



ECOS-EEB-Coolproducts comments on Draft 1 of the Review Preparatory Study on Ecodesign and Energy Labelling for Professional Refrigerating Appliances

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Summary

This document contains the comments by ECOS, EEB and the Coolproducts campaign, on the first draft of the review preparatory study on Ecodesign and Energy Labelling for Professional Refrigerating Appliances. Our main points are:

- We welcome the scope extensions proposed by the study team, but in our view there are additional products that should be included, namely medicine cabinets and laboratory grade refrigerators and freezers, and ice machines. In addition, exemptions for heavy duty cabinets and static refrigerators should be removed.
- A very worrying trend shown by the study is how the energy class of new models on the market is typically C-D, and not the higher classes. A probable cause of this is a combination of simple non-compliance and an absence of the energy information in the specific contexts where these products are sold, which is often trade fairs or B2B sales without a fixed advertised price. This problem must be tackled in the regulation.
- It is important that the review and subsequent adoption of these regulations proceeds without delays. Contrary to the views some stakeholders have expressed, the pandemic is no reason to delay important energy efficiency policy, especially in the case of these products where the correlation between price and energy performance is very low.
- We think it is unfortunate that there was very little opportunity for stakeholders to exchange reactions to the study results at the stakeholder meeting in January. Allowing sufficient speaking time for meeting participants provides an overview of the concerns and suggestions of different stakeholders, and a possibility to react to them – not just to the material presented by the study team. We believe such stakeholder exchange ultimately contributes to fostering better policy.

These are further explained in the following sections.

Scope

Inclusion of medicine cabinets and laboratory grade refrigerators and freezers

Medicine cabinets are in every pharmacy, hospital, and doctor's office in Europe. Recent months have put a spotlight on the need for proper refrigeration for the storage of medicine and vaccines. Other refrigerated appliances for medical use could also be included into the regulation, such as laboratory refrigerators, refrigerators for blood storage, and ultra-low temperature refrigerators. These devices are constructed in a similar way to other storage cabinets and their energy consumption can be measured thanks to a well-established measurement method¹. The inclusion of these products can therefore be easily achieved. The test standard also provides quality assurance that the contents are refrigerated uniformly and safely. A first analysis of the medicine cabinets available showed that the energy consumption varies greatly amongst products¹. Based on the product analysis, with an efficient device, energy savings could be 455 kWh per year per device when comparing to an average device. **Hence, inclusion of these products is both feasible and motivated from an energy savings point of view.**

Inclusion of ice machines

These products should also be included into the regulation. A study from the Swiss Federal Office of Energy¹, investigated the market for ice machines and estimated that 200 000 to 500 000 units were sold in the EU every year. The market for ice machines is even larger than the market for blast cabinets. The study also provides an overview of all types of ice making machines and technologies. It estimated a stock of 1.5 million ice machines in the EU. Interviews with manufacturers confirmed that yearly sales will increase with time as the demand for chilled drinks is increasing. An advanced test standard for ice machines is established in the form of the DIN 18873-10 – providing both energy and water consumption – and can serve as base for the development of an EN standard.

Against this background, the Commission should **establish mandatory information requirements for the energy and water consumption for these products**. These information requirements should already include an energy efficiency index to facilitate informed decision making by buyers and as further preparation for the subsequent steps of energy labelling and MEPS in the next review process.

Introduction of MEPS and an energy label for refrigerator-freezers

Refrigerator-freezers were covered in the scope of the Ecodesign regulations (EU 2015/1095), making the declaration of the daily energy consumption in kWh/24h mandatory since July 2016. This was set to gather information on the products on the market to define further Ecodesign requirements for the next review. However, the review study now recommends not including these products. **It is our view that the Commission should set Ecodesign requirements for these products starting with the definition of an Energy Efficiency Index (EEI) and introduction of an energy label.**

The market could strongly benefit from these measures as shown in a Topten overview of the Swiss market in 2021 using data from the websites of 9 Swiss retailers and 6 European manufacturers. It shows that for over 41 models the daily energy consumption is in the range of 1.4 to 9.3 kWh/24 h. While no volume was declared for some of the models, both models with minimum and maximum energy consumption are of one-door-width. This indicates that there is a **saving potential of multiple factors** between models of a similar size.

¹ BFE, 2021. URL: <https://pubdb.bfe.admin.ch/de/publication/download/10718>



An important point to consider while defining the upcoming EEI formula, is setting clear instructions for the testing of the different compartments as there are gaps that can lead to different interpretation of the text.

Introduction of MEPS and an energy label for blast cabinets

Information requirements for blast cabinets were also part of the Ecodesign regulations (EU 2015/1095). Manufacturer are required to declare the energy consumption per kg of foodstuffs per standard temperature cycle in kWh/kg. These information requirements were also set with the intention to achieve market transparency for setting further Ecodesign requirements and a potential Energy label in the next revision.

A 2021 Topten overview of the Swiss market covering 220 models and using product data from the websites of 7 Swiss retailers and 6 European manufacturers showed that the energy consumption per kg of foodstuffs of less efficient units was 35% higher than efficient models for the freezing cycle ranging from 0.2016 to 0.2739 kWh/kg and 30% higher for the refrigerating cycle, ranging from 0.0798 to 0.0921 kWh/kg. In several cases, the mandatory product information was not declared. '

The proposal for Ecodesign requirements for this product group is very welcome, as a next step in advancing sustainability of these products.

Introduction of MEPS and an energy label for static refrigerators

There is no reason for these products to remain unregulated. Their lack of regulation creates confusion in the market where some retailers declare an energy label when it is not needed. All products should be on the same playing field. **The loophole created by the exemption of these products should be closed in the upcoming regulation.**

Heavy-duty exemption and stricter requirements

Currently tier 2 and tier 3 MEPS of the Ecodesign regulation do not apply to "heavy-duty" cabinets. However, data shows that these products are energy efficient, and they represented a large share of the products on the market. Of the 131 professional refrigerated storage cabinets listed on Topten (Table 1), 90% (118 models) of these are "heavy-duty". The high percentage of heavy-duty cabinets of those BAT models holds true for all energy classes and all product types. These products reach the highest energy classes and do not require the exemption for them to be competitive. As mentioned in the review study the Topten data shows that it is possible to make the requirements stricter without removing a large part of the products from the market. Different MEPS scenarios further show that stricter MEPS have a small influence on the price for the lower classes (see Table 2). **We therefore argue for the exemption to be removed for heavy-duty cabinets and recommend setting ambitious MEPS.**

Table 1: Number of heavy duty refrigerators per energy class on the Swiss market (October, 2020)

HEAVY DUTY										
Refrigerator	A++	A+	A	B	C	D	E	F	G	Sum
Under counter	-	-	14	-	1	-	-	-	-	15
1-door	-	-	25	9	19	5	-	-	-	58
2-door and more	-	-	4	1	9	5	-	-	-	19
Freezer										



	A++	A+	A	B	C	D	E	F	G	
Under counter	-	-	-	-	-	1	-	-	-	1
1-door	-	-	1	4	25	10	-	-	1	41
2-door and more	-	-	-	-	6	3	2	1	1	13

Table 2: Average price of products per MEPS scenario

Only Heavy Duty

Refrigerator					
	Today	MEPS E	MEPS D	MEPS C	MEPS B
Under counter	4'217	4'217	4'217	4'217	4'393
1-door	3'478	3'478	3'478	3'807	4'059
2-door and more	4'094	4'094	4'094	5'955	7'167
Freezer					
	Today	MEPS E	MEPS D	MEPS C	MEPS B
Under counter	1'900	1'900	1'900	n/a	n/a
1-door	3'268	3'350	3'350	4'467	4'300
2-door and more	3'333	3'500	4'083	8'167	n/a

Role of the energy label in avoiding backsliding

The review team has clearly shown how the energy class of newly registered models has moved from C to D in the last years. According to them, this is explained by consumers being more worried about the purchase costs instead of the operating costs of the product, even though this shift has started before the beginning of COVID. It should be mentioned however, that there is a lower compliance rate with the proper labelling of products in this product category. Indeed, even though the energy label for this product category has been available for many years, there are still many retailers that do not show the required energy related information on the product description. The absence of the label at trade fairs such Host in Milano confirms this. The energy label has not had the opportunity to influence consumers as much as it has done for household products. **The regulation states that the energy label should be shown next to the price information. In many cases, the websites do not show the price because the seller makes an offer on the basis of the number of units sold. This can be considered as a loophole and could explain partly why the energy label is often missing. We urge the Commission to address this problem in the regulation.**

Proposed MEPS

The proposal shows that the new regulation will encompass two tiers. The first tier is set at 140 and removes 7% of the market. The second tier (EEI = 110) will then remove 31% of the cleaned data set. The data does not show how many of these are heavy duty. Data from Topten has already shown that the exemption for Heavy Duty products should be removed because there are already many models in the higher classes. The MEPS in Tier 1 (adjusted according to the new reference lines) should be more stringent that the MEPS for storage cabinets that are in force today (EEI of 85). Tier 2 abruptly removes a very large share of the market (approximately 30%) while Tier 1 only removes 7% of the models on the market. Setting a lower threshold for the MEPS in Tier 1 avoids that too many products are removed from the market at once in Tier 2. The MEPS should also be more stringent in Tier 1 to avoid the possibility of further backsliding as it has been observed in the recent years. **We therefore recommend that the MEPS threshold for tier 1 is lowered.**



Timeline

Through written statements published on the study website, some stakeholders have asked to postpone the review of the Ecodesign and Energy Labelling regulations for professional refrigeration, due to market uncertainty caused by the pandemic. We want to stress that such deliberate inaction would be irresponsible and lacking reason. The pandemic started over two years ago and it is still uncertain how this new normal may go on for. The climate crisis however urgently calls for action and there is no room to wait for years with advancing energy efficiency policy. The Commission therefore cannot let the pandemic hold off the Ecodesign process for any product, but should continue with it assuming that the pandemic may be the status quo for a long time. The argument that buyers, because of the uncertainty, prefer supposedly less efficient products because they are cheaper is not valid. Based on the data we have gathered on products on the market, it is evident that there is no correlation in between price and energy efficiency class. The highest correlation coefficients were for 1-door refrigerators and 2-door refrigerators and they were -0.43 and -0.33 respectively. The other coefficients are in between -0.10 and -0.14. **The suggestion to deliberately delay this review process must therefore be disregarded.**

Data on medical cabinets

The review team has asked for any data on medical devices. As an annex to these comments, we are submitting an excel table containing such data, collected by Topten for the Swiss ministry of Energy.

