



ANEC/ BEUC POSITION ON ENERGY LABEL REQUIREMENTS FOR REFRIGERATING APPLIANCES

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Summary

In 2008, the EU proposed improving the energy efficiency of refrigerating appliances by introducing mandatory eco-design requirements. In addition, the Commission saw a need to update the Energy Label requirements for refrigerating appliances to better inform consumers.

In this position paper we call for introducing the new Energy Label requirements more quickly than foreseen in the draft legislation.

We also call for redefining the class boundaries as only adding a third class (A+++) on top of "A" does not make the scheme fit to respond to future technological innovations.

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

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

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

Introduction

In 2008, the European Commission proposed to improve the energy efficiency of refrigerating appliances by introducing mandatory Ecodesign requirements. Moreover, the Commission proposed updating the existing Energy Label requirements for refrigerating appliances. ANEC and BEUC welcomed both proposals¹. As the energy labelling scale had reached its end in the 1990s, ANEC and BEUC had for long been calling to adapt the scheme to technical progress.

While refrigerating appliances will have to meet minimum energy efficiency requirements from 1 July 2010 onwards², 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 refrigerating appliances³.

1. Label needs to be updated as soon as possible

New requirements should be provided to consumers 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 This timeframe is far too long considering that the Energy label requirements for this product group are completely outdated.

As the Energy Label requirements and the Ecodesign requirements will be based on the same calculation formula, manufacturers are already aware about the calculation formula and how to test the energy efficiency of refrigerating appliances 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.

2. Labelling classes should be more demanding

The delegated act for refrigerating appliances must ensure that there is sufficient headroom to accommodate for future technological development. We strongly oppose merely introducing a third plus on top of "A" as this would make the scheme inflexible.

Moreover, we strongly oppose the proposal to only decrease the EEI that determines the class boundaries of class "A" in the year 2014.

Instead of adding a new class and only making a minor change at class "A", we ask to redefine the energy efficiency values of the current A++ to G classes. Thus, the current A++ appliances should be allocated to the future "A" class.

¹ See ANEC/BEUC position paper "Consumer relevant eco-design and labelling requirements for refrigerators and freezers", <http://www.anec.eu/attachments/ANEC-PT-2008-EuP-048final.pdf>.

² Based on Commission Regulation (EC) No 643/2009 with regard to ecodesign requirements for household refrigerating appliances.

³ Our comments relate to the working draft as distributed to stakeholders on 11 February 2010.

Presuming that the technological improvement potential will be achieved at an Energy Efficiency Index of less than 11, the future values should at least be downgraded by one class as follows:

Energy Efficiency Class	Energy Efficiency Index
A+++	$EEI < 11$
A++	$11 \leq EEI < 22$
A+	$22 \leq EEI < 33$
A	$33 \leq EEI < 42$
B	$42 \leq EEI < 55$
C	$55 \leq EEI < 75$
D	$75 \leq EEI < 95$
E	$95 \leq EEI < 110$
F	$110 \leq EEI < 125$
G (least efficient)	$125 \leq EEI < 150$

Should this allocation be unpractical at the lower end of the scale with regard to absorption type refrigerators, we propose making the band of class "G" broader. This would allow allocating all absorption type refrigerators into the lowest energy efficiency class.

Information at the point of sale has to inform consumers clearly about the new Energy Label.

3. Pictograms have to be clear

We call on the Commission to provide the information on the annual electricity consumption prominently on the label. In the draft proposal, the box for the electricity consumption seems to be considerably smaller than in the working documents for TVs. Therefore we ask to increase the size of this information.

We welcome providing the information about noise levels on the label.

The pictogram indicating the size of the cooling department (a package of milk) is ambiguous and not self-explanatory to consumers. We ask that the pictograms used on the new Energy label take into account any existing examples or standards for such symbols (e.g. symbols used for similar purposes in other parts of the world) and that consumer comprehension of the symbols is tested before the label is introduced. In addition, we suggest combining the pictograms with written text as this will provide for clarity for consumers.

4. 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 up to ten years after the last refrigerator/freezer of a certain model has been placed on the market.

5. 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 distant selling. Only indicating the energy efficiency class will not be sufficient to allow for a well-informed purchase decision.

6. 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.

7. Impact of the measure on consumers has to 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 refrigerating appliances in the revision process and to make changes if necessary.