

Notes from joint EFCEM / EEPLIANT2 webinar on 12 July 2019:

“What suppliers must do to comply with energy label and ecodesign regulations for professional refrigerated storage cabinets”

Slides and a recording of the webinar are available via EFCEM.

Speakers

Fabio Gargantini, Executive Secretary of EFCEM

Davide Polverini, DG GROW policy officer responsible for energy label and ecodesign regulations for professional refrigerated cabinets

Franz Zach, Austrian Energy Agency, WP6 Leader

Jeremy Tait, WP6 Facilitator, PROSAFE Consultant

Agenda

1. Welcome and introduction to the role of EFCEM, Fabio Gargantini (10 minutes)
2. Introduction to EEPLIANT2, Jeremy Tait (5 minutes)
3. Update from DG GROW, Davide Polverini (10 minutes)
4. What suppliers must do to comply, Franz Zach & Jeremy Tait (45 minutes)
5. Q&A and discussion, all (15 minutes).

Context of the webinar

This webinar explained what is required from technical and marketing teams in supplier businesses regarding energy labelling and ecodesign requirements for professional refrigerated storage cabinets, drawing on the good practice approaches collated through the EEPLIANT2 project. The content was also informed by overall lessons from recent lab testing of 25 professional cabinets and inspection of technical documentation from over 50 cabinets across Europe under the EEPLIANT2 project.

Key points of the webinar

Fabio Gargantini welcomed delegates and introduced EFCEM and its benefits to members.

Davide Polverini of DG GROW emphasised how important proper enforcement is to effectiveness of the regulations and highlighted three main items:

1. A 'Frequently Asked Questions' document published by DG GROW about the regulations
2. That EN16825 is used by authorities for conformity assessment and will be formally recognised by the Commission as the harmonised standard for presumption of conformity purposes during summer 2019.
3. Review of these regulations by the Commission is expected to begin in Autumn 2019, to review topics listed in the regulations themselves plus definitions, scope and stringency.

Franz Zach and Jeremy Tait presented the main material to help suppliers. This covered scope, obligations of suppliers, common non-compliances, what a market surveillance inspector is likely to ask.

Webinar materials made available

Slides used and a recording are available via EFCEM. A brochure of guidance to suppliers that formed the basis of the webinar technical content is available via EFCEM and via EEPLIANT2 from August 2019.

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Questions and discussion

Question: Which test method should be used?

Answer: EN16825 is used by authorities for the purposes of conformity assessment and this remains true despite publication of EN ISO 22041 in July 2019 which supersedes EN16825.

Question: Must every cabinet model be tested?

Answer: No. Suppliers may extrapolate from test results of a similar cabinet, or test a representative model and declare that consumption (such as for a family of cabinets, as long as the tested cabinet has the highest consumption of the family), or explain in the technical documentation why a model has the same consumption as another tested model.

Question: Won't all energy labels be only A to G classes soon?

Answer: The Commission is transitioning energy labels for all products back to a simple A to G system over coming years, but this is several years off for professional cabinets and a date will be set during review of the energy label regulation for professional cabinets which starts at the end of 2019.

Question: Must energy labels be displayed at trade fairs such as HOST 2019?

Answer: The energy label regulation for professional storage cabinets is not explicit about trade fairs. A determining factor that suppliers must consider is that if cabinets are offered for sale in this venue, then the labels must be displayed. The energy label anyway has useful marketing value and suppliers are encouraged to display it.

Question: what links are there between the EPREL EU database and the EEPLIANT2 project?

Answer: The EPREL database does not feature in the EEPLIANT2 work plan and whilst the successor EEPLIANT3 project has an activity focused on EPREL, it is to help Market Surveillance Authorities with no plans to produce material directly for suppliers. An EPREL brochure for suppliers has been produced for the Nordic Council of Ministers, link shown in list at end of this document.

Question: Do these regulations apply to refrigerated display cabinets?

Answer: No. Commercial refrigerated retail display cabinets will come under a later 2019 regulation for 'Refrigerating appliances with a direct sales function'. It was noted that professional cabinets that are fitted with a glass door are included under the regulations for professional cabinets as long as the definitions of a professional cabinet as set out in the regulations are met.

Question: how about cabinets that were already in the supply chain before July 2019?

Answer: Any individual cabinet already in an EU supply chain at 1 July 2019 must meet the requirements and EEI threshold in force at the time that cabinet was placed on the EU market (which means when this particular item first entered the supply chain in the EU from the manufacturer (or from the importer if the manufacturer is outside of the EU)). Appliances placed on the EU market after 1 July 2019 must meet the new requirements.

Question: EN ISO 22041 has some significant differences in its methodology compared with EN 16825 and cabinets would have to be retested - how long will it be until EN ISO 22041 is adopted as the harmonised standard? (One key difference is number of shelves installed during test, which also affects calculated net volume and cabinet loading).

Answer: The EEPLIANT2 team will seek guidance on this from DG GROW and report back to EFCM.

Jeremy Tait & Franz Zach

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For further information

1. The Commission's web page for guidance on energy label and ecodesign regulations for professional refrigerators is at https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-andrequirements/energy-label-and-ecodesign/energy-efficient-products/professional-refrigerators_en
2. The DG GROW web page for general ecodesign information is at http://ec.europa.eu/growth/industry/sustainability/ecodesign_en A guidance document called FAQ related to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095 is published here: https://ec.europa.eu/energy/sites/ener/files/guidelines_2018_refrigerated_storage.pdf
3. For guidance on how to comply with all EU product rules, see The Blue Guide on the implementation of EU product rules, published by the European Commission DG GROW, 2016 version, available in all EU languages. https://ec.europa.eu/growth/content/'blue-guide'-implementation-eu-product-rules-0_en
4. To find your local Market Surveillance Authority (MSA) for this topic, see https://ec.europa.eu/growth/single-market/goods/building-blocks/market-surveillance/organisation_en Download the MSA listing 'by sector' and look for 'Eco-design and energy labelling'.
5. Nordsyn has produced a Guideline for suppliers in English about EPREL, available at the Swedish Energy Agency's website: http://www.energimyndigheten.se/globalassets/energieffektivisering/_jag-ar-saljare-eller-tillverkare/ekodesign-energimarkning-och-ce-markning/eprel-guideline_en_190710.pdf
6. EEPLIANT2 project website is here: <http://eepliant.eu>