



**Household refrigerating appliances:
Recommendations on the final Ecodesign and Energy Labelling proposals**

November 2018

Ahead of the Member States' vote expected by the end of the year, we would like to express our support of the draft Ecodesign and Energy Labelling Regulations¹ proposed by the European Commission. In the upcoming discussions on the ambition of the requirements, it is relevant to note that the new rules for volume measurement will generally lead to more favourable energy ratings than before. We hereby put forward the following recommendations on how to further improve the proposals.

Accelerate implementation of requirements

We regret the one-year delay on all application dates compared to the previous drafts. Everything should be done to respect the Energy Labelling Regulation 2017/1369, which foresees that new labels are displayed in shops by end 2019. The proposed delay of 18 months is, in our opinion, unacceptable. Manufacturers do not need to redesign all their products to respect the new regulations. Remeasuring and relabelling products according to the new rules should not require more than 12 months.

Finetune the scope

We welcome the definition of the scope, especially the reinstatement of wine coolers and minibars with glass doors. We still see a risk of potential gaps in the combined scope of these regulations and those of professional and commercial appliances. For instance, we feel that vertical static-air cabinets may escape all requirements. We also believe that low-noise fridge-freezers should be covered by energy-efficiency requirements right now, and that mobile appliances should at least be covered by energy labelling.

Simplify the Energy Efficiency Index Formula

We regret that the formula for the energy efficiency index has not been simplified and streamlined. We firmly believe that too many correction factors and bonuses remain. The 'built-in factor' in particular should be removed in the energy label to give a fair information to consumers. We also consider that the auto-defrost correction factor is too generous and should not exceed 5%.

Improve the label

We regret that no icons have been envisaged that could help consumers buy more durable, repairable products, such as the free warranty period offered by the manufacturer or spare parts availability. DG

¹ [Ecodesign](#) & [Energy Label](#) draft Regulations notified to the WTO on 4 October 2018

Justice's [behavioural study on consumers' engagement in the Circular Economy](#)² released last month describes how effective this could be in shifting purchasing decisions towards products with greater durability and reparability.

Moreover, many stakeholders have called for avoiding that the G class of the label I.1.1 for standard fridges is empty of mainstream products from the beginning (i.e. non-low noise models). This has not been considered and we again insist on the need to change the F and G class boundaries to avoid this situation.

Strongly reinforce provisions on resource efficiency

▪ **Target non-destructive ease of disassembly, not only ease of dismantling**

The provision on disassembly should be taken to the next level by allowing easy access to key components for repair. Ease of disassembly should not be limited to door gaskets but encompass an exhaustive list of parts as proposed below. It is very ironic to see that light sources have been taken off this list.

Ecodesign Annex II, Clause 3 (a):

(1) manufacturers shall ensure that refrigerating appliances are designed so that the access to, the replacement and removal of components the following parts³ referred to in Annex VII of Directive 2012/19/EU can be removed is possible without permanent damage to the appliance and without the use of any tool which is not readily available for purchase;

- Thermostats / thermistors / temperature sensors
- Starting relays
- No-frost heating resistors
- Electronic processors (PCBs)
- Compressors
- Interior elements (drawers, baskets and shelves)
- Knobs, Dials & Buttons
- Refrigerant gas tubes
- Door seals/gaskets
- Light sources
- (...)

New point (4) Manufacturers shall freely document the sequence of operations needed to access the parts listed above, including for each of these operations, the type and the number of fastening techniques(s) to be unlocked, and tool(s) required.

² Overall, all strands of research found that consumers were generally willing to engage in circular economy practices. But actual engagement was rather low. The reason for this low engagement in circular economy practices could be that consumers lack information regarding product durability and reparability as well as the lack of sufficiently developed markets (e.g. for second-hand products, renting, leasing or sharing services etc.). In the behavioural experiment the provision of such information was found to be highly effective at shifting purchasing decisions towards products with greater durability and reparability. The survey and experiment also found that repair decisions are easily disrupted if arranging repair requires effort.

³ "parts" rather than "components", in line with the standards being developed under M/543 in CEN CENELEC TC10 to support repair, specifically prEN 45554 – General methods for the assessment of the ability to repair, reuse and upgrade energy-related products

▪ **Strengthen the availability of spare parts provision**

Availability of spare parts is a key resource efficiency consideration, and we urge Member States to introduce ambitious provisions on spare parts availability as described below:

- all spare parts should be available **during at least the average product lifetime**, i.e. 16 years after the last unit is supplied. As a minimum, these should be available for 10 years, in line with the Austrian standard ONR 192102.
- spare parts access **should not be restricted to professional repairers** but should be for retailers, repairers and consumers.
- the list of spare parts mentioned in Annex II.3 should be extended to include the list of parts specified in the previous point. We believe that the current formulation which mentions only three types of parts diminishes the chances of this requirement being properly enforced.
- A maximum delivery time of **one week** for spare parts should also be introduced.

▪ **Introducing a requirement on access to repair and maintenance information**

In a [recent study](#), the most commonly cited reason for an unsuccessful repair was the lack of information; this was the cause for one out of three failed repairs (32%). Therefore, a clause on “Access to repair and maintenance information” should be included, as was done in the proposed Ecodesign Regulations for washing machines and dishwashers.

Other proposed changes

- Maintain the new definition of the door heat loss factor and the fact that it is based on the number of doors or compartments, whichever is the lowest.
- Add the load processing efficiency to the list of mandatory information requirements. This can be a useful information to better reflect the real-life use of refrigerating appliances.
- Broaden Article 5 of the Energy Labelling Regulation to any website to avoid any gap:
Where a website allows the selling of refrigerating appliances, the website owner shall enable the showing of the electronic label and electronic product fiche sheet provided by the dealer on the display mechanism in accordance with the provisions of Annex VIII and shall inform the dealer of the obligation to display them.
- Refine Recital 13 of the Ecodesign Regulation and make it a regulatory Article, as in Article 6 of the Energy Labelling proposal:
The relevant product parameters should be measured using reliable, accurate, reproducible and representative of real-life conditions and users’ behaviour methods. (...)
- Better inform on the presence of refrigerants by including in the Product information sheet, an information requirement on the presence of refrigerant fluids, that will specify its name and Global Warming Potential and the charge (like in the regulation for professional refrigeration).

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