

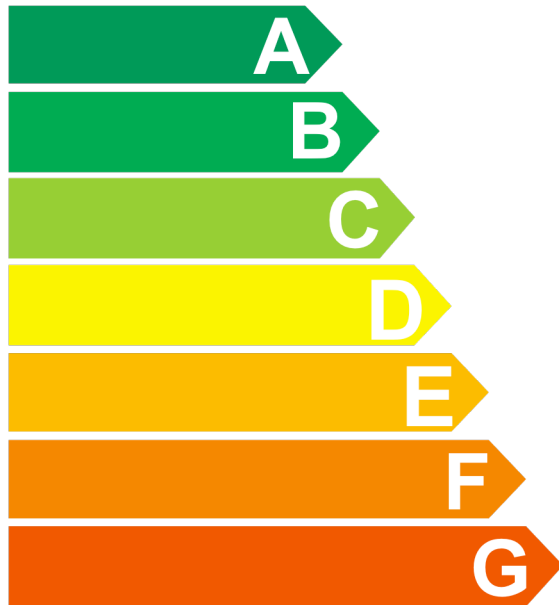


Energy

Manufacturer
Model

Logo
ABC
123

More efficient



Less efficient



Experiences with verification and enforcement of the EU Energy Label

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Overview

- Issues, problems
 - Measured versus declared
 - Verification procedure
 - Large variety of products
- Requirements for effective compliance checking (proposals)

What are the Issues?

- Accuracy of energy labels is essential
- Compliance checking responsibility of (27) EU countries (and in several countries delegated to regional level)
- Many reported difficulties
- Some suggested improvements
- Based on lessons learnt in CEECAP project, EnR WG Labelling & Ecodesign
- Joint paper forthcoming

Many countries don't check compliance

- Most countries check label presence in shops
- Various countries (mostly NMS) claim not to have access to a qualified test laboratory
- Most countries don't have an established verification & enforcement procedure
- Out of 27 EU countries, only 3 (+1) regularly test accuracy of labels
- Establishing non-compliance is hard

Measured versus declared energy performance

- Tests repeatedly show higher energy consumption than declared
- Approx 15% of all tested products deviated more than allowed 15%
- On average: measured energy consumption 8% higher than declared
- Test tolerance seems lower than 15%
- Conclusion: energy performance is structurally overstated, but the current verification practices can't stop this

Verification procedure complex and expensive

- Procedure is long (up to 2 years)
- Involves four tests and a check of technical documentation
- Not clear if documentation can be requested and checked until after first test
- Results uncertain
 - Often, tested products are no longer on the market
 - Legal consequences unclear or too low
 - Legal service not interested

Large variety of product type numbers

- In EU, approx 30,000 models on the market (only cold and wet appliances)
- Model type numbers change frequently
- Many models are essentially similar; this is not known to enforcement authorities
- Suppliers may declare energy performance anyway they like
- Authorities must check every single model (type number) to establish (non) compliance

Requirements for effective compliance checking (in EU)

1. Improved availability of adequate test facilities
 - Round robin testing to improve quality
 - Use of certified laboratories (accredited or notified bodies)
 - Lowering of allowed measurement tolerances when using certified labs

Requirements for effective compliance checking (in EU)

2a. Technical documentation always available

- Technical documentation supporting energy performance claims made available when a product is placed on the market
- Enforcement authorities can routinely check documentation as part of market surveillance

2b. Suppliers must link related model type numbers within all EU countries

- Enables authorities to check if product has been tested already
- Facilitates information sharing

Requirements for effective compliance checking (in EU)

3a. Simplified procedure

- First test allows (generously) for measurement and production tolerances
- Failure to meet limit + tolerance = strong indication of non-compliance
- Settlement proposed to supplier
- If refused: Two additional tests, but cost + fine for supplier if average of three tests doesn't comply

3b. Reduced measurement tolerances

- Lower tolerances if laboratory can prove it can do better than assumed

Requirements for effective compliance checking (in EU)

4a. More testing

- Member states should check accuracy of energy performance declarations
- Legal action should follow in case of non-compliance
- Important now, more important when Ecodesign measures (MEPS) introduced

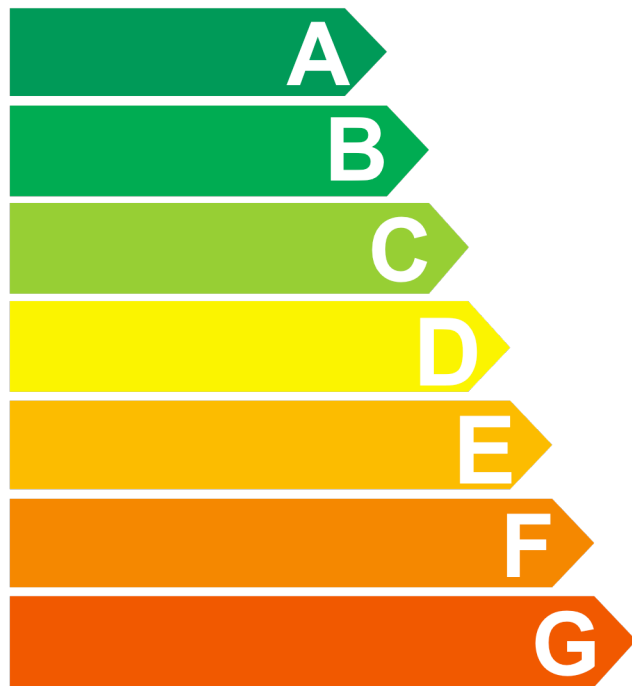
4b. EC to facilitate information sharing

- E.g. database of tested products, with related type numbers in all EU countries

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Thank you for your attention

more info:

www.ceecap.org

www.enr-network.org



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