



EXPERT
WEBINAR BY
EUROVENT

ECODESIGN AND ENERGY
LABELLING REQUIREMENTS
FOR REFRIGERATING
APPLIANCES WITH A DIRECT
SALES FUNCTION:
INDUSTRY RECOMMENDATION

26 JANUARY 2021

14:30-16:00H (BRUSSELS TIME)




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- Use the 'question field' function in your control panel for comments and questions
- If needed, click on the arrow  to expand your control panel and see the 'question field'
- Questions will be answered during the Q&A session at the end of the webinar
- Webinar will be recorded and shared afterwards

Speakers



Mr Pierluigi Schiesaro
R & D Director
Arneg



Mr Francesco Mastrapasqua
Institutional Affairs Manager
Epta



Ms Ines Muehlhaus
Manager Systems Cabinets
Carrier



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EXKAL



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Secretary General
Eurovent



Mr Francesco Scuderi
Deputy Secretary General
Eurovent

Roadmap

1. **Welcome remarks**
2. **Ecodesign and Energy Labelling requirements and EPREL**
3. **Reference models and extrapolation rules**
4. **Market Surveillance**
5. **Incomplete deliveries**
6. **Q&A**
7. **Closing remarks**

1. Welcome remarks



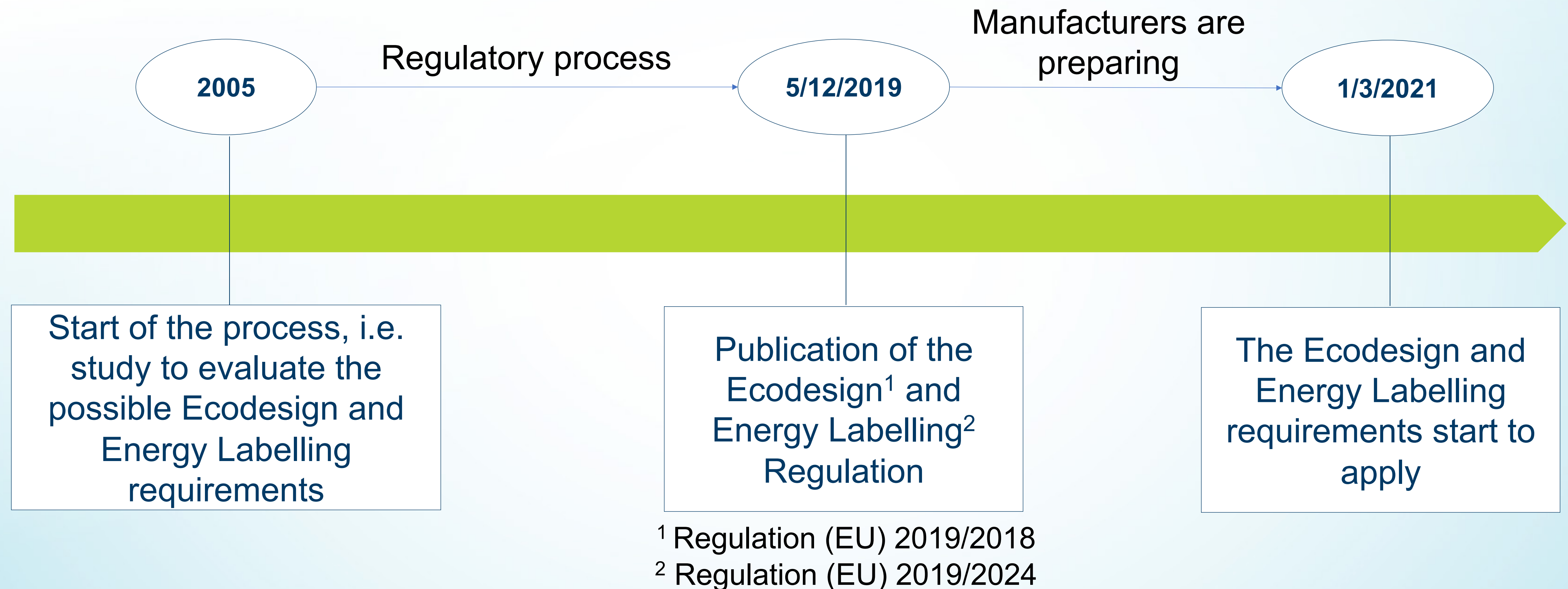
Mr Pierluigi Schiesaro

- **Research & Development Director**
Arneg S.p.A.
- **Chairman**
Eurovent Product Group 'Commercial Refrigeration Equipment' (PG-RDC)

Products in scope

Supermarket remote cabinets	Supermarket plug-in cabinets	Commercial beverage coolers	Refrigerated vending machines	Ice cream freezers	Gelato- scooping cabinets
 	 			 	 

How did we come to the requirements?



Eurovent 14/6 – 2020

Interpretation of Regulation (EU) 2019/2018 and of Regulation (EU) 2019/2024

Eurovent 14/6 - 2020:

- Provides a sound interpretation of the Regulations (EU) 2019/2018 and 2019/2024
- Provides the European Commission with the industry input for the future European Commission guidelines accompanying the Regulations



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- 2. Ecodesign and Energy Labelling requirements and EPREL**
3. Reference models and extrapolation rules
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2. Ecodesign and Energy Labelling requirements and EPREL



Mr Francesco Mastrapasqua

- **Institutional Affairs Manager**
Epta S.p.A.
- **President**
Assocold (IT)

Ecodesign and Energy Labelling

Products covered by the Regulations

Supermarket remote cabinets	Supermarket plug-in cabinets	Commercial beverage coolers	Refrigerated vending machines	Ice cream freezers	Gelato- scooping cabinets
 	 			 	 

Ecodesign and Energy Labelling Requirements

Ecodesign requirements

- Minimum energy efficiency
- Resource efficiency
- Information

Energy Labelling requirements

- Energy label
- Product information sheet
- Technical documentation



Energy Efficiency Requirements

EEI

$$AE = 365 \cdot \text{daily energy consumption [kWh/year]}$$

$$EEI = \frac{\text{Annual energy consumption (AE)}}{\text{Standard annual energy consumption (SAE)}}$$

$$SAE = 365 \cdot P \cdot (M + N * Y) \cdot C \text{ [kWh/year]}$$

Energy consumption of a typical appliance of the same type – different types of appliances have different SAEs

Product segmentation by means of SAE M & N Coefficients

$$SAE = 365 \cdot P \cdot (M + N * Y) \cdot C$$

Category	Value for M	Value for N
Beverage coolers	2,1	0,006
Small ice-cream freezers	2,0	0,009
Vertical and combined supermarket freezers	7,5	19,3
Horizontal supermarket freezer cabinets	4,0	10,3
Vertical and combined supermarket refrigerators	9,1	9,1
Horizontal supermarket refrigerators	3,7	3,5

Vertical open and closed refrigerators have the **SAME** values

Product segmentation by means of SAE

C Coefficient

$$SAE = 365 \cdot P \cdot (M + N * Y) \cdot \textcolor{red}{C}$$

Cabinet Family	Temperature Class	C
Vertical Refrigerator	3M2	1 (baseline)
	3H	0,82
	3M1	1,15
	3M0	1,30
Horizontal Refrigerator	3M2	1 (baseline)
	3H	0,92
	3M1	1,08
	3M0	1,13
Vertical Freezer	3L1	1 (baseline)
	3L2/L3	0,9
Horizontal Freezer	3L1	1 (baseline)
	3L2/L3	0,92

Product segmentation by means of SAE

P Coefficient

$$SAE = 365 \cdot \textcolor{red}{P} \cdot (M + N * Y) \cdot C$$

Cabinet Family	P
Supermarket Remote	1
Supermarket Plug-In	1,1

EEI levels

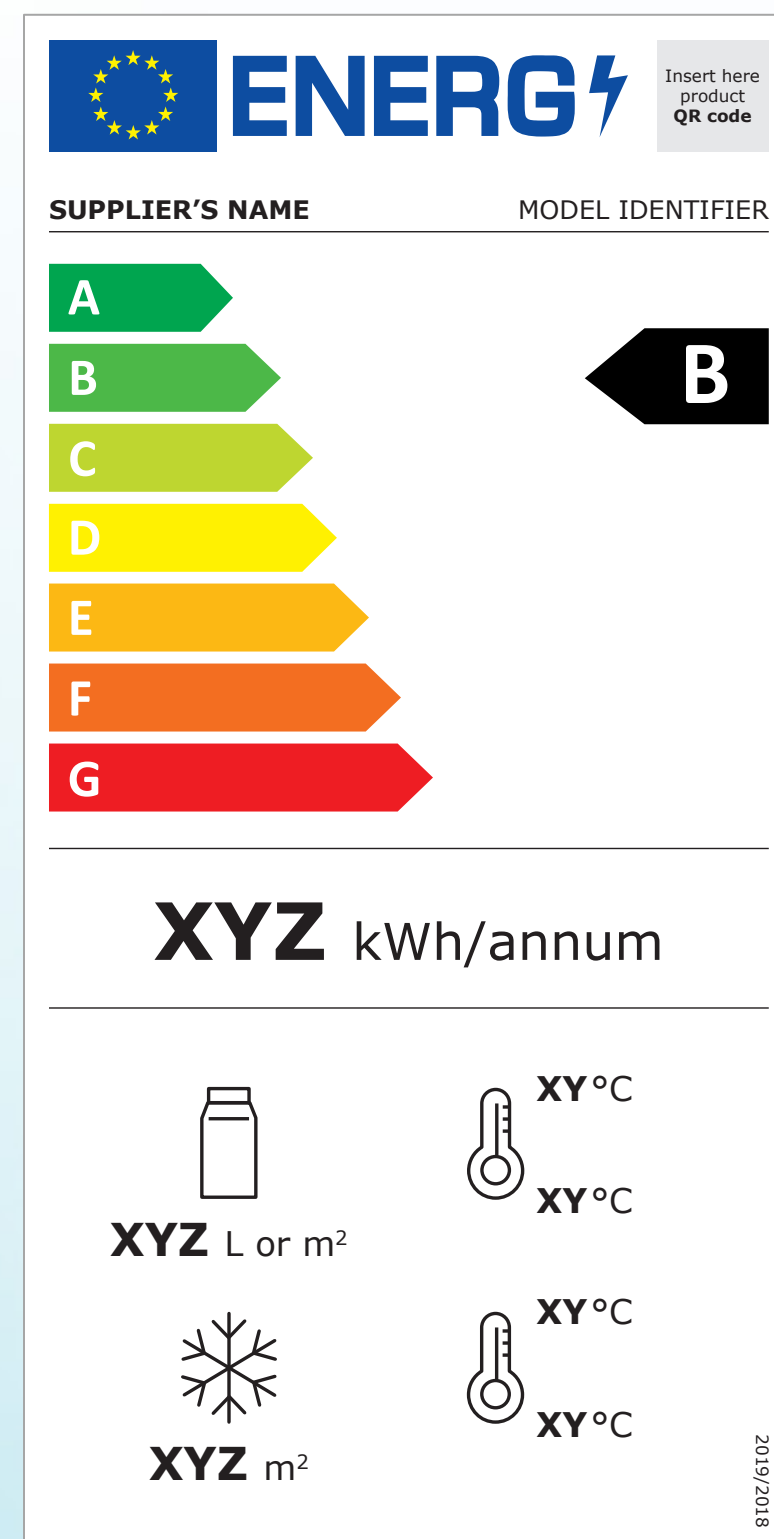
What happens from 1 March 2021?

	1 March 2021	1 September 2023
All except ice cream freezers	≤ 100	≤ 80
Ice cream freezers	≤ 80	≤ 50

- From this date, **manufacturers and importers can no longer place products** on the EU market with an EEI higher than the values in this table
- Products placed on the market before 1 March 2021 can still be sold, e.g. if a manufacturer sold an appliance with an EEI higher than in the table to the dealer before the dates in the table, the **dealer can still sell** the appliance after the dates in this table

Energy Label

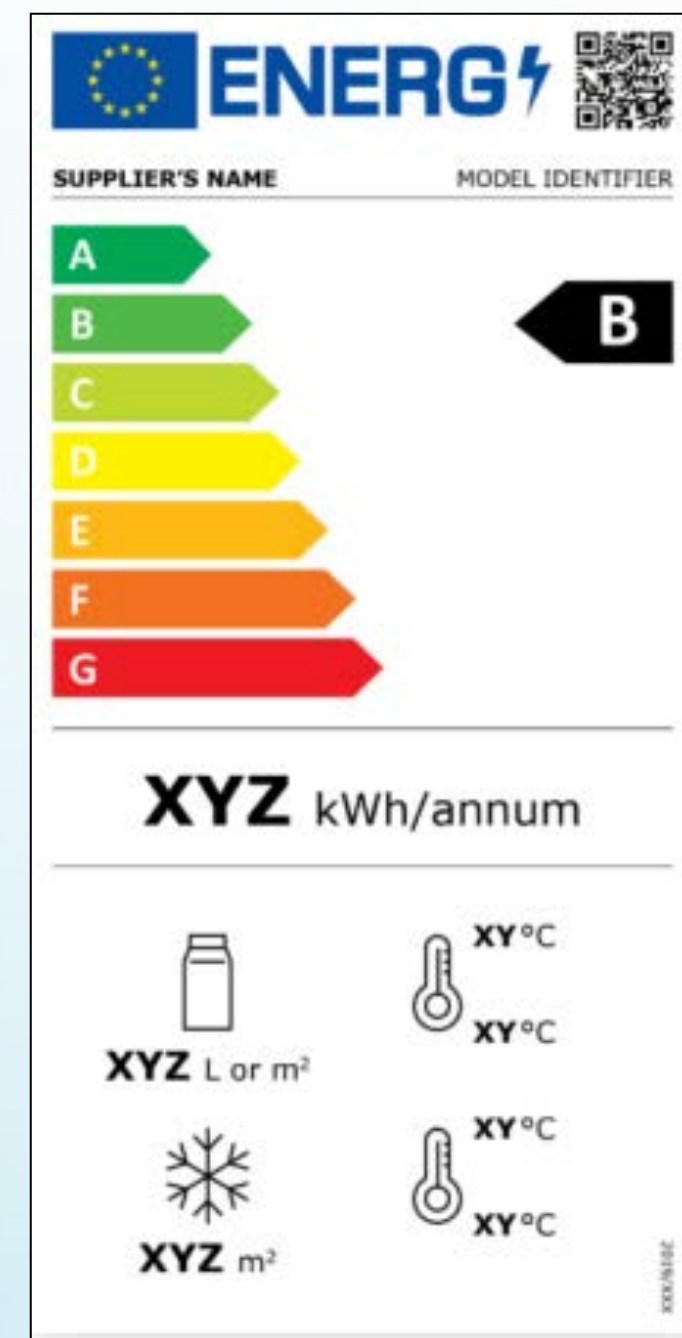
Energy Efficiency classes



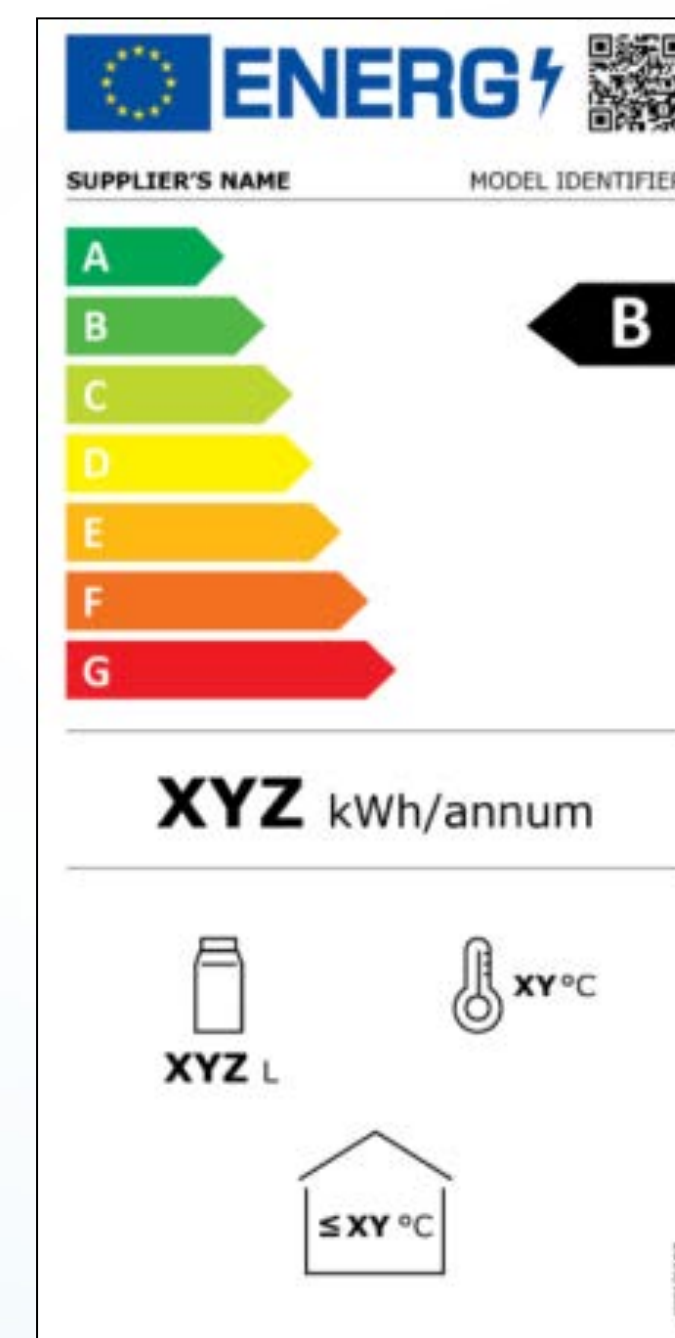
Energy Efficiency class	EEI
A	$EEI < 10$
B	$10 \leq EEI < 20$
C	$20 \leq EEI < 35$
D	$35 \leq EEI < 50$
E	$50 \leq EEI < 65$
F	$65 \leq EEI < 80$
G	$80 \leq EEI$

Energy Label Different types

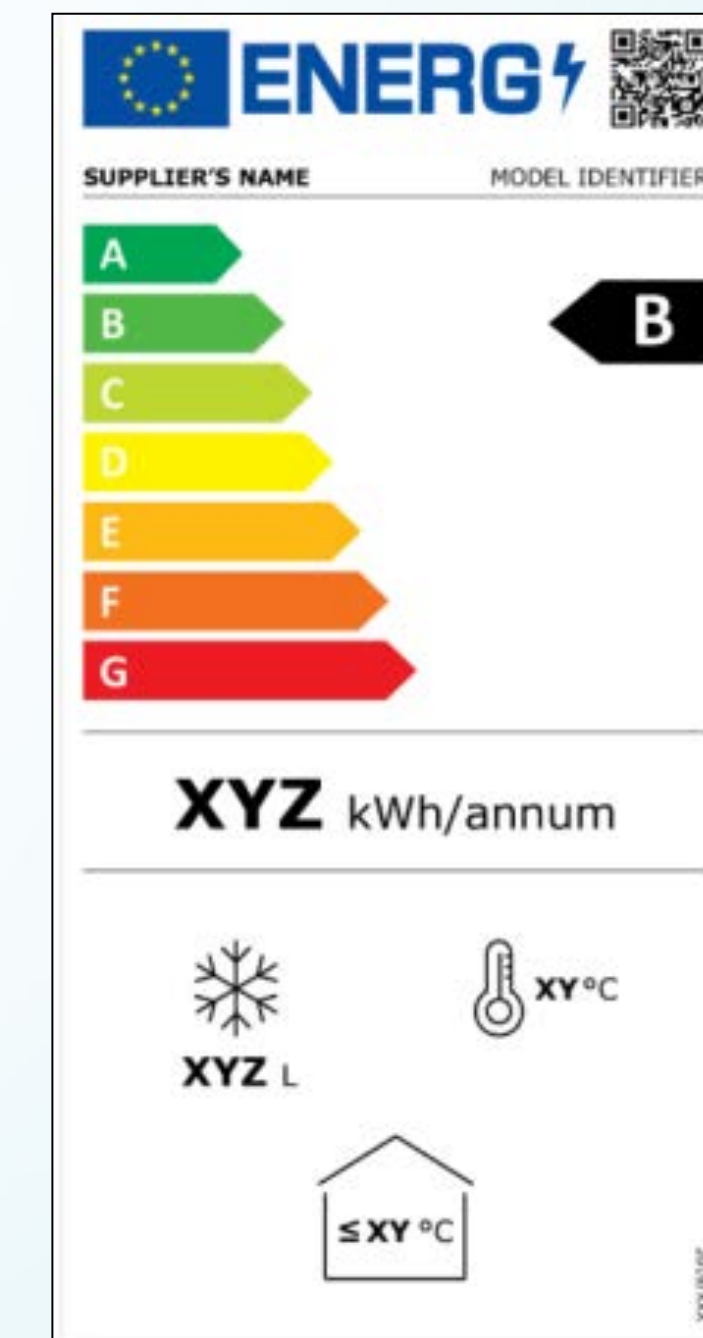
DISPLAY CABINETS



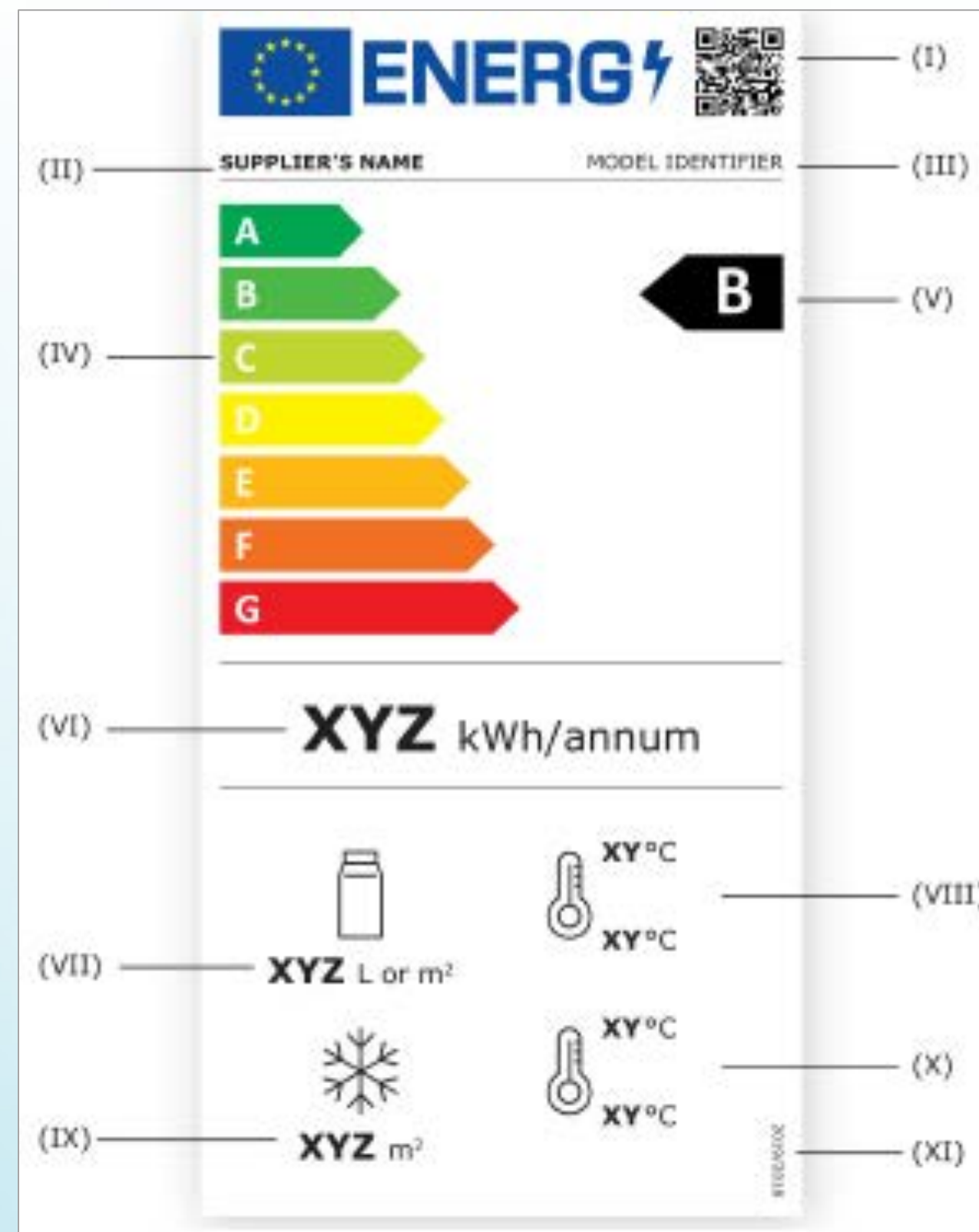
BEVERAGE COOLERS



ICE CREAM FREEZERS



Energy Label General



1. QR code
2. Supplier's name or trade mark
3. Supplier's model identifier
4. Scale of energy efficiency classes from A to G
5. Energy efficiency class
6. Annual energy consumption in kWh per year
7. The total display area with chilled operating temperatures [sqm]
8. The highest and the lowest M-package temperature [°C]
- 9-10. Same as point 7-8 for the frozen compartments
11. Regulation number

Energy Label

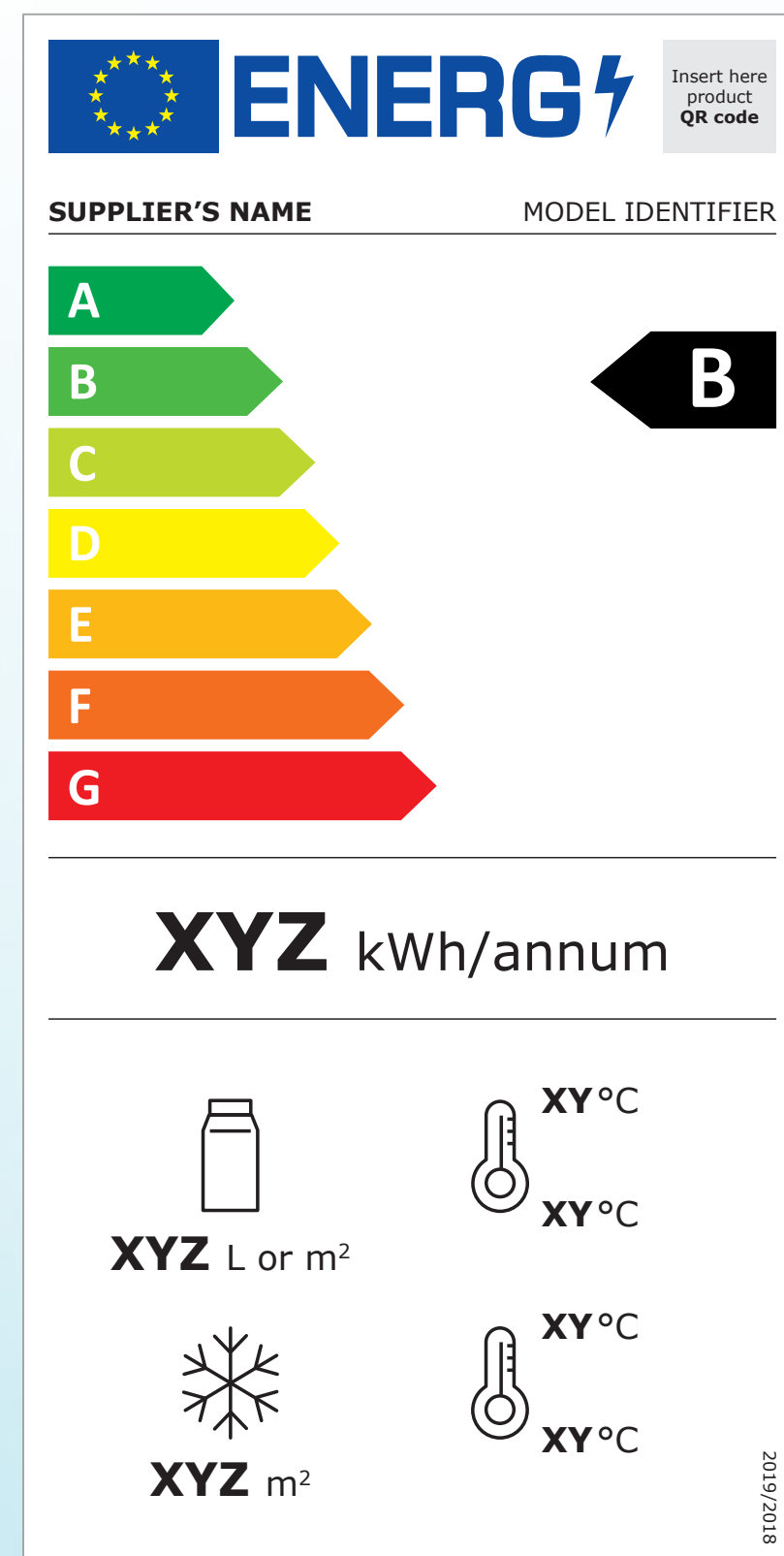
Meaning of Energy Efficiency classes

Energy Efficiency class	EEI
A	$EEI < 10$
B	$10 \leq EEI < 20$
C	$20 \leq EEI < 35$
D	$35 \leq EEI < 50$
E	$50 \leq EEI < 65$
F	$65 \leq EEI < 80$
G	$80 \leq EEI$

- **A class** = Best NOT available technology → EMPTY in 2021
- **B class** = Best available technology (ice cream freezers) → **Best performing ice cream freezers**
- **C class** = Best available technology (supermarket cabinets) → **Best performing supermarket cabinets**
- **D-G class** = Products with an EEI between 20 and 100

Energy Label

What happens from 1 March 2021?

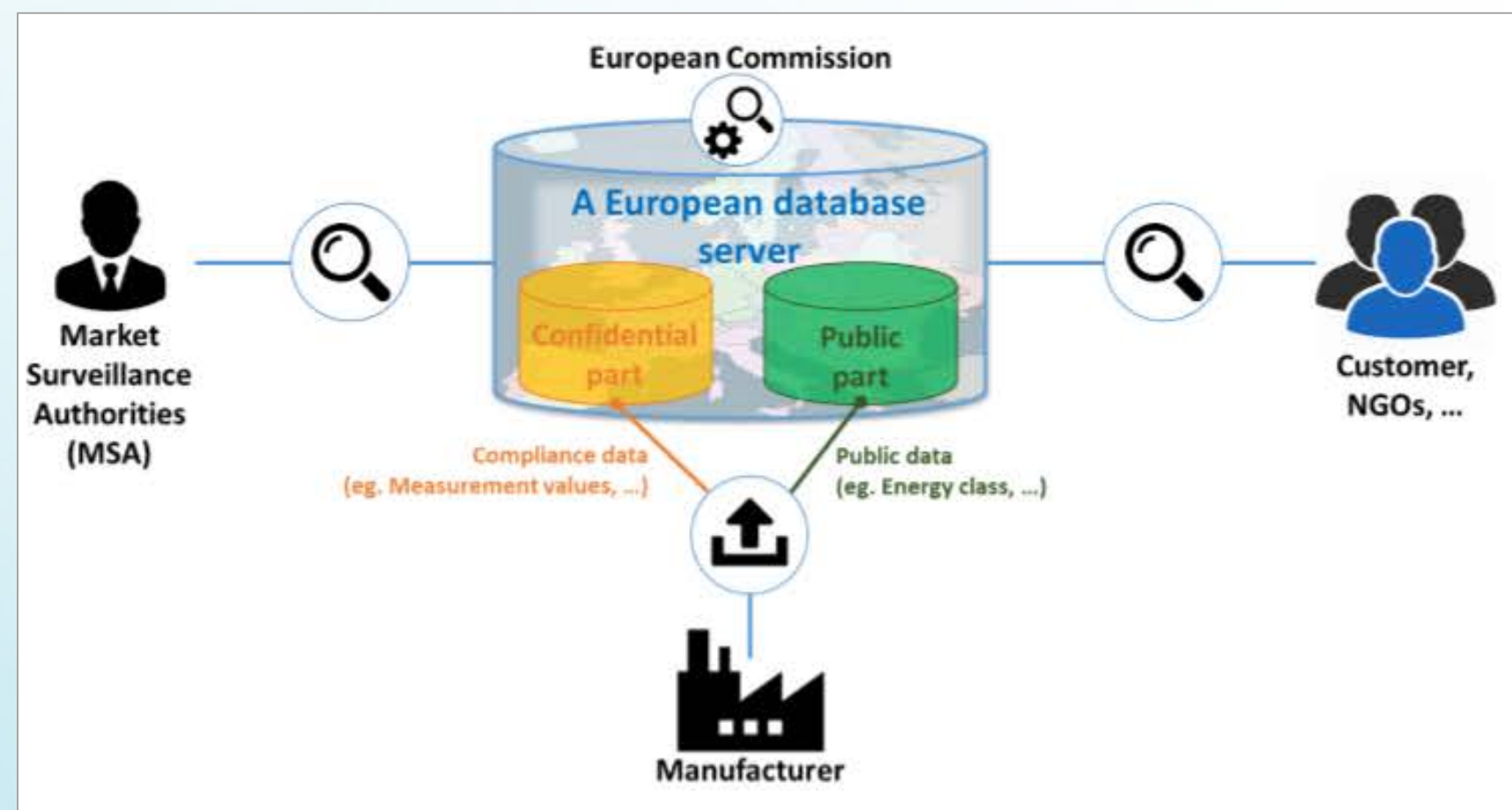
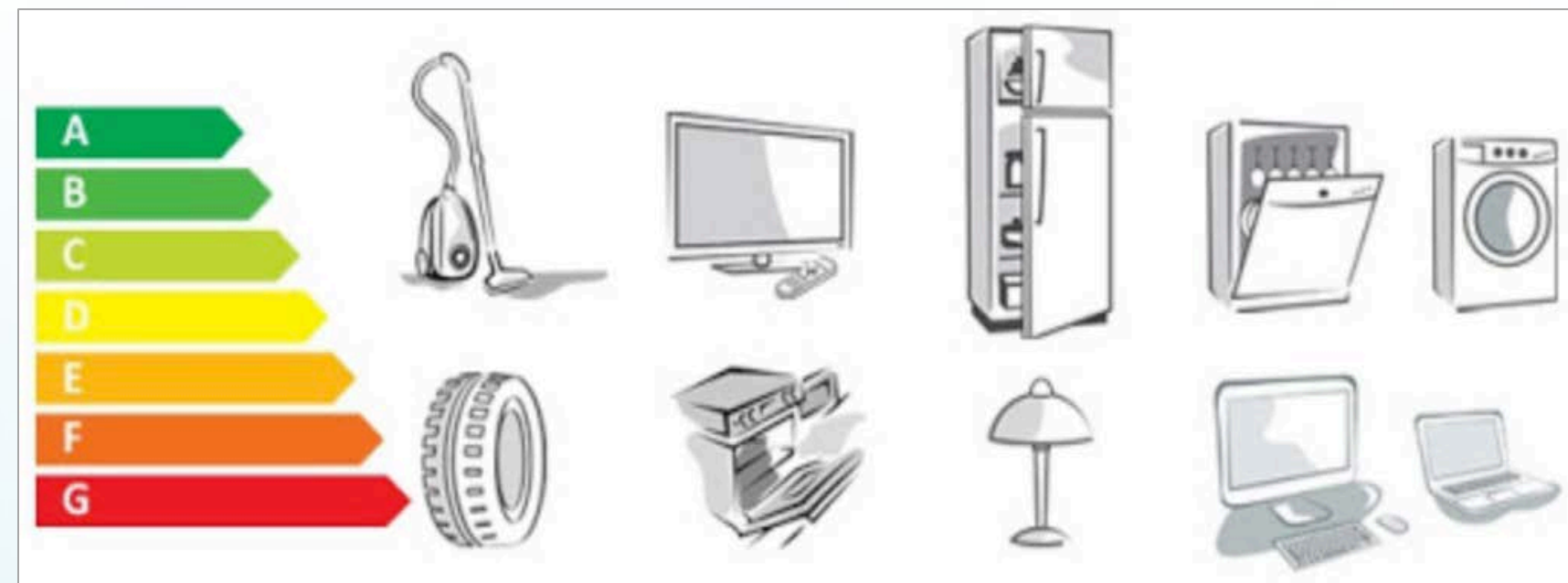


The supplier (manufacturer, dealer or importer) needs to ensure that

- Each refrigerating appliance bears the Energy Label at the point of sale, at trade fairs, etc.
- Any visual advertisement or promotional material for a specific model shows the Energy Efficiency class and the range of Energy Efficiency classes available
- The products are supplied with the Energy Label

Energy Label

What happens from 1 March 2021?



- As of 1 March 2021, the suppliers (manufacturers, importers or authorised representatives) need to register the appliances, subject to Energy Labelling, in the **European Product Register for Energy Labelling EPREL** before placing them on the **European Market**
- Energy Labelling data of supermarket cabinets, beverage coolers and ice cream freezers will be in EPREL
- Consumers, as well as MSAs and EC, will have free access to the registry with the product information

Ecodesign and Energy Labelling Products not covered by the Regulations

- Refrigerating appliances with a direct sales function that are only powered by energy sources other than electricity
- The remote components, such as the condensing unit, compressors or water condensed unit, to which a remote cabinet needs to be connected in order to function
- Food processing refrigerating appliances with a direct sales function
- Refrigerating appliances with a direct sales function specifically tested and approved for the storage of medicines or scientific samples
- Refrigerating appliances with a direct sales function that have no integrated system for producing cooling, and function by ducting chilled air that is produced by an external air chiller unit; this does not include remote cabinets nor does it include category 6 refrigerated vending machines, as defined in Table 5 of Annex III
- Professional refrigerated storage cabinets, blast cabinets, condensing units and process chillers as defined in Regulation (EU) 2015/1095
- Wine storage appliances and minibars

Ecodesign and Energy Labelling

Products covered ONLY by Resource efficiency and Information requirements

Regulations

- Refrigerating appliances with a direct sales function that do not use a vapour compression refrigeration cycle
- Refrigerating appliances with a direct sales function for the sale and display of live foodstuffs, such as refrigerating appliances for the sale and display of living fish and shellfish, refrigerated aquaria and water tanks
- Saladettes
- Horizontal serve-over counters with integrated storage designed to work at chilled operating temperatures
- Corner cabinets
- Vending machines designed to work at frozen operating temperatures
- Serve-over fish counters with flaked ice

Eurovent Recommendation

- **Backwall cabinets** (remote and integral units, chilled and frozen) with integrated refrigerated reserve spaces having a compartment volume ≥ 100 l/m
- **Fruit, vegetables or meat chilled cabinets (vertical and horizontal) using humidification systems**
- **Curved cabinets**
 - Resulting from the assembly of several corner cabinets (e.g. 30° - 45° - 90°)
 - Resulting from the assembly of linear cabinets plus corner cabinets (only the linear part is covered by all the ED energy efficiency requirements and by the and EL requirements; the same applies to cabinets having a recognisable longitudinal axis)
 - Not having a recognisable longitudinal axis
- **Carousel cabinets**

Circular Economy

- All **products and materials are highly valued**, unlike the traditional linear economy model based on 'take-use-dispose'
- When a product reaches the end of its life, **the materials must be maintained**, where possible, **within the economic cycle**, using them many times in the productive cycle, **re-using, repairing, reconditioning and recycling** them, thus creating further value
- **Extend the product's life**, produce long-lasting goods, recondition and reduce waste production
- Specific requirements regarding **the availability and the maximum delivery time for the spare parts**, information on repair, maintenance and specific dismantling instructions to recover and recycle the materials to prevent disposal



Resource efficiency requirements

Availability of spare parts

The following spare parts will be available for at least 8 years

For professional repairers	For all
Thermostats	Door handles and hinges
Starting relays	Knobs, dials and buttons
No frost heat resistors	Door gaskets
Temperature sensors	Peripheral trays, baskets and racks for storage
Software and firmware	
Printed circuit boards	
Light sources	

Resource efficiency requirements

Access to repair and maintenance information

Professional repairers will have access to

- Unequivocal appliance identification
- A disassembly map or exploded view
- Technical manual of instructions for repair
- List of necessary repair and test equipment
- Component and diagnosis information
- Wiring and connection diagrams
- Diagnostic fault and error codes
- Instructions for installation of relevant software and firmware
- Information on how to access data records of reported failure incidents stored on the appliance

Resource efficiency requirements

Requirements for dismantling for material recovery and recycling

- Some components (identified in Annex VII of Directive 2012/19/EU) need to be removable with the use of commonly available tools
- If the appliance has vacuum insulation panels, they need to be marked with the letter VIP

Wrap-up

From 1 March 2021

- Ecodesign requirements will start to apply for refrigerating appliances with a direct sales function
 - ▶ Manufacturers will no longer be able to place on the market products that do not meet these requirements
- Energy Labelling requirements will start to apply for refrigerating appliances with a direct sales function
 - ▶ Dealers will need to show depending on the situation and amongst others the Energy Label or the Energy Efficiency class
 - ▶ Additional information will be available in the EPREL product database

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3. Reference models and extrapolation rules



Ms Ines Muehlhaus

- **Manager Systems Cabinets Carrier**

Reference models

Cabinet representative of a group of cabinets in terms of energy consumption and it is intended to be used as reference for the extrapolation of the energy consumption data/EEI of a group of deducted models



Example of standard configurations

Standard configuration

- Configuration to be used to perform tests, particularly the test for reference model, for the benefit of repeatability, decrease the number of potentially different models, to ease comparison and standardise the entry into extrapolation methods
- The Eurovent Recommendation 14/6 defines **18 different standard configurations** (6 for remotes, 6 for integrals, 6 for semi-plugin)



Example of standard configurations

Remote vertical/semi-vertical open refrigerators

Parameter	Configuration
Number of shelf rows	Declared front opening height [mm] divided by 300, rounded up to next near integer
Shelf depth	Maximum shelf depth allowed by the cabinet's load limit line
Length	2,5m or the closer length (e.g. 2,44m)
Product temperature	Lowest applicable product temperature
Shelf inclination	0° unless differently specified by the manufacturer
End walls	Solid
Lighting	If undershelf lighting option is available: Canopy lighting and undershelf lighting shelf (number of shelves equal to the listed number of shelves)
	If undershelf lighting option is not available: Canopy lighting only
	The declared EEI shall refer to the supplied lighting system which has to take into account the supplied wiring equipment (if the cabinet is prepared to have lighting, the EEI shall reflect it)
Night covers	Yes, if only delivered with night covers
Price ticket holder	40-60mm
Evaporator defrost	Electrical defrost if available

Example of standard configurations

Integral vertical/semi-vertical closed supermarket freezers

Parameter	Configuration
Number of shelf rows	Declared front opening height [mm] divided by 300, rounded up to next near integer
Shelf depth	Maximum shelf depth allowed by the cabinet's load limit line
Length	2,5m or the closer length (e.g. 2,44m)
Product temperature	Lowest applicable product temperature
Shelf inclination	0° unless differently specified by the manufacturer
End walls	Solid
Lighting	If undershelf lighting option is available: Canopy lighting and undershelf lighting shelf (number of shelves equal to the listed number of shelves)
	If mullion lighting option is available: Canopy lighting and vertical lighting (maximum available vertical lighting)
	If undershelf and mullion lighting option are not available: Canopy lighting only
	The declared EEI shall refer to the supplied lighting system which has to take into account the supplied wiring equipment (if the cabinet is prepared to have lighting, the EEI shall reflect it)
Price ticket holder	40-60mm
Doors	Hinged if available
Evaporator defrost	Electrical defrost if available
Door antifog/antimist system	Antifog/antimist heaters if available
	The declared EEI shall refer to the supplied antifog configuration which has to take into account the supplied wiring equipment
Other heaters	If available the EEI shall refer to the maximum configuration for safe and reliable operation under ISO 23953 climate class rating conditions, taking account the supplied wiring equipment

Example of standard configurations

Semi-plugin horizontal supermarket refrigerators (service and self-service serve over counters)

Parameter	Configuration
Number of shelves	Base shelf + maximum number of available refrigerated shelves
Shelf depth	Maximum shelf depth allowed by the cabinet's load limit line
Length	2,5m or the closer length (e.g. 2,44m)
Product temperature	Lowest applicable product temperature
Shelf inclination	0° unless differently specified by the manufacturer
End walls	Solid
Lighting	Superstructure lighting if available (or foreseen as accessory)
	Undershelf lighting if available (or foreseen as accessory)
	The declared EEI shall refer to the supplied lighting system which has to take into account the supplied wiring equipment (if the cabinet is prepared to have lighting, the EEI shall reflect it)
Night covers	Yes, if only delivered with night covers
Evaporator defrost	Electrical defrost if available
Glass antifog/antimist system	Antifog/antimist heaters if available
	The declared EEI shall refer to the supplied antifog configuration which has to take into account the supplied wiring equipment
Other heaters	If available the EEI shall refer to the maximum configuration for safe and reliable operation under ISO 23953 climate class rating conditions, taking account the supplied wiring equipment
Antifog fan	Antifog fan if available
	The declared EEI shall refer to the supplied antifog configuration which has to take into account the supplied wiring equipment

Extrapolation rules

Set of common rules to be used in order to derive the EEI of the deducted model from the one of tested reference models



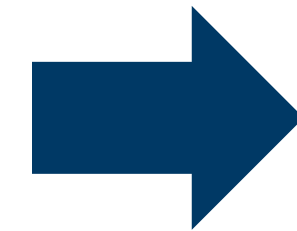
Extrapolation rules

Remotes: Delta Length

$$EEI = \frac{AEC}{SAEC} = \frac{TEC * 365}{P * (M + N * TDA) * C * 365}$$

$$EEI_L = \frac{AEC_L}{SAEC_L} = \frac{TEC_L * 365}{P * (M + N * TDA_L) * C * 365}$$

$$TEC_L = TEC_{2,50} \times \frac{M + N * TDA_L}{M + N * TDA_{2,50}}$$



$$EEI_L = EEI_{2,50}$$

The Energy Efficiency Index (EEI) of a cabinet having its length different from 2,5m can be assumed as equal to the EEI of the same cabinet of a length of 2,5m ($EEI_L = EEI_{2,50}$)

Extrapolation rules

Remotes: Delta Front Opening Height

Applicability

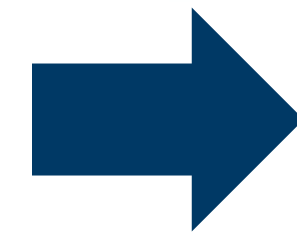
- Reference model and deducted model must belong to the same product segmentation (e.g. same M and N coefficients)
- Reference model and deducted model have the same air discharge and air return geometry
- **Deducted model has air ducts shortened in length only**
- Reference model and deducted model have the same temperature class
- $\Delta \text{ height} = [+0; -10\%]$
- $\Delta \text{ height} = \Delta (V_0 + V_g)$ (as EN/ISO23953-2 Annex A)

Extrapolation rules

Remotes: Delta Front Opening Height

$$EEI_{DED} = \frac{AEC_{DED}}{SAEC_{DED}} = \frac{TEC_{DED} * 365}{P * (M + N * TDA_{DED}) * C * 365}$$

$$TEC_{DED} = TEC_{REF} \times \frac{M + N * TDA_{DED}}{M + N * TDA_{REF}}$$

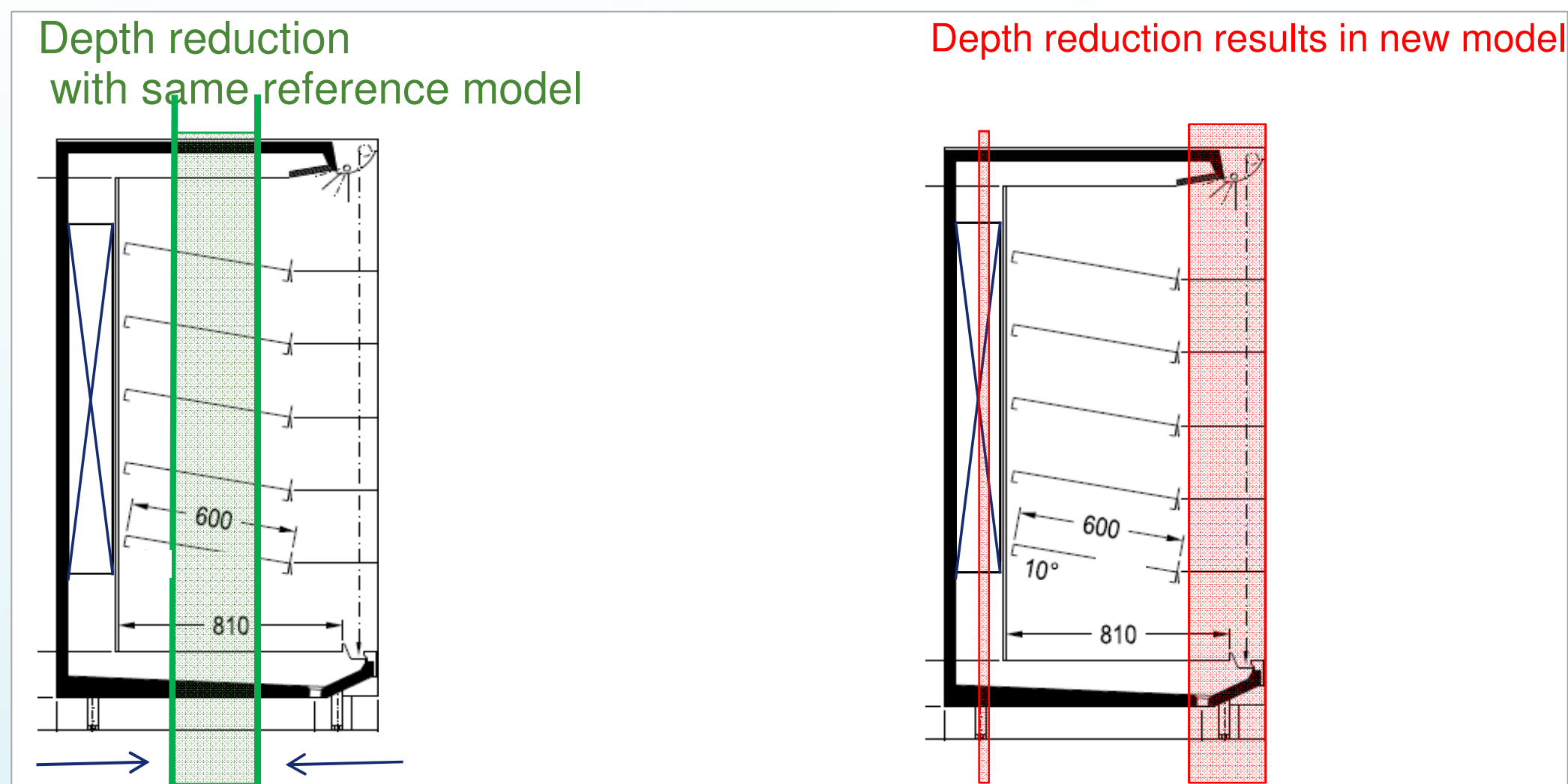


$$EEI_{DED} = EEI_{REF}$$

The EEI of a deducted cabinet can be assumed as equal to the EEI of the reference one

Extrapolation rules

Remotes: Delta Depth Vertical cabinets

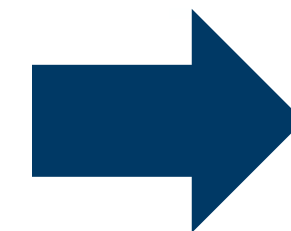
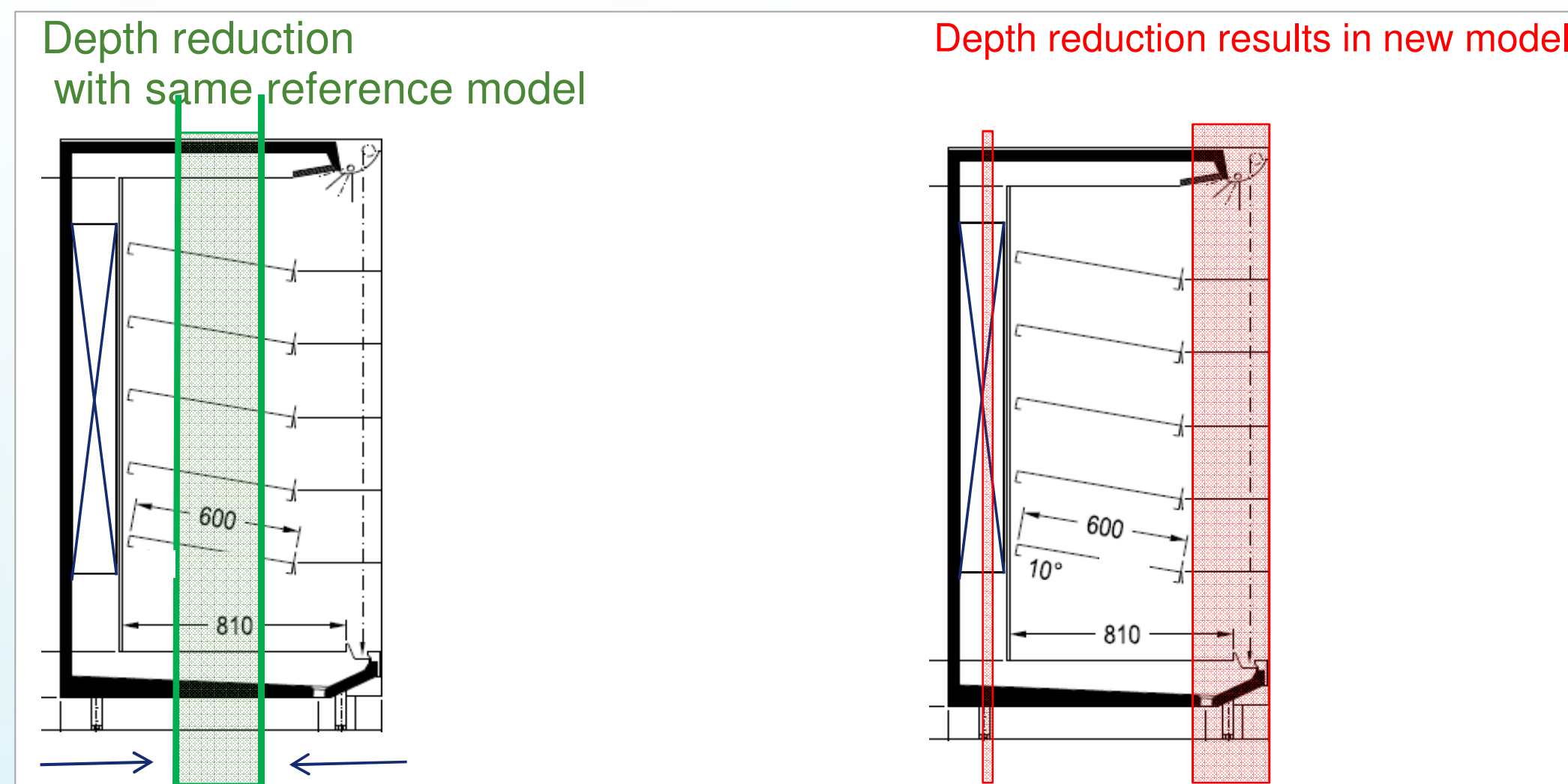


Applicability

- Reference model and deducted model must belong to the same product segmentation (e.g. same M and N coefficients)
- Reference model and deducted model have the **same air discharge and air return grid geometry and position to each other**
- Reference model and deducted model have the **same refrigeration components, and same back panel pattern**
- Reference model and deducted model have the **same number of fans, same type of fans, and same fan speed**
- The reduction of the depth of the cabinet must keep the same distance between air outlet and the load limit line
- **Air ducts are shortened in length only**
- Reference model and deducted model have the same temperature class
- $\Delta \text{depth} = [+0; -30\%]$
- $\Delta \text{depth} = \text{delta internal depth of the base shelf}$

Extrapolation rules

Remotes: Delta Depth Vertical cabinets

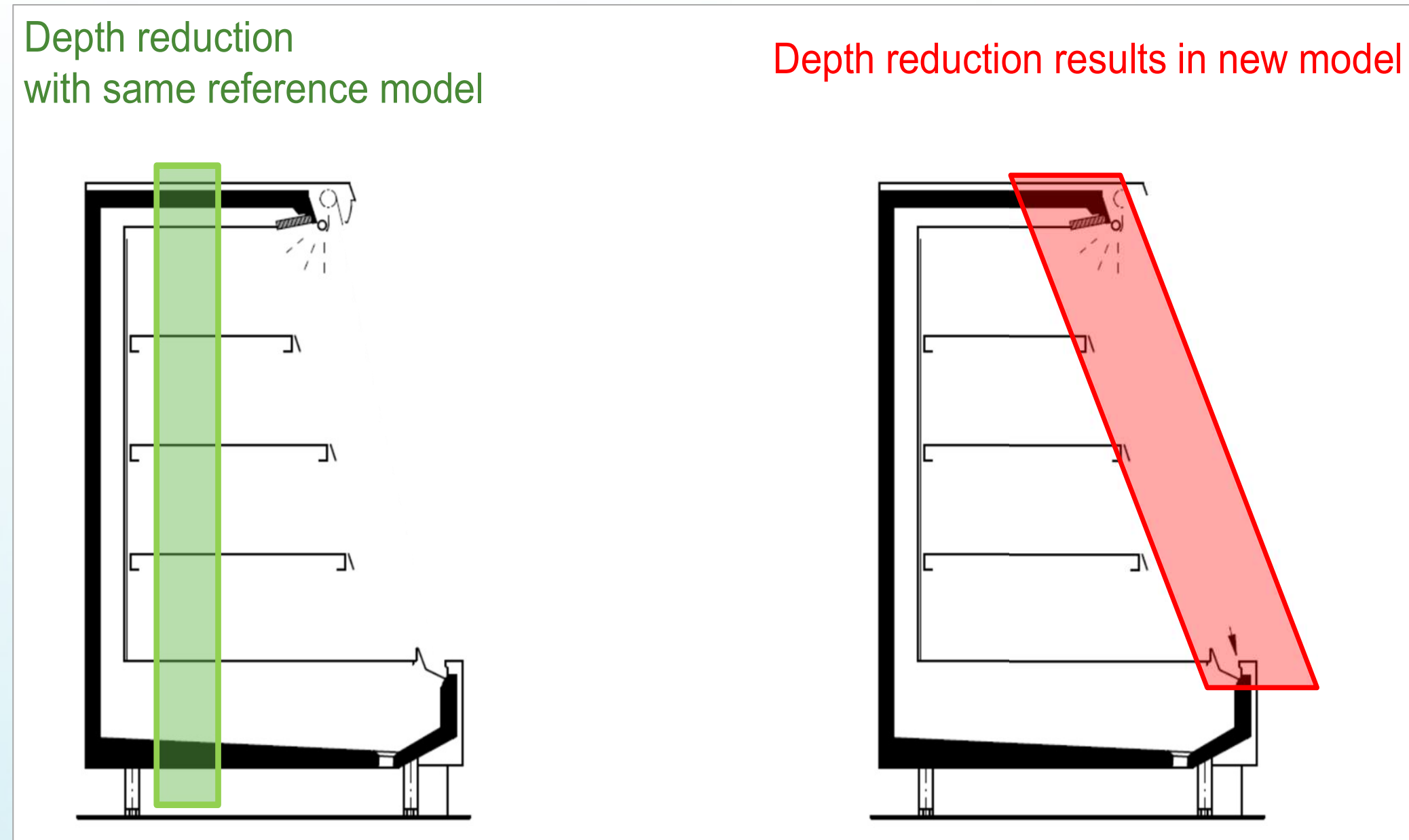


$$\text{TEC}_{\text{DED}} = \text{TEC}_{\text{REF}}$$

The TEC of a deducted cabinet can be assumed as equal to the TEC of the reference one

Extrapolation rules

Remotes: Delta Depth Semi-Vertical cabinets

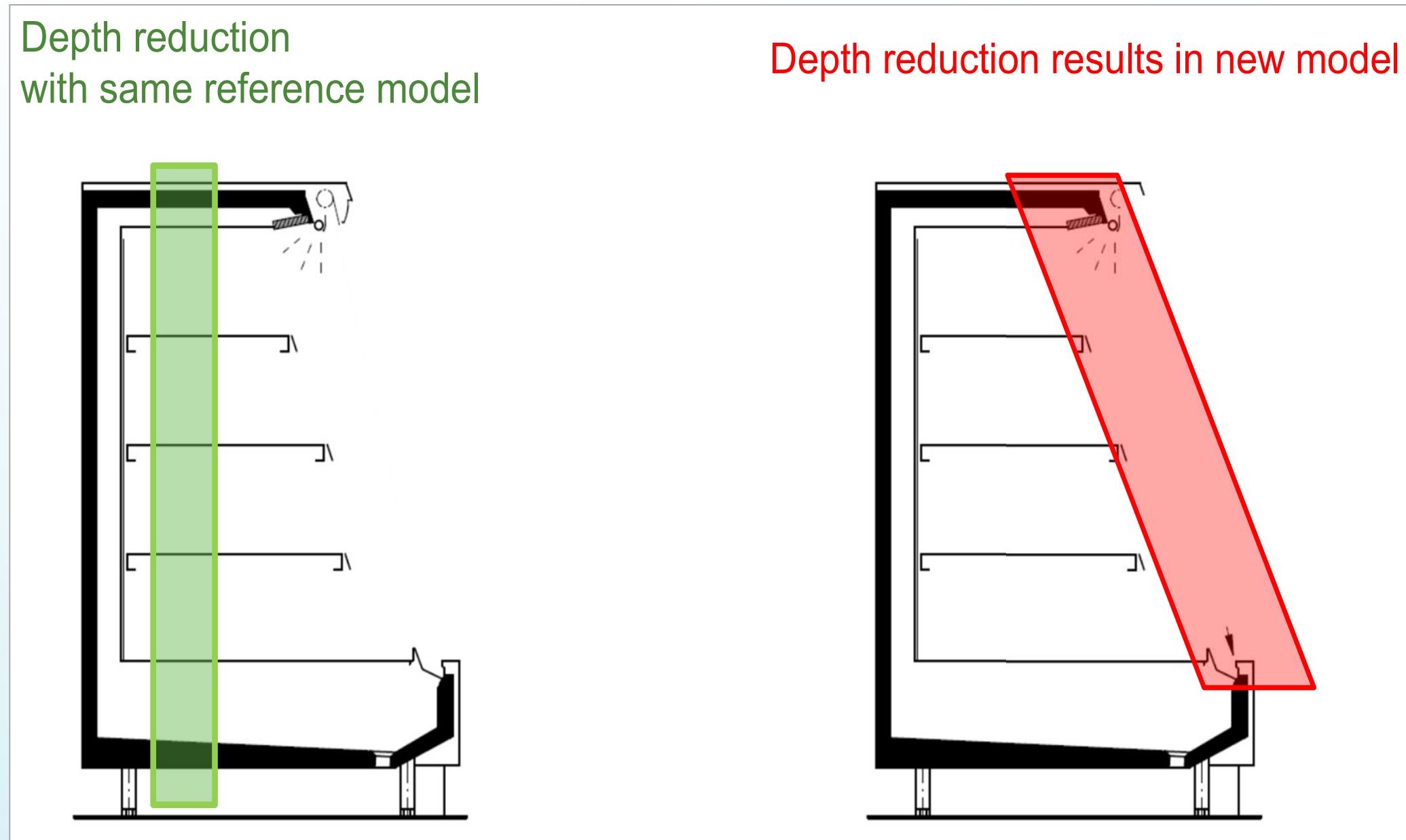


Applicability

- Reference model and deducted model must belong to the same product segmentation (e.g. same M and N coefficients)
- Reference model and deducted model have the **same air discharge and air return grid geometry and position to each other**
- Reference model and deducted model have the **same refrigeration components, and same back panel pattern**
- Reference model and deducted model have the **same number of fans, same type of fans, and same fan speed**
- The reduction of the depth of the cabinet must keep the same distance between air outlet and the load limit line
- **Air ducts are shortened in length only**
- Reference model and deducted model have the same temperature class
- $\Delta \text{depth} = [+0; -30\%]$
- Δdepth = delta internal depth of the base shelf

Extrapolation rules

Remotes: Delta Depth Semi-Vertical cabinets



$$\text{TEC}_{\text{DED}} = \text{TEC}_{\text{REF}}$$

The TEC of a deducted cabinet can be assumed as equal to the TEC of the reference one

Extrapolation rules

Integral/Semi-plugin: Delta Length

Applicability

- Multiplexable units only
- The number of identical refrigeration circuits is modular and proportional with the cabinets' length

$$EEI_L = EEI_{2,50}$$

The Energy Efficiency Index (EEI) of a cabinet having its length different from 2,5m can be assumed as equal to the EEI of the same cabinet of a length of 2,5m ($EEI_L = EEI_{2,50}$)



*RC= Refrigeration Circuit

Extrapolation rules

Integral/Semi-plugin: Delta Front Opening Height

Applicability

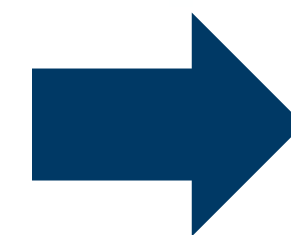
- Multiplexable and non-multiplexable units
- Reference model and deducted model must belong to the same product segmentation (e.g. same M and N coefficients)
- Reference model and deducted model have the same air discharge and air return geometry
- **Deducted model has air ducts shortened in length only**
- Reference model and deducted model have the same temperature class
- $\Delta \text{ height} = [+0; -10\%]$
- $\Delta \text{ height} = \Delta (V_0 + V_g)$ (as EN/ISO23953-2 ANNEX A)

Extrapolation rules

Integral/Semi-plugin: Delta Front Opening Height

$$EEI_{DED} = \frac{AEC_{DED}}{SAEC_{DED}} = \frac{TEC_{DED} * 365}{P * (M + N * TDA_{DED}) * C * 365}$$

$$TEC_{DED} = TEC_{REF} \times \frac{M + N * TDA_{DED}}{M + N * TDA_{REF}}$$

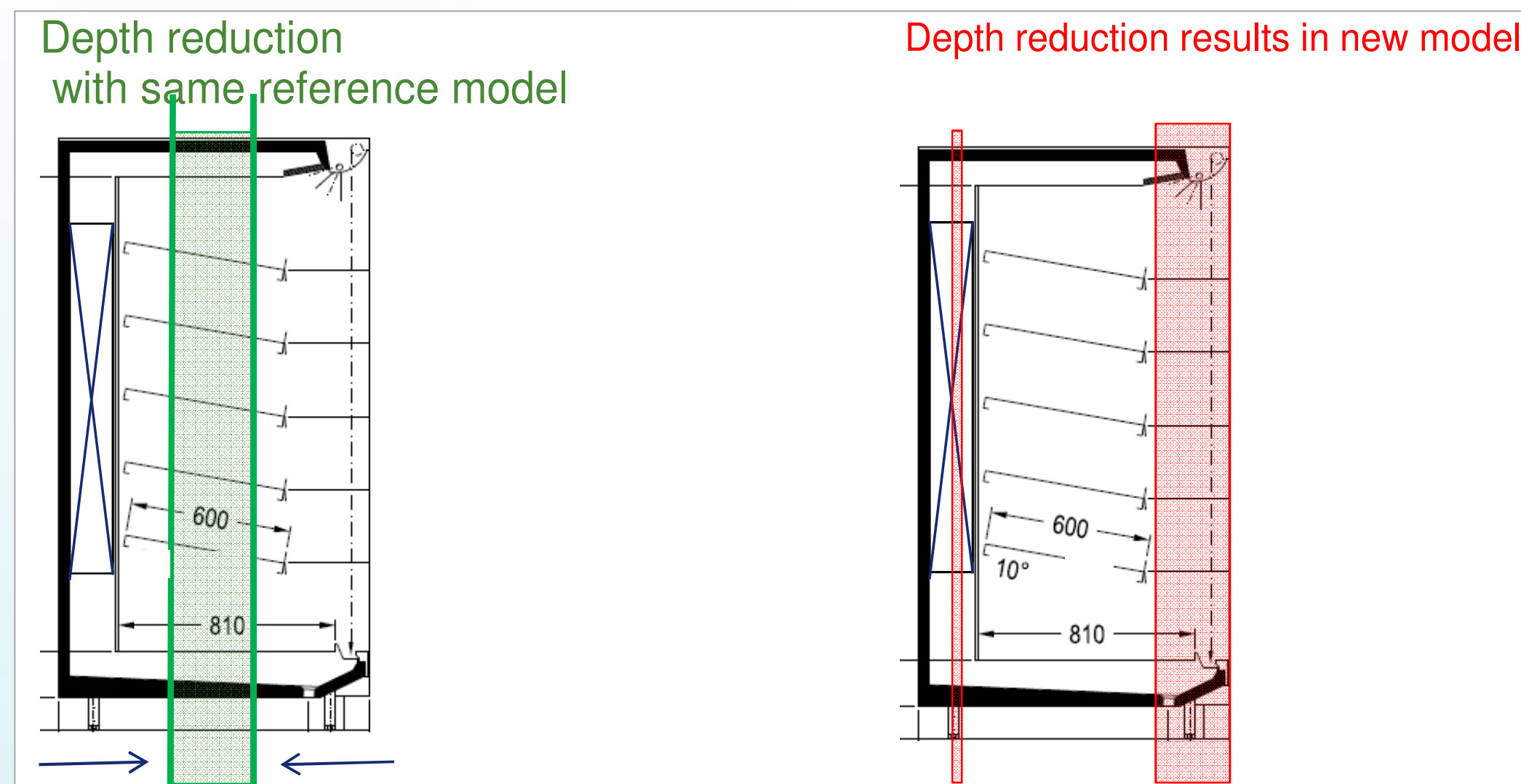


$$EEI_{DED} = EEI_{REF}$$

The EEI of a deducted cabinet can be assumed as equal to the EEI of the reference one

Extrapolation rules

Integral/Semi-plugin: Delta Depth Vertical cabinets

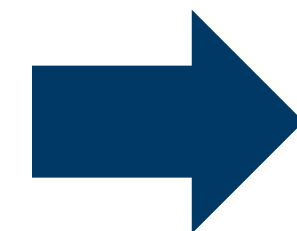
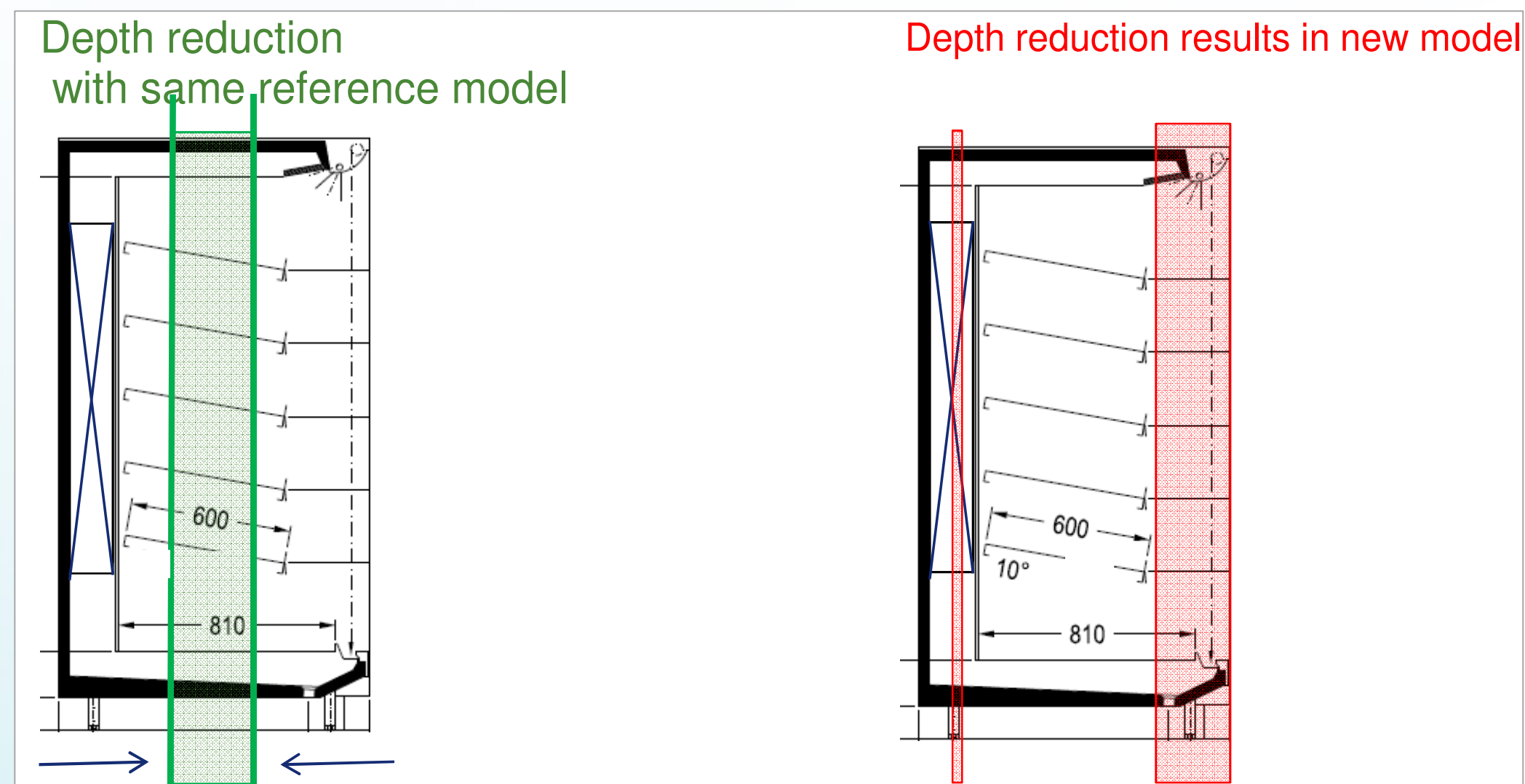


Applicability

- Multiplexable and non-multiplexable units
- Reference model and deducted model must belong to the same product segmentation (e.g. same M and N coefficients)
- Reference model and deducted model have the **same air discharge and air return grid geometry and position to each other**
- Reference model and deducted model have the **same refrigeration components, and same back panel pattern**
- Reference model and deducted model have the **same number of fans, same type of fans, and same fan speed**
- The reduction of the depth of the cabinet must keep the same distance between air outlet and the load limit line
- **Air ducts are shortened in length only**
- Reference model and deducted model have the same temperature class
- $\Delta \text{depth} = [+0; -30\%]$
- Δdepth = delta internal depth of the base shelf

Extrapolation rules

Integral/Semi-plugin: Delta Depth Vertical cabinets



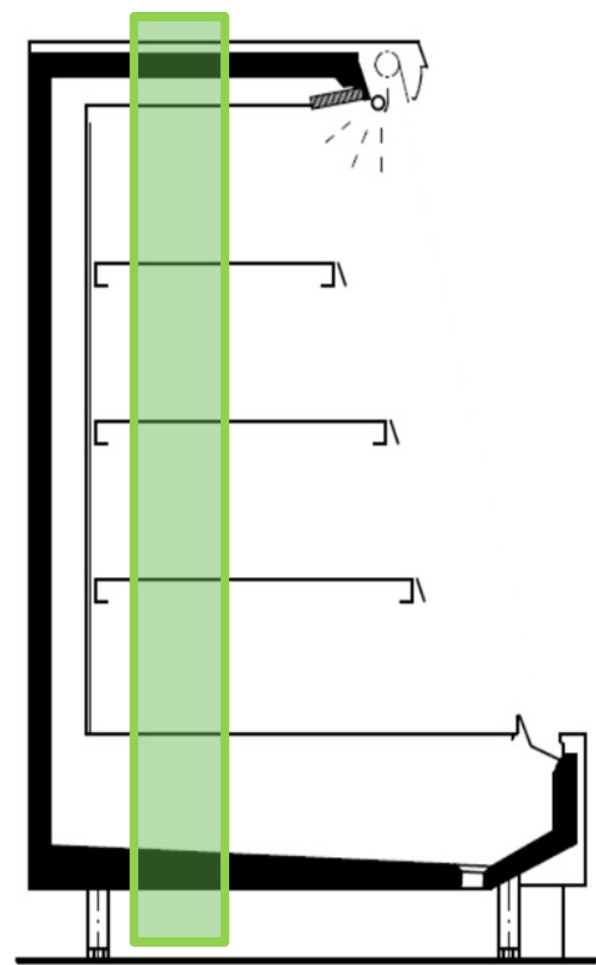
$$TEC_{DED} = TEC_{REF}$$

The TEC of a deducted cabinet can be assumed as equal to the TEC of the reference one

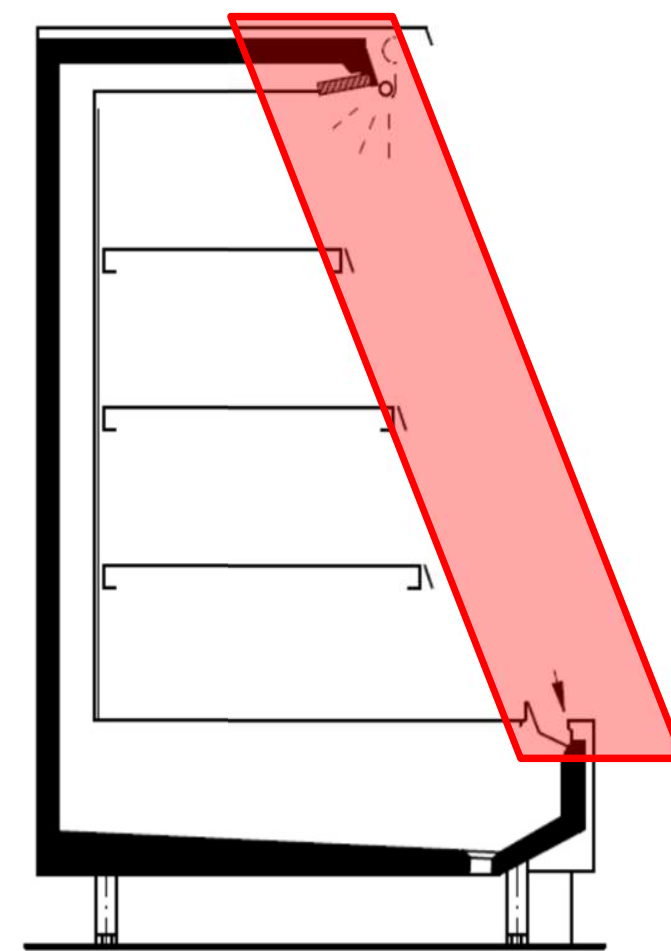
Extrapolation rules

Integral/Semi-plugin: Delta Depth Semi-Vertical cabinets

Depth reduction
with same reference model



Depth reduction results in new model



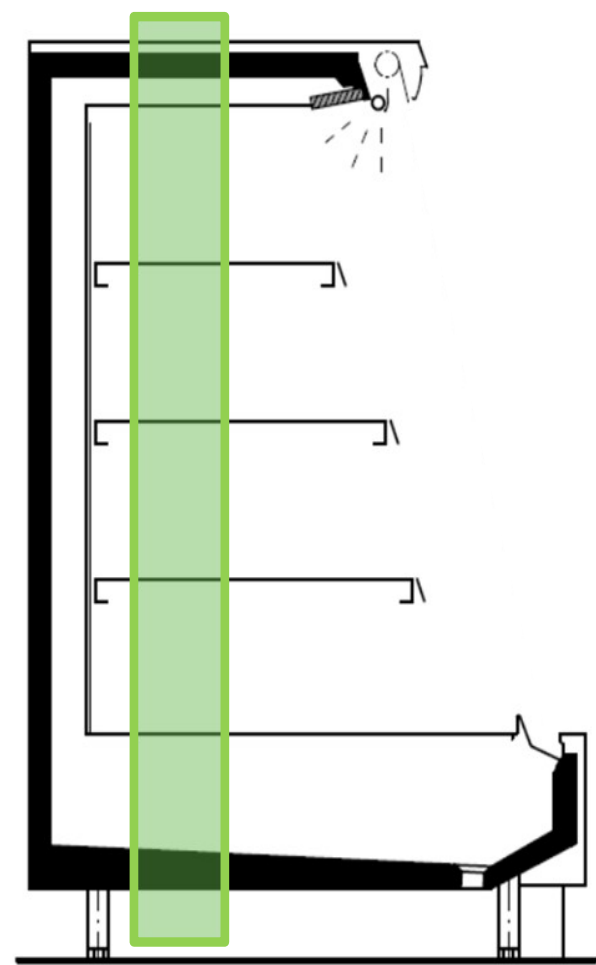
Applicability

- Multiplexable and non-multiplexable units
- Reference model and deducted model must belong to the same product segmentation (e.g. same M and N coefficients)
- Reference model and deducted model have the **same air discharge and air return grid geometry and position to each other**
- Reference model and deducted model have the **same refrigeration components, and same back panel pattern**
- Reference model and deducted model have the **same number of fans, same type of fans, and same fan speed**
- The reduction of the depth of the cabinet must keep the same distance between air outlet and the load limit line
- **Air ducts are shortened in length only**
- Reference model and deducted model have the same temperature class
- $\Delta \text{depth} = [+0; -30\%]$
- Δdepth = delta internal depth of the base shelf

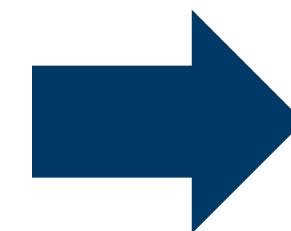
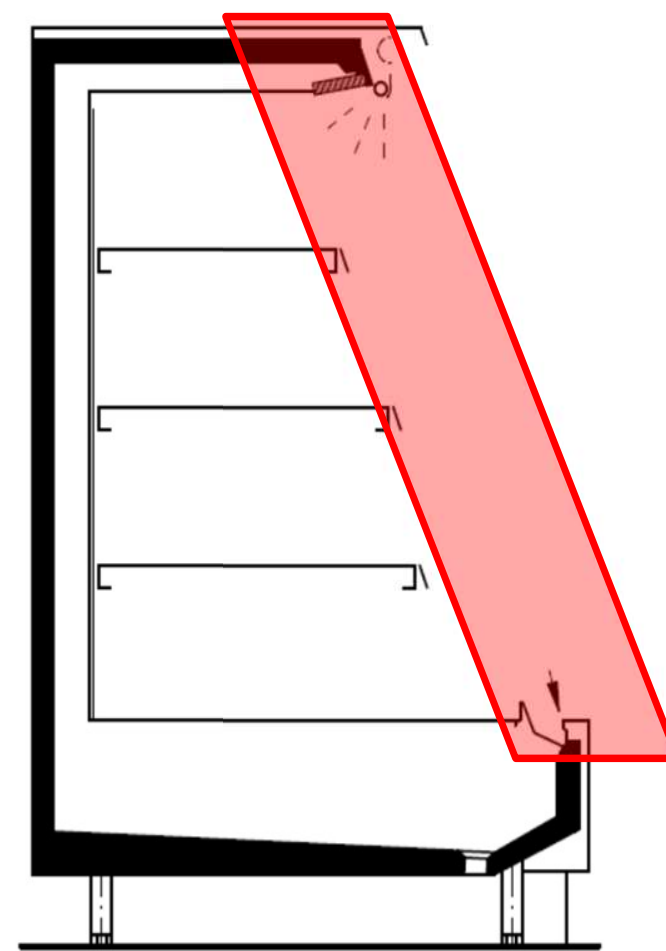
Extrapolation rules

Integral/Semi-plugin: Delta Depth Semi-Vertical cabinets

Depth reduction
with same reference model



Depth reduction results in new model



$$\text{TEC}_{\text{DED}} = \text{TEC}_{\text{REF}}$$

The TEC of a deducted cabinet can be assumed as equal to the TEC of the reference one

Roadmap

1. Welcome remarks
2. Ecodesign and Energy Labelling requirements and EPREL
3. Reference models and extrapolation rules
- 4. Market Surveillance**
5. Incomplete deliveries
6. Q&A
7. Closing remarks

4. Market Surveillance



Mr Daniel Antoñanzas

- **General Manager
EXKAL S.A.**

Market Surveillance and compliance of products Regulation (EU) 2019/1020

Article 3

‘market surveillance’ means the activities carried out and measures taken by market surveillance authorities...

‘market surveillance authority’ means an authority designated by a Member State under Article 10 as responsible for carrying out market surveillance in the territory of that Member State

Article 10

Member States shall organise and carry out market surveillance as provided for in this Regulation



Market Surveillance and compliance of products

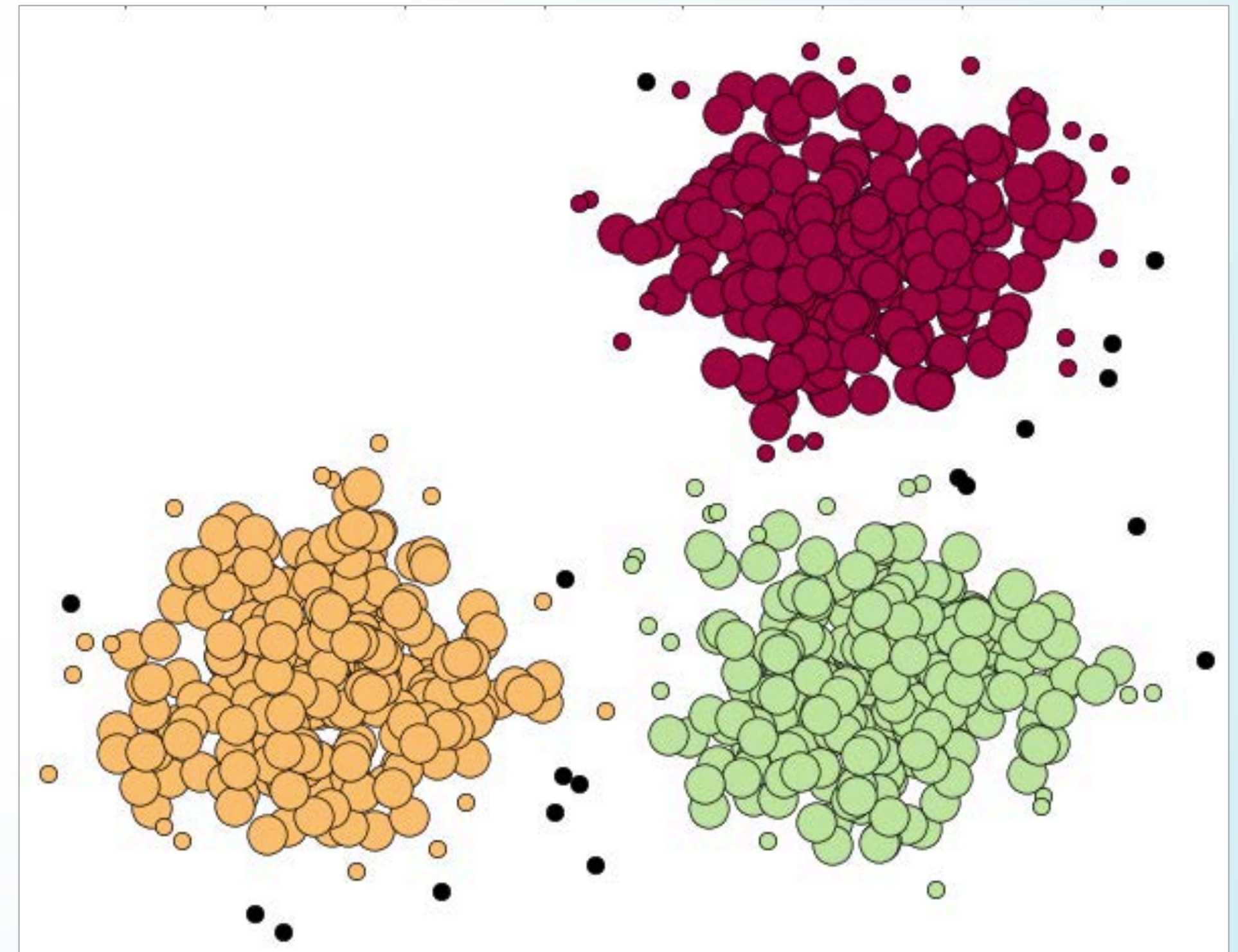
- Regulation (EU) 2019/1020
- The Market Surveillance is not organised at central EU level
- It is organised at local level by each single Member State



Market Surveillance Cluster approach

Cluster

Set of cabinets identified as one model for the purposes of Ecodesign, Energy Labelling and EPREL



Market Surveillance Cluster approach

Manufacturers

- Manufacturers might want to group different models into one model, which is representative of the highest EEI (i.e. worst score) of the listed family
- It is the manufacturers' decision if and how to use the cluster approach

MSAs

- MSAs can access EPREL data related to the mother-model and make use of them for assessing the product under evaluation

Market Surveillance

Verification tests: Which products should be tested?

Suggestion of Eurovent

- **2,5m length** - or the closer length (e.g. 2,44m) - cabinet

Why?

- 2,5m is by far the most common module
- No test capabilities available to carry out tests according to relevant standards for cabinet length $> 2,5\text{m}$
- **$EEI_L = EEI_{2,50}$**

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Incomplete deliveries

Background

- What is placed on the European market must meet the Ecodesign requirements (and is subjected to the CE declaration of conformity)
- Article 2 of the Ecodesign Directive (2009/125/EC)
- Manufacturer's product documentation, EPREL declaration, Energy Label, CE declaration, sales order, and associated invoices must relate to the specific product as it is placed on the market
- This documentation shall include all the components/accessories influencing the EEI of the specific unit at the time of placing on the market

Incomplete deliveries

Placing products on the European market

Option 1



Option 2



— Time of handing over the overall control of product = product is made available on the Community market

Incomplete deliveries

Wrap-up

- It is not possible to place on the market products which could meet the minimum requirements only in a later stage
- Only the manufacturers of refrigerating appliances with a direct sales function can be responsible for their conformity with the Regulations (EU) 2019/2018 and (EU) 2019/2024



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6. Questions & Answers



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Questions and Answers



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7. Closing remarks



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Thank you!

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