



Policy scenario proposals on household refrigeration

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This document describes the policy scenarios that we wish to see covered in the final chapter of the preparatory study (for modelling and assessment).

We only include specific Ecodesign requirements and energy labelling classification here. We also have recommendations regarding generic Ecodesign and information requirements (notably on durability and resource efficiency). We are not mentioning them here because they cannot be easily quantified in a model, however **we expect the final chapter of the study on policy recommendations to also refer to such requirements.**

At this stage, it is difficult to express scenarios for specific Ecodesign requirements and Energy Labelling classes in a precise way, as the background formulas and levels of the energy efficiency index are meant to change in the new regulations, and the new formulas are not stabilised yet. The proposed new approach to the EEI would allocate the same reference line (SAEc) to different refrigerator categories, making them comparable. This is a simplification and a substantial improvement compared to today, but this alignment also means changes to the current situation, with a different impact from one category to another. So it is difficult to use the current EEI reference lines as a basis for future scenarios.

First and foremost, we consider that whatever the final EEI formula, **the Ecodesign requirement levels and label classification should still be the same throughout the whole product lot**, and not differentiated by categories. The only temporary exception could be wine cellar appliances, for which Ecodesign requirements could be more progressive (as they have not been covered by Ecodesign before).

▪ Specific Ecodesign requirements

The Ecodesign Directive specifies that the level of energy efficiency requirements must be set aiming at the least life-cycle cost to end-users for representative models. The preparatory study report (p. 146) reveals that the LLCC level (as calculated in 2015 based on the current EEI formula and not taking into account future learning effects) is between EEI of 20 and 31 (depending on the categories), that is mostly in class A++, or for some A+++.

A basic policy recommendation should be to set a specific requirement at (or close to) the LLCC point as quickly as possible. Expressed with the new EEI formula, it could be chosen at the bottom level of the range of LLCC points for the different product categories (excluding wine coolers, which are treated separately). It should be ensured that this level does not lead to any back sliding (i.e. allowing forbidden products back to the market in some categories).

We propose this tier (at LLCC) one year after entry into force of the Regulation (i.e. around 2019).

In order to provide long-term visibility to the industry, we also strongly support a second more forward looking tier. In line with past policy considerations and recommendations from evaluation studies on the Ecodesign policy, this tier should be set at the level of current BAT, to reflect future decreasing trends on efficiency progress costs that will drive the LLCC point even further.

We propose this second Ecodesign tier at the bottom level of the range of BAT points five years after entry into force of the Regulation (i.e. around 2023).

For **wine coolers** (sold for households or professionals), a more classical set of Ecodesign tiers could be set as for new products regulated, e.g. first tier quickly at the level of current A class (Switzerland has been implementing this level for wine coolers since January 2013), and a 2nd tier at the LLCC level after three years.

- **Energy Labelling classes**

In line with current policy discussions on the revision of the Energy Labelling framework, the label for refrigerating appliances should revert to an A to G scale, with the A and possibly B class empty at start.

We propose to set the F class threshold at the level of the first Ecodesign tier (i.e. current LLCC level), and the C class so that the current most efficient BAT model (irrespective of the category) just reaches this level.

The classes in between can be divided equally. The resulting average improvement step from one class to another can then be applied to set the B and A class levels accordingly.

ENDS.

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