

Appliance compliance: the EU

APEC workshop

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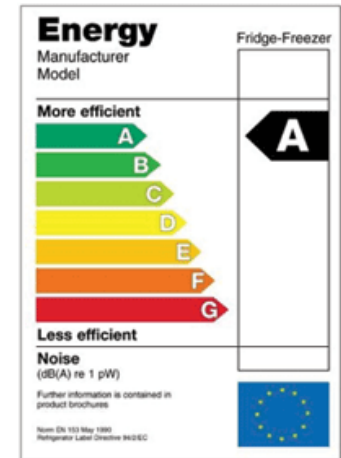
Overview

Scope: MV&E for EU Eco-Design and mandatory categorical labelling

- The key features of the system(s) used
- How effective are they?
- Recommendations/advice on developing MV&E programmes?

Policy background - EU Ecodesign and Energy Labels

- Mandatory for over 20 products
- EU Ecodesign = MEPS though other environmental considerations
- self-declaration by manufacturers/importers



Key features

- The 27 Member States responsible for MV&E, not the EU
- MS governments will:
 - Transpose/implement EU regulations
 - authorises a national agency (agencies) to undertake MV&E
- Usually, MV&E agencies will:
 - determine strategy
 - Undertake store surveys (for labels)
 - Employ test laboratories to measures equipment (for compliance, label and MEPS)
 - Interact with supply chain (advise, take action)
- Voluntary action by other agents:
 - Eg Consumer organisations may undertake informal MV(not E)

How effective? (1/2)

- Level of checking by MS MV&E agencies:
 - Not all EU MS undertake MV&E
 - Budget spend low (perhaps €7m/year, approx 80 FTE, across EU)
 - Low level of checking (MV) currently (though increasing, over 1000 tests/year)
 - Little reporting of results
 - However, MV&E improving the last couple of years (eg UK moved to a single better funded agency from multiple regional agencies)
- Compliance levels:
 - Dependent on product and timing (eg label coverage takes time)
 - Mostly unknown (less than 90%?)
 - EU ATLETE project:
 - 80 refrigerator products selected randomly, tested
 - 80% pass (energy and size), 43% pass (all aspects)

How effective? (2/2)

- Enforcement and penalties
 - Few cases found, few result in prosecution (fines)
 - Low level of fines (€100s to €41k maximum), low deterrent, to date
- Issues
 - technical competency (difficult technical area few staff in compliance agencies)
 - Insufficient number of accredited testing laboratories (only 7 countries can test multiple products)
 - Little co-ordination between the 27 MS
- **SUMMARY** –low level of MV&E to date

Recommendations

- Include MV&E expectations in EU/MS regulations (eg surveillance coverage required, level of sanctions)
- Increase resources for MV&E (very cost-effective policy measure)
- Make the supply chain aware of their responsibilities – guide them through the policy process (eg NMO in UK)
- Require a central register of all products placed onto the EU market
- Consider the use of third-party (independent) testing (submit test reports)
- Co-ordination (pooling) of MV&E results and experience by individual MS regulators, also enable strategic targetting of products
- Make regulations in Eco-design and labelling directives simpler (cheaper) to check for (non-) compliance.
- Similarly make test procedures simpler;
- Continue towards harmonising testing procedures globally (easier for MV&E agencies to share knowledge on global products)

Thank you!

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References:

- ATLETE: <http://www.atlete.eu>
- Clasp: <http://www.clasponline.org>

Results: ATLETE

ALL (70)		
	PASS	FAIL
Energy class	79%	21%
Energy consumption	77%	23%
Storage temperature	90%	10%
Storage volume	73%	27%
Temperature rise time	84%	16%
Freezing capacity	70%	30%
TOTAL	43%	57%