeted towards introduction of energy efficient appliances on the market. Support with information for education and training of the inspectors.

Activities to be taken

Throughout the CEECAP project its representatives will be in close contact with the responsible personnel of the **Trade Inspectorate**. KAPE will support with information about EC legislation, best practice of other countries in the field of energy labelling. It will support education and training of the inspectors and other responsible personnel.

Target: to increase the level of regular activities (shop visits, label information control, tests) – not only due to the requests from the legislation, but also on its own will.

Within the CEECAP project we will:

- **Support control authorities by providing information and best practice examples from abroad and within the Poland**
- **Offer personalized training with the description of the proper activities related to shop visits and control of information on labels**
- **Ask the state organizations for the action on concrete tasks**

Appliance producers and importers:

Current situation

The main producers and importers are the members of CECEDPolska association.

Their members are:

Amica Wronki S.A.

BSH Sprzęt Gospodarstwa Domowego Sp. z o.o.

Beko Polska S.A.

Candy Polska Sp. z o.o.
Ciarko Sp. z o.o.
Gorenje Polska Sp. z o.o.
Electrolux Poland Sp. z o.o.
Indesit Company Polska Sp. z o.o.
Miele Sp.z o.o.
Philips Polska Sp. z o.o.
Groupe SEB Polska Sp.z o.o.
Whirlpool Polska Sp.z o.o.
FagorMastercook S.A.

The largest hipermarkets are the biggest importers of appliances, i.e. Saturn, Media Markt, EuroRTVAGD, Electroworld

Proposed improvement

Furthermore, increased general involvement of manufactures and importers in the promotion of energy labelling would be very welcomed and beneficial for the general public.

Activities to be taken

Close cooperation with CECED and other manufacturers that are not members in promotion of energy labelling of refrigerators and freezers.

Close cooperation with importers and retailers, consulting and supporting it in the promotion of energy efficient appliances in the main shopping centres.

Target: motivate for continued proper usage of energy labels, increase the share of properly labelled appliances within the more problematic types of labels, and motivate manufacturers for their own activities aimed at promoting energy labels towards retailers and the general public

Within the CEECAP project we will:

- **Support the improvement of the usage of energy labels by working with CECED**
- **Motivate authorities of manufacturers and importers to take part on educating retailers with respect to energy labelling of appliances**
- **Motivate importers to participate in education and training activities to use labels as a marketing tool**

Tests:

Current situation

Until present time no appliances have been tested to verify the information on their labels.

There are technical possibilities to test appliances in Polish Centre for Testing and Certification. The Trade Inspectorate is the body that is entitled to assign the tests.

Proposed improvement

The results of appliance tests undertaken in individual EU member countries should be shared among the member countries. While such initiative should take place on a general EU level among all member states, CEECAP partners would do their best to promote and support such move within its territories.

On the national level, the desired improvement to be taken would include the start up of testing of selected appliances.

Activities to be taken

The main activity will be the data collection about the results of the tests made by testing laboratories of other EC countries.

Target: initiate undertaking of independent products tests and exchange information on the results

Within the CEECAP project we will:

- **Support the control organizations and consumers with information about appliances testing results from EC countries**

Media:

Current situation

Media representatives and journalists show an on-going interest in advertisement of energy efficiency, including energy labelling and promotion of energy efficient appliances. But there are not many TV programmes that show energy efficiency or labelling aspect. It is therefore good to use this opportunity to more widely promote energy labels to the general public.

Proposed improvement

More attention to this item would be beneficial. In addition, joining together with other potential partners would increase the impact, as more activities could be organized.

Activities to be taken

Always react upon concrete requests from journalists and provide information to them about energy labels and energy efficiency implications. Also connect various partners

(state agencies, retailers, manufacturers, energy utilities, consumer groups etc.) to prepare publishing materials and to focus general attention to this topic.

Target: to increase of published materials devoted to energy efficient appliances

Within the CEECAP project we will:

- **Involve media and initiate publishing materials explaining and supporting the usage of energy labels**

- **Try to involve other partners to be more proactive in media publishing (including retailers, manufacturers, energy utilities, consumer and environmental groups, etc.)**

Consumer organizations:

Current situation

Practice of retailer's show, that consumers are interested in the energy efficiency appliances but they are not sufficient aware of energy labels. Existing income of consumers is stopping usage the most energy efficient appliances.

The Office of Competition and Consumer Protection implements the governmental policy of consumer protection. The primary objective of the OCCP in this area is to represent the public interest, i.e. to initiate administrative proceedings in case of practices infringing collective consumer interests.

The OCCP opines drafts of legislative acts and other legal documents ensuring that these suitably cover the interests of consumers. The Office also initiates legislative changes aimed at providing weaker market participants with the most comprehensive protection.

The OCCP cooperates with municipal and district consumer ombudsmen and non-governmental organisations financed by the State Budget (Consumer Federation, Association of Polish Consumers) that provide free of charge legal services in individual cases.

Consumer Federation is a non-governmental organization that initiates pro-consumer changes in legislation, works in standardization and certification commissions, creates consumer lobby to promote consumers' interests, seeking support for consumer protection policy among Parliament members and provides schools with consumer education programs.

Association of Polish Consumers is an expert group with no mass membership. The Association i.a. tests products and services, and publishes the results of tests, takes part in standardisation work and develops and promotes consumer education projects.

Proposed improvement

Continued support to providing information about the energy labelling and efficient appliances and an effort to initiate national testing of appliances would help to further increase the general knowledge of consumers about this topic and it would also help to further increase the attention of importers, retailers and manufacturers to this topic.

Activities to be taken

Continued support for the consumers in their public information campaigns. Also further organizations, such as the energy utilities, could be involved in informing their clients about the energy efficiency aspects of appliances.

Target: motivate them to take their role in the control of proper labelling and testing of appliances, and informing customers about the advantages of orientation by labels

Within the CEECAP project we will:

- **Provide information for promoting activities**
- **Motivate their orientation towards energy labelling and energy efficient appliances**

- **Involve other organizations, such as environmental groups, to be proactive in the promotion of energy efficient appliances through the energy labels**

EU Flower

Current situation

The Eco Flower logo (for environmentally friendly products) can be used on energy label for selected environmentally friendly products. In Poland exists also Polish Eco Label. Since 2005 the criteria for Eco Flower and Polish Eco Label are the same. It is the Polish Centre for Testing and Certification that tests appliances and issues a certificate.

Proposed improvement

Support actions to promote energy labels as a part of the general promotion of environmentally friendly products.

Activities to be taken

Collection and distribution of materials focused on energy labels.

Target: to exchange information between energy labels and the eco-flower to promote energy efficient and environmentally friendly products towards clients, retailers.

Within the CEECAP project we will:

- **Support promotion efforts of the environmentally friendly products and the energy label for household appliances**

Retailers and Internet shops:

Current situation

Labels are visible in Poland in large shops (appliance supermarkets) but not always in small shops. Information on the labels is very rarely controlled and appliances are not tested. Consumer awareness about how to use information from the labels is still insufficient.

Proposed improvement

Proposed improvement for higher degree of presence of labels in shops, more proactive promotion of labels towards the customers, and giving full attention to the reproduction of information from the energy labels into the retailer catalogues.

Activities to be taken

Work with concrete retailers (both classic shops and internet ones) to increase the presence of labels in their shops, use labels for active promotion of their products, select the most energy efficient products to be sold by them. Prepare concrete tips on how to promote energy labelling and efficiency aspects of appliances to customers, help to follow the market with giving attention to the best or to the most problematic types of appliances etc. Also work with the state control institutions on forcing them to do concrete action and/or to get their support in further action towards the retailers.

Target: increase the level of labelling in all types of shops, increase the self-motivation of retailers for further promotion labels to their customers, proper usage of labels and information from the labels.

Within the Ceecap project we will:

- **Undertake random shop inspection controls and inform retailers and the state control bodies about the results**
- **Organise random control of the content of energy labels and its method of publication and inform retailers and the state control bodies about the results**

Synergy effects

Current situation

The general increase of energy prices, raising attention to the negative environmental impacts of energy usage, energy security issues etc. – this all supports the ever wider usage of energy labels.

Proposed improvement

It is possible to reach synergic effects by adding label and appliance information to other projects, organisations and institutions, within public procurement etc. The promotion of labelled appliances in the public procurement should be a priority.

Activities to be taken

Follow the market and constantly initiate efforts to increase the profile of energy labelling.

CEECAP can help to call government's and controlling authorities' attention to labels. As a result of the project more controlling activities are expected. The project gives good knowledge for authorities, manufacturers and retailers about UE and national legislation (with current amendments) – a starting point to improve the labelling system and to implement UE directives.

Target: ensure that energy labels will contribute to the increase of energy intensity of household energy usage and other environmental benefits

Within the Ceecap project we will:

- **Support any multiplication effect of various related activities, initiate such steps and promote them among the project target groups.**

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