

## **Come On Labels - Supporting energy labelling of products by monitoring labels in shops, collecting information about tests, supporting surveillance, and promoting to consumers**

**Author:** *Juraj Krivošík, Executive Director – SEVEn, The Energy Efficiency Center, Come On Labels project coordinator, Americká 17, 120 00 Praha 2, Czech Republic*

*Tel.: + 420 224 252 115, fax.: + 420 224 247 597, [juraj.krivosik@svn.cz](mailto:juraj.krivosik@svn.cz),*

*[www.come-on-labels.eu](http://www.come-on-labels.eu)*

### **Affiliations:**

Corinna Fisher, Öko Institute, Germany

Milena Presutto, ENEA, Italy

### **Abstract:**

The Come On Labels project was organized between 12/2010 and 5/2013 and focused on the implementation of the energy labelling legislation in 13 European countries. The main project activities included:

- Overview of the national implementation of EU labelling legislation,
- Visiting over 900 shops to assess the proper display of energy labels at the points of sale,
- Collection and exchange of information about the product compliance verification activities through laboratory testing around the EU,
- Promotion of the energy labels to consumers, and
- Evaluation and monitoring of labelled product early and better replacement schemes.

This paper focuses on:

- Comparing EU legislation on energy labelling and ecodesign in terms of energy efficiency classes created in each product specific energy labelling scheme and actually existing on the market for the contemporary effect of the ecodesign requirements
- Monitoring the level of market surveillance activities in selected countries for energy labelling,
- Collected information about compliance verification tests within the project duration,
- The results of the shop visiting exercise that took place in 13 European countries:
  - 3 rounds of shop visits (spring and autumn 2012, spring 2013),
  - 20 shops at least in each country at each round,
  - Focus on all types of shops and labelled products.

## **1. Summary: main project findings and achievements**

The Come On Labels project has been designed in 2009, before the new energy labelling legislation were put in place. When, starting from 2010, the new framework directive and the first product specific delegated acts were enforced for the major household appliances, TV and lighting the Project was in the unique position to be the right tool to support the proper implementation of new energy labelling schemes in 13 European countries. The project targets are market surveillance Authorities, retailers, suppliers and consumers.

Examples of the most successful activities include:

### **Working with market surveillance authorities:**

Each EU Member State is responsible for organising market surveillance activities, ensuring that correct information is shown on the energy labels, and that energy labels are properly displayed in shops and other points of sale. However since the level of such activity in a number of countries is insufficient, the Come On Labels project has organised the following supporting actions:

- Two presentations to ADCO Labelling group and numerous individual cooperations on energy labelling market surveillance, related to label display and product testing,
- discussions and explanations aimed to reach a common understanding of the legislation labelling requirements, for example about the meaning of individual icons displayed on the label,
- clarification of the concept of “placing on the market and putting into service”,
- sharing the outcome of the shop visits and the found levels of proper label display, and hypothesising possible improvement activities,
- organising common training activities for national inspectors, or the market actors such as the retailers and suppliers,
- analysing the feasibility of product compliance verification activities through laboratory testing and best ways for sharing test results data among national market surveillance Authorities in the EU Member States.

### **Collecting and sharing data on product compliance verification through laboratory tests:**

Testing products to verify the declarations on the energy labels is one of the key factors for ensuring that energy and resources savings foreseen through energy labelling are really achieved. Unfortunately, the number of product compliance verification testing is insufficient. The project is not expected to directly test products, but has given an important contribution in this sector through:

- collecting publicly available information about product tests results. Information on product testing in the EU (UK, The Netherlands, Sweden), as well as in Australia and USA has been collected, together with product testing activities of other Intelligent Energy Europe projects. All information has been summarised and circulated among stakeholders with the aim to improve the knowledge on the feasibility and affordability of product testing.

- Stimulating EU wide cooperation in product testing: While manufacturers test their product only once for the whole EU market, MSA usually refer to the models available on their national markets. The Come On Labels project has therefore prepared documents summarising the existing experiences in testing products in foreign laboratories, regular meetings of authorities to share experience, regional testing approach sharing the model names of products, and the examples of European projects. All these reports are aimed at making the EU-wide cooperation easier for national authorities.

### **Monitoring the label presence in shops<sup>1</sup>:**

Energy labels can be a successful tool for consumers if they are properly displayed in shops. But how often and how correctly are labels shown in shops? The Come On Labels project has organised three rounds of shops visits, each time visiting around 300 shops, monitoring the presence of energy labels per shop type and product type. Outcomes include:

- Monitoring the label presence per shop type and evaluating possible improvements for shop types where correct label display is lower: kitchen studios, individual retailers, and general hypermarkets,
- monitoring the label presence per product type, showing a lower percentage of labelled model for wine appliances, air-conditioners and electric ovens and the increasing percentage for TVs,
- evaluating the effect of new energy labels, already displayed in 2012 on more than half of the models, to lower the amount of incorrect labelling, since the new energy labels are printed in one part only.

### **Retailer training manual<sup>2</sup>:**

In order to improve the level of label display in shops, the Come On Labels project has prepared a retailer training manual aimed at educating shop assistants on the proper label display. The manual, available in 11 languages and 13 country adaptations, summarises the legal requirements of product labelling, explains the marketing importance of label display, shows examples of correct/incorrect label display in shops, and gives concrete advice which the shop assistants can give to customers. The training material has been:

- Circulated to individual market surveillance authorities' inspectors
- Used in individual retailer training seminars for retailer chains and shops
- circulated to shops via national CECED manufacturers' association members
- Disseminated at conferences and events for market actors.

### **Dissemination to consumers and end-users<sup>3</sup>:**

Purchasing decisions by consumers influence the energy consumption of installed products for many years ahead. Therefore consumers are the primary target for energy labels. But consumers have to be fully aware about energy labelling and understand the content of the single products label. Consumer awareness and label understanding has become more

---

<sup>1</sup> <http://www.come-on-labels.eu/displaying-energy-labels/status-of-appliance-labelling>

<sup>2</sup> <http://www.come-on-labels.eu/displaying-energy-labels/retailer-training-manual>

<sup>3</sup> <http://www.come-on-labels.eu/promoting-energy-labels/examples-of-promotion-activities>

important with the introduction of new energy labelling. The Come On Labels project has organised a number of activities for better consumer awareness:

- Numerous press releases and articles in general media – over 170, with a readership/viewers of over 3,3 million,
- preparation of leaflets, brochures, posters, or bookmarks and distribution to consumers via shops, information centers, energy agencies, libraries, etc., - over 580 pieces printed,
- Organisation and participation to events, seminars, fairs and exhibitions, explaining the energy labels to visitors and participants.

#### **Comparing energy labelling with ecodesign requirements<sup>4</sup>:**

Energy labels were designed to help consumers to choose more energy efficient products at points of sale. Energy class A has been for long time the best energy efficiency class. However due to the technological development, the introduction of the three new A+/A++ / A+++ classes and the contemporary enforcement of the ecodesign requirements, class A is in a number of cases only the least available energy class on the market. The Come On Labels project has therefore produced a paper, summarising the range of energy classes displayed on energy labels and the effect of the enforcement of minimum ecodesign requirements. This paper has been circulated among national authorities and market actors, to explain the energy efficiency classes available on the market for individual products.

Product group		Energy efficiency classes shown on the energy label	Energy efficiency classes allowed on the market by minimum ecodesign requirements	Energy efficiency classes shown on the label, but not allowed by minimum ecodesign requirements
Washing machines		A+++ / D	A+++ / A	B, C, D
Dishwashers		A+++ / D	A+++ / A	B, C, D
Refrigerating appliances	Compression type	A+++ / D	A+++ / A+	A, B, C, D
	Absorption type	A+++ / G	A+++ / E	F, G
Televisions		A / G	A / G	
Light sources		A / G	A / C	D, E, F, G

*Due to the complexity and the multiple actions of the project it is impossible to give a complete summary of the outcome in this paper. Therefore in the following paragraphs only three tasks will be described in detail: the implementation of the energy labelling and ecodesign legislation in EU Member States, the shop visits for monitoring label presence and the overview of product testing.*

<sup>4</sup> <http://www.come-on-labels.eu/legislation/eu-product-energy-labelling>

## 2. Energy Labelling and Ecodesign legislation implementation

While organising the project activities, such as visiting shops monitoring the presence of energy labels, collecting information about the product testing activities, disseminating energy labels to consumers and evaluating experience about product replacement schemes, one of the key features of the Come On Labels project activities in all of its 13 participating countries<sup>5</sup> was a regular contact with the national Market Surveillance Authorities, as well as other key national stakeholders, such as government representatives, manufacturer and retailer associations, etc. All of the project achievements, such as an overview of the presence of labels by the types of products and shops, or the examples of product tests, have been negotiated, with the aim to improve the quality of market surveillance activities, and thereby the level of product/shop compliance and consumer satisfaction.

One of the specific product project outcome was a detailed review of the level and nature of activities undertaken in individual project countries<sup>6</sup>. Find out here examples of some of the activities described in the main deliverable – only covering countries participating directly to the project:

A positive example of an increase of the level of surveillance activities came from the **Czech Republic**, which has in the past visited only limited number of shops, to verify the presence of energy labels, eg. 4 in the year 2010. In the year 2011 this has increased to 18 shops surveyed, and in 2012 to close to 300 shops. Overall results have been published in a press release. Authority representatives confirmed, to maintain this level of shop visits also for the future periods.

**Austria** reports 70 shop visits per year, with last year identifying 70 products not being labelled. This level of shop surveillance is considered by the authorities as sufficient and does not expect more controls in the future. No product testing takes place in Austria, but active participation to ADCO labelling group is confirmed.

In **Belgium**, 1,3 full time staff equivalent work at the ministry responsible for the legislation adaption and inspectorate responsible for its implementation, and 0,2 full time equivalent responsible for energy labelling related ecodesign and environmental product issues. In 2011, some 202 shops have been surveyed, and 3330 products declared as non compliant out of almost 20 thousand surveyed. 46 products have been tested in the last 4 years (2009 – 2012), mainly light sources, refrigerators and dishwashers, no sanctions have been applied, some lamp manufacturers have adapted the product packaging. Testing three units of the Step 2 is considered as one of the most prohibitive reasons for not conducting more product tests, and for the future foreign laboratories are expected to be able to submit tender applications.

The situation in **Germany** is more fragmented, since the surveillance activities take place by individual federal states. The recast of the German legislation on labelling, as a reaction to

---

<sup>5</sup> Austria, Belgium, Czech Republic, Croatia, Germany, Greece, Italy, Latvia, Malta, Poland, Portugal, Spain, UK

<sup>6</sup> Those interested in more information on related topics, may also consult another IEE projects: ATLETE II, focusing on market surveillance activities, by a questionnaire, mainly related to washing machines: <http://www.atlete.eu/2/market-surveillance-authorities> and Ecopliant project, focusing on ecodesign related activities: <http://www.ecopliant.eu/activity-streams/work-package-2-establishing-best-practice/>.

the EU Energy Labelling directive recast, has strengthened the role of market surveillance, eg. by introducing the requirement to set up a market surveillance plan, and reporting requirements. An example from the federal state *Hesse* includes a cooperation between the authorities and retailers, not only in ensuring correct labelling but also actively promoting efficient appliances. In *Bavaria*, laboratory testing of LED lamps is envisaged for 2013, related both to the energy labelling and ecodesign requirements. *Rhineland-Palatine* reports on 211 shop visits (including both first-time and follow-up visits) and 18 cases of administrative fines conducted. *Baden-Wuerttemberg* focused on an agreement between the federal state's ministry of environment and the local authorities, including a specific target for conducting market surveillance and establishing a management system comprising both labelling in shops and product testing. Results of activities are shared on a national level in the Bund-Länder working group, and internationally within the ADCO group on market surveillance.

The **Italian** surveillance authority is planning to implement a programme of checks on lighting products in the period 2013 - 2014 as part of a Memorandum of Understanding with the Italian Union of Chambers of Commerce, in cooperation with the chambers of commerce in the area, which includes the inspections of manufacturers and distributors as well as carrying out tests in selected laboratories. In general it is expected that suppliers must provide the technical documentation of the controlled product and, in case of doubt, the demonstration of compliance through the results of laboratory tests.. The monitoring costs are borne by the Authority. While few product tests take place in Italy, for 2013-2014 about 70 light sources are planned to be tested. As for the cooperation and international information exchange opportunities, Italian representatives appreciate the co-funding of market surveillance actions by the EU programmes and the European Commission offer of both financial support and the opportunity to meet with other Authorities and related institutions to share experience, compare procedure and when possible results. Also, EU centralised market surveillance actions and studies, developed by the European Commission such as the 2008 shop survey, or the funding of Round Robin test are welcomed.

One of the countries where little labelling compliance verification activities take place is **Latvia**, where no product testing and limited shop visits take place. However, Latvia can benefit significantly from the international cooperation. The 'Nordic project', focusing on market surveillance of the Nordic countries, also invites Baltic countries for cooperation and Latvian authority has confirmed its interest to receive the results and learn from its best practice.

The legislation in **Malta**, for example, includes the right of the Technical Regulations Division to request technical documentation in electronic format from suppliers within a specific timeframe and in case of potential and actual non-compliance cases, to order the supplier to forward the evidence concerning the accuracy of the information supplied on their labels or fiches and take the necessary preventative steps to ensure compliance. Some 20 formal shop visits took place in 2012 and 20 are planned for 2013, and while no formal fines have been issued, information meetings and retailer trainings have been organised to inform non-compliant shops about their obligations related to energy labelling. No product tests take place, with one of the arguments being the lack of national accredited laboratory, but an interest in international exchange of experience and best practice was confirmed.

The last country to fully transpose the Energy Labelling directive has been **Poland**, which was officially and publicly urged by the European Commission to adapt it. The legislation was issued in September 2012 and entered force in Poland on February 1<sup>st</sup>, 2013. Two organisations are responsible for the market surveillance, one for all energy related products except TVs, and one for TVs only (and other electronic equipment for other surveillance matters). Due to the late approval of the legislation, no formal shop visits and product tests have yet been reported. A plan for testing 12 products has been announced for 2013, but the product categories have not yet been selected. Lack of financial resources and other priorities (dangerous products) are reported as the main barrier, but also an interest for international projects and active sharing and adaption of best practice.

**United Kingdom** is one of the EU countries, conducting regular product testing and shop surveillance visits. Its Advertising Standards Authority is also responsible for advertising and distance selling requirements. The approach of the National Measurement Office is to combine market surveillance with business support in order to increase compliance. In 2012, 188 retailers were visited, with average compliance over 70%, and 28 thousand products captured with over 60% compliant. Shops with a non-compliance rate of 50-100% products displayed were revisited, others received immediate advice followed by a letter requesting evidence of compliance. As regards product testing, the overall review of activities is not known, individual cases have been published in the form of press releases. The Energy Saving Trust, voluntary scheme covering 20% of the top energy efficient products, carried out 15 tests in 2010-2011 and 9 tests in 2011 – 2012, results of which have been discussed with the suppliers.

### 3. Shop visits

The proper presence of energy labels at the point of sale, or specific information on catalogues and for internet sales, is crucial to allow consumers to make an educated choice of their new appliances.

The experience shows that the presence of labels on appliances in many shops is in general high around the European Member States; however, significant problems still exist in relation to specific product groups or distribution channels.

The Proper position of the label according to the EU legislation is shown in Table below.

**Internet sites and mail order catalogues check:** It is important that customers unable to see the product (and therefore the label) displayed are provided with the essential information of the products before the purchase. Internet sales and mail order catalogues check can be approached in the same way as shop inspections. The list of information to be checked is included in the product specific implementing measure.

**Checking of product advertisements:** According to the new energy labelling framework directive any advertisement for a specific products shall contain the energy efficiency class, if energy-related or price information are disclosed. Therefore, one of the market surveillance actions is also to verify if the energy class is always properly mentioned on the advertisements.

**Table:** Proper position of the label according to the EU legislation

Appliance	Position
General	In the clearly visible position specified in the relevant implementing directive or regulation
Refrigerators, freezers and their combinations	The label shall be placed on the outside of the front or the top of the appliance, in such way as to be clearly visible
Washing machines	
Dishwashers	
Televisions	On the front, in such a way as to be clearly visible
Tumble driers	On the outside of the front or the top of the appliance, in such way as to be clearly visible, and not obscured.
Combined washer-driers	
Air conditioners	
Ovens	On the door (outside) of the appliance in such way as to be clearly visible and not obscured. For multi-cavity ovens, each cavity shall have its own label, except a cavity which does not fall within the scope of the harmonized standards.
Lamps	The label shall be placed or printed on, or attached to, the outside of the individual packaging of the lamp. Nothing else shall obscure it or reduce its visibility.

### 3.1 The shop visit methodology<sup>7</sup>

Within the Come On Labels project, 3 rounds of shop visits have taken place between December 2011 - January 2012 / August - September 2012 / and January - February 2013. The shop visits took place in 13 European countries and each partner visited at least 20 shops at every round of the shop visits.

The check of the correct label presence in the shops within the Come On label project should follow the same procedure for every visit in order to make inspection results comparable.

The formal procedure for each shop visit includes three steps: preparation, inspection and follow-up. The label display for each model of the investigated products should be recorded following the check list and the shop should be informed about the next steps that the

---

<sup>7</sup> <http://www.come-on-labels.eu/displaying-energy-labels/appliance-labelling-in-shops>

national Authority would be intending to take after the conclusion of the inspection. The follow-up depends on the verification procedure established in the national legislation.

In total, within the project, 900 shops have been visited, on average 300 shops per shop visit and 23 shops per country. The following types of shops were monitored:

- **Electronic superstores:** Large-scale specialists offering electrical appliances with a broad product range and often specialised departments for the different product groups.
- **Electric specialists:** Small and medium enterprises usually with a large range but a limited display area; often combined with service and maintenance offers.
- **Kitchen/Furniture stores:** Offering kitchen furniture including major household appliances; high degree of competence in planning and consulting services for clients; usually selling complete kitchens with most common major electrical appliances mainly of the built-in type.
- **Hypermarkets/Cash and Carry:** In most Member States, these are not as important for the sale of large household appliances as the other channels because the self-service character of these shops often does not respond to customers need for advice at the purchasing time.
- **Mail order and internet stores:** Based on websites and catalogues which are increasingly important for the sales of major domestic appliances. Information from the label and product fiche is displayed, often by text, not necessarily as a picture of the label.

Each country could select between two options for the selection of the range of shops covered:

- **Random selection:** in a selected town, region or country, making sure that each type of shops are represented. Within the random selection, some countries focused primarily on the retailers representing highest national sales.
- **Potentially “problematic” types:** the majority of shops covered are the ones expected to have lower presence of labels – in general or for certain type of shops.

**It is worth noting that the overall results of this exercise are not representative of the market for the EU and for individual countries, but only indicate some trends and identify some of the problems.**

Project partners have monitored all products covered by the old and the new energy labelling scheme:

Appliances with a “new label”:

- Washing machines
- Dishwashers
- Refrigerating appliances including wine storage appliances
- Televisions.

Note: TVs and wine storage appliances have been included in the calculations, even though some of the products may have entered the market before the labelling requirement entered into force in November 2011.

Appliances with the “old” energy label:

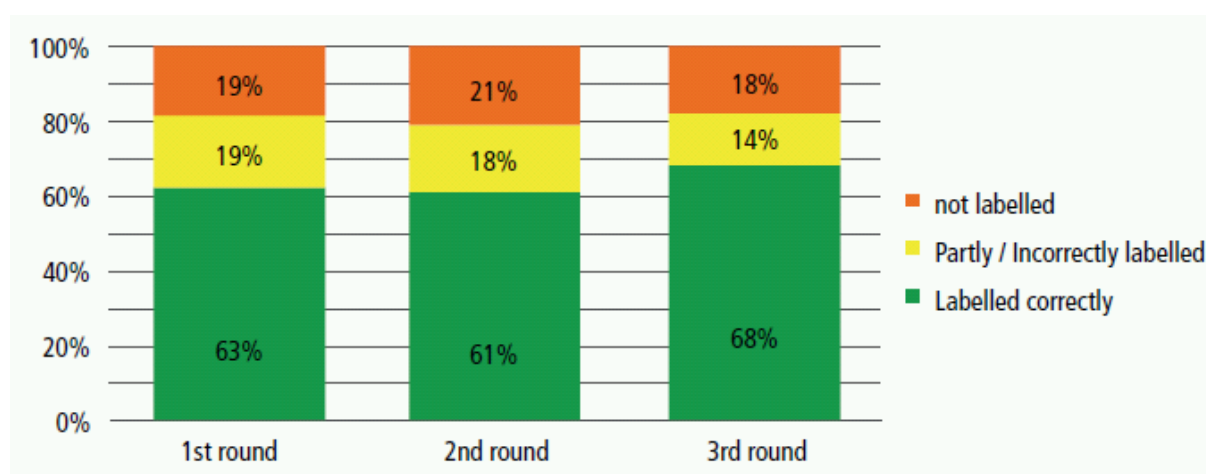
- Tumble driers<sup>8</sup>
- Electric ovens
- Air conditioners<sup>9</sup>
- Household lamps.

Light sources are not covered in the shop visit, since the label is printed on the package directly and therefore does not have the same potential label display problem as the other products.

### 3.2 Summary of findings of the proper presence of energy labels in shops

The overall result of the shop visit exercise is that between the late 2011 and early 2013 a **slight improvement** of the presence of energy labels at the points of sales has been occurred.

**Figure:** Share of proper label display in 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> round of shop visits per products



One of the main explanation, as shared by project partners, is the increased use of the new energy labels. The reasons for that are:

- The new energy label is only circulated in one piece which reduces the possibility of wrong label display
- Due to the new design and content there is a higher motivation of retailers to display label properly on products

<sup>8</sup> Voluntarily the new label can be used since May 2012.

<sup>9</sup> The new label is mandatory from 1 January 2013, but could be displayed before on a voluntary basis. This fact was reflected in the monitoring.

- Organisation of a number of promotion activities increased the attention of consumers towards the labels
- Within the market surveillance activities, some authorities and other organisations increased the level of activities related to label display.

The Come On Labels project also monitored a “**partial/incorrect label**” display (i.e. for example labels being printed in shops, black and white copies, “strip” displayed only, labels placed at the back or inside the appliance, etc). There are two contradictory tendencies influencing the label display:

- As mentioned before, new energy labels are improving the situation reducing the opportunities for retailers to display only part of the label,
- With the growing importance of products sold over the internet, internet shops often display only partial information from the labels. While the legislation specifies the list of information to be provided for each product type, internet shops often only publish main product features, but not all the requested information.

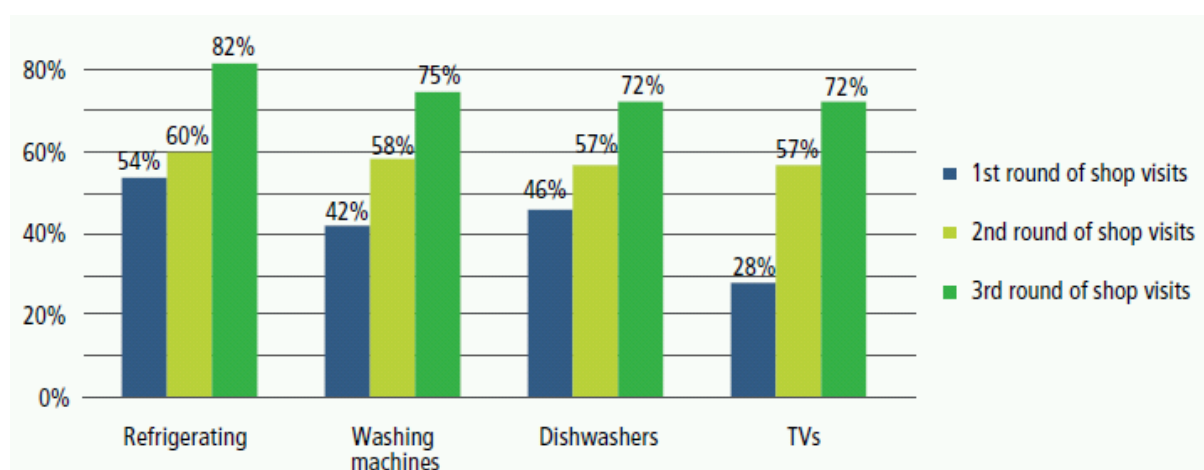
Within the project duration (12/2010 – 5/2013), the **new energy labels** have entered stores for the three types of white appliances (refrigerating appliances, washing machines, dishwashers), and TVs and wine storage appliances.

New energy labels for tumble driers, air-conditioners, non-directional light sources and lamps, were also enforced, but due to the later dates of mandatory application, and because the project partners were unable to gather the date of placing on the market of the single models the presence of the new label for these appliances have been monitored, but not statistically evaluated.

The new label display for refrigerating appliances has been most “successful”, where over 80% of appliances in the shops in early 2013 had already the new energy label – up from half of the products of about one year earlier.

Televisions are the product group being labelled in shops for the first time. While less than one third of models was labelled in early 2012, one year later over two thirds of models bore the label.

**Figure:** Share of the new energy label display per product category



On the contrary the following products were the most “**problematic**” in terms of the proper label display:

- Wine storage appliances: newly labelled product group, with a niche position and slow turnover in most markets, taking the least attention of the retailers and presumably also consumers,
- Air-Conditioners: sometimes distributed in other types of shops (installers shops) , where shop assistants are less used to display energy labels,
- TVs: A new product category, still showing a significant increase of the labels display, but with the date of market entry of individual products not possible to verify,
- Ovens: surprisingly this product category is often not labelled, even if ovens have had the label for a long time and are distributed in shops where other products are instead correctly labelled, and, moreover, large section of the market is listed as class A.

**Table:** Display of new energy labels in shops – Results per product type

	Labelled correctly	Partly labelled	Not labelled
Refrigerating appliances	76 %	14 %	10 %
Wine storage	34 %	8 %	58 %
TVs	57 %	10 %	33 %
Washing machines	73 %	15 %	12 %
Dishwashers	71 %	15 %	14 %
Air-Conditioners	28 %	32 %	39 %
Electric ovens	45 %	23 %	32 %
Tumble driers	58 %	24 %	18 %

When shop types are considered, the following ones are the most “**problematic**” in terms of the proper label display:

- Kitchen studios: since kitchen studios are specialised in furniture selling, many shop assistants do not use labels on purpose, arguing that the labels destroy the design of the kitchen furniture displayed
- General hypermarkets: since general hypermarkets focus on a large number of items, labelled products are only one (sometimes very small) part of their portfolio.
- Electric specialists: despite focusing mainly on electric products, these are individual shops (not chains) and the level of proper label display ranges considerably here, from almost 100% compliance to a very low level of label display, depending on the shop manager decisions.

**Table:** Display of energy labels in shops – Results per shop type

Shop type	Count	%	Labelled correctly	Partly / Incorrectly labelled	Not labelled
Electronic superstore	73	24%	70%	9%	21%
Electric specialist	126	30%	56%	12%	31%
Kitchen studio / Furniture stores	58	24%	26%	15%	59%
General hypermarkets / Cash and Carry	47	14%	50%	8%	37%
Mail order and internet stores	27	8%	54%	35%	11%
Total - Visits 3	279		51%	13%	35%
Total - Visits 2	331		52%	11%	38%
Total - Visits 1	290		54%	13%	33%

### 3.3 Example of labels not correctly displayed

The most common examples of labels not being correctly displayed include:

- Labels covered with other stickers, advertising materials, or price tags
- Labels placed inside the appliance, on the side or on the back
- “DIY” labels, hand written labels made by retailers
- Labels sealed in a plastic envelope, not accessible to consumers in shops
- For old labels – only the data strip is displayed / or only the background with the coloured arrows but with no figures
- Labels not matching the appliances
- Two labels for one appliance – in some cases also both the old/new labels, both showing a different energy class.
- For internet shops, some of the prescribed data is missing
- Usage of non-existing energy classes, such as A+++++ or A+++20% in internet sales, where it is used as the energy class indication.

These and other issues have also been reflected in the project’s retailer training manual, which was then actively circulated around the shops, and which includes further sample pictures of wrong label placement.

Some of the shop visits were accompanied by informal interviews with shop assistants, seeking feedback on why labels were not displayed fully in certain shops or for certain products types. These interviews have been done on a voluntary basis – not as a formal project deliverable. Retailers have been, however, indicating the following reasons for not showing the labels correctly:

- The national system of the distribution of energy labels to shops influences the availability of labels.
- In countries, where labels are not distributed by supplier associations, the responsibility of individual suppliers to deliver the two parts of the old labels could be lower.
- Sometimes the energy label is sealed in a plastic bag, which neither the retailers nor the consumers want to open in the shop, since it could be perceived that the specific model is a used product, or that other parts included in the bag could be lost.
- Sticking a label onto the product could leave glue residues on the surface of the product, when the label is removed.
- The aesthetics of the labels on the products, mainly for built-in and in kitchen/furniture shops.
- The use of the shop's or manufacturer's own "eco" labels for retail stores. These labels, placed on selected products, are made clearly visible and are often part of marketing activities of the retail store. However, the criteria for selection are not always made available and in any case this behaviour is in contrast with the obligations of the retailers established in the energy labelling framework directive.
- Arguments of having no interest in labels, as if the label were simply a matter of choice.
- Slow turnover of some products, resulting in presumably old models being displayed that were placed on the market before the new legislation entering in force.
- Mandatory presence of energy class information generally unknown to managers of e-commerce shops' general catalogue websites and in product advertising since this is a new provision.
- Claiming that a different legal entity is selling the products to consumers, than the one displaying the products in the shop.

#### 4. Retailer training

To contribute to the improvement of the proper display of energy labels in shops, the Come On Labels project has prepared a Retailer Training Manual, summarising the following information:

- Explanation of the content and importance of energy labels
- Guidance on the proper label display
- Facts and tips on the labels and energy efficiency for consumers.

The document is available in 11 language and



13 national adaptations<sup>10</sup>.

Over 1000 copies of the training manual have been printed and circulated, numerous electronic samples have been circulated to retailers, suppliers, authorities and other interested stakeholders. Examples of the usage of the document include:

- Retailers: Individual training sessions for shop assistants from individual shops and shop chains and Inclusion into retailers' education and e-learning schemes
- Manufacturers: Common distribution of the manual to individual suppliers, either by individual manufacturers, or in cooperation with the national manufacturer association
- Authorities: Distribution to individual inspectors located around the country and organisation of common events and seminars for inspectors or the retailers
- Consumer NGOs etc: Common awareness raising about proper labels display

## **5. Examples of known compliance tests<sup>11</sup>**

Energy labels are a crucial driver for market transformation, orienting consumers' choice towards more energy efficient appliances and thus realizing the potential of available technologies.

Unfortunately, not all EU Member States apply effective actions for controlling the correct labelling implementation. Without a concerted effort the same is likely to happen for the forthcoming eco-design and energy labelling implementing measures for energy using products.

The Come On Labels project therefore seek to collect information about product testing, undertaken in order to verify energy consumption related information on the product energy labels. This information is shared by the project partners in 13 European countries with stakeholders, such as national surveillance authorities, manufacturer and retailer representatives, consumer organisations, media, etc.

The main goal of this Deliverable was to increase European-wide implementation and control of energy labelling and eco-design implementing measures for appliances by:

- collecting and circulating results of the European testing results on household appliances;
- contributing to increased the attention of the National Authorities through a better awareness of the impact of the energy labelling on the national energy efficiency;
- giving concrete guidance to EU and National Authorities for an increasingly effective labelling implementation;
- highlighting a shared procedure for the verification of the manufacturers' labelling declaration including referencing to a methodology for laboratories accreditation and models selection.

---

<sup>10</sup> <http://www.come-on-labels.eu/displaying-energy-labels/retailer-training-manua>

<sup>11</sup> <http://www.come-on-labels.eu/appliance-testing/appliance-tests-2011-2013>

**The individual testing activities collected and explained in the three editions of this document include:**

- **ATLETE project, Intelligent Energy Europe project, 2009 – 2011**

The project has focused on testing refrigerating appliances for their compliance with the energy label declarations and it was the first European wide testing activity focusing on a EU policy measure concerning market surveillance and physically testing 80 randomly selected refrigerating appliances. The project has brought specific examples of product test results and confirmed the affordability of market surveillance.

The final test results show that 80% of appliances subjected to testing and for which testing has been concluded complied with the energy efficiency class declaration and the two related key parameters: energy consumption and storage volume. But when all five parameters are taken into consideration 57% of them do not comply with at least one of the tested parameters.

All test results and test reports for each individual model are publicly available on the project website and have been shared with the EU Member State Market Surveillance Authorities, media, experts and stakeholders.

- **UK - National Measurement Office, 2010 – 2012**

The National Measurement Office (NMO) tested refrigerators, fridge freezers and freezers across a broad spectrum of specifications for compliance against the EC regulation 94/2/EC for energy labelling accuracy and also EC 643/2009 for allowed energy use for household appliances.

Twelve models were purchased from on-line and high street retailers and sent to an independent accredited test house for examination. Four of them were subject to further testing to verify non-compliance. The four failed with a range of results requiring a range of investigation, enforcement action and sanctions. In the worst case, the test report identified the percentage difference between the measured and claimed energy consumption was over 120%, this would be the equivalent of claiming to be an A rating when in-fact the test results suggested a G rating.

- **UK – Energy Saving Trust 2010 - 2012**

The UK's Energy Saving Trust Recommended scheme (ESTR) voluntary product labelling scheme is an example of an Environmental Product Information Scheme encompassing its own compliance testing, enforcement activity and evaluation for environmental effectiveness and improvements in environmental quality.

In 2010-2012, EST tested 24 refrigerating appliances for the energy consumption and the storage volume, but not the other parameters of the energy labelling (storage temperature, temperature rise time and freezing capacity) to verify the (old or new) energy labelling declarations and the compliance with the ESTR minimum requirements (EEI corresponding to A+ class).

As far as the energy consumption is concerned, 4 models out of the 6 for which a Step 2 test (on 3 additional units of the same model) would have been necessary show a difference between the declared and the measured value largely exceeding the permitted tolerance of the relevant labelling scheme, while for other 2 models the difference is almost negligible.

- **Spain – IDEA tests, 2008 – 2011**

In Spain IDAE, the Institute for the Diversification and Saving of Energy, manages a national database efficient domestic appliances including the models eligible for the governmental rebate scheme.

Compliance verification actions on the declared labelling parameters were run on these models according to the EU legislation and the relevant harmonised standards. IDEA acquires from the manufacturer a sample of the product to be tested that is sent to LCOE

(the Official Central Laboratory). In general, models selection is based on a higher probability of non-compliance.

It is worth noting that since only one unit of each model has been tested no formal conclusions about the compliance with the labelling declaration can be drawn from the test results.

- **Spain – ANFEL tests, 2010 - 2011**

The Spanish Association of Domestic Appliances Manufacturers, ANFEL, is active in supporting market surveillance by denouncing non-compliant household appliances and relevant suppliers.

Examples of their activities include publishing the results of tests of two models of refrigerator-freezers, accused not to be compliant with the energy label declaration, requesting the national authorities and the national subsidy scheme organisers to remove these from the list of models eligible for the subsidy.

- **Nordic project: 2011**

Financed by The Nordic Council of Minister starting from 2011, the aim of the project is to develop the Nordic collaboration concerning market surveillance to check the accuracy of the information declared on the energy label and if the product fulfils the eco design requirements for Sweden, Norway, Denmark, Finland and Iceland.

Although limited additional information is available on the technical characteristics of the appliances tested, this is a good example on how test developed in one laboratory could be used as the basis for a market surveillance action in a number of EU countries.

- **The Netherlands: testing in German laboratory**

Another example of the successful use of test results achieved in a laboratory of a different country is included in the “Annual report 2009, Energy label compliance in the Netherlands”. As reported, most of the tests on household appliances were done in the German laboratory VDE located in Offenbach. The testing of appliances followed a European procurement procedure, after which VDE Offenbach (and TNO Apeldoorn) were selected to carry out tests for 2009. On the basis of random sampling, several appliances from each category were tested to establish the level of correctness of information provided on energy labels. This example demonstrates the possibility of conducting testing in a cooperation between a MSA and laboratory from different countries.

- **Intelligent Energy Europe projects 2012 – 2014**

Several European projects are currently organised with the aim to verify energy consumption of certain products groups and to compare this with the energy label declarations, and / or the ecodesign legislation requirements. Currently (Spring 2013) these projects are:

- **ATLETE II:** 50 models of washing machines, full tests, including test reports, to be published in 2014,
- **Ecopliant:** product categories for testing to be decided, aggregated results expected in 2014,
- **PremiumLight:** focusing on high quality CFL and LED light sources, 60 – 80 models, test results expected in 2013-2014,
- **Euro Topten MAX:** high efficiency LED lamps, TV and tumble drier models, results in 2014,
- **MarketWatch:** product categories to be decided, based on non-compliance high risk suspicion, results expected in 2014,
- **CompliantTV:** 125 TVs and 75 monitors to be tested for energy labels and ecodesign compliance, results expected in 2014.

## 6. Conclusion

The Come On Labels project has focused on main aspects of the energy labelling implementation: from cooperating with the market surveillance Authorities, to the actual monitoring of the labels presence in shops and the collection of information about the presence of labels in shops, to the analysis of the potential of product replacement schemes and the monitoring of existing ones, to finally organising numerous dissemination activities.

Within the two main activities described in this paper, the project has concluded:

- Slight improvement of the presence of energy labels in shops, presumably mainly due to the increased presence of new energy labels,
- An interest of market surveillance authorities to exchange information about product testing and surveillance best practice, so that the authorities could learn from each other and benefit from their individual activities.

*The sole responsibility for the content of this report lies with the authors. It does not necessarily reflect the opinion of the European Union. Neither the EACI nor the European Commission is responsible for any use that may be made of the information contained therein.*



Co-funded by the Intelligent Energy Europe Programme of the European Union