PROSAFE Joint Actions Best Practice

ERPLIANT

The Project is funded by the European Union

ENERGY LABELLING AND ECODESIGN OF PROFESSIONAL REFRIGERATED CABINETS: BENEFITS AND YOUR OBLIGATIONS AS A SUPPLIER

September 2019

Caution: This brochure is only a guidance document. The texts of the EU regulations have legal force and suppliers must make their own decisions regarding compliance.

Why the energy label and other requirements are important

EU ecodesign and energy label regulations are big priorities for the EU to achieve its energy savings targets. The regulations help foodservice operators reduce their energy costs and ensure that appliances can do the required job. Proper enforcement of the regulations is better for users and better for reputable suppliers.

- Reputable suppliers can proudly use the energy label as an indicator of cabinet performance
- Energy efficient cabinets save running costs for users every day
- Energy labels enable buyers to compare on a fair basis
- The energy label confirms a cabinet can hold temperature under rated conditions and keep food safely
- Only appliances meeting important performance levels are allowed to be sold in the EU market

About the regulations

- Energy labels provide mandatory, clear information to help buyers compare energy performance and make well-informed purchase decisions.
- Ecodesign regulations set mandatory minimum levels of energy efficiency and other requirements which appliances must meet to be legally placed on the market.

Other requirements also apply to suppliers but relevant regulations for professional refrigerators include:

- Regulation (EU) 2015/1094 with regard to the energy labelling of professional refrigerated storage cabinets (with amendment[1] on verification procedure for authorities).
- Regulation (EU) 2015/1095 with regard to ecodesign requirements for professional refrigerated storage cabinets, blast cabinets, condensing units and process chillers[2] (with similar amendment[3]).

[1] Commission Delegated Regulation (EU) 2017/254 of 30 November 2016 with regard to the use of tolerances in verification procedures.

[2] Note that the Commission issued a Corrigendum to the Italian version of (UE) 2015/1095 in the Official Journal L115, pages 51-52, of 29.04.2016, which corrected a number of translation inaccuracies.

[3] Commission Delegated Regulation (EU) 2016/2282 of 30 November 2016 with regard to the use of tolerances in verification procedures.

PROSAFE Office, Avenue des Arts/Kunstlaan 41, B-1040 Brussels, Belgium
Tel:+32 2 8080 996; E-mail: info@prosafe.org

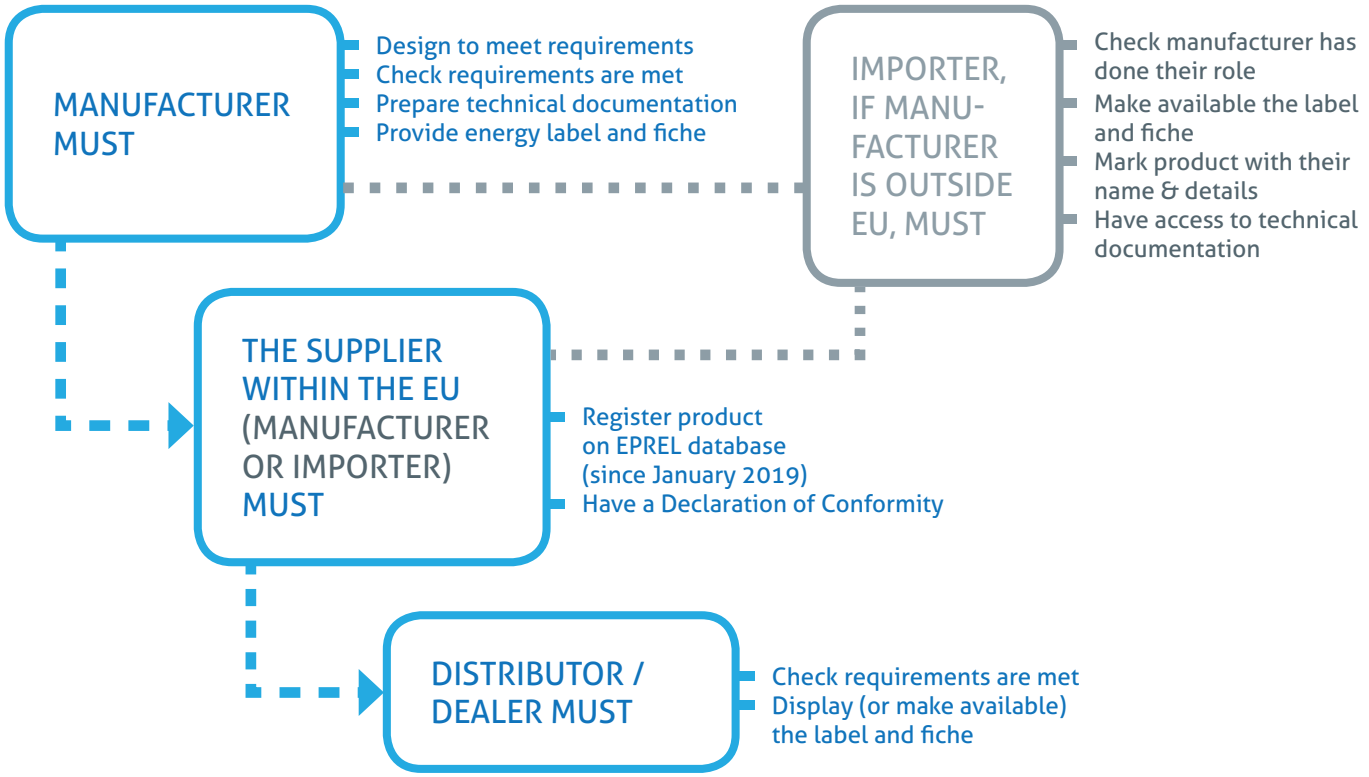
- The revised framework regulation (EU) 2017/1369 for energy labelling[4]
- The framework Directive 2009/125/EC for ecodesign[5]
- Other requirements in Regulation 765/2008 regarding market surveillance[6] and Decision 768/2008/EC regarding marketing of products[7].

Scope of appliances included

Regulations 2015/1094 and 2015/1095 apply to integral refrigerating appliances with one or more doors or drawers for chilled (-1°C to +5°C) or frozen (<-15°C) storage of foodstuff in professional environments. 'Professional' means for non-household use but not for the display to or access by customers, i.e. for use only by employees/staff. Inclusions and exclusions apply - see the regulations and the FAQ document from DG GROW.

Note that commercial refrigerated retail display cabinets will be subject to a separate regulation in due course for 'refrigerating appliances with a direct sales function'.

Overview of what suppliers and dealers must do



All supply chain players are obliged to cooperate with relevant market surveillance authorities. An organisation may have the role and obligations of more than one of these.

[4] Regulation (EU) 2017/1369 of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU.

[5] Directive 2009/125/EC of 21 October 2009 establishing a framework for the setting of ecodesign requirements for energy-related products.

[6] Regulation (EC) No 765/2008 of 9 July 2008 setting out the requirements for accreditation and market surveillance relating to the marketing of products and repealing Regulation (EEC) No 339/93.

[7] Decision No 768/2008/EC of 9 July 2008 on a common framework for the marketing of products, and repealing Council Decision 93/465/EEC.

Common reasons for non-compliance

Common reasons for non-compliance include:

- Failure to provide authorities with necessary documentation.
- Failure to provide mandatory information in the instruction manual (especially tips for good energy efficiency, compartment volume(s), label class and refrigerant information).
- Errors in the calculation of energy label class.
- Net volume found to be lower than claimed.
- Higher energy consumption than claimed.
- Cabinet cannot attain the required temperature at rated conditions.

What market surveillance authorities may ask of suppliers

Common requests from market surveillance authority inspectors include:

- The Declaration of Conformity.
- The energy label and its product specification sheet (as specified in the regulation annex).
- The technical documentation file.
- The authority may obtain an appliance and test it.

Summary of energy label requirements

The energy label regulation requires that cabinets are supplied and advertised with an energy label and a fiche from July 2016. From 1 July 2019 the label must show label classes up to A+++[8]. The information items shown on the energy label are explained in the figure below.

Suppliers must provide the following information on the energy label:

1. Supplier's name or trade mark
2. Supplier's model identifier
3. The declared energy efficiency indicator for that model
4. From 1 July 2019 the label must display classes up to A+++[9]
5. The annual electricity consumption for that model in kWh
6. The sum of the net volumes in litres of all chilled compartments
7. The sum of the net volumes in litres of all frozen compartments (and compartments declared as multi-use)
8. The rated climate class (could be 4, 3 or 5).

Note: regardless of this rating, all energy consumption figures are declared as tested at Climate Class 4 conditions (or calculated to be as if tested at Class 4 for light duty cabinets, as explained in the Regulation).

See Commission guidance on how to generate an energy label for a professional refrigerated storage cabinet at https://ec.europa.eu/energy/eepf-labels/label-type/professional-refrigerated-storage-cabinets.

8 Cabinets already in an EU supply chain at 1 July 2019 do not have to be relabelled, but any individual cabinet first placed on the EU market after 1 July 2019 must have the new label. Reference: The Blue Guide.

9 Cabinets already in an EU supply chain at 1 July 2019 do not have to be relabelled, but those first placed on the EU market after 1 July 2019 must have the new label.

The main requirements from regulations 2015/1094 and 2017/1369 are (summarised, not complete):

- A printed energy label must accompany every appliance.
- A fiche[10] must be made available
- At the point of sale, each appliance must bear the label on the outside of the front or top of the appliance so that it is clearly visible
- Wherever an appliance is offered for sale, hire or hire-purchase, where the end-user cannot be expected to see the product displayed, the suppliers must provide the energy efficiency class, the annual consumption (kWh/year), net volume of compartment(s) and the rated climate class
- Where the appliance is offered on the Internet, the full label must be accessible (can be in a 'nested display'. The fiche must also be accessible.
- Any visual advertisements or technical promotional material for a specific model must include the energy efficiency class and the range of the efficiency classes available on the label.

Registration of models on the EPREL product database

EPREL is the European Product Database for Energy Labelling[11]. Registration has been mandatory for professional refrigerating appliances since 1 January 2019 and cabinets must be registered before placing on the market. Note that 'the concept of placing on the market refers to each individual product, not to a type of product'[12] and so even if the model was first sold in 2018 or before, if additional cabinets of that model are entering the supply chain then the model must be registered. Products that have sat in the supply chain since August 2017 also had to be registered by end of June 2019. For products still sitting in supply chain since before 1 August 2017 and which are no longer marketed after this date, their registration is on a voluntary basis. The Commission provides comprehensive guidance for suppliers on how to register products[11].

Summary of ecodesign requirements

The ecodesign regulation requires (with some exceptions) that:

- Cabinets achieve an EEI of less than 85 from 1 July 2019[13] (other limits applied previously; EEI 115 continues to apply for heavy duty cabinets)
- Specified information is provided in the instruction booklet and on supplier websites from July 2016.

What is a technical documentation file?

Both the ecodesign framework directive and the energy label framework regulation set out requirements for a technical documentation file, which must be made available to authorities on request. In general terms, the technical file must contain sufficient detail to enable the accuracy of the information made available by the supplier about the appliance to be verified (including on the label, fiche and on the public website). Indicatively, its content

[10] The information content of the fiche is specified in Annex IV of the energy label regulation. This includes appliance model number(s), efficiency class, rated climate class and particular declarations if the appliance is heavy duty or light duty.

[11] See https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/european-product-database-energy-labelling_en.

[12] See The Blue Guide, section 2.3. Placing on the Market, page 20.

[13] Any individual cabinet already in an EU supply chain at 1 July 2019 must meet the EEI threshold in force at the time that cabinet was placed on the EU market; appliances placed on the EU market after 1 July 2019 must meet the new requirement.

should include:

1. A general description of the product;
2. Results of any design calculations carried out;
3. Any test reports;
4. Results of any environmental assessment studies;
5. List of the technical standards which have been applied to ensure compliance (e.g. EN16825);
6. The CE Declaration of Conformity;
7. A list of 'equivalent models' and of the appliances covered by the same technical file, called a 'Declaration of Identity'. This is important if, for example, the model name shown on the test report appears not to match the model number used by the supplier in the EU.

Which test method should be used?

When authorities test these appliances, they use the most recent edition of EN16825[14] which was notified by the Commission as a transitional test standard for these regulations. Suppliers would be well-advised to base their declarations on this standard too, to avoid problems if/when challenged. Note that EN16825 with its 2019 amendment is expected to be formally recognised as the harmonised standard for presumption of conformity during summer 2019.

Note: EN16825 remains recognised by the Commission despite its withdrawal by CEN in July 2019 (superseded by technically similar but not identical EN ISO 22041:2019).

Must every cabinet model be tested?

No, suppliers do not have to test every cabinet model. But if challenged by the authorities the supplier must be able to justify the performance declared for each model. Calculations may be used to extrapolate performance from testing of a similar model. Tolerances cannot be 'added' to the measured or calculated performance.

What do 'heavy duty', 'standard duty' and 'light duty' mean?

Cabinets are rated by the supplier for performance in different ambient temperatures:

- Standard duty: must meet temperature requirements in Climate Class 4 (30°C / 55% humidity);
- Heavy duty: must meet temperature requirements in Climate Class 5 (40°C / 40% humidity);
- Light duty (for use outside of a kitchen e.g. front of house): must meet temperature requirements at Climate Class 3 (25°C / 60% humidity).

Energy performance is declared for all duties based on testing (or calculations) at Climate Class 4 so that labels are comparable.

[14] EN16825: Refrigerated storage cabinets and counters for professional use – Classification, requirements and test conditions. The reference to this standard was published in the Official Journal in Commission communication 2017/C 044/01 without a specific date for the standard and so the most recent published edition is to be used, which is EN 16825:2016+A1:2019 (amendment 1 which was published April 2019).

Must energy labels be displayed at trade fairs?

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

Aren't all energy labels going back to only A to G classes?

The Commission is transitioning energy labels for all products back to a simple A to G system over coming years but this is several years off for professional cabinets. A date will be set when the energy label regulation for professional cabinets is updated. An additional change to note: the new energy label framework regulation and Commission communications about energy labels now use the phrase 'product information sheet' instead of 'fiche' but they refer to the same thing.

For further information

1. The Commission's web page for guidance on energy label and ecodesign regulations for professional refrigerators is at https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/energy-efficient-products/professional-refrigerators_en
2. The DG GROW web page for general ecodesign information is at http://ec.europa.eu/growth/industry/sustainability/ecodesign_en
3. A guidance document called FAQ related to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095 is published here.
4. For guidance on how to comply with all EU product rules, see The Blue Guide on the implementation of EU product rules, published by the European Commission DG GROW, 2016 version, available in all EU languages.
5. To find your local Market Surveillance Authority (MSA) for this topic, see https://ec.europa.eu/growth/single-market/goods/building-blocks/market-surveillance/organisation_en. Download the MSA listing 'by sector' and look for 'Eco-design and energy labelling'.

About EFCEM

The European Federation of Catering Equipment Manufacturers (EFCEM, http://efcem.info) represents manufacturers of commercial kitchen equipment and includes the key European National Associations and their 660 company members. The federation is active in the formulation of standards and monitors regulatory developments for its members.

About EEPLIANT2

EEPLIANT2 (http://eepliant.eu) is a project coordinated by PROSAFE and funded by the European Union under the Horizon 2020 framework. EEPLIANT2 started in September 2017 and will last for 30 months. It unites seventeen Market Surveillance Authorities (MSAs) and a national agency from fifteen EU Member States to coordinate their monitoring, verification, and enforcement actions to increase rates of compliance with ecodesign and energy label regulations.

Background information: This information is issued by PROSAFE and the MSAs representing 15 EU Member States in the EEPLIANT2 Action. PROSAFE brings together market surveillance officers from all over Europe.

Disclaimer: This brochure arises from the Action EEPLIANT2, which receives funding from the European Union's Horizon 2020 research and innovation programme under grant agreement number 752591. The content of this brochure represents the views of the author and it is his sole responsibility; it can in no way be taken to reflect the views of the Executive Agency for Small and Medium Enterprises (EASME) or any other body of the European Union. EASME does not accept responsibility for any use that may be made of the information it contains.