



Come On Labels

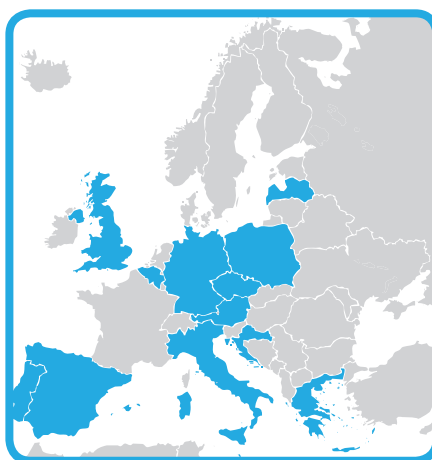
# Come On Labels

Common Appliance Policy  
– All for One, One for All –  
Energy Labels

## Final Publishable Report

May 2013

Supporting energy labelling of products –  
Ensuring that accurate information are shown on the energy labels  
Monitoring the proper display of the energy labels at the points of sale  
Developing promotional activities towards the final consumers  
Identifying efficient product replacement schemes



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EUROPE

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Common Appliance Policy – All for One, One for All – Energy Labels



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  - Identifying efficient product replacement schemes





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## About the project

Come On Labels – Common Appliance Policy – All for One, One for All – Energy Labels

- [www.come-on-labels.eu](http://www.come-on-labels.eu)
- December 2010 – May 2013
- Supported by the Intelligent Energy Europe programme:  
<http://ec.europa.eu/energy/intelligent/>
- Czech Republic – project coordinator SEVEn, The Energy Efficiency Center, [www.svn.cz](http://www.svn.cz)  
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[www.come-on-labels.eu/zum-projekt-at/willkommen-at](http://www.come-on-labels.eu/zum-projekt-at/willkommen-at)
- Belgium – Brussels Energy Agency, [www.curbain.be](http://www.curbain.be)  
[www.come-on-labels.eu/concernant-le-projet-be/message-daccueil-be-fr](http://www.come-on-labels.eu/concernant-le-projet-be/message-daccueil-be-fr)
- Croatia – ELMA Kurtalj d.o.o, [www.elma.hr](http://www.elma.hr)  
[www.come-on-labels.eu/o-projektu-hr/poruka-dobrodoslice-hr](http://www.come-on-labels.eu/o-projektu-hr/poruka-dobrodoslice-hr)
- Germany – Öko-Institut e.V., Institute for Applied Ecology, [www.oeko.de](http://www.oeko.de)  
<http://www.come-on-labels.eu/zum-projekt-de/willkommen-de>
- Greece – Center for Renewable Energy Sources and Saving, [www.cres.gr](http://www.cres.gr)  
[www.come-on-labels.eu/about-the-project-gr/welcome-message-gr](http://www.come-on-labels.eu/about-the-project-gr/welcome-message-gr)
- Italy – ENEA – Agenzia nazionale per le nuove tecnologie, l'energia e lo sviluppo economico sostenibile, [www.enea.it](http://www.enea.it)  
[www.come-on-labels.eu/informazioni-sul-progetto-it/messaggio-di-benvenuto-it](http://www.come-on-labels.eu/informazioni-sul-progetto-it/messaggio-di-benvenuto-it)
- Latvia – Ekodoma, Ltd, [www.ekodoma.lv](http://www.ekodoma.lv)  
[www.come-on-labels.eu/par-projektu-lv/laipni-ludzam-lv](http://www.come-on-labels.eu/par-projektu-lv/laipni-ludzam-lv)
- Malta – Projects in Motion, [www.pim.com.mt](http://www.pim.com.mt)  
[www.come-on-labels.eu/about-the-project-mt/welcome-mt](http://www.come-on-labels.eu/about-the-project-mt/welcome-mt)
- Poland – KAPE, Polish National Energy Conservation Agency, [www.kape.gov.pl](http://www.kape.gov.pl)  
[www.come-on-labels.eu/o-projekcie-pl/witamy-pl](http://www.come-on-labels.eu/o-projekcie-pl/witamy-pl)

- **Portugal** – QUERCUS – Associação Nacional de Conservação da Natureza, [www.ecocasa.pt](http://www.ecocasa.pt)  
[www.come-on-labels.eu/o-projecto-pt/bem-vindo-pt](http://www.come-on-labels.eu/o-projecto-pt/bem-vindo-pt)
- **Spain** – ESCAN, s.l., [www.escansa.com](http://www.escansa.com)  
[www.come-on-labels.eu/acerca-del-proyecto-es/bienvenidos-es](http://www.come-on-labels.eu/acerca-del-proyecto-es/bienvenidos-es)
- **United Kingdom** – Severn Wye Energy Agency, [www.swea.co.uk](http://www.swea.co.uk)  
[www.come-on-labels.eu/about-the-project-uk/welcome-uk](http://www.come-on-labels.eu/about-the-project-uk/welcome-uk)

### Benefits and main project activities:

- **Legislation:** Monitoring product labelling legislation, and promoting its national understanding and implementation.
- **Testing products:** Sharing information and cooperation with market surveillance authorities and experts in exchanging information on appliance surveillance tests.
- **Labels in shops:** Conducting a wide research on the proper presence of energy labels at the points of sale, involving retailers in improving the level of the proper display of the energy labels in shops.
- **Dissemination:** Promotion of the energy labels for energy-related products to the general public, focussing on the new energy labels.
- **Replacement:** suggesting policy tools for better and early replacement, evaluating their benefits and potential for energy efficiency, monitoring product replacement schemes.



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## Main project findings and achievements

The Come On Labels project was designed in 2009, before most of the new energy labelling legislation had been put in place. Throughout 2010 to 2013, new energy labelling and Ecodesign requirements have been approved or entered force for several product groups, such as refrigerators, washing machines, dishwashers, driers, air-conditioners, TVs, and light sources.

The Come On Labels project has been therefore in a unique position to support the proper implementation of new energy labelling among all stakeholders in 13 European countries, namely:

- **Market surveillance authorities:** common understanding of the impacts and requirements of the legislation, and organisation of common activities, such as shop visits, expert training and providing consumer feedback.
- **Retailers and suppliers:** educating and increasing their awareness on the usage of new energy labels at the points of sales, visiting hundreds of shops and circulating a retailer training material.
- **Consumers:** organising widespread dissemination activities to educate consumers about the energy labels and motivate them to purchase energy efficient products. Outcomes include events and seminars, fair stands, leaflets and brochures, bookmarks and articles, press releases and posters.

Examples of the most visible and acknowledged activities include:

### Working with market surveillance authorities

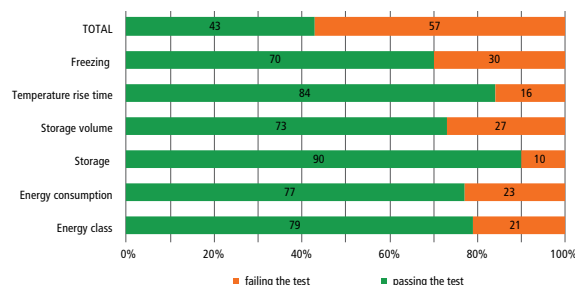
Each EU member state is responsible for organising market surveillance activities, ensuring that the correct information is displayed on the energy labels, and that energy labels are visible in shops and other points of sale. It is a well known fact, however, that the level of such activities in a number of countries is not sufficient. The Come On Labels project has therefore organised, for example, the following activities:



- Discussing common understanding of the legislation requirements, focusing, for example, on the meaning of individual icons displayed on the label, or the market entry definition issues,
- sharing knowledge on the display of labels from the project visits in shops, and negotiating possible improvement activities,
- organising common education activities for the inspectors, or the market actors such as the retailers and suppliers,
- negotiating product testing activities and the best methods for sharing such data among authorities in other countries.

## Collecting and sharing data on product surveillance tests

Testing products to verify the correctness of information published on the energy labels is one of the key factors for ensuring that savings, declared on energy labels, are really achieved. It is also a well known fact that the number of tests covering all relevant parameters is insufficient. The project, while not testing products on its own, has made its best to contribute in the following two ways:

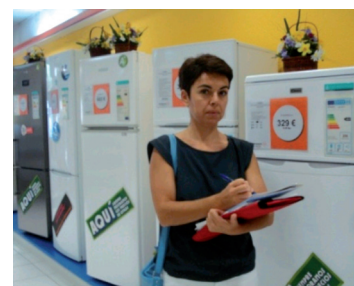


- Collecting information about product tests available publicly. Information on product testing, made by the authorities in the UK, Netherlands, Sweden, as well as in Australia and USA, has been collected, together with product testing activities of other Intelligent Energy Europe projects. These have all been summarised and circulated among stakeholders with the aim to make the knowledge on product testing more widespread.
- While manufacturers only test their product once for the whole EU market, authorities take reference on the models tested from their national markets. The Come On Labels project has therefore delivered reports, summarising possibilities and experience aimed to make EU-wide cooperation easier and activities simpler for the authorities. The reports include the experience 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, where test results became fully publicly available.

## Checking label presence in shops

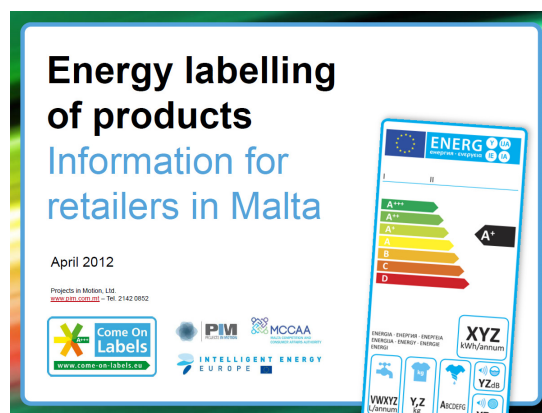
In order that the consumer uses energy labels as a tool for their purchasing decisions, labels need to be visible in shops. But how often and how correctly are labels used in shops? The Come On Labels project has organised three rounds of shops visits, each time visiting around 300 shops, monitoring the proper presence of energy labels per shop type and product type. Outcomes included:

- Monitoring the label presence per shop type, and evaluating possible improvements for kitchen studios, individual retailers, and general hypermarkets, where correct label display is on average the lowest.
- Monitoring the label presence per product type, showing the lowest rates for the wine coolers, but also for air-conditioners, electric ovens, and TVs.
- Evaluating the impact of new energy labels, which were used already in 2012 for more than half of products displayed, contributing to a lower share of partly labelled products, since the new energy labels are distributed in one part only.



## Retailer training manual

In order to improve the level of label display in shops, the Come On Labels project has prepared a retailer training manual, educating shop assistants on the proper label display. The manual, available in 11 languages and 13 country adaptations, explains the importance and legal requirements for label display, shows examples of proper and non-proper label displays in shops, and gives concrete advice which the shop assistants can give to customers. Examples of the training material include:



- Circulation to individual market surveillance authority inspectors
- Organisation of individual retailer training seminars for retailer chains and shops
- Common circulation to shops with national CECED manufacturer association members
- Usage of the material at conferences and events, where market actors participate

## Comparing energy labelling with Ecodesign requirements

Energy labels were designed to help consumers to choose more energy efficient products from the models displayed at the points of sale. Energy class A has been long understood as the best performing class from the point of view of energy

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+++ / A+	A, B, C, D
	Absorption type	A+++ / G	F, G
Televisions	A / G	A / G	
Light sources	A / G	A / C	D, E, F, G

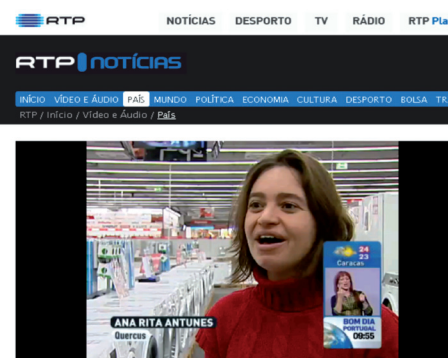
efficiency. However, the market developments, introduction of A+ / A+++ classes and the Ecodesign requirements have caused that the A class is in a number of cases only the least available energy class on the market. The Come On Labels project has therefore produced a paper, summarising the range of energy classes displayed on energy labels, with the Ecodesign requirements for the products allowed to enter the market. This paper has been circulated among stakeholders, authorities and market actors, to enable a more appropriate explanation of the energy efficiency class for individual products.

## Dissemination to end consumers

Consumers and their purchasing decisions, which influence the energy consumption for many years ahead, are the primary target groups for energy labels. In order to ensure that the consumers do take labels into account, they have to be fully aware about them and understand their content.

The proper understanding has increased in importance with the introduction of new energy labels. The Come On Labels project has therefore organised a widespread set of activities:

- Numerous press releases and articles in general media
- Publishing leaflets, brochures, posters, or bookmarks and distributing them to end consumers via shops, information centres, energy agencies, libraries, etc.
- Organisation and participation to events, seminars, fairs, and exhibitions, explaining the energy labels to visitors and participants



Read more on the project experience and achievements in more detail in the following chapters!

Find out more on energy labelling and all of the project outcomes on the website:

**A+++**

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

## Introduction

The Come On Labels project was designed in 2009 and implemented during 2010–2013, with activities undertaken in 13 European countries. The primary project goal was to support the role of energy labels in promoting energy efficient products on the market. In order to achieve this goal on a long term basis, the following specific activities have been organised:

- Increasing awareness about the EU legislation and its proper implementation among the authorities, market actors and the general public
- Collection and sharing of data about product surveillance testing
- Visiting hundreds of shops to monitor the proper label display
- Organising a wide range of dissemination activities aimed at the general public
- Evaluating product early and better replacement schemes

The Come On Labels project activities relate to all appliance types which bear the energy label – both the “new” energy labels (starting with refrigerating appliances, dishwashers, washing machines, and televisions), and the “old” energy labels (ovens, light sources, air-conditioners, and dryers). The main focus, however, has been on the new energy labels, and their gradual implementation and entry into force for a growing number of products.

The Come On Labels project (and its website) is the place where you can find the following information:

- Overview of the European and relevant national legislation related to appliance labelling
- Description of the system of product testing for ensuring the device features’ compliance with the information on the label
- Information about known appliance tests undertaken during the duration of the project
- Overview of how labels should be displayed properly in shops and how this should be controlled
- Description of the status of label presence in retailer shops according to visits made by project partners
- Wide range of promotional activities designed to encourage the general public to take into account the information on the energy label in making their purchasing decisions
- Overview and evaluation of policy tools to promote early and better replacement of appliances

The organisation, content and interaction of the projects’ Work Packages were as follows:

### 1) Administration and consortium management

Internal project administration and management.

### 2) Legislation related to energy labels

Review of the EU and national legislation and of the latter’s compliance with the EU labelling and relevant Ecodesign directives and implementing measures. Detailed description of legislation concerning products groups, such as driers, light sources and air-conditioners, for which

new legislation was elaborated during the course of the project. Analysis of the level of surveillance activities in individual countries covered by the project, with an overview of activities undertaken, as well as possibilities for higher level of activities, where relevant.

### 3) Appliance testing

The procedures and a list of known national (or regional) appliance tests (conducted mainly within national market surveillance actions and European projects designed to perform product surveillance testing) have been elaborated, and circulated. A recommendation for further activities and tools for increased level of surveillance was drafted and shared with consortium members and other institutions and organisations on national and EU levels.

### 4) Retailer compliance

The proper presence of labels in shops was investigated, performed by project partners in 13 countries. The level of proper label display has been monitored by the product and shop type. The growing presence of new energy labels has been monitored and its impact on label display in shops discussed among retailers and other stakeholders. A retailer training manual has been produced in 11 languages and widely disseminated to further support proper label display.

### 5) Promotion of energy labels – Dissemination

Concrete educational and information activities have been undertaken to disseminate correct and updated information on energy labels to final customers and retailers. A wide range of activities have taken place, from media presence (such as articles, press releases, TV appearances), through printed documents (e.g. leaflets, brochures, posters and bookmarks), to organisation of and participation at events, seminars, fairs and conferences. The aim was to increase awareness and involve multipliers in circulating the outcomes on a wide basis.

### 6) Replacement of old appliances

Even if the system of energy labelling is working properly, the replacement of old installed appliances by new, most efficient ones, may not be as quick as desired. The project therefore analysed possible policy tools evaluating the impacts on consumer purchasing decisions, environmental benefits, financial and organisational demands, and monitored previous and current campaigns and activities organised to support an early and better replacement of products.

### 7) Final recommendations

The project experience, and its final recommendations have been elaborated and presented by the project Final Publishable Report (this document), during the Final event, held on March 15, 2013 in Brussels with high level participation of stakeholders from all segments of market actors, and a series of national events in all participating countries.

### 8) Common Dissemination Activities

Activities undertaken under the leadership and on direct request from the European Commission, and the Executive Agency for Competitiveness and Innovation.



## Project's target groups and key actors and their involvement in the project:

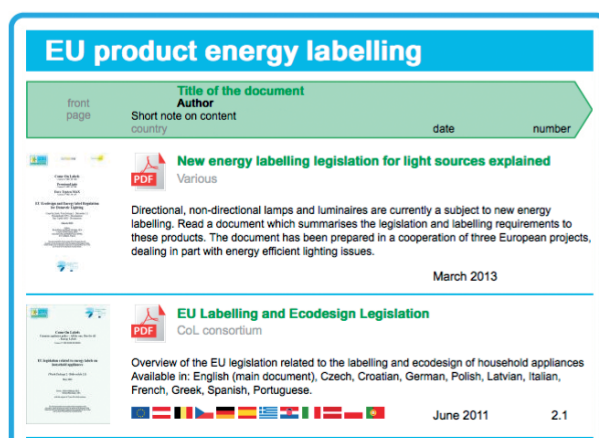
State institutions	<ul style="list-style-type: none"> <li>received evaluation of the legislation requirements in order to create a common understanding</li> <li>received information on the project's labelling surveillance activities in order to increase awareness</li> <li>participated in stakeholder education, common events, shop visits, shared their experience from surveillance activities</li> </ul>
Suppliers (manufacturers and importers)	<ul style="list-style-type: none"> <li>received retailer training manuals</li> <li>participated in project events</li> <li>contributed to dissemination activities to end consumers and retailers</li> </ul>
Retailers	<ul style="list-style-type: none"> <li>shared their experience with the label display</li> <li>took part in retailer training seminars and e-learning on label display</li> <li>participated in selected dissemination activities</li> </ul>
Consumer groups and NGOs	<ul style="list-style-type: none"> <li>participated in the organisation of shop visits</li> <li>helped organise dissemination activities</li> <li>contributed to improved level of surveillance activities</li> </ul>
General public	<ul style="list-style-type: none"> <li>benefited from improved knowledge of the energy labels</li> <li>received responses to individual queries on label design and content</li> </ul>
International organisations and other national institutions	<ul style="list-style-type: none"> <li>Come on Labels project members cooperated with organisations such as EnR Energy labelling and Ecodesign working group, ADCO Labelling group, IEA 4E and relevant Intelligent Energy Europe projects on sharing the experience and finding solutions for improved and increased surveillance activities.</li> </ul>

# Legislation on energy labelling of products

## Brief summary of the new EU labelling legislation

*This chapter is extracted from the project's document "EU-legislation related to energy labels on household appliances"; first version published in May 2011 in 11 languages, with updates on individual product groups when relevant legislation was adapted. Full documents available here:*

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



Council Directive 92/75/EEC which formerly governed energy labelling has been replaced by the new framework directive 2010/30/EU which has been in force since June 2010. For individual product groups, the existing labels will gradually be replaced by new labels by means of product-specific implementing measures. The first product groups, for which the "new energy labels" have been introduced, are refrigerators and freezers, washing machines, dishwashers, with one product group that so far had not been labelled, TVs. More product groups have followed afterwards, such as the air-conditioners, household tumble driers, lamps and luminaires.

The EU energy label is based on the principle of self-declaration which gives the suppliers full responsibility for the values declared on the label. In short, the main differences between the old and the new energy labelling schemes are:

- **No national implementation necessary:** the new labelling implementing measures are no more in the form of directives, that require the transposition into the national legislation, but in the form of "delegated regulations", which are immediately applicable in all Member States. Only the organisation of the monitoring and evaluation is left to the national Market Surveillance Authorities following the principle of subsidiarity.
- **The energy labelling will cover additional products:** the new labelling scheme may cover any product that uses energy or influences the energy use ("energy-related product"). Since October 2010, a label for TVs has been introduced (mandatory from November 2011). Other appliances to follow include boilers, water heaters, vacuum cleaners, range hoods etc.



- **Energy classes A+, A++ and A+++:** if technical development allows it for the specific product these new energy efficiency classes may be introduced to the label. Classes A+, A++ and A+++ exist already for refrigerators and freezers, washing machines and dishwashers. For TVs, they will be introduced at predefined points in time.
- **Seven energy efficiency classes:** as a principle, the energy label should show only seven energy efficiency classes. So, when A+++ is the highest class, the worst rating will be D, instead of G. The upper class must be always be green and the lowest one red.
- **New calculation methodology:** the calculation of the Energy Efficiency Index, which in general is used to determine the energy efficiency class of the appliance models, has been updated, to better reflect the actual use of the labelled products. For example, for washing machines it is now based on the energy consumption for both 40 and 60°C cotton programmes at full and half load plus the consumption in low power modes.
- **New information on the labels:** the new labels contain additional icons to highlight specific product features (such as capacity, performance indicators, presence of an “off-switch” etc.). On the other hand, the washing machine and dishwasher energy label does not contain the washing performance class any more: since all models on the market have a washing efficiency of class A, this performance is now considered a specific minimum requirement for the placing on the market within the relevant Ecodesign regulation. In addition, the electricity and water consumption are shown on the label in terms of annual consumption.
- **Language-neutral label:** the new labels are the same in all EU countries, without the need for national language versions. This improvement is achieved by presenting the information through pictograms rather than verbally. As a consequence, there will be one single label instead of the former combination of a language specific coloured background label and a language neutral data strip.
- **Internet sales covered:** the legislation specifies which type of information has to be listed when appliances are sold through the internet, catalogues or any other means that does not allow the consumer to see the product displayed, and thus to see the label.
- **Energy efficiency class advertised:** as from 2012, all appliance advertisements listing the price and/or the energy consumption have to indicate the energy efficiency class, too.

**Schedule of the introduction of the new energy labels:** the mandatory application of the label is usually set one year after the entering into force of the relevant delegated regulation. After this period all new models placed on the market or put into service in the EU will bear the new label at the point of sale.

The directive and the product-specific regulations also define the responsibilities of the suppliers, dealers, and the authorities. These are for example as follows:

**Responsibilities of suppliers**, who shall ensure that:

- each energy-related product falling under the regulation is supplied with a printed label;
- a product fiche is made available;
- the technical documentation is made available on request to the authorities of Member States and to the Commission;
- any advertisement for a specific model contains the energy efficiency class, if the advertisement discloses energy-related or price information;
- any technical promotional material concerning a specific model which describes its specific technical parameters includes the energy efficiency class of that model.

**Responsibilities of dealers**, who shall ensure that:

- each product, at the point of sale, bears the label provided by suppliers on the outside of the front or top of the household appliance, in such a way as to be clearly visible;
- household appliances offered for sale, hire or hire-purchase where the end-user cannot be expected to see the product displayed are marketed with the specific information to be provided by the suppliers;
- any advertisement for a specific model contains a reference to its energy efficiency class, if the advertisement discloses energy-related or price information;
- any technical promotional material concerning a specific model, which describes its specific technical parameters includes a reference to the energy efficiency class of that model.

**Verification procedure for market surveillance purposes:**

It is the responsibility of the Member States to organise the surveillance of the market and the labelling scheme enforcement. Each Member State has its own Market Surveillance Authority and enforcement body.

In general the product compliance verification procedure consists of a series of tests that use the relevant European standards. Suppliers make the technical documentation available for inspection by market surveillance authorities.

Each Member State is required to develop its own regime and take the necessary preventive measures and measures aimed at ensuring compliance within a precise time-frame and, in the case of persistent non-compliance, restrict or prohibit the placing on the market of a product.

Every four years, Member States will submit a report to the European Commission including details about their enforcement activities and the level of compliance in their territory.

## Comparison between energy label and Ecodesign requirements

*This chapter is extracted from the project's document "Comparison of energy efficiency requirements of the energy labels and Ecodesign legislations"; published in June 2012. Full document is available here:*

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

The EU Energy labelling of major appliances and other products is a long known and appreciated tool for consumers, advising them on the energy efficiency and other functional performance qualities of models which they consider for their purchase.

The purpose of energy labels is to **rank all models of certain type of products** within certain energy class range, typically from A to G, or A+++ to D and **show this ranking at the points of sale**.

The Ecodesign measures are another set of the EU legislation that regulates the energy consumption and functional performance aspects of products through the setting of minimum requirements for the placing on the market or the putting into service of products. Contrary to the labelling, this legislation is not "visible" to consumers, as products entering the market shall automatically comply with the relevant requirements.

In certain cases both legislations apply to the same product types: for washing machines, dishwashers, refrigerators, air-conditioning units, televisions, dryers and light sources both energy label and Ecodesign have been set through Commission Regulations.

In practice (at the points of sale) these types of products are displayed with the respective energy labels showing the full range of energy efficiency classes (e.g. A+++ to D), but at the same time the Ecodesign legislation prohibits the market entry of models below a certain minimum energy efficiency class (e.g. worse than class A).

The summary Table shown below compares the energy efficiency classes set in energy labelling and allowed by the Ecodesign requirements for the most common product types (washing machines above 4 kg load, dishwashers above 10 place settings). Various dates of entry of the legislation into force are set for each product type.

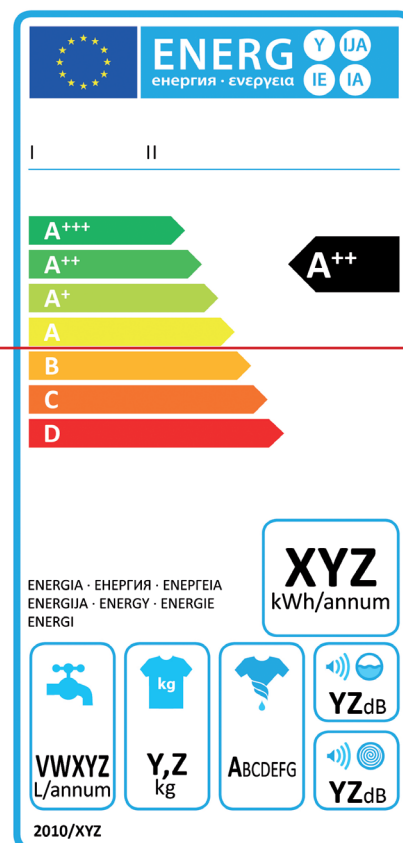


Table: Comparison of the energy efficiency classes in energy labelling and Ecodesign requirements, as of June 2012

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+++ / A+	A, B, C, D
	Absorption type	A+++ / E	F, G
Televisions	A / G	A / G	
Light sources	A / G	A / C	D, E, F, G

**Note:** For TVs the “plus” classes may be voluntarily used before they are introduced on a mandatory basis, the label would still contain seven classes only (e.g. bottom letter would be deleted in such case).

Further energy-related products have been added since. Regulation (EU) 626/2011 on room air conditioners has entered into force in May 2011; requirements apply from January 2013. A Commission delegated regulation No 392/2012 of 1st March 2012 with regard to energy labelling of household tumble driers has been entered into force in March 2012; requirements apply from May / September 2013. The new energy label for tumble driers will contain A+++ / D energy classes. At the same time, the Ecodesign regulation for this product group has been approved by the Regulatory Committee in May 2012 and suggests limiting the market entry of D and for some models C class models (one year after the entry into force of the Regulation). Regulation (EU) 1194/2012 on directional light sources has entered into force in January 2013; requirements apply from September 2013.

Other product groups for which both the energy labelling and Ecodesign legislations are expected in 2013 include: ovens, water heaters, heating appliances, vacuum cleaners, and commercial refrigerating equipment.

## Energy Labelling and Ecodesign legislation implementation

*This chapter is extracted from the project's document "Energy Labelling and Ecodesign legislation implementation"; published in March 2013. Full document is available here:*

<http://www.come-on-labels.eu/legislation/energy-labelling-legislation-in-the-project-countries>

While organising the project activities, such as visiting shops to monitor 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>1</sup> was the regular contact with the national Market Surveillance Authorities, as well as other key national stakeholders, such as government representatives, manufacturer and retailer associations, etc. Many of the relevant 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 discussed, 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 project outcomes was a detailed review of the level and nature of surveillance activities undertaken in individual project countries.<sup>2</sup> Examples of some of the activities described in the main deliverable are given here:



A positive example of an increase of the level of surveillance activities came from the **Czech Republic**, which has in the past visited only a limited number of shops, to verify the presence of energy labels, e.g. four in the year 2010. In the year 2011 this increased to 18 shops surveyed, and in 2012 to almost 300 shops. Overall results have been published in a press release. Authority representatives confirmed to maintain this level of shop visits for subsequent years to come. In 2011, six refrigerating appliances have been tested for electricity consumption and all have been found compliant with the label declaration. No other product tests are currently expected.



**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 four years (2009–2012),

<sup>1</sup> Austria, Belgium, Czech Republic, Croatia, Germany, Greece, Italy, Latvia, Malta, Poland, Portugal, Spain, UK

<sup>2</sup> Those interested in more information on related topics, may also consult other 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/>.

mainly light sources, refrigerators and dishwashers; no sanctions have been applied, but some lamp manufacturers have adapted the product packaging. The cost of testing is considered as a difficulty and a reason for not conducting more product tests, and for the future national laboratories will be encouraged to get full accreditation.



The national market surveillance authority in **Greece** performed 7 shop visits in 2012 and 60% compliance was identified. Recommendations have been made but no fines have been applied so far. No products were tested due to economic restrictions. The authority is interested to overcome the existing barriers and to expand its activities.



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 the EU Energy Labelling directive recast, has strengthened the role of market surveillance, e.g. 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. This includes the inspection 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 tests 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 international cooperation. The 'Nordic project', focusing on market surveillance of the Nordic countries, also invites Baltic countries for cooperation and the 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 was **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 1st, 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 there is an interest for international projects and active sharing and adaption of best practice.



Some 450 appliances and 300 compact fluorescent light bulbs have been specifically checked for label presence in **Spain** in the period of 2011–2012. In addition, some 36 products have been tested for label compliance by the market authorities in the period of 2008–2011. The surveillance activities take place by the Regional Governments, with additional related activities being undertaken by a national energy agency, organising a subsidy scheme, and individual tests being published by a manufacturer association.



The **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's 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.

# Shop visits

## Summary of the shop visit methodology

*This chapter is extracted and adapted from the project's document "Proper appliance labelling in shops"; published in June 2011. Full document is available in 11 languages here:*

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



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 essential elements of the implementation of energy labels in Member States are defined in the EU energy labelling framework directive and in the product-specific implementing directives or regulations, and in the general "market surveillance" regulation 765/2008/EC. European law defines the responsibilities of suppliers and dealers as follows:

- "Suppliers placing on the market or putting into service products covered by a delegated act supply a label and a fiche in accordance with this Directive and the delegated act".
- "Dealers display labels properly, in a visible and legible manner, and make the fiche available in the product brochure or other literature that accompanies products when sold to end-users".
- Furthermore, in cases where the consumer cannot be expected to see the product displayed, such as in catalogue or online selling, dealers must provide to their customers the information that is included in the energy label.

According to the European legal framework, the European Member States are required to ensure proper labelling of the products through market surveillance (verification actions). Shop visits are one possible action to ensure retailer compliance.



## **Enforcement of the proper presence of labels in shops:**

Member states shall:

- Ensure that suppliers and dealers fulfil their respective duties.
- Assign institutions to perform market surveillance (such as planning and executing product compliance verification and retailer compliance verification) and endow them with sufficient competences and resources.
- Draw up market surveillance programmes.
- Lay down rules for assigning penalties to infringements of the Directive.
- Ensure external border control.
- Report to the Commission every four years about their enforcement activities and the level of compliance in their territory.

## **Verification activities:**

- Verification aims to answer the question whether a supplier or dealer complies with the obligations of the framework directive and the implementing directives or delegated regulations.
- European legislation describes the essential elements of the product compliance verification (through a two Step appliance testing). No general procedure is foreseen for verifying whether dealers fulfil their obligations (e.g. shop visits). These procedures are left to each Member State following the principle of subsidiarity, although Regulation 768/2008/EC makes the market verification mandatory for Member States.

## **Shop visits**

The institution/s responsible for verifying proper appliance labelling in shops should carry out inspections in order to verify the compliance with the legislation provisions.

The decision about the size of the sample for the different shop categories can be done on the basis of (i) a statistical analysis, (ii) previous experience and knowledge, or (iii) individual complaints from consumers.

The check of the correct label presence in the shops should follow the same procedure for every visit in order to make inspection results comparable. As there is no European law specifying how shop visits should be conducted, the Come On Labels project has developed some recommendations, based on the experience of other projects and its own surveys.

The procedure for visiting shops should take three steps: Preparation, inspections and follow-up.

Shops: procedure for the inspections	
Preparation	
Appliance selection, shop selection and check-list elaboration.	
Inspections	
■	Visit shops and record the labelling status.
	Inform shop of next steps.
Follow up	
■	Assess the results and process them (in case of sanctions).
	Feedback of the results to the shops.
	Store the results for the next shop/appliance selection.
	Report the results.

The proper label display for the products should be recorded following the check list (see next table) and the shop should be informed about the next steps to be carried out by the national Authority after the conclusion of the inspection. The follow-up depends on the verification procedure established in the national legislation.

Table: Proper position of the label

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 a 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 a 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.

## 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 about 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 product shall contain the energy efficiency class, if energy-related or price information is disclosed. Therefore, one of the market surveillance actions is also to verify if the energy class is always properly mentioned on the advertisements.

## Summary of findings in the shops

*This chapter is extracted and adapted from the summary of the project's three rounds of shop visits, organised between December 2011 and February 2013. Full document is available here:*

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

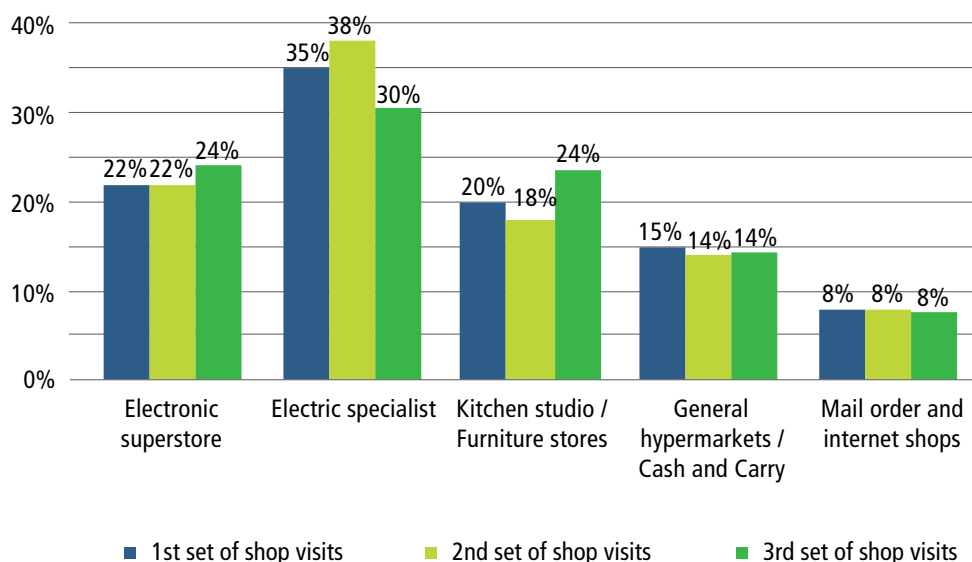
Status of appliance labelling				
front page	Title of the document	Author	date	number
	Short note on content	country		
	 <b>National Shop Visits Report II</b>	CoL consortium		
One of the very visible outcomes of the Come On Labels project is the personal visit of hundreds of shops around Europe, monitoring the proper presence of energy labels on products. Enclosed is a report, summarising the results of shop visits from 13 European countries, covering total 330 shops, undertaken in second half of 2012. Find out more on the situation related to the proper display of energy labels per product type and per shop type, the presence of new energy labels, and description of situation by each individual country.				
			February 2013	4.9
	 <b>National Shop Visits Report I</b>	SEVEN, ESCAN		
Report on the first set of shop visits.				
			April 2012	4.9

Within the Come On Labels project, each of the 13 project partners have visited at least 20 selected shops three times during the project. During the entire duration of the project, over 900 points of sales have been visited and monitored.

- The first round of shop visits took place between December 2011 and February 2012 and included 290 shops.
- The second round of shop visits was conducted within the period of July 2012 to October 2012 and included 331 shops.
- The third round took place in January and February 2013 and included 305 shops.

**Note:** the size of the sample and the sampling characteristics result in a shop sample that is not representative of the EU appliance market or of the distribution of the shop types. The project visit results therefore are only indicative of some trends and highlight some of the problems with the label display, but do not represent the full situation of the household appliance retailers both at EU and national levels.

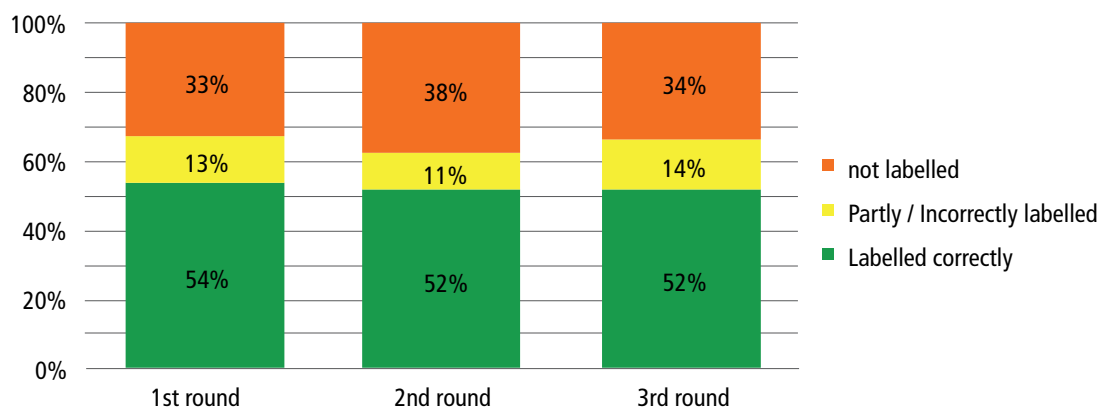
The Figure below compares the share of shops visited in the first, second and third round of shop visits. While the total number of shops visited has changed, the shares during the first and second round of shop visits remained similar. During the third round of shop visits, electronic superstores and kitchen/furniture studios were visited slightly more often. On the other hand, less electric specialists were inspected whereas the share for general hypermarkets/cash and carry as well as mail order and internet shops remained similar to the previous rounds.



The % share of shop types visited in 1st, 2nd and 3rd round of shop visits

## Compliance per type of shops

It should be noted, that compliance per shop category differs considerably from country to country and only refers to the number of fully correctly labelled products – partly or incorrectly labelled products are not considered here. For the third round of shop visits, the highest overall shop compliance was found in Germany (77%), Croatia (73%), Spain (65%), Poland (63%), and the UK (55%). The lowest overall compliance was found in Malta (37%), Belgium (32%), and Greece (31%).



Average shop compliance rates in 1st, 2nd and 3rd round of shop visits – Summary per shops

In addition to that, full compliance also varies greatly according to the type of shop, ranging from as low as 26% in kitchen studios/furniture stores to 70 % in electronic superstores.

Overall, **kitchen and furniture studios** are the shop type with the lowest share of properly energy labelled products followed by **general hypermarkets** and **electric specialist** shops. In the case of kitchen and furniture studios the situation worsened when comparing all three rounds of shop visits, and only 26% of all appliances were labelled properly in the last round (30-33% in the previous shop visit rounds). General hypermarkets showed a similar trend with an overall compliance just reaching 50% during the third round of shop visits. This led to the conclusion that shops that are selling a large variety of products perform differently when it comes to displaying energy labels properly. This depends mainly on the type of products offered, the turnover of specific models, the supply of energy labels by the manufacturer/importer, and knowledge of shop assistants, etc.

Results of the third round of shop visits further show that compliance in **electronic superstores** remain high (70%) and relatively stable compared to the first (76%) and second (71%) round of shop visits. However, significant differences could be observed when comparing the individual countries. In countries such as Austria, Croatia, Czech Republic, Germany, Italy, Poland, Spain, and UK, compliance for this shop type is above 80% whereas in some of the other countries the compliance is much lower: around 45% in Greece, and Malta 39%.

**Electric specialists** account for 31% of all shops visited by the project consortium. Overall compliance in this shop category has again improved for the second consecutive time. 56% of all appliances in shops of this type were labelled correctly, compared to 52% in the second round of shop visits and 48% in the first round. Compliance in this shop category differs significantly from country to country and also depends on the individual shops visited. For example, compared to the second round of shop visits, compliance for this shop type in Germany went down from ca. 80% to 59% (probably as a result of purposefully selecting shops suspected to be non-compliant). Compliance in Greece, Malta and Belgium remained on a low but stable level, whereas in Croatia the situation further improved with ca. 78% of all shops in this category displaying energy labels correctly.

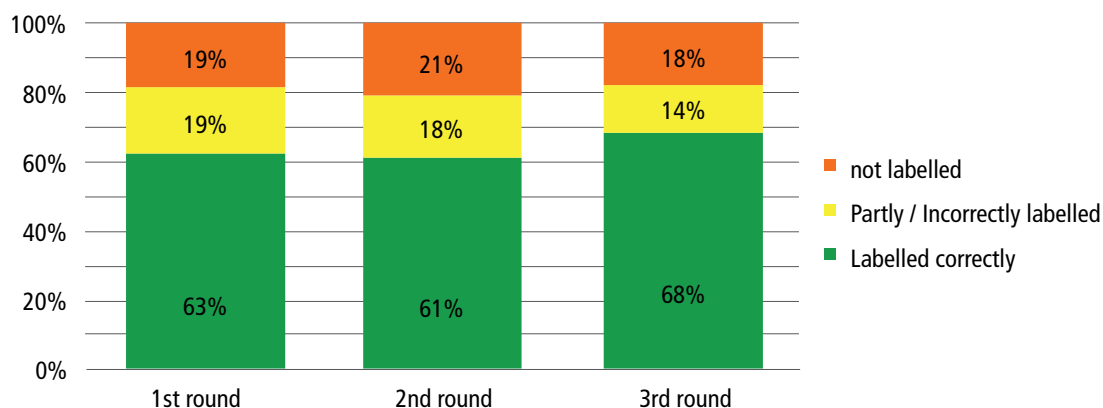
However, it needs to be mentioned that the shop visit results are strongly influenced by the applied shop selection strategy. Germany, the Czech Republic, Spain, and UK intentionally selected a larger number of kitchen/furniture shops and/or cash and carry shops. Austria, Greece, Latvia, Malta, and Poland focussed on shops with the largest share of sales in the given market; whereas Belgium, Croatia, Italy, and Portugal covered all shop types equally.

In terms of displaying energy labels only partially and/or incorrectly, **internet shops** are the most problematic type of shop when comparing all three rounds of shop visits. Despite an improvement compared to the second round of shop visits, in 35% of the cases web shops do not provide consumers with all required information from the energy label. The EU energy labelling legislation requires a specific set of information to be displayed with the product offered on internet or catalogue sales. Whereas data such as the energy class or the volume of products are commonly displayed, other information such as noise or climatic class (for refrigerating appliances) is often missing.<sup>3</sup>

## Compliance per product group

Compared to the first and second round of shop visits, the overall rate of appliances being correctly equipped with an energy label has **increased in the third round of shop visits**.

The main result observed is that whereas the rate of proper energy labelling stood between 63% and 61% during the first two rounds, this figure **increased to 68%** during the third round. The rate of unlabelled products remained relatively stable at 19% and 21% during the first two rounds of shop visits and 18% during the third round. At the same time, the rate of incorrectly labelled products decreased from 19% and 18% during the first two shop visit rounds to only 14% during the third round. This change can be mainly attributed to the increased presence of new energy labels on the market which are being supplied in one piece. This is reported to be better received by retailers and manufacturers and understood by consumers alike.



Energy Label compliance by products inspected

<sup>3</sup> For examples of wrongly labelled appliances in internet stores, see the picture section at the end of the document, describing the second round of shop visits.

In total, 60149 appliances were checked during the third round of shop visits. In the first round of shop visits, some 51 thousand products were checked. In the second round of shop visits, ca. 76 thousand products have been surveyed. These numbers exclude lamps which usually have the energy labels printed on the product packaging.

In total **68% of the appliances surveyed were labelled correctly**, 14% labelled partly/incorrectly and 18 % not labelled at all (weighted average). In general, there is a significant difference of compliance levels between traditional white-goods such as refrigerating appliances, washing machines, dishwashers, and appliances that are found less often in households or which have carried the energy label for a shorter time, and/or are sold in different types of shops, such as air conditioners, electric ovens, tumble driers.

## **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.

During all three rounds of the shop visits, informal interviews with shop assistants were conducted in some shops in several countries in order to gather 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 appliances and in kitchen/furniture shops.
- The use of the shop’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 into 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.

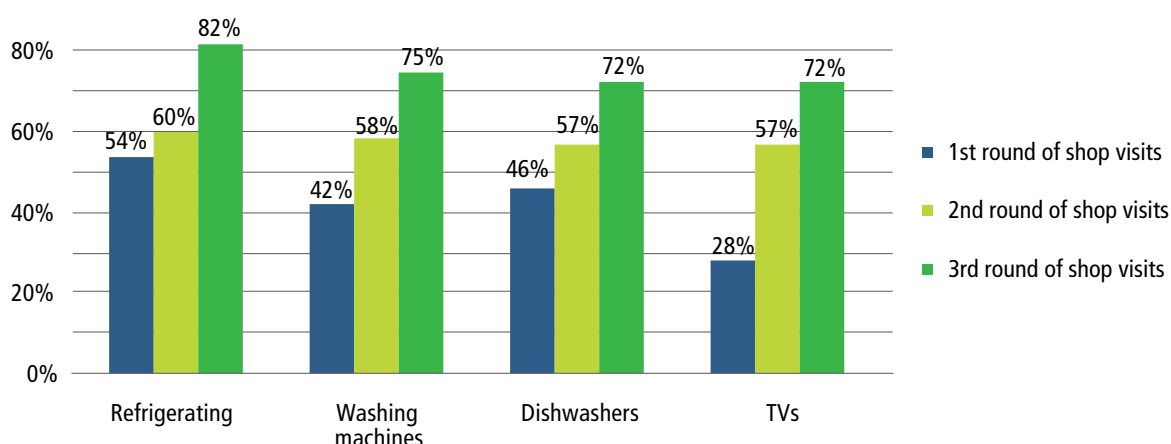
## Market share of new energy labels

In all three rounds of shop visits, the share of old and new labels has been monitored and compared. It needs to be mentioned though that during the first round of shop visits non-labelled TVs and wine storage appliances were not taken into consideration as their market entry date could not be verified during the visits (only products with the label were counted).

In the first round of shop visits (depending on the product category) between 42% and 54% of the appliances with the possibility to bear the old or the new labels were found with a new label while between 46% and 58% were still equipped with the old label.

In the second round of shop visits, it was observed that the share of new energy labels has increased in general in all concerned product categories. This was particularly visible in the case of Televisions for which formerly no label was available. In this category a high share of products was labelled with the new energy label right from the start.

During the third round of shop visits, the previously observed trends could be confirmed as the share of new energy labels further increased considerably in all four product categories. Between 71% and 82% of dishwashers, washing machines, and refrigerating appliances are now equipped with a new label. Similarly, 72% of TVs found during the shop visits now have a new energy label. This is a remarkable increase particularly compared to the first round of shop visits during which only 28% had a new energy label and 72% were not labelled at all.



Display of the new energy label – Summary



## Examples of incorrectly labelled products as monitored during the shop visits

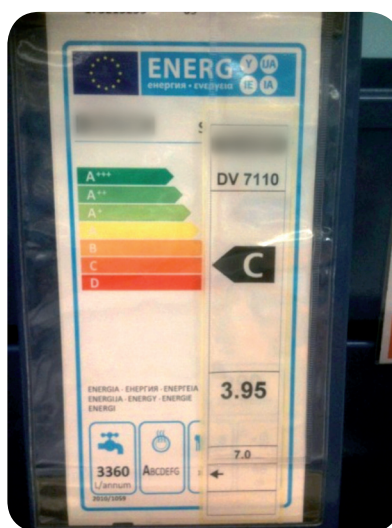


Labels displayed at wrong place.



	EAN kód	
	Kategorie	zpředu plněná
	<b>Vlastnosti</b>	
	6. smysl Colours	ano
	Intuitivní ovládání	ano
	Doporučené dávkování	ano
	Roční spotřeba energie	155 kWh
	Energetická třída	A+++ - 20 %
	Kapacita prání	8 kg
	Green generation	ano
	Objem bubny	64 l
	Účinnost prání	A
	Účinnost odštěďování	A
	Roční spotřeba vody	9900 l

Wrong energy class declaration.



Label covered by other document, combination of an old and new label.

## Retailer training

In order 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 languages and 13 national adaptations on the project website:  
<http://www.come-on-labels.eu/displaying-energy-labels/retailer-training-manual>

Over 1000 copies of the training material 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,
  - Inclusion into retailers' education and e-learning schemes
- **Manufacturers:**
  - Common distribution of the material to individual suppliers, either by individual manufacturers, or in cooperation with the national manufacturer association
- **Authorities:**
  - Distribution to individual inspectors located around the country
  - Organisation of common events and seminars for inspectors or the retailers
- **Consumer NGOs etc**
  - Common awareness raising about proper labels display

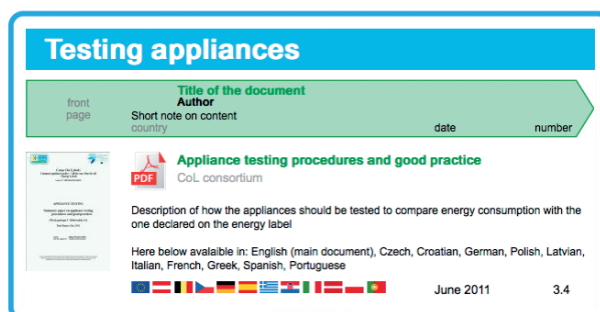
In total, over 2600 shop assistants, representatives of over 830 shops, as well as some 70 surveillance inspectors, suppliers and other stakeholders from around the EU have benefited from the retailer training manuals.

# Product compliance verification and laboratory testing

## Overview of verification procedure and market surveillance

*This chapter is extracted and adapted from the project's document "Appliance testing procedures and good practice"; published in June 2011. Full document is available in 11 languages here:*

*<http://www.come-on-labels.eu/appliance-testing/energy-consumption>*



After the publication of the new labelling directive 2010/30/EU in 2010, a number of Regulations followed, setting new labels for major energy-related products. Contemporarily, the Ecodesign Regulations published in 2009 established minimum requirements that products shall fulfil to be placed on the EU market. The compliance with all these requirements needs to be verified as well as the product's conformity with the label declarations.

Unfortunately in the last decade market surveillance activities have been developed only in some Member States and in most cases in a discontinuous way. Starting in 2009, the European Commission has supported some pan-EU actions through the financing of specific projects within the Intelligent Energy Europe Programme. The specific ADCO (Administrative Cooperation) Groups on Labelling and on Ecodesign have also been set.

It is also worth noting that one of the new legislative requirements for the EU Member States, included in Directive 2010/30/EU is to prepare (every four years) a report to the Commission including details about their enforcement activities and the level of compliance in their territory. This should include information on appliance compliance testing, which this chapter is dealing with.

## The procedure to be followed in EU Member States

Whether in the case of an old implementing directive or a new delegated regulation, the verification procedure is based on a two-step approach: in Step 1 the check is performed on one unit of the model; in case of suspected non-compliance Step 2 is then developed checking three additional units of the same model.

Depending on the parameter to be verified, a verification tolerance (that takes into consideration the uncertainty in the laboratory measurements) is applied to the measurements carried out in the two Steps. In this respect it is worth noting that while in the old labelling directives the tolerance accepted in Step 1 was larger than that accepted in Step 2, to take into account also the production variability, in the new delegated regulations tolerances are in most cases the same in both Steps for each verified parameter.

Table: Summary of the EU verification system and tolerances for energy consumption for the new labelling and Ecodesign requirements

Appliance	Implementing regulation	Standard	Verification procedure			
			Step 1		Step 2	
			Units (n)	Tolerance (%)	Units (n)	Tolerance (%)
(new) Energy labelling scheme						
Refrigerators&freezers	1060/2010/EU	EN 153	1	10%	3	10%
Washing machines	1061/2010/EU	EN 60456	1	10%	3	6%
Dishwashers	1059/2010/EU	EN 50242	1	10%	3	6%
Ecodesign requirements						
Refrigerators&freezers	643/2009/EC	EN 153	1	10%	3	10%
Washing machines	1015/2010/EC	EN 60456	1	10%	3	6%
Dishwashers	1016/2010/EC	EN 50242	1	10%	3	6%

The European standardisation bodies (CEN, CENELEC, ETSI) have the task of drawing up the corresponding technical specifications (i.e. the measurement standards), compliance with which will provide a presumption of conformity with the legislation. Such specifications are referred to as «harmonised standards». In this respect:

- products manufactured in conformity with harmonised standards are presumed to be compliant to the essential requirements;
- standards are not mandatory, they remain voluntary. Alternate paths are possible but the producers have an obligation to prove their products are compliant to the essential requirements;
- standards must offer a guarantee of quality with regard to the essential requirements of the EU legislation;
- national Authorities are still responsible for the market surveillance on their territory and to take all appropriate measures to avoid (and even withdraw) non-compliant products from the national markets.

## Existing legal obligations for Member States on market surveillance

The New Legislative Framework (NLF), the modernisation of the New Approach for marketing of products, was adopted in Council on 9th July 2008 and finally published in the Official Journal on 13th August 2008. It consists of two complementary instruments, Regulation 765/2008/EC on accreditation and market surveillance and Decision 768/2008/EC establishing a common framework for the marketing of products.

The objective of the **package** is to facilitate the functioning of the internal market for goods and to strengthen and modernise the conditions for placing a wide range of industrial products on the EU market. The package:

- introduces better rules on market surveillance to protect both consumers and professionals from unsafe products, including imports from third countries. This particularly applies to procedures for products which can be a hazard for health or the environment for instance, which in such a case will be withdrawn from the market;
- enhances the confidence in and quality of conformity assessments of products through reinforced and clearer rules on the requirements for notification of conformity assessment bodies (testing, certification and inspection laboratories) including the increased use of accreditation; a reinforced system to ensure that these bodies provide the high quality services that manufacturers, consumers and public authorities need;
- enhances the credibility and clarifies the meaning of CE marking. In addition the CE marking will be protected as a community collective trade mark, which will give authorities and competitors additional means to take legal action against manufacturers who abuse it;
- establishes a common legal framework for industrial products in the form of a toolbox of measures for use in future legislation. This includes provisions to support market surveillance and application of CE marking, amongst other things and it sets out simple common definitions (of terms which are sometimes used differently) and procedures which will allow future sectoral legislation to become more consistent and easier to implement. The provisions are split for legal reasons, but must be considered in parallel, as they are fully complementary and together form the basis of consistent legal framework for the marketing of products.

The legislation also sets the obligations of the Member States regarding the organisation of the market surveillance. Member States in fact shall:

- establish appropriate communication and coordination mechanisms between their market surveillance authorities
- establish adequate procedures
- entrust market surveillance authorities with the powers, resources and knowledge necessary for the proper performance of their tasks
- ensure that market surveillance authorities exercise their powers in accordance with the principle of proportionality



- establish, implement and periodically update their market surveillance programmes
- periodically review and assess the functioning of their surveillance activities.

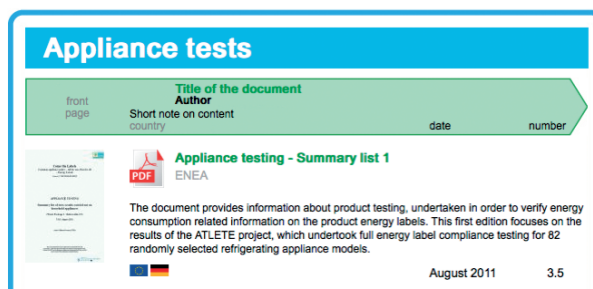
In conclusion, a set of recommendations can be drawn for the definition and implementation of an effective verification procedure for the EU legislation on energy-related products:

- set a clear, transparent and precise procedure, to be largely publicised to all market actors and thoroughly followed by the national Market Surveillance Authority. This should include (the list is not exhaustive):
  - the use of an appropriate measurement method and test conditions
  - the commitment to run the 2 Steps of the verification procedure as set by the relevant EU labelling/Ecodesign product specific measures
  - the verification of all parameters requested by the legislation provisions (e.g. energy efficiency class, energy consumption, water consumption, capacity). All parameters have the same importance when product compliance is considered.
  - in case of failure of Step 1, the supplier should be given the possibility either to accept the results and go for an immediate remedy action or to ask for the development of the second Step.
- foresee and support the discussion with the supplier about the possible reasons for non-compliance: the understanding of the non-compliance causes is as important as the identification of non-compliant products;
- define staged and timely corrective actions to be applied by the national Market Surveillance Authority: such actions should always follow the identification of a non-compliant product and should possibly include an initial approach to the product supplier for the correction of the product declaration(s), followed by – if and when considered necessary – the application of penalties or sanctions (effective, proportionate and dissuasive) down to the obligation to remove the non-compliant product(s) from the market;
- set a “working plan” for the market verification, to be announced to all market actors, to publicise the concept that no products will be forgotten and that market verification is a routine action and not an exception.

## Examples of known compliance tests

*This chapter is extracted and adapted from the project's document "Summary list of test results carried out on household appliances"; published in three editions (8/2011, 5/2012 and 3/2013). Full documents are available in two languages here:*

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



The Come On Labels project has collected information about product testing undertaken for compliance verification of 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 is to increase European-wide implementation and control of energy labelling and Ecodesign measures for appliances by:

- collecting and circulating results of the European testing results;
- contributing to increased 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 manufacturer's energy labelling declarations including referencing to a methodology for laboratories accreditation and models selection.

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

- **ATLETE project, Intelligent Energy Europe project, 2009–2011<sup>4</sup>**

The project has focused on testing refrigerating appliances for their compliance with the (old) energy label declarations and it was the first European wide testing activity for market surveillance. 80 randomly selected refrigerating appliances were tested in selected laboratories. The project has brought specific examples of product test results and confirmed the technical feasibility and economic 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 consumption and the energy efficiency class declarations.

<sup>4</sup> [www.atlete.eu](http://www.atlete.eu)

But when all five parameters under verification are taken into consideration 57% of models do not comply with at least one of the tested parameters.

All test results and test reports for each 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, refrigerator-freezers and freezers for compliance against the energy labelling and Ecodesign requirements.

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 suspected non-compliance: all four failed the additional tests and were therefore subject to enforcement actions and sanctions. In the worst case, the test report identified a 120 percentage difference between the measured and claimed energy consumption.

#### ■ **UK – Energy Saving Trust, 2010–2012**

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

In 2010–2012 EST verified the compliance of 24 refrigerating appliances: energy consumption and storage volume were tested but not the other parameters relevant for the energy labelling (storage temperature, temperature rise time and freezing capacity). The aim was 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 the other two models the difference is almost negligible. Results of the tests were negotiated with the respective manufacturers and in case of their disagreement, the Step 2 (three additional units tested) would have been undertaken. Models considered non-compliant were removed from the EST Recommended promotion scheme and results were also shared with the national market surveillance authority.

#### ■ **Spain – IDAE tests, 2008 – 2011**

In Spain IDAE, the Institute for the Diversification and Saving of Energy, manages a national database of 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. IDAE has acquired from the manufacturer a sample of the products to be tested that were sent to LCOE (the Official Central Laboratory). In general, model selection was 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 of not being 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

The aim of the project, financed by The Nordic Council of Minister and started in 2011, is to develop the collaboration among Nordic countries for market surveillance, to check the accuracy of the information declared on the energy label and if the product fulfils the Ecodesign 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 tests developed in one country could be used as the basis for a market surveillance action in a number of other 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 Authority's "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 in 2009. On the basis of random sampling several appliances from each category were tested to establish the compliance with the energy labelling. 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 developed with the aim to verify the compliance of the energy consumption and other parameters of certain product groups with the energy label declarations, and/or the Ecodesign requirements. Currently (spring 2013) these projects are:

- **ATLETE II:** 50 models of washing machines, all energy labelling and Ecodesign requirements will be verified, results to be published in 2014,
- **Ecopliant:** motors (30–50 models), external power supplies (10 models) and 5 models of tertiary sector lamps. 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 high risk of non-compliance, results expected in 2014,
- **CompliantTV:** 125 TVs and 75 monitors to be tested for energy labelling and Ecodesign requirement compliance, results expected in 2014.

## Possibilities for a European appliance test results exchange system

*This chapter is extracted and adapted from the project's document "Proposal of European appliance test results exchange"; published in May 2013. Full document is available here:*

*<http://www.come-on-labels.eu/appliance-testing/results-exchange>*

Market surveillance activities concerning energy labelling and Ecodesign requirements for energy-related products around the EU is fragmented and systematically carried out only in a small number of EU member States. The low level of surveillance can however endanger the overall EU goals on energy efficiency, consumer protection and fair competition.

The main barriers perceived by national Authorities for a more effective market surveillance action include the lack of financial resources, lack of expertise, lack of national accredited test laboratories and a scarce coordination of surveillance actions and sharing of information and test results among Member States.

Project partners have therefore collected the list of testing activities undertaken in individual countries (see chapter above), but also prepared a document including information that could support national Authorities information exchange in order to achieve a higher level of market surveillance, without increasing the human and financial resources. Two main findings are described in this document, the new 2013 "Product safety and market surveillance package" and a summary of the elements already included in the existing legislation.

### Product Safety and Market Surveillance package 2013

Published in February 2013 this new package describes the possible improvements and future organisation of the Market Surveillance Activities in the EU. While mainly focusing on the safety of products, it also relates to energy labelling and Ecodesign legislation. Elements addressed by the "MSA Package" include:

- Increased effort for communication between the authorities on an international level,
- Easier identification and traceability of products under surveillance,
- Sharing product related surveillance activities among the authorities to avoid duplication of efforts
- Promoting and sharing the results of tests among Member States

### Summary of the elements already existing in current legislation

Other aspects covered by the existing legislation that are briefly described in the document include:

- **ADCO – Administrative Co-operation Working Group** – The tool for market surveillance authorities to meet, share and discuss experiences related to product surveillance activities. Meetings take place twice a year, two separate sub-groups exist, concerning energy labelling and Ecodesign (in some countries headed by the same organisations, in others by different ones).

- **Obligation of suppliers to provide MSA with technical specifications of the products** – suppliers shall provide upon request of national Authorities the technical documentation, supporting energy labelling declarations and compliance with the Ecodesign requirements.
- **Univocal product identification** – overview of legislation requirements to univocally identify each model of the products covered by energy labelling and/or Ecodesign measures.
- **Use of tolerances** – legislation should clarify that measurement tolerances are for verification purposes only and should not be used by suppliers for achieving a better energy labelling ranking or to comply with Ecodesign requirements.

## Promotion of energy labels

Energy labels have proved to be one of the most effective energy efficiency mechanisms. They bring easy to understand guidance to the consumers at low cost to the stakeholders.

With the new energy labels entering the shops since 2011 and with the list of appliances and products bearing the energy labels increasing, there is a constant need to help and support consumers in using the information on the energy label to make informed purchasing decisions.

For this reason, the project partners organised a wide list of dissemination activities and sought to involve other national organisations in order to ensure that consumers will have access to information explaining the content of energy labels.

Examples of activities undertaken include media appearances in printed, electronic and broadcast media; organisation of and appearance at events, seminars, and conferences; elaboration and circulation of printed leaflets, brochures, posters, and bookmarks. Examples of some of the project dissemination activities can be found below.

For the full list of dissemination activities, please visit the project website:

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

*(Please note that the examples feature one sample only from each participating country. Each project partner has, however, organised a wide set of activities, typically including printed materials, events, media outcomes, etc.)*



Country: [Austria](#)

Date: March 2012

Name and type of activity:

**Information leaflet to consumers circulated by retailers**

Description: 100 000 copies of leaflets circulated to shops around Austria, in cooperation with the retailer association.



Country: [Belgium](#)

Date: March 2012

Name and type of activity:

**Series of information materials on energy labels**

Description: Specific set of leaflets designed for each product group with a new energy label, explaining its content. Circulated via events, fairs, consultations and seminars.





Country: **Czech Republic**

Date: June 2011

Name and type of activity:

## **Publication on new energy labelling elaborated with energy utility**

Description: One of the first consumer oriented publications on the new energy labels, published after the legislation entered force. Produced in cooperation with a major energy utility, which made it available to its customers.



Country: **Croatia**

Date: June 2012

Name and type of activity:

## **Organisation of energy days around Croatian municipalities**

Description: A series of stands, events and information centre visits have been organised in Croatia, to inform consumers all around Croatia on the new energy label content and meaning.



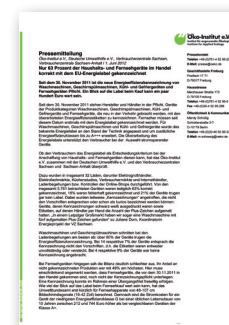
Country: **Germany**

Date: August 2012

Name and type of activity:

## **Press release summarising the results of national shop visits**

Description: A press release published in Germany, summarising the results of the first two rounds of the shop visits, resulted in numerous articles being published and informing the public about the state and importance of label display in shops.



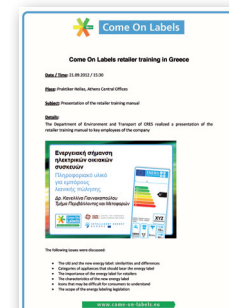
Country: **Greece**

Date: September 2012

Name and type of activity:

## **Retailer training to shop chain assistants**

Description: The retailer training was delivered in Greece in cooperation with major shop chain representatives, improving their knowledge on the proper label display in shops.





Country: **Italy**

Date: February – October 2012

Name and type of activity:

## Series of presentations to students

Description: A set of presentations and educational events have been held for elementary and high school students in several Italian municipalities, increasing their awareness on energy efficiency and knowledge on how to recognise it by the meanings of energy labelling.



Country: **Latvia**

Date: December 2012

Name and type of activity:

## Bookmarks featuring new energy labels disseminated through libraries

Description: Practical bookmarks have been in Latvia, introducing in a brief and effective manner to book readers about new energy labels. Bookmarks have been circulated to all Latvian libraries for free distribution to readers.



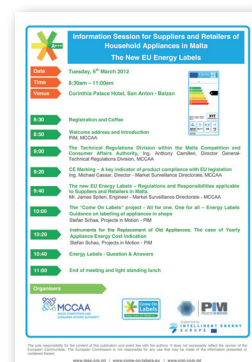
Country: **Malta**

Date: March 2012

Name and type of activity:

## Stakeholder seminar on new energy labels

Description: A successful seminar was organised in Malta, actively involving all stakeholders – from the authorities, to suppliers and retailers, discussing the share of proper label displays in Maltese shops and the possible improvement actions.



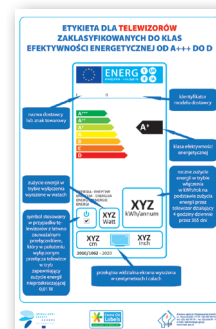
Country: **Poland**

Date: June 2012

Name and type of activity:

## Posters explaining new energy labels for each product group

Description: Set of posters were printed in Poland, introducing new energy labels for each specific product group. Posters were used at events and fairs, to reach wide range of consumers.







Country: **Portugal**

Date: April 2012 / February 2013

Name and type of activity:

## Series of national TV broadcasts via Green Minute programme

Description: Several broadcasts on national TV and Radio stations, as well as daily papers in Portugal enabled the partner to inform a wide range of consumers about the emergence of new energy labels.



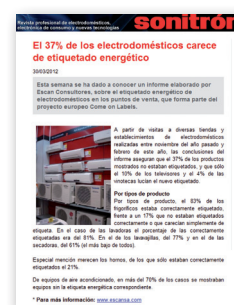
Country: **Spain**

Date: January – June 2012

Name and type of activity:

## Set of articles explaining labels to end consumers and retailers

Description: Set of articles published in Spanish media resulted in an increased awareness on both energy labelling in general, and on the status of label display in shops.



Country: **United Kingdom**

Date: November 2011

Name and type of activity:

## Leaflets on energy labels disseminated via shops, events, housing associations and direct delivery to thousands of homes

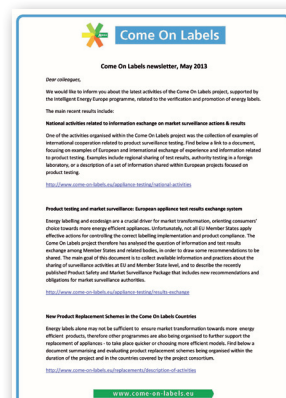
Description: Leaflets were produced by the UK project partner, instructing users on labels. Leaflets were disseminated through energy centres and consumer information services, with a recommendation from the national energy authority.



In total, over 580 thousand leaflets, brochures, posters and other information materials have been printed and distributed within the project by its partners.

In addition, over 115 articles and media and event presentations (printed, online, TV, radio, seminars) have been released with more than 3 million readers and viewers around the EU.

Regular information about the project progress has been also circulated to over 220 individual stakeholders on international level by seven editions of a project newsletter, which was published in English and in part in Portuguese and Greek languages.



## Replacement of inefficient appliances:

The Come On Labels project supports the implementation of the EU labelling directive for energy-related products in a number of member states. The EU energy label alone, however, is neither sufficient to persuade households to replace inefficient appliances nor to ensure the full market penetration of highly efficient appliances. Rather, a comprehensive set of measures is needed, including:

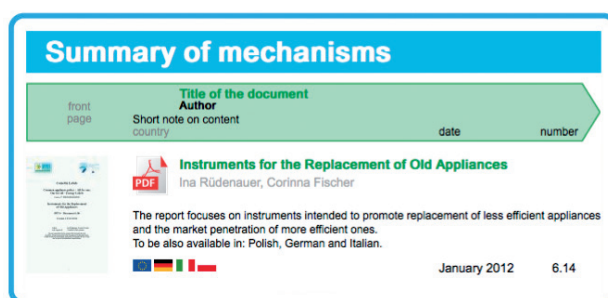
- government-funded research and development helping to develop and commercialise new technologies;
- consumer education;
- efficiency standards to eliminate inefficient products from the marketplace; and
- incentives to encourage consumers to purchase products significantly more efficient than the minimum standards or to replace inefficient appliances before the end of their lifetime.

Within Come On Labels, a document has been elaborated that establishes the rationale for policy instruments that support product replacement; presents different possible instruments, discussing their advantages and disadvantages; and reviews existing examples of replacement mechanisms. Towards the end of the project, a second review has been conducted, updating existing mechanisms and drawing some conclusions.

## Summary of mechanisms and impacts

*This chapter is extracted and adapted from the project's document "Instruments for the replacements of old appliances"; published in January 2012. Full document is available in four languages here:*

<http://www.come-on-labels.eu/replacements/summary-of-mechanisms>



## Better replacement and early replacement

*Better replacement* means that consumers choose a more energy efficient appliance than they would have chosen without the corresponding policy instrument. The energy, environmental and financial advantage arises from the lower power consumption of the «better» appliance. For example, an A+++ model consumes about 60% less electricity than an A model.



*Early replacement* means the replacement of an (old) installed appliance although it is still working. Whether it is environmentally beneficial, depends on the type of appliance. It is measured by the «environmental payback period» which denotes the time after which the environmental impact of the cumulative energy savings outweigh the additional environmental impact from the premature disposal of the old appliance. For the replacement of an average refrigerator-freezer combination manufactured in 2000 by a corresponding A++ appliance, this period is only about 2 years in terms of cumulative energy demand and global warming potential.

The following instruments are suitable to promote early and / or better replacement:

- **Informational Instruments**

### **Communication of life cycle costs**

This means consumers are given information on the financial savings they can achieve throughout the product life cycle by purchasing a highly efficient appliance. It has the advantage that a general environmental benefit of a product is converted into an individual benefit for the consumer. However, the argument is mainly valid for better replacement, and less so for early replacement.

### **Market overviews and product databases**

Market overviews and product databases such as [www.topten.eu](http://www.topten.eu) facilitate the purchase process by providing potential purchasers with an overview of efficient products, their features and prices, and eventually their life cycle costs under average conditions. Hence, they are rather a tool for *better replacement*. They may be provided by different actors, such as national energy agencies, manufacturers' associations, NGOs or other independent bodies.

### **Additional voluntary labelling**

In addition to the mandatory EU energy label, there are voluntary ecolabels both on an EU level and in some nation states. The goal is to particularly reemphasize highly efficient products or products that, beyond the energy savings, meet further environmental and quality criteria. This measure can especially promote *better replacement*.

### **Information campaigns**

Information campaigns are relatively inexpensive. Their effectiveness, however, is difficult to assess. Just like voluntary labelling, they are generally more effective in combination with other tools. On the other hand, many other instruments need to be accompanied by information campaigns in order to draw consumers' attention to the existence of that instrument.

### **Measuring energy consumption**

The measurement of the energy consumption of appliances in a private household is an appropriate measure to promote *early replacement*. Firstly, it may raise the consumer's awareness to an associated cost. Secondly, it can form an integral part of a replacement programme. For example, in-house measurement may be used to determine the eligibility of a household / appliance to participate in a subsidy program.

## ■ Financial incentives

Financial incentives can address the dilemma when the reduced energy costs could make a difference for low-income households and businesses, while they often lack the finances for the upfront investment.

### **Direct subsidies to consumers**

The basic idea is to provide consumers of particularly efficient appliances (who are at the same time disposing of an old appliance) with a financial reward. This is one of the most popular instruments. Examples of national programmes abound, and there are even more examples of programmes set up by trade, manufacturers or energy companies.

If the measure is limited in terms of time or budget, rather *early replacement* will be stimulated. If it is planned on a long-term basis (i.e. over several years), *better replacement* is promoted more or less ad infinitum, thus bringing forward falling prices and a longer-term market transformation.

### **Fiscal incentives for consumers**

Tax incentives have been extremely successful for major household appliances in Italy. But in other countries, they are rarely applied for household appliances. This is probably due to the comparably low purchase price of these devices, and, as a result, of the high administrative costs. Tax benefits therefore are primarily applied in the building sector, relating to equipment such as boilers, water heaters or air-conditioning systems (which are or will be also covered by the EU energy label).

### **Indirect subsidies**

In the case of indirect subsidies, as practised in the «Eco-point» system in Japan or the Korean «Carbon Cashbag», consumers obtain credit «points» upon the purchase of a highly efficient product. Then, these points can be traded for certain products or services. Another variant is that consumers can acquire bonus points when they buy other products, or as a bonus on their salary, which can then be used to purchase highly efficient appliances.

### **Bonus/malus programmes**

Bonus/malus programmes aim at adjusting the price of energy-using products according to their efficiency. When buying a highly efficient appliance, an allowance (bonus) is granted to the consumer, while he or she must pay an additional amount (malus) on purchase of a particularly inefficient product. When buying an average appliance, neither a bonus nor a malus does accrue.

### **Financial incentives for producers (upstream incentives) or retailers and installers (midstream incentives)**

Producers may receive financial incentives to produce and sell more highly efficient appliances or to reduce their prices. Lower consumer prices improve the conditions both for *better* and *early replacement*. Such incentives are particularly effective when the market is dominated by a few large producers that are present in all countries. Furthermore, as a tool for better replacement, sales personnel or installers receive (financial) incentives to sell particularly efficient appliances.

## Micro credits

Consumers can be helped to purchase highly efficient appliances when they are able to receive a micro credit that can be paid back from savings in the energy bill (also called micro contracting.) This kind of financing model is sometimes offered by utilities.

## Voluntary agreements

The market penetration of highly efficient devices can be supported by voluntary agreements (VAs) between manufacturers and governments which aim at increasing the market share of highly efficient appliances and improving the fleet performance.

The effectiveness of voluntary agreements, however, is a very controversial issue. The European Commission deems five requirements to be essential for a VA to succeed: (1) quantified targets, (2) significant market share of the manufacturers involved (at least 80%), (3) effective monitoring scheme, (4) transparency of the process, (5) sanctions in case of non-compliance.

## Conditions for success

Some general conditions for the success of replacement tools have been identified in the literature:

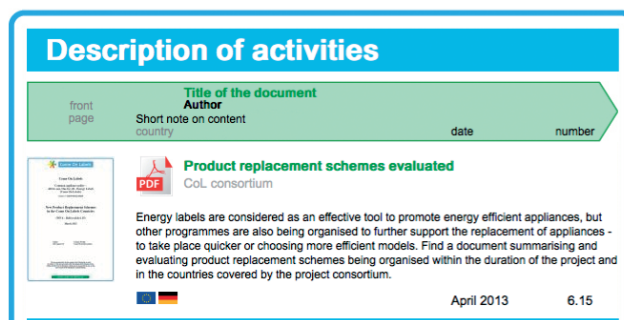
- Programmes should be part of a long-term strategy and be underpinned by reliable mandates and budgets.
- Criteria for support schemes must be clear and demanding; upon the achievement of a certain market share, the schemes should be revised.
- Careful planning:
  - definition of the exact objective of the measure (*early replacement* or continuous market transformation resulting from *better replacement*)
  - proper timing (in terms of marketability of technologies, i.e. not too early)
  - involvement of relevant stakeholders (manufacturers, retailers, where appropriate energy providers, ...)
  - duration of the measure should not be too short and the overall budget not too small.

## Update of recent mechanisms

*This chapter is extracted and adapted from the project's document "New Product Replacement Schemes in Come On Labels Countries"; published in April 2013. Full document is available here:*

***<http://www.come-on-labels.eu/replacements/description-of-activities>***

Since the beginning of the Come On Labels project, about a dozen new replacement schemes have been or are currently being put in place in Austria, Belgium, Croatia, Germany, Italy, Spain, and the UK. Some of them are of a primarily informational nature, others include significant financial incentives. This has been possible in spite of the economic crisis, partly because such schemes need not necessarily be financed by public money. Utilities may participate in replacement programs for customer retention, image reasons, or, as in Italy, to fulfil their obligations under a White Certificate scheme. Also, retailers may support them in order to stimulate consumption.



Some interesting features of current programs are:

## Use of competitions, drawings, and prizes

In a number of examples from Austria, informational measures are combined with financial or material incentives in order to increase the impact, generally in the form of a competition. For example, households who demonstrate energy savings, or buy a new highly efficient appliance can win an efficient product as a prize. Also, the costs of grant or rebate programmes are minimised when instead of a general grant, payments are raffled among the purchasers of an efficient appliance.

## Nature of the financial incentives

All financial measures make use of the classic options of rebate, direct payment, or free appliance / exchange. Those kinds of schemes are easiest to implement because ample experience exists.

## Embedding financial incentives in a broader context

Financial incentives are usually accompanied by communication campaigns providing information on the scheme itself, efficient appliances, energy savings options etc. This is essential to not only promote the program but produce longer-lasting effects. The German project “Stromspar-Check” even embeds the distribution of efficient appliances into a tailor-made energy advice session for low income households.

## Involvement of the regions

In Spain and Belgium, regional governments are administering the grant schemes. This way, authorities can adapt the programs to the specific economic and demographic conditions in their region.

## Lifetime running cost approach

Highly efficient appliances carry a prize premium. In many cases, though, the elevated purchase costs are compensated by the energy savings during the lifetime of the appliance. Communicating the real lifetime running cost of an appliance may therefore reduce consumer reluctance in the face of higher purchasing costs. In the UK, this approach will be tested in a trial phase in 2013. Similar efforts are being developed in the EU project YAEI (Yearly Appliance Energy Cost Indication).

## Little evaluation available

Given the fact that replacement schemes involving financial incentives are costly, surprisingly little evaluation is available. Sometimes numbers of participants or replaced appliances are

communicated and energy or CO<sub>2</sub> savings are extrapolated. However, the programmes have rarely been evaluated in detail. A relatively detailed evaluation is available for the German Stromspar-Check, but even this report does not balance costs and benefits. The UK lifetime running cost trial and the Croatian pilot grant scheme will surely be monitored so that future policies can be based on them.

In the following, a few recommendations for developing product replacement schemes are developed and illustrated with examples from the cases collected.

### **Choose eligibility criteria wisely**

Eligibility criteria refer to both target groups and / or products. Eligibility criteria for products define how efficient a product must be in order to receive support. Eligibility criteria for target groups may specify, for example, that the program is targeted at low-income households, or at the inhabitants of a specific region, or that it includes SMEs as well as households.

Eligibility criteria for products should be based on reliable market data in order to avoid windfall gains. As a rule of thumb, for market transformation purposes it might not be advisable to subsidize appliances which already have 20% or more market share. It has to be considered, though, that market shares can vary significantly between appliances as well as between different national markets.

### **Make sure the old appliance is being disposed**

The energy savings effect of a new highly efficient appliance is counteracted when the old appliance keeps running in the cellar, is given away or sold. Therefore, to ensure energy savings, one element of the scheme should be the collection and correct disposal of the old appliance, as is done, for example, in Austria (Trennungsprämie), Spain (RENOVE program), and Croatia (pilot incentive scheme for efficient appliances).

### **For financial incentives, design accompanying information measures**

Information activities are not only necessary to promote the program and explain its conditions. Accompanying information on the benefits of efficient appliances, on how to identify them (including the meaning of the energy label) and on important aspects of specific appliance types can multiply the effect of the incentive program. Databases that collect technical features, energy efficiency, price, and possibly sources of appliances, such as run by [topprodukte.at](http://topprodukte.at) or IDAE in Spain, have proven especially helpful.

### **Monitor effects and efficiency of the program.**

Besides monitoring the number of exchanged appliances and projecting energy and CO<sub>2</sub> savings, an evaluation should also try to assess possible windfall gains, to balance cost and benefit of a program, to identify which elements and mechanisms have been most successful, and to evaluate the procedures in order to see whether and where they may have to be improved. This way, subsequent programs can be designed in order to provide the best value for money.

## Final conference – March 15th 2013, Brussels

One of the final project outcomes has been the organisation of the final conference. It took place on March 15, 2013 in Brussels.

SEVEN, The Energy Efficiency Center, Czech Republic, as the Come On Labels project coordinator, organised the event in cooperation with **Eceee – European council for an energy efficient economy, and the Permanent Representation of the Czech Republic to the European Union.**

All project achievements and activities were presented, and, in addition, a high level round-table discussion was organised focusing on the current experience with new energy labels, and the plans for its future updates. The round table discussion participants included:

- **European Commission** – Ewout Deurwaarder
- **CECED** – Luigi Meli
- **ECOS** – Edouard Toulouse
- **Swedish Energy Agency** – Nills Ahlén
- **NL Agency** – Hans Paul Siderius
- **ATLETE and ATLETE II project** – Milena Presutto, ENEA
- **CLASP** – Pernille Schiellerup
- **GfK Retail and Technology** – Barbara Inmann
- **EFER – The European Federation of Electronics Retailers** – Maurice Estourgie.

Some 75 participants from 19 European countries, and representatives of the European Commission, national Market Surveillance Authorities, government institutions, representatives of manufacturers, environmental and consumer protection non-governmental organisations, national energy agencies, independent experts, and media participated to the event.



Permanent Representation  
of the Czech Republic  
to the European Union



european  
council for an  
energy efficient  
economy



In addition, each of the 13 national partners has organised a national seminar, conference or round table discussion, summarising the project achievements, national labelling implementation, and related future activities. Complete list of events is available here:

<http://www.come-on-labels.eu/about-the-project/all-project-seminars-eu>



## Project deliverables

List of Come On Labels project deliverables, their content and links to relevant documents:

Deliverable name	Language versions	Target group	Description	Link
Description paper: EU product Labelling (Ecodesign) Legislation	English, Czech, Croatian, French (Belgium), German, Greek, Italian, Latvian, Polish, Portuguese, Spanish	Authorities, stakeholders, national and EU experts on energy efficiency and labelling	Overview of the EU labelling legislation concerning the new EU energy labels	<a href="http://www.come-on-labels.eu/legislation/eu-product-energy-labelling">http://www.come-on-labels.eu/legislation/eu-product-energy-labelling</a>
Description paper: National Appliance / Ecodesign Labelling legislation and comparison	English	National and EU experts	Description of the specific level of implementation and activities resulting from the EU labelling legislation on individual markets	<a href="http://www.come-on-labels.eu/legislation/energy-labelling-legislation-in-the-project-countries">http://www.come-on-labels.eu/legislation/energy-labelling-legislation-in-the-project-countries</a>
National report on legislative activities	English, Spanish, Portuguese	National and EU experts	Detailed explanation to the new energy labelling legislation adapted during the course of the project, focused on four product groups	<a href="http://www.come-on-labels.eu/legislation/eu-product-energy-labelling">http://www.come-on-labels.eu/legislation/eu-product-energy-labelling</a>
Summary paper on appliance testing procedures and good practice	English, Czech, Croatian, French (Belgium), German, Greek, Italian, Latvian, Polish, Portuguese, Spanish	National Market Surveillance Authorities and stakeholders	Description of how the appliances should be tested to compare energy consumption with the one declared on the energy label	<a href="http://www.come-on-labels.eu/appliance-testing/energy-consumption">http://www.come-on-labels.eu/appliance-testing/energy-consumption</a>
Summary list of tests which are carried out	English, German	National authorities	Three editions of information about product testing, undertaken in order to verify energy consumption related information on the product energy labels	<a href="http://www.come-on-labels.eu/appliance-testing/appliance-tests-2011-2013">http://www.come-on-labels.eu/appliance-testing/appliance-tests-2011-2013</a>
Report on national activities related to information exchange	English	National authorities and stakeholders	Examples of activities undertaken in individual EU countries in order to increase the level of surveillance activities	<a href="http://www.come-on-labels.eu/appliance-testing/national-activities">http://www.come-on-labels.eu/appliance-testing/national-activities</a>
Report on the European appliance test results exchange system	English	National and European authorities and experts	Set of activities identified on the central level aimed to improve cooperation and improve the level of surveillance activities	<a href="http://www.come-on-labels.eu/appliance-testing/results-exchange">http://www.come-on-labels.eu/appliance-testing/results-exchange</a>
Summary of proper appliance labelling in shops	English, Czech, Croatian, French (Belgium), German, Greek, Italian, Latvian, Polish, Portuguese, Spanish	National government authorities, market actors	Information on how national authorities could organise the shop visits to check that energy labels are in place as required	<a href="http://www.come-on-labels.eu/displaying-energy-labels/appliance-labelling-in-shops">http://www.come-on-labels.eu/displaying-energy-labels/appliance-labelling-in-shops</a>
Report on national shop visits	English	National authorities and experts, market actors	Three sets of shop visits with results available per country, product and shop type	<a href="http://www.come-on-labels.eu/displaying-energy-labels/status-of-appliance-labelling">http://www.come-on-labels.eu/displaying-energy-labels/status-of-appliance-labelling</a>
Report on the involvement of other national organisations	English	National and international experts	List of practical activities undertaken to support improved label display	<a href="http://www.come-on-labels.eu/displaying-energy-labels/support-of-proper-labelling">http://www.come-on-labels.eu/displaying-energy-labels/support-of-proper-labelling</a>

Retailer training manual	English, Czech, Croatian, French and Dutch (Belgium), German, Greek, Italian, Latvian, Polish, Portuguese, Spanish	National retailers, experts and authorities	Education material for shop assistants explaining the content and design of the energy labels and its proper display	<a href="http://www.come-on-labels.eu/displaying-energy-labels/retailer-training-manual">http://www.come-on-labels.eu/displaying-energy-labels/retailer-training-manual</a>
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Deliverable name	Language versions	Target group	Description	Link
Labelling marketing good practice	English	National and EU experts, retailers, manufacturers, NGOs	Specific promotion examples from six countries on how labels have been effectively promoted	<a href="http://www.come-on-labels.eu/promoting-energy-labels/good-practice-case-studies">http://www.come-on-labels.eu/promoting-energy-labels/good-practice-case-studies</a>
National promotion activity report	English, outcomes in all project languages	General public	Dissemination activities, including leaflets, events, bookmarks, articles, and many more	<a href="http://www.come-on-labels.eu/promoting-energy-labels/examples-of-promotion-activities">http://www.come-on-labels.eu/promoting-energy-labels/examples-of-promotion-activities</a>
Summary of available financial and organisational mechanisms	English, German, Italian, Polish	State governments, manufacturers, consumer groups and NGOs	Examples of instruments intended to promote replacement of less efficient appliances and the market penetration of more efficient ones	<a href="http://www.come-on-labels.eu/replacements/summary-of-mechanisms">http://www.come-on-labels.eu/replacements/summary-of-mechanisms</a>
Description of new local activities	English	National experts, state inspectorates, consumer groups, manufacturers	Examples of replacement schemes undertaken during the course of the project	<a href="http://www.come-on-labels.eu/replacements/description-of-activities">http://www.come-on-labels.eu/replacements/description-of-activities</a>
International seminar	English	National and international experts and government representatives	High level seminar and round table discussion sharing experience and future plans with energy labels	<a href="http://www.come-on-labels.eu/about-the-project/all-project-seminars-eu">http://www.come-on-labels.eu/about-the-project/all-project-seminars-eu</a>
National seminar or presentations	English, Czech, Croatian, French (Belgium), German, Greek, Italian, Latvian, Polish, Portuguese, Spanish	National experts and government representatives	Set of national events, organised to explain the latest experience with energy labelling to national stakeholders	<a href="http://www.come-on-labels.eu/about-the-project/all-project-seminars-eu">http://www.come-on-labels.eu/about-the-project/all-project-seminars-eu</a>



## What others have said about the Come On Labels project

*“The Come On Labels project has already enabled our member utilities to inform many thousands of households about the energy label, and will continue to contribute significantly to competently advising private households on this important topic. Especially, I would like to thank the project members for the joint development of a mail supplement with which ASEW and its member utilities will continue to spread information about the energy efficiency label even after the end of the project.”*

**Vera Litzka** 

Managing Director,

ASEW (Arbeitsgemeinschaft für sparsame Energie- und Wasserverwendung im VKU,  
Association of Municipal Utilities Supporting Sustainable Resource Management), Germany  
(Association of municipal energy utilities)

*“The retailer training offered by the Come On Labels project was of great value to our sales and marketing teams here at ‘KNK appliances and household goods’. The information provided about the most common mistakes when affixing the energy label and detailed guidance on how to display energy labels properly was most useful for our day-to-day business operations. We are now in a position to inform our customers about the energy consumption of household products and also about the meaning of the symbols in an accurate way and we are glad to have a manual to refer to in case that customers require further information about energy labeling.”*

**Karl Vella** 

Director

KNK Ltd., Malta

Retailer

*“CECED Italia received daily enquiries from retailers. There was a lot of confusion about the new energy label: understanding which appliances adopted the new and which maintained the old one. It was a great pleasure to cooperate with AIRES Italia – the distributors association - to ENEA’s «Come On Labels» initiative. Besides our dedicated website, it was absolutely necessary to take part to an informative tour in the most important Italian cities in order to promote the new label and its correct display. During our tour we met many retailers, as it was really useful to increase the awareness concerning the changes in legislation.”*



**Antonio Guerrini**

General Director

Confindustria Ceced Italia

Italian Association of Home and Professional Appliances Manufacturers

*“The Come On Labels project has brought many interesting insights, and paved the way for increasing the surveillance of the implementation of the EU Energy Label.”*

*The project’s final conference gathered a high-quality audience and speakers, and has been a great opportunity to exchange among stakeholders on the future of the label. Come On Labels has been a very timely project to start reflecting on the revision of the Energy Labelling Directive planned in the coming years.”*

**Edouard Toulouse** 

Senior Policy Officer

ECOS – European Environmental Citizens Organisation For Standardisation

*“The State Energy Inspectorate of the Czech Republic, as the market surveillance authority in the field of energy labelling in the Czech Republic, has been cooperating with the organisers of the Come On Labels project in the area of sharing experience related to the surveillance of the proper display of energy labels in shops and other points of sales. The Inspectorate has also participated to gain information on methodologies related to testing products undertaken in order to verify their energy consumption. One of the significant cooperation areas was the usage of the project’s label display manual (retailer training manual) in the activities of the authority’s inspectors. One of the outcomes of this cooperation has been the publishing of the aggregated results of the inspection’s shop surveys in the year 2012. The Come On Labels project has also given us the opportunity to obtain information about similar ongoing activities taking place in other EU countries.”*

**Antonín Český** 

State Energy Inspectorate of the Czech Republic  
Market Surveillance Authority

*“Based on the implementation of the Come On Labels project activities, it can be confirmed that its educational activities have been useful and helpful to the consumer community in order to achieve their better understanding of energy labeling. It was particularly useful in terms of informing the public and other interested stakeholders within the business community, about the labelling system elements, including the technical documentation. Significant activity was also undertaken to clarify the differences between the old and new energy labels associated with the relevant legislation, and relating to the transposition of the EU Directive 2010/30/EU and the other delegated regulations for individual product groups. Finally, the implementation of this project has contributed to the improvement and support to national activities related to the information for end-users in order to improve their awareness about energy efficient appliances on the market.”*

**Igor Ragzrin** 

Department of renewable energy sources, energy efficiency and new technologies  
Sector of Energy  
Ministry of Economy, Croatia

*“In the earlier phase of our project, the Come On Labels materials on the legal situation have been extremely helpful. They enabled me to get a quick overview of the relatively complex subject. Furthermore, the Come On Labels documents on correct labeling in shops and on the results of shop visits have been very useful in preparing our own shop visits. I especially liked the fact that Come On Labels members were prepared to share their experience with shop visits in a personal conversation. Finally, I was very happy about the opportunity to prepare consumer leaflets jointly. I liked the idea of various appliance-specific leaflets to be developed, allowing to put in specific information for a targeted audience. The support of Come On Labels, both in terms of budget and expertise, enabled a much better outreach than would have been possible otherwise.”*

**Elke Dünnhoff** 

Coordinator energy labelling project,  
Verbraucherzentrale Rheinland-Pfalz  
(consumer center Rhineland-Palatinate), Germany  
(Consumer rights Non profit organisation)

*“The Spanish Federation of Domestic Appliances’ Retailers, FECE, has participated actively since the start of the Come On Labels project activities. Several meetings have been carried out since 2011 in Madrid and Zaragoza in order to organise the shop visits, prepare the Retailer training manual “El etiquetado energético y los comercios” and disseminate the results via the web page of the Federation and other means. The cooperation with the Federation has been considered as very positive in terms of providing updated information about energy labelling, exchanging experience, including the reports on the shop visits and label presence checks, and the associated problems and possible ways for their solution. In summary, the Federation is very satisfied with the outcomes of the Come On Labels project and views positively its activities to support energy labeling.”*

**Cesar Domínguez** 

Secretary General  
Federación Española de Comerciantes de Electrodomésticos,  
Federation of Appliance Retailers , Spain

*“We definitively confirm our position that the energy label is a tool that can help for energy savings. It provides consumers with effective information when purchasing appliances. It helps to drive product innovation and competition. It also contributes to achieving the EU energy saving targets. In our opinion, the new energy label provides a lot of information, which, if used properly, both household appliance stakeholders and the consumers can benefit from.”*

**Joseph Sinigalias** 

President  
SVEIS, Association of Electrical Appliances Manufacturers & Importers, Greece

*“The proper presence of energy labels in shops and the support to labelling organised within the market surveillance activities is crucial for further progress in highlighting energy efficient products on the market. We appreciate the effort made by the Come On Labels project in increasing the presence of labels in shops, in educating consumers about the new energy labels, and in supporting the transparent conditions on the market for individual manufacturers and suppliers.”*

**Paulo Nogueir** 

Sustainable Development Department  
Portuguese Energy Agency, Portugal

*“Energy efficient products are one important tool to achieve the national and indeed individual goals for protecting the environment and lowering financial expenditures. Energy labels are a crucial tool enabling consumers to achieve these goals and therefore we appreciate and support the Come On Labels project activities undertaken to make energy labels working even better towards these goals.”*

**José Valverde** 

Executive Manager  
AGEFE, Association of the electrical, appliance, photographic and electronic sector, Portugal

*“Pražská energetika, a.s. (Prague energy utility), the third largest electricity supplier in the Czech Republic, has been working with the Come On Labels project organisers already since early 2011, shortly after the new European legislation on energy labelling entered force. Due to this, we were one of the first ones to elaborate and bring a complete information on new energy labels to our customers and offer up-to-date advisory on selecting more energy efficient products within the services of our Energy advisory center.”*

**Josef Raffay** 

Chief of Department Market Analysis & Advisory Pražská energetika, a.s., Czech Republic  
Prague energy utility

*“The DATART, a.s. company, member of Darty Group, operating 32 consumer electronic shops around the Czech Republic, has cooperated with the Come On Labels project on creating a consumer material. It is informing its readers about energy labelling, and is being distributed among the company’s individual shops. We have moreover used the training manual, informing retailers and shop assistants on the proper display of energy labels at the points of sale. We consider similar projects to be useful in terms of increasing the consumer awareness on energy intensity of products and the possibilities to select more efficient models.”*







**Jana Choroušová** 

Marketing Manager BTL communication  
DATART INTERNATIONAL, a.s., Czech Republic





## Come on Labels project members – contacts

	<b>Czech Republic – project coordinator</b>	<b>SEVEEn</b> , The Energy Efficiency Center <a href="http://www.svn.cz">www.svn.cz</a>	
	<b>Austria</b>	<b>Austrian Energy Agency</b> <a href="http://www.energyagency.at">www.energyagency.at</a>	
	<b>Belgium</b>	<b>Brussels Energy Agency</b> <a href="http://www.curbain.be">www.curbain.be</a>	
	<b>Croatia</b>	<b>ELMA Kurtalj d.o.o</b> <a href="http://www.elma.hr">www.elma.hr</a>	
	<b>Germany</b>	<b>Öko-Institut e.V.</b> , Institute for Applied Ecology <a href="http://www.oeko.de">www.oeko.de</a>	
	<b>Greece</b>	<b>Center for Renewable Energy Sources and Saving</b> <a href="http://www.cres.gr">www.cres.gr</a>	
	<b>Italy</b>	<b>ENEA</b> – Agenzia nazionale per le nuove tecnologie, l'energia e lo sviluppo economico sostenibile <a href="http://www.enea.it">www.enea.it</a>	
	<b>Latvia</b>	<b>Ekodoma, Ltd</b> <a href="http://www.ekodoma.lv">www.ekodoma.lv</a>	
	<b>Malta</b>	<b>Projects in Motion</b> <a href="http://www.pim.com.mt">www.pim.com.mt</a>	
	<b>Poland</b>	<b>KAPE</b> , Polish National Energy Conservation Agency <a href="http://www.kape.gov.pl">www.kape.gov.pl</a>	
	<b>Portugal</b>	<b>QUERCUS</b> – Associação Nacional de Conservação da Natureza <a href="http://www.ecocasa.pt">www.ecocasa.pt</a>	
	<b>Spain</b>	<b>ESCAN, s.l.</b> <a href="http://www.escansa.com">www.escansa.com</a>	
	<b>United Kingdom</b>	<b>Severn Wye Energy Agency</b> <a href="http://www.swea.co.uk">www.swea.co.uk</a>	



This document was prepared within the Come On Labels project, supported by the Intelligent Energy Europe programme. The main aim of the project, active in 13 European countries, is to support appliance energy labelling in the field of appliance tests, proper presence of labels in shops, and consumer education.

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**More information about the project activities and all of its results are published on:**

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