



**Come On Labels**

**Come On Labels  
Common appliance policy – All for one, One for all  
– Energy Labels**

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**Benefits and challenges of product databases for  
energy labelling related market surveillance**

**(Work Package 2 - Deliverable 2.3)**

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## 1. Introduction

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

Unfortunately, a number of EU Member States do not regularly apply effective actions for controlling the correct labelling implementation and product compliance. Lack of resources, time, expert staff, budget and national certified laboratories are most often used as reasons for a low level of surveillance activities.

Poor level of market surveillance leads to a significant proportion of non-compliant products - estimated to be on average 10-20% - on the market. As an illustration, the IEE-funded ATLETE project has reported 21% of products not complying with the energy class declaration. If for example 10% of the potential energy savings from the Energy labelling and Ecodesign directives would be lost, this would translate into 90 TWh of final energy per year by 2020 (as much as the residential electricity consumption in all Eastern European Member States combined).

However, examples of good practices exist. To improve the level and effectiveness of market surveillance, procedures and results should be exchanged and possibly harmonised among national Market Surveillance Authorities, thus leading to an optimisation of the available human, financial and time resources and in the end to a higher level of compliance verification activities and compliant products marketing of the Community market.

The Come On Labels project has collected available information about product testing which was undertaken in order to verify energy consumption and functional performance of the product energy labels. This information has been shared by the project partners in 13 European countries with the national Authorities, and various stakeholders.

The information about individual product tests is, however, fragmented and not centrally available, not even to the surveillance authorities. The main goal of this document is to investigate how far the use of **product databases** can contribute to improving the exchange of information on market surveillance actions and results between authorities and towards other stakeholders. Different types of databases exist, and there are conditions to use them effectively in the context of market surveillance of Energy Labelling.

This document describes in the EU context:

- The potential benefits from product databases,
- The different types of applicable product databases,
- The challenges to consider,
- Some considerations on current trends.

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.



## 2. Benefits from product databases for market surveillance

There is a growing interest in the EU for market surveillance related to Energy Labelling and Ecodesign, and for more collaboration between stakeholders. There is now a variety of public and private initiatives to try and increase the level of compliance to these two Directives (2010/30/EU and 2009/125/EC).

These Directives refer to the need for collaboration on market surveillance, but in rather general terms and without stipulating how information sharing should be concretely organised (Kreitz, 2011).

A recent survey (ADEME 2013), organised within the ATLETE II project, also confirmed that *more cooperation among MS and coordination of MV&E activities at EU level will quickly and effectively promote the adoption of best practices on carrying out market surveillance activities. At present only a little more than half of MS (10 MS out of 17 MS who provided feedback) in EU confirmed their participation in know-how and experience sharing through Administrative Co-operation Working Group (ADCO).*

Using centralised and **harmonised databases to report and exchange on market surveillance can be a very effective way**, for several reasons:

- A well-designed database can support a systematic and comprehensive collection of information. This follows an important rule highlighted in the international CLASP Practitioner's Guidebook on Monitoring, Verification, and Enforcement for Appliance Standards & Labelling: *'it is essential to design market surveillance strategies that systematically identify and report on non-compliance, even for what appear as minor offences, such as not correctly displaying a label. This sends a powerful message to stakeholders that non-compliance is likely to be detected.'* (CLASP, 2010).
- Through a harmonised database tool, the quality of the information exchange is increased as the data can be unambiguously understood, compared and aggregated. Centralisation of information also facilitates comparability, limits the burden on data providers and avoids duplication. In particular, harmonised product databases can assist in reconciling the identification of products, especially when the same product is sold under different names or references in different countries. This facilitates subsequent enforcement actions in several countries.
- The collection of information in a centralised database helps organising the accessibility to the information. This is recommended in the Policy Pathway guide on Monitoring, Verification and Enforcement of the International Energy Agency: *'A central database of declared product performance and test results should be created with differing levels of accessibility for different stakeholders (...). The full dataset can be used by*



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*regulators for cross-matching data, identifying responsible persons, communicating with stakeholders about changes (...) A less detailed register from the database is also a major compliance tool enabling competitors to inform the programme manager of suspected non-compliance (...) Giving more access to supplier-declared data can assist greatly in prioritising compliance actions, if all parties have a clear understanding of the rules for data access.'* (IEA, 2011).

- Databases can improve the cost-effectiveness of market surveillance activities by contributing to synergies in the area. *'Sometimes information sharing starts at home, and there are numerous bodies and agencies responsible for a wide variety of product policies (safety, hazardous substances, certification schemes etc.) which would benefit from sharing information on non-compliance. There is also the potential to undertake combined verification tests.'* (CLASP, 2010).
- A database can be a tool to speed-up and streamline the treatment of complaints and suspicions stemming from non-official stakeholders (competitors, consumer organisations, individual citizens, etc.). If the process works effectively, it can participate in the quality of the market surveillance program and encourage other stakeholders to contribute.
- A centralised database also makes it easier to extract useful information, such as analysis of compliance rates for different product categories, identification of priority areas for future market surveillance plans, and follow-up to enforcement actions.

In summary, product databases can be of great support for market surveillance activities. However, as regards the EU situation and legislation on Energy Labelling and Ecodesign, there is currently a perceived *'lack of centrally administered databases allowing easy comparison of compliance data between compliance officials'* (CLASP, 2011). More precisely, most EU Member States still have diverging procedures and approaches to collect market surveillance data. The exchange of market surveillance information with counterparts and other stakeholders is sometimes non-existent, or done via e-mails, or during official coordination meetings, and still rarely using product databases (ECOPLIANT, 2013).



### 3. Existing types of product databases

A product database is a database that stores individual information on product models placed on the market, such as the manufacturer / importer, model identification, declared performance (e.g. energy consumption or other regulatory information), source for the declared values (measurement method and laboratory), etc.

Various types of product databases are possible, depending on the nature of the data collected and more importantly on the scope and procedure to collect this data.

#### ***Databases of tested and non-compliant products***

Such a database has a scope limited to the products actually tested by authorities during market surveillance programs. It only contains the small share of the market models submitted to verification activities (or even more limited to the ones that are found non-compliant). It is usually administrated by market surveillance authorities, who are responsible for uploading the data. The single purpose is to share information on ex-post results of market surveillance activities, and eventually warn relevant stakeholders of non-compliant cases (e.g. risks on health).

Two centralised databases of this nature have been set up at EU level:

- RAPEX

[http://ec.europa.eu/consumers/safety/rapex/index\\_en.htm](http://ec.europa.eu/consumers/safety/rapex/index_en.htm)

RAPEX is the EU rapid alert system that facilitates the rapid exchange of information between Member States and the Commission on measures taken to prevent or restrict the marketing or use of products posing a serious risk to the health and safety of consumers – with the exception of food, pharmaceutical and medical devices, which are covered by other mechanisms. Since 2010, the system also facilitates the rapid exchange of information on products posing a serious risk to the health and safety of professional users and on those posing a serious risk to other public interests protected via the relevant EU legislation (e.g. environment and security). Both measures ordered by national authorities and measures taken voluntarily by producers and distributors are reported by RAPEX.

When a product (e.g. a toy, a childcare article or a household appliance) is found to be dangerous, the competent national authority takes appropriate action to eliminate the risk. It can withdraw the product from the market, recall it from consumers or issue warnings. The RAPEX National Contact Point then informs the European Commission about the product, the risks it poses and the measures taken by the authority to prevent risks and accidents. The European Commission disseminates the information that it receives to the National



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Contact Points of all other EU countries. It publishes weekly overviews of products posing a serious risk and the measures taken to eliminate the risks.

The RAPEX system is still essentially focusing on direct risks to health (from toys, textiles, etc.) and has not been put to use to report on non-compliance related to other aspects, such as energy performance.

- ICSMS

<https://www.icsms.org>

ICSMS (Information and Communication System for Market Surveillance) has been in operation in 12 EU/EFTA Member States since 2003. This European database has been designed to exchange information on products tested by official market surveillance authorities. ICSMS consists essentially of an on-line database which is divided into two areas, one open (public), the other password-protected (for authorities). The internal area contains data on more than 50,000 products. Recent developments include a better interface between ICSMS and RAPEX (facilitating exchanges between both platforms).

The database can be searched by product type, code (EAN) or manufacturer. Some characteristics of each product can be found, together with a description of the test or non-compliance, and measures taken. ICSMS contributes to improving and accelerating communication between market surveillance authorities in Europe.

This is however not yet widely the case for information related to Energy Labelling or Ecodesign. Data that can be found in ICSMS related to energy-using products (e.g. fridges, washing machines, televisions, etc.) essentially reports threats of electrical shocks or electromagnetic disturbance issues. Data related to energy performance can hardly be found, especially as the public access interface does not allow filtering the data by regulation.

## ***Databases of certification programs (official or private)***

Databases of this nature have a broader scope. They include all products registered to a voluntary certification program (established by a public or private body). Manufacturers and importers of products are responsible for registering their products to a central database when they want to benefit from this certification. This registration usually requires so-called 'entry conditions', such as providing a set of declared characteristics about the products (either in the form of self-declaration or third party certified, test reports, etc.).

The database can then be used to monitor the program, prepare verification activities and eventually flag out products for which a declared characteristic is proven to be incorrect. The benefit in terms of market surveillance activities can be substantial. *'Entry conditions can*



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*provide an invaluable source of information to the programme administrator, including: the number and type of products within the scope; the energy performance of these products; the sales volume or market share of models; the details of suppliers responsible for placing individual products on the market, providing traceability for compliance purposes. This information is invaluable because it establishes a claim of performance for individual models that can be verified (...) Linking individual models to suppliers is vital for enforcement.'* (CLASP, 2010)

- A European example of a private program: the EUROVENT certification

<http://www.eurovent-certification.com/>

It certifies the performance ratings of air-conditioning and refrigeration products according to European and international standards. The goal is to build up customer confidence by levelling the playing field and increasing the integrity and accuracy of the industrial performance ratings. An on-line database of certified products contains the list of participants, product references and performances ratings. If a product is proven to fail to meet test requirements, the participant will be required to adjust the performances not only for the specific product but also all similar products, or to withdraw the products from the market.

- A similar US program: the AHAM (Association of Home Appliance Manufacturers) certification

[http://www.cooloff.org/sub\\_manu03.html](http://www.cooloff.org/sub_manu03.html)

In this certification scheme, each manufacturer submits its certified values for incorporation into a database of certified products. Manufacturers, distributors, buyers, sales people consumers, utility companies, consultants, researchers and others use these directories. The program provides a uniform and commercially practical verification of certain performance criteria for each product; an independent laboratory under contract to AHAM provides the verification testing.

- An example of a public certification initiative: Energy Star

[http://www.energystar.gov/index.cfm?c=manuf\\_res.pt\\_manuf](http://www.energystar.gov/index.cfm?c=manuf_res.pt_manuf)

The program is implemented both in the US and EU. In the US, since 2011 new products entering the program must be certified by an officially recognised body. Upon certification of a product, the certification body submits the qualified product data to the official administration for listing on a centralised product database (available on-line).



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- Another example in the EU: Spanish IDAE database of energy efficient products

<http://www.idae.es>

This national database informs public and private buyers about the most energy efficient appliances. It also supports market surveillance authorities in checking energy labelling declarations and preparing testing operations and complaint investigations.

## ***Comprehensive product databases / registers***

Databases of this nature intent to cover the full spectrum and track all products placed on the market. On top of the previous benefits, such databases offer a comprehensive view on market trends and developments, can assist in characterising specific areas of compliance risks, and enable authorities to amplify their verification and enforcement activities (for instance by immediately identifying all products from a suspicious manufacturer, better tracking similar models, etc.)

A comprehensive product database entails some costs for operation. However, if suppliers are requested to upload the characteristics of their products through a simple on-line system, the procedure can be streamlined and eventually reduce administrative costs afterwards because authorities have much less trouble identifying manufacturers, contacting them and accessing product technical fiches as can be the case otherwise (CLASP, 2010).

- The Australian product register: a well-known example of a comprehensive product database on energy labelling administered by a public authority

<http://www.energyrating.gov.au/products-themes/product-registration>

In Australia, products covered by energy labelling and energy performance standards need to be registered to a database before supplying them into the market. This supports the administration in running a monitoring, verification and enforcement program which is considered to be one of the best in the world. A publicly searchable Energy Rating website is also offered. The system has been further upgraded in 2012 through a single point of contact and more streamlined process for registrations, clarification of how the enforcement is carried out to ensure models that are unregistered or non-compliant do not enter the market, and a new requirement for registrants to submit annual sales data.

- Another example: Canada's use of border controls

The Canadian administration maintains a database of products covered by energy efficiency regulations, based on an electronic reporting system that relates product shipments to a qualified product list. In 2009/10, 1.5 million transactions were processed. The documents provided by suppliers enable the administration to maintain a product database (EnerGuide



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Directory) and product web search engines, which inform and educate the general public, utilities, and other organisations on the energy performance of products (CLASP, 2010).

In many countries, some product databases covering the full market also exist but are operated by private marketing companies (such as GfK, the most well-known in Europe). However, access to these databases can be expensive and the information is designed primarily to fit the interests of the business sector. The collection of data on energy or environmental performance is not necessarily complete nor sufficiently precise (e.g. the energy class might be recorded, but not the full set of technical parameters behind).

In the EU, there is currently no comprehensive centralised product database administered by public bodies, at least not in the area of energy-related products and appliances. Under the WEEE Directive, EU Member States have to set up national registries of electronics placed on the market, but not to the level of each individual model and with no EU-wide harmonisation at present.

A recent call for tender reveals the intention of the European Commission to start establishing a database for some energy-using product groups, with the main goal of better monitoring the market to inform policy decision on Energy Labelling and Ecodesign. The call also mentions briefly that *'the data will also be used to support enforcement activities of national authorities'* (EACI, 2013). The scope will be limited to 6 product groups for 3 years, and there is no visibility about future funding and maintenance. The process to feed the database is still uncertain (there is no intention at present to put an obligation on manufacturers to register their products, as in Australia for instance).



## 4. Challenges for using product databases in market surveillance

Product databases that are intended to contribute to the collection and exchange of information on product verification and compliance need to fulfil a number of conditions. Below, a list of such conditions in the EU context is suggested.

### ***EU harmonisation***

The first challenge is evidently the harmonisation between authorities and countries exchanging the information. This can be achieved either by using a single EU centralised database, or by making sure that the different databases in use are fully compatible.

This is particularly important because market surveillance and enforcement activities require a high degree of accurateness and rigour, especially when it comes to challenging the declarations of a manufacturer and supporting a legal action. The language issue is also prominent: a harmonised database needs to ensure that users from different languages and cultures are able to report correctly and in an unambiguous way a compliance default.

### ***Compatibility with other market surveillance initiatives***

On top of harmonising data from official authorities, a very useful attribute would be the possibility to easily input findings from verification activities performed by other organisations. This additional centralisation would facilitate the work of all stakeholders involved and provide much stronger benefits to the database users. It would make sure that all information related to a specific product model can be accessed in one place (be it official tests performed in certified labs, simplified check tests or other data providing further degree of evidence and suspicion).

This includes for instance:

- Data from Intelligent Energy Europe projects in the area of market surveillance, including mainly:
  - Come On Labels: collection of known product tests from around the EU,
  - ECOPLIANT: motors (30–50 models), external power supplies (10 models) and 5 models of tertiary sector lamps, 2014
  - ATLETE: tests of 82 refrigerating appliances, 2011
  - ATLETE II: 50 models of washing machines, 2014
  - PREMIUMLIGHT: 60 – 80 models of high quality CFLs and LEDs, 2013-2014
  - CompliantTV: 125 TVs and 75 monitors, 2014
  - MARKETWATCH: 100 models, product categories to be decided, based on high risk of non-compliance, results expected in 2014,



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- EURO-TOPTEN MAX: high efficiency LED lamps, TV and tumble drier models, results in 2014.

A harmonised procedure to report findings from these projects into a database that market surveillance authorities can access to would be beneficial.

- Data from private verification initiatives, such as tests of products covered by voluntary certification schemes (e.g. Energy Saving Trust Recommended UK, IDAE Spain, initiative on lamp compliance to be launched by LightingEurope, etc.)
- Results from tests and warnings from countries outside the EU (even if measurement methods sometimes diverge, there are areas where test results can provide useful information).
- Other relevant indications, such as complaints or warnings from supplier associations, consumer organisations or individual citizens.

## ***Equivalent model identification***

When a product model is deemed non-compliant or suspected thereof, it is important to identify all product models on the market that are equivalent to this one, because they are likely to be non-compliant as well.

'Equivalent' means similar in terms of basic technical parameters, but with a potential minor difference (in terms of colour, design, country of placement, etc.) At present, equivalent models can be difficult to track because manufacturers are free to name and declare them in the way they want. Also, manufacturers sometimes use different product codes to differentiate between individual manufacturing plants for the same product model. This difficulty has already been identified as a major one for market surveillance in the EU: '*Similar products are sold under different product identifications in different countries, or conversely products with slight differences may be sold under the same identification in different countries*' (Kreitz, 2011). '*Surveillance and testing would be much easier if the relationship between similar products were clearer*' (CSES, 2012).

When a manufacturer is placing on the market equivalent models, the declaration of performance is often based on a single test performed on the master model (eventually corrected by calculations to take into account small differences), which could be then distributed all around the EU or a number of countries, but the list of model names for which such declaration has been used is not known. It is all the more important to make sure that the relevant data can be obtained when verifying a product's performance.



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In order to solve this overall difficulty, a product database should be able to group equivalent models together, so that the full set can be identified. One way or the other, manufacturers should be requested to provide the information on equivalence at some point.

*'The technical details submitted at registration or otherwise held by the supplier may all be based on the original model and on which all the subsequent derivations are based. The supplier could maintain an internet accessible master file of similar models, such that the authority can immediately identify which technical details are to be scrutinised. Focusing market surveillance on this original model could enable a large number of other models to be covered too.'* (CLASP, 2010)

The Intelligent Energy Europe project ECOPLIANT (launched in 2011) gathers 10 EU authorities who plan to investigate current barriers to collaboration on market surveillance. This equivalent model issue will be covered. It seems that their approach will be to base document inspection exercises on the use of product identity declarations and the assignment of a 'basis model' to each product as a way to identify products that can be consider equivalent in the sense of Energy Labelling or Ecodesign.

More information on: <http://www.ecopliant.eu>

## **Accessibility to the information**

As mentioned earlier, one of the benefits of market surveillance databases can be to facilitate and organise the access to the information to various stakeholder types. Market surveillance databases should not only be internal tools for official authorities, but also provide information to a wider audience (in particular manufacturers, NGOs and the general public). This is a way of putting higher pressure on free riders and creating an overall climate of compliance.

The accessibility to the public can be limited to certain data, but should be warranted in a user-friendly way. At present, it is impossible for a citizen to access to a centralised list of products that have been tested and declared non-compliant in the EU with respect to their Energy Labelling or Ecodesign performance. The information is currently limited or scattered. As indicated earlier, the public access to the ICSMS database does not allow an easy filtering of non-compliance types.

The database could be helpful in other aspects as well - one of the findings of the ATLETE project (testing 82 refrigerating appliances in 2009-2011) was that information visible on the label had a greater compliance rate than information only provided on fiche. In addition, the database could also contribute to react to the market speed, where market fragmentation/seasonality is high for many products (Meli, 2011).



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## **Cost aspects**

An argument often opposed to the development of large centralised databases or registers is the costs for running and maintenance. However, costs can be saved by substituting existing national databases and other initiatives. Databases also improve cost-effectiveness of market surveillance activities by avoiding some duplication and administrative work. Last, any market surveillance activity that contributes to increasing the level of compliance is in general highly cost-effective (CLASP, 2011). *'There are costs involved in reaching higher degrees of assurance in product performance, as well as in obtaining more data. However, these data lead to greater compliance benefits and opportunities for strong programme integrity, as well as greater accuracy in evaluating and monitoring the programme'* (CLASP, 2010). Moreover, the current total government expenditure on European compliance activities is about €7m across the EU and EEA and hence is only about one 2000th of the value of the energy being lost (CLASP, 2011).

In addition, product databases, if used as a system of the registration of the products on the market, enabling to detect the market share of individual energy efficiency classes and thereby enabling the update of the energy label and energy classes (Topten, 2012), would further reduce the costs of a database used also for the surveillance purposes.



## 5. Current trends and recommendations

In this last part, two main trends are discussed with respect to using EU databases for market surveillance in the area of Energy Labelling and Ecodesign: the increased use of the ICSMS database, and the potential use of a broader product database. Some recommendations are also provided.

### ***Increased use of ICSMS for Energy Labelling and Ecodesign?***

An increased use of the ICSMS system seems to be a foreseeable trend and a rationale way to increase exchanges on tested and non-compliant products between EU Member States and towards other stakeholders.

First, it is relevant to note that the use of the ICSMS database is an obligation for Member States to notify products presenting a risk (as stipulated in the EU Regulation 765/2008 on market surveillance). Furthermore, the draft new Market Surveillance Package recently presented by the European Commission mentions several areas for reinforcement (European Commission, 2013):

- Clarification that *'market surveillance activities should not be directed exclusively towards the protection of health and safety but should also be applicable to the enforcement of EU legislation which seeks to safeguard other public interests, for example, by means of regulating (...) energy efficiency.'*
- Clearer need for national market surveillance authorities to use ICSMS.
- Increasing the 'portability' of test reports in the EU by promoting the use by market surveillance and external border control authorities of tests performed in other Member States and facilitating their distribution via ICSMS.
- Further developing ICSMS to collect, store and exchange information and best practices among all actors concerned (publication of test results, results of joint actions, guidelines, guidance for training, case studies, statistics, etc.)

It is also a sign that the Intelligent Energy Europe project ECOPLIANT highlights the necessity to ensure compatibility of market surveillance activities in the area of Energy Labelling and Ecodesign with ICSMS.

ICSMS is therefore likely to be used by an increasing number of authorities, and cover the Energy Labelling and Ecodesign legislation. In this context, some additional recommendations can be made in relation to the challenges mentioned in the previous part:

- As regards EU harmonisation, it should be ensured that all market surveillance activities carried out by the 27 Member State authorities on Energy Labelling and Ecodesign are uploaded in ICSMS. More standardised description of non-compliance, translated in all



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languages should be made available (or at least in English, which is not always systematic at present). As mentioned in the communication of the European Commission on the new Market Surveillance Package, *'the usefulness of this tool depends entirely on the speedy, accurate and diligent entering of information into the database.'* (European Commission, 2013)

- The compatibility between ICSMS and the results of other market surveillance initiatives (notably from IEE-funded projects) should be addressed. It would be useful to design databases that can easily interact or feed ICSMS.
- As ICSMS is filled by official authorities (and not manufacturers through product registration), the equivalent model issue still has to be settled; this requires probably that manufacturers provide further information on basis and equivalent models to market surveillance authorities in some way.
- In terms of accessibility, improving the public access to the ICSMS system should be a priority, notably through more refined search engines allowing finer data filtering.

## **Broader product database of use for market surveillance?**

The second main trend relates to the potential development of a broader EU product database covering the market in a comprehensive way, and the extent to which this database could be linked to or merged with ICSMS.

An evaluation study on the Ecodesign Directive completed in 2012 assessed market surveillance of Ecodesign and Energy Labelling and remarked that *'a key issue is the limited information available to authorities on the products circulating in the market. This information would be of considerable help to authorities in their surveillance activities.'* (CSES, 2012)

The study then recommended considering a systematic product registration: *'For some products in Europe, such as chemicals and fertilisers, there are registration requirements before a product can be put on the market. This is an approach that could also be followed in the case of the Ecodesign Directive'* (CSES, 2012). The way such an EU-registration system could work is further described:

*'It can be done easily on-line, especially if a common format is agreed, and would mainly consist of the information already required in the declaration of conformity. Such a system is already in operation in Australia and the United States for products within the scope of energy efficiency legislation. The benefits are that, as well as contributing to market monitoring in general, surveillance authorities would be in a much better position to plan and carry out their work and the benefits of more open information on market developments referred to in the Directive, would be more readily apparent (...)* The registration should be



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*accessible to the Commission and the relevant Member States authorities to assist in conducting market surveillance, to reduce non-compliance and unfair competition but also to serve as a key source of information to monitor developments in the market and support future evaluations'* (CSES, 2012).

A 2011 CLASP study on market surveillance in the EU also came to a similar conclusion: *'Member States cooperation could be greatly facilitated were all products and their variants sold in the EU to be registered in a central database and national compliance testing results to be shared'* (CLASP, 2011).

At present, the EU is not implementing this recommendation to the full extent. The recent call for tender for establishing a first EU-wide product database is limited to 6 product groups, and does not rely on a product registration approach. The consultants in charge of the database will be expected to carry out the work using *'publicly available sources'* (EACI, 2013). This means that they may be confronted to gaps, partial or sometimes obsolete data sources. The identification of equivalent models will also be an issue for this database, as it will not be directly fed by manufacturers and suppliers. In terms of accessibility of the information, it is clarified that the database will include a read-only restricted access given to stakeholders such as the industry, NGOs, consumer organisations, etc.

The call for tender does not stipulate to which extent and how this product database could interact with ICSMS. It would certainly be useful to clarify this point, and make sure that a certain degree of compatibility is planned from the start (in the database features, templates, procedures, tools, etc.), so that synergies between both databases can be implemented sooner or later.

As regards a fully-fledged EU registration of energy-using products, the option does not seem to be considered by decision-makers at the moment. Here, a recommendation could be to start with an intermediary solution, for instance a registration obligation limited to products qualifying for the top two energy classes (A++ and A+++). This would have some similarities with the US registration of Energy Star products, and is grounded on the observation that non-compliance in lower energy classes may be expected to be less likely or have less impact than in top classes. Products in this partial register could then eventually be submitted to basic automatized verification procedures (detection of inconsistencies in the declared parameters, recalculation of the energy class, etc.), similar to what is carried out for products recommended on Topten guides ([www.topten.eu](http://www.topten.eu)). This would provide a first useful screening and contribute to spotting potentially suspicious products.



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