



1st round results

Energy Label Display trends in Shops

WP4
June, 2014

Authors:

Juraj Krivošík
SEVEN, The Energy Efficiency Center
Czech Republic
Juraj.Krivosik@svn.cz

and the MarketWatch consortium
(National chapters written by individual project partners)

Project coordinated by

Frances Downy
Energy Saving Trust
United Kingdom
Frances.Downy@est.org.uk

Supported by

Intelligent Energy Europe



Co-funded by the Intelligent Energy Europe
Programme of the European Union

The sole responsibility for the content of this publication lies with the authors.
It does not necessarily reflect the opinion of the European Union. Neither the EASME nor the European
Commission are responsible for any use that may be made of the information contained therein.



Contents

Background and introduction	3
Energy label display in shops	3
Overview of activities: shop visits and product categories and legislation requirements covered	5
Overview of the shop visit results – Summary	8
Analysis of the shop visit results at a project level	14
Results per product type	14
Results by shop types	20
Specific energy label requirements concerning product information	23
Ecodesign requirements concerning product availability and information	24
Results by Country	27
Other literature and references	63
Contacts	64

Please note that the pictures used in this report are illustrative of typical problems we monitored, and not incriminating the specific manufacturers or retailers.

Background and introduction

Insufficient market surveillance is one of the main obstacles to the full realisation of the energy saving potential of the EU Ecodesign and Energy Labelling Directives. It is estimated that 10% of the expected savings can be wasted due to non-compliant products on the market. This translates into more than 100TWh of annual final energy savings that could be missed in the EU (as much as the current residential electricity consumption of East-and Central Eastern Europe).

National authorities in member states have their role to play in verifying compliance and sanctioning free riders. However, these activities are not the only condition and opportunity for creating a much more compelling climate of compliance and removing free riders' sense of impunity. Civil society stakeholders can play a substantial role, provided they build more capacity, ramp up their expertise in this field and collaborate more at EU level.

The MarketWatch project aims at increasing the involvement of civil society in market surveillance activities related to Ecodesign and Energy Labelling, with the ultimate goal to increase the level of compliance in the EU.

This project brings together a large consortium of environmental, consumer and energy non-profit organisations in several key countries representing 80% of the EU final energy consumption.

Energy label display in shops

One of the fundamental roles energy labels play among consumers is the opportunity to rank and compare products by their energy performance and some other functional parameters. In order that consumers can compare the products and, if they wish, choose more energy efficient models, energy labels have to be clearly displayed at the point of sale.

The need to display energy labels in shops is a legal requirement resulting from European legislation¹ and it is applied in all EU member states.

For most product groups, the labels have to be displayed on the outside of the front or top of the product, depending on its typical shape (differences are of course possible for light sources, TVs, etc.).

¹ Directive 2010/30/EU of 19 May 2010 on the indication by labelling and standard product information of the consumption of energy and other resources by energy-related products, Article 6 – Responsibilities of dealers, as well as each product specific Regulations with regard to the energy labelling

Each product-specific legislation also defines the exact list and order of information which have to be provided to the consumer in case of internet and catalogue selling.

Project activities in energy label display monitoring

The MarketWatch project consortium has prepared and started to undertake a substantial activity consisting of visiting numerous shops and points of sales, including internet shops, and monitoring the proper display of energy labels for all products for which one should be present.

In short, between late 2013 and late 2015, project partners will undergo three rounds of shop visits, in most cases checking label presence in 10 physical and 10 internet shops (with some individual modifications). In total, at the end of the project, more than 300 visits to physical shops and 300 in-depth on-line consultations will have been carried out during the project, covering the most important and suspicious product categories. According to the original plan, assuming an estimate of average of 10 models examined per product category, and at least 3 product categories in-store and 5 product categories online. This represents over **25,000 product being viewed and checked by the MarketWatch project**. In reality, many more products (see below) have been viewed.

The project team will also prepare a specific educational document, informing any interested stakeholders, on how the energy labels should be properly displayed and will distribute this in numerous languages.

Results of individual shop visits, when more than 10% of products displayed would be identified as non-compliant with the label display requirements (label missing or wrongly displayed), will be negotiated with the individual retailers. If no improvement effort is reported, these results will be also shared with the national Market Surveillance Authorities, and – consequently – to the media and general consumers, and through the project's own websites.

The following shop visits have been scheduled to take place three times during the project, with the first spate of shop visits taking place between December 2013 and February 2014 in the following countries:

Country	Physical shop visits	On-line shops / catalogues
Austria	At least 10 visits / year	At least 10 consultations / year
Czech Republic	At least 10 visits / year	At least 10 consultations / year
Germany	At least 20 visits / year	At least 20 consultations / year
Denmark	At least 12 visits / year	At least 12 consultations / year
France	At least 10 visits / year	At least 10 consultations / year
Italy	At least 10 visits / year	At least 10 consultations / year
Poland	At least 10 visits / year	At least 10 consultations / year
Portugal	At least 10 visits / year	At least 10 consultations / year
Spain	At least 10 visits / year	At least 10 consultations / year
UK	At least 8 visits / year	At least 8 consultations / year
Belgium	3 visits / year	3 visits / year

Overview of activities: shop visits and product categories and legislation requirements covered

The following types of shops have been identified and visited by the project team: depending on the situation of each market, partners used their local knowledge and visited either retailers with large market share (mostly electronic superstores) and/or a pre-chosen segment, where problems with labelling were identified in previous surveillance projects (e.g. Come On Labels and UK National Measurement Office's project in 2012). These shops were most often the kitchen studios, furniture and DIY stores or showrooms. Some countries also included supermarkets that sell electronics. The research also emphasised the difference between physical and online shops which were equally represented within the label information checks.

The scope was in general set for all appliances with an energy label, covering:

- the household appliances like washing machines, dishwashers, tumble driers, electrical ovens, refrigerators,
- televisions,
- appliances previously identified as least likely to bear a label such as air conditioners and wine storage appliances.
- energy saving lamps were also checked (these have specific conditions as the label has to be printed on the original package)
- most participants checked all types of appliances while only a few omitted certain types of product categories based on the (low) market availability or penetration, or previous positive experience of compliance.

Regarding energy labels as such, the survey focused on monitoring the following basic requirements concerning the proper label display:

- label placement: energy labels typically have to be shown on the top or front of the appliance (except e.g. TVs, and light sources)
- label format: especially old energy labels have proven to be a matter of incorrect formatting as they often come in two pieces that have to be put together, labels can't be printed in-house by the retailer, edited or hand written by the shop assistant, etc.
- model mismatch, when a different label would be applied to a specific model unit
- energy label missing entirely
- for the electronic shops, the information was monitored by following the prescribed list of information, which is defined in product-related energy label legislation and which has to be displayed in a pre-defined order.

Product fiche:

Besides the energy label, products offered for sale also have to be accompanied by a fiche, which is a document containing additional information about the product's performance characteristics. The specific list of information is defined in each product's specific legislation.

Partners have looked for the fiche or asked the retailer staff for at least two models (various manufacturers) from within two different product categories. The availability of fiches and retailer awareness about them was also monitored.

Energy label SuperDeclarations (*Any A+++++ or A+++-X% energy classes*)

Products claiming to consume less energy than a certain energy efficiency class, are sometimes declared as class A-X% or A+++-X%.

This declaration may be misleading for consumers since such percentage declaration is typically calculated from the bottom level of the specific energy efficiency class.

The energy label legislation does not allow the label to be modified, so energy labels displayed in physical shops mostly do not display such modified class declaration. However, products displayed may be covered by stickers or printed catalogues that declare the energy class in this format.

These declarations are also often found online as the energy class specification.

Advertisements / Energy class missing in advertisements containing price of the product:

One of the requirements of the energy label legislation is to display energy class information in adverts, whenever a specific model price or technical specification is promoted.

Some partners have therefore also collected catalogues and advertisements, for which the product's energy class information was missing.

Similarly to the other activities, this information is also shared with the responsible stakeholders, and the authorities.

Further to energy labelling legislation, Ecodesign legislation also specifies a wide set of requirements, concerning energy efficiency parameters, but also specific information to be made available to consumers. The project team has therefore monitored the availability of products, which have been declared and labelled as an energy class that already should no longer enter the market. Further to this, some other Ecodesign requirements are easily tested or noticeable, for example; the team also monitored whether a proper display of 'standard' programme was present on panels or displays of washing machines and dishwashers.

The following Ecodesign requirements have been monitored:

- Lamps: Incandescent lamps available
(Since 9/2012 only class D and better non-directional lights on the market)
- Refrigerators: Compressor type energy class A and below
(Cannot enter market since 1/7/2012)
- Washing machines: Energy class B and below
(Cannot enter market since 1/12/2011)
- Washing machines: 'standard' programme clearly identifiable on the panel (Text or Symbol)
- Dishwashers: Energy class B and below. (60 cm wide models only)
(Cannot enter market since 1/12/2011)
- Dishwashers: Default standard cleaning cycle on the panel (Text or «Eco»)
- Tumble driers: Energy class D and below

Overview of the shop visit results – Summary

Main findings

Energy labels:

In its first round, MarketWatch partner organisations checked 67,638 single products in 225 physical and online shops (51:49%) in 11 EU countries.

All categories of shops combined:

Category:	Labelled correctly	Wrong format	Wrong placement	Label does not match model	Not labelled / Missing
N. of units:	22,030	14,864	663	39	3,746
Share:	53%	36%	2%	0.09%	9%

Only 53% of all checked models were considered as labelled fully correctly. The main error was identified as retailers using an incorrect format both in online and physical shops.

Incorrect formatting issues are specific according to type of shop (online/physical) and type of product, and include cases where, for example, e.g. only partial information is being provided by online shops. Some products seem to have specific problems based on the nature of the label (new/old label type etc) (see below). A minor problem seem to be related to the label placement, where in total only 2% of labels were incorrectly placed – hidden in the appliance, covered etc.

Nearly no instances were observed for labels not matching the correct models.

The missing labels rate was calculated as 9%, and seems to be related to certain type of shops, mainly the kitchen studios and furniture stores, as expected and experienced in previous similar activities. These type of shops, however, represent only a small portion of checked products, and most likely, by extension, of the market share in general.

Overview for physical shops:

Category:	Labelled correctly	Wrong format	Wrong placement	Label does not match model	Not labelled / Missing
N. of units:	12,300	1,261	440	22	1,930
Share:	77%	8%	3%	0.14%	12%

The project shop visits confirm that energy labelling display in physical shops in the eleven participating countries is generally at a rather high level. As many partners focused on retail points that are more prone to miss labels or use them in a wrong way, the results do not represent a full market picture. Shops such as kitchen studios or furniture stores would often have no labels or place them in a less visible place, which is wrong. On the other hand a typical failure in an electronic superstore would be an on-site printed label or otherwise where the label was changed or edited by the staff, especially in case of the old type of label. Labels not matching the specific models to which they are attached were rare and also all types of e-shops, when belonging to physical retail chains, show similar types of non-compliance categories.

Overview for internet shops:

Category:	Labelled correctly	Wrong format	Placement	Label does not match model	Not labelled / Missing
N. of units:	9,730	13,603	223	17	1,816
Share:	38%	54%	1%	0,07%	7%

Energy labelling, or displaying the energy label related information in e-shops seems to not be working well in terms of delivering the full set of information (as required by the respective legislation). Nearly always, there is energy class information for the specific model, however some additional information is often incomplete and not in the right order. Within the internet shop segment, there are very few differences between the different countries inspected.

It is therefore one of the main findings of this research round, that the internet shop segment is not displaying the information in full scope or proper order and that a new relevant legislation (entering force 1 January 2015) might be very useful in this regard.

Most common mistakes observed:

The main problem with providing information on the energy label relates to online sales, where part of the prescribed information may be missing, or is displayed in an incorrect order.

Other examples include only partial labels and in-house versions of labels; wine storage appliances often come without any label.

Appliances displayed with no or modified energy label:



Ecodesign Requirements: The main issue related to the Ecodesign Directive requirements for sale of consumer products is identification of the standard programme for dishwashers and washing machines on appliances. This information should be shown either as a symbol on washing machines or text saying ‘standard programme’ or ‘eco’ for dishwashers. It was not clearly identifiable on 26% of checked washing machines and 22% of dishwashers.

This requirement is intended to help consumers see which programme the energy label refers to and make an easier buying and operation decision with regard to intended use. In reality, this seems not to be the case with every fourth or fifth appliance.

These figures are indicative only, however, due to the fact that the information on the ‘standard programme’ should be displayed either on the model’s panel, or electronic display, if any. Since products are in off-mode in shops, it is typically not possible to verify the display of the standard cycle for (the increasing number of) models which have the electronic display.

Have inefficient models (below Ecodesign legislation requirements) been found on the market?

In general, out of the nearly 70,000 checked appliances, MarketWatch researchers found only 1,872 machines with energy classes lower than allowed (at the time of the survey) to enter the market.

Out of all product categories checked, the category with the highest level of non-compliance were the lighting products: The highest rate was found for lamps, with 1,402 incandescent lamps seen in shops, representing 5.3% of checked lamps (labelled as energy class E, incandescent lamps).

Over three hundred (3%) of refrigerators of class A and below were seen, rates for “outdated” washing machines (1.7%), dishwashers or tumble driers (both below 1%) were low.

Selling old stock of these appliances is not forbidden and it was not possible for MarketWatch to check market entry dates (this can only be officially done by market surveillance authorities). Based on the results, we can presume that there are very little signs of supplying the market with outdated products in terms of Ecodesign, with the exception of incandescent light bulbs (but which could also have come from the large stock built before phase-out as they are cheap and easy to store).

Examples of incandescent lamps found on the market:



It is difficult to derive summary data for fiche documents availability, due to the low number of checks organised within the project in comparison to the full market size (only two product categories with two models each were checked in each shop visits, not all products displayed). However, we can say that these were only partly available or unavailable, depending on the country, type of the shop and type of appliance. Results show more-or-less random availability, based on local conditions and a different level of information and internal document display procedures of the retailer.

Example of a product fiche found in shop:

Product fiche pursuant to Delegated Regulation (EU) no. 1060/2010	
Model	BIAA 10
Energy efficiency class on a scale from A+++ (low consumption) to G (high consumption)	A+
Storage volume fridge compartment (l)	182
Storage volume freezer compartment (l)	48
Design temperature of fridge compartment	+5 °C
Design temperature of freezer compartment	-18 °C
Design temperature for wine compartment	N/A
Temperature rise time in case of blackout (h)	17
Climate class : W[climate class] 3)	N-ST
Built-in model	NO

1) Refrigerator with one or more fresh-food storage compartments. 2) Refrigerator-cellar, Cellar and Wine storage appliances. 3) Refrigerator-cellar and Refrigerator with x 0-star compartment. 4) Refrigerator with a one-star compartment. 5) Refrigerator with a two-star compartment. 6) Refrigerator with a three-star compartment. 7) Refrigerator-freezer. 8) Upright Freezer. 9) Chest freezer. 10) Multi-use and other refrigerating appliances.
 1) Based on standard test results for 24 h. Actual energy consumption will depend on how the appliance is used and where it is located.
 2) This appliance is intended to be used at an ambient temperature between 2 [lowest temperature] °C and 7 [highest temperature] °C. 3) N=Extended temperat., ambient temperature between +16°C and +32°C; N+ Temperat., ambient temperature between +16°C and +32°C; ST=Subtropical, ambient temperature between +16°C and +30°C; Tropical, ambient temperature between +16°C and +43°C.
 4) Further information, please visit Infratell web site.

MarketWatch could also see common SuperDeclarations (e.g. A+++++ or A+++–X%) in all countries for some products, often directly placed as a sticker on the appliance. This leads to a suspicion, that it is a common and deliberate practice by manufacturers and not a matter of misunderstanding or lack of information in retail endpoints. While on the one hand it also indicates the success of energy labelling as a marketing tool and by bringing ever more efficient models to the market, such declarations are not subject to formal market surveillance. These declarations may be misleading to consumers (as they typically link to the bottom of the respective class), and should not be formulated as a formal part of the energy label (which at least in catalogues and internet declarations these usually are).



Concerning advertising information, partners have collected material such as catalogues and newspaper ads, where we could see individual cases (impossible to derive an overall statistics) of missing energy classes, most commonly for televisions. In individual cases, the team also noted a model advertised as the cheapest one offered, without the energy class declaration, while all other models in the catalogue had an energy class highlighted.





Note: this shop catalogue for washing machines and dryers has energy classes highlighted, but one model is missing it, where a claim is made that it is the cheapest model on the market.

Further comments

The general data presented in this document has to be taken as indicative rather than empirical, linking to the most significant trends observed. It is an initial baseline for the three year project, with two more similar rounds of shop visits following in 2014 and 2015.

A rough comparison with former projects is possible on specific country levels where the work follows up their findings. There are several methodological challenges, such as comparison of results between countries; different choice of sample shops; and sometimes even types of goods not all included in the first round in all countries. This may bias later results. Some data, such as fiche checks, super-declarations or advertising, are difficult to analyse as they are anecdotal or not based on a statistically significant sample of the market.

Project' s next steps:

- **Escalation of results:** individual project partners are negotiating their findings with individual shops or retailer chains, pointing them to the most significant violations of the legislation. Results are also being shared with national market surveillance authorities, discussing the trends observed and offering cooperation in future project activities.
- **Next rounds of shop visits:** A second and third round of shop visits are planned for late 2014 and 2015. The same individual shops will be visited, if shown a significant degree of non-compliance, and in general, again, shop types with the highest degree of non-compliance will be visited, to monitor specific improvements.

Analysis of the shop visit results at a project level

Results per product type

The following chapter comments on the proper display of energy labels per product category.

	Labelled correctly	Partly / Incorrectly labelled			Not labelled
		Format	Placement	Model match	
Refrigerating appliances	62%	31%	1%	0%	6%
Wine storage appliances	44%	37%	1%	0%	18%
TVs	62%	21%	0%	0%	16%
Washing machines	53%	40%	2%	0%	4%
Dishwashers	57%	39%	2%	0%	3%
Air conditioners	18%	61%	2%	0%	20%
Electric ovens	29%	54%	3%	0%	15%
Tumble driers	43%	42%	2%	0%	13%
Washer driers	30%	58%	1%	3%	8%

Note: the table combines both the physical and online shops, and the new and old energy labels. The totals may not sum to 100% due to rounding.

- Refrigerating appliances:** Represent a large sample (nearly 11,000 appliances inspected) with rather positive results, which was predictable, since energy labels for this category of white goods has been under the spotlight for a very long time and subject to significant efficiency improvements. 94% of models reviewed were labelled and 61% of those with the new label were labelled correctly, which is the second best rate of compliance in the study. The only problematic portion in physical shops are those with the old energy label consisting of two pieces, where 29% of models displayed had a label with some sort of a wrong format. This may indicate that the new label has solved these issues (black and white, one part missing, hand written, wrong language, etc.) to a large degree. The most common problem was incorrect format of the label, reported often as an in-house printed or otherwise edited label.

Example of a wrong display of an old energy label:



- **Wine storage appliances:** This is typically only a niche market product, the second smallest sample within this survey at 580 appliances monitored, mostly from online shops in the Czech Republic, Denmark, Germany, Italy, Portugal and Spain. However, 18%, the second highest figure, were not labelled at all, while 44% were labelled correctly. The prevailing problem with labelling format could be possibly linked to a general problem of data provision and order in the online shops (see more below), as well as with the placement of the label in physical shops. While the specific sample is too small to derive formal conclusions, the trend indicates that this type of product is among those missing labels most often.

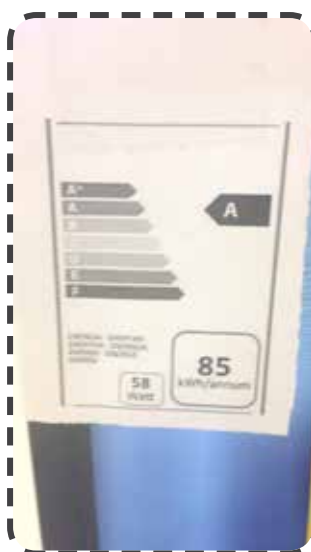
A product offered without a label



- TVs:** A rather large sample of 8,089 models monitored did reveal the highest share of correctly labelled units (62%) and also a rather high share of missing labels (16%). Format issues were again the primary problem with in-house printed labels and, specifically for TVs, a hard on/off box without the tick on the original label, which is not appropriate. In Germany MarketWatch found TVs with an empty tick on the label that actually had a hard on/off switch. This means that the manufacturer has modified the design of the label, which is not in line with the specific legal requirements. It is most likely a mistake by a manufacturer when there is a misunderstanding of the specific requirement and/or the ability to modify the design of the energy label. (Note: MarketWatch Austrian and Belgian partners did not check TVs, mainly due to alternative retail sector selection.)

Televisions with no energy label displayed

TV label modified by the retailer



If the Energy Label has an icon without a tick in the hard on/off switch symbol then this is a non-compliance because the icon graphic has been modified outside the bounds of the regulation as the icon should only be shown with a tick in or not at all. This has been be classified as a format non-compliance.

- Washing machines:** MarketWatch inspected a sample of 7,613 models, finding the second best results in terms of labels presence, at 96%. Half the appliances with the new label were labelled correctly, which is relatively good. Old label problems are similar to those described with refrigerators. Some 126 models of the sample suffered from incorrect placement of the label. Washing machine labels seem to be rather well established and understood in terms of energy labelling. Washing machines without labels could sometimes be found in supermarkets or hypermarkets

Washing machines without energy labels



- **Dishwashers:** This category achieved the best results, with 97% of models labelled and 55% of full and correct display of the new label. Most problems were linked to label format. Two percent of dishwashers with the new label (127) had misplaced labels, often inside the appliance. With respect to general issues common for all types of appliances, energy labels for dishwashers enjoy a similar level of establishment and understood by retailers as washing machines

The energy label put inside a product (should be placed outside)



- Lamps:** Of all product groups inspected, the largest sample was lamps where 26,294 light source models were checked. Due to the fact that the energy label for lamps is printed on packaging, the retailer is not able to make mistakes displaying the label. Lamps were therefore not included in the total summary and were only a subject to inspection of their Ecodesign requirements, represented by the presence of incandescent lightbulbs in shops, which made up 1,402, or 5.3% of products seen by the project partners. The presence of energy labels on product packaging seems not to be a problem. But the demand for and a display of incandescent lamps at shop shelves and online stores remains an issue, possibly due to a persistent lack of consumer confidence (or information), or opposition to energy saving lamps.

Incandescent lamps in class E offered



- Air conditioners:** This category saw the smallest sample checked by MarketWatch – 489 models from the Czech Republic, Denmark, Germany, Italy, Portugal and Spain, with approximately two thirds from online retailers. The worst results were recorded for this product category, with 20% of labels (or energy information for online product pages) missing and only 13% labelled correctly. Only 9% of labelled air conditioners online were labelled correctly, which is again linked to the wrong data format seen for most online products. In physical shops, the situation is not much better, with an 18% correctness for old label and 27% with the new label. Besides that, correct placement of the label is occasionally problematic.

Air-conditioner energy label modified



- **Electrical ovens:** 5,529 ovens were inspected by MarketWatch, often in kitchen studios or furniture stores. Seventeen percent were missing a label, but 60% were labelled correctly, even though ovens still only use the old style label. Ovens sold online often lacked required data or the order of the data presented was wrong. In physical shops, 6% of the appliances displayed had a misplaced label (mostly inside the oven) and the rate of incorrect formatting was among the highest in the study. The data confirmed the earlier findings by e.g. the Come On Labels project suggesting that for ovens, not only those sold in kitchen studios, aesthetics may be more important than energy related information in the eye of quite a number of retailers.

A missing energy label for an oven



- Tumble driers:** This category produced average results, with 13% of driers missing labels out of 1,635 models checked. This product category was not checked in Belgium, France, Italy and Poland, mainly due to a low market presence of this product category. Sixty percent of appliances with the new label were labelled incorrectly. In physical shops, this figure was, however, 26%, which is a relatively low figure. Common problems were label format and also some misplacement. For tumble driers, the main challenge seems to be the correct provision of energy related information in online shops.
- Washer-driers:** This is a niche product in a number of countries, and represents only 1.6% of all models surveyed. So far, washer-driers only display the old style label. Some 92% were found to be labelled in some way and some 30 % of them labelled fully correctly. A vast majority, however, (595 appliances out of 669) were checked online and suffered from online issues, such as information being provided in an incorrect order. Results in physical shops were similar to those for washing machines, with a high rate of format issues.

Results by shop types

Our research found that both physical and internet retailers have their specific problems with fulfilling certain sets of legal requirements.

Shop type and number of shops visited	Total number of shops	% of all shops
Electronic Superstore	38	17%
Electronic specialist	21	9%
Kitchen studio / Furniture store / DIY store	23	10%
General super/hypermarket / Cash and Carry	27	12%
Department store	5	2%
Mail order and internet store	111	49%

While energy labels have to be displayed in physical shops, **online shops** do not need to show an image of the label, but do have to provide a list of required information, and to provide it in the right order to allow consumers an easy comparison of different models.

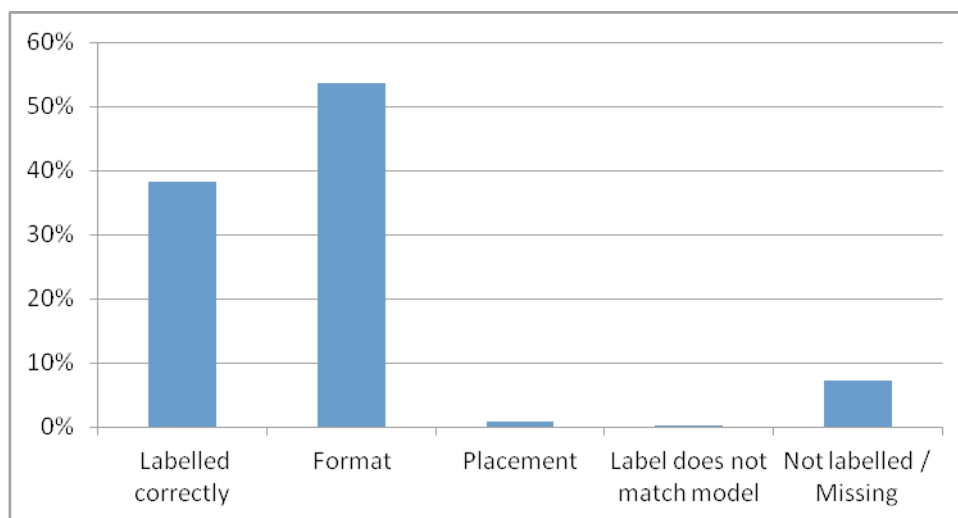
The complete and correct order of information seems to be the main challenge for online retailers. As a result, only 38% of products sold online (25,391) were labelled correctly, due to format problems (proper order of information displayed) (54%).

On the other hand, all energy label related information missing can be found less frequently than in physical shops (7% missing all information vs. 12% missing the energy label) – which means that at least some information on energy performance, e.g. the energy class or annual consumption figure, is made available, in comparison to a situation of a fully missing label for physical shops. Exceptions were found for wine storage

appliances and air conditioners, where MarketWatch found more than half, and one third, respectively, of models with completely missing information in online shops (e.g. no energy class of energy consumption figure provided). The best results were recorded for TVs, with 52% correctly labelled (70% in physical shops).

It has to be noted that incorrect ordering of information online or information partially missing (monitored as the “Format category” in our research) is one of the main reasons for the low overall rate of correct labelling, at only 53%.

Chart: Results for online shops:



An example of an online store offering a product without full information



Refrigerator (A+++)

Artikelnr.: 276
 Hersteller: Gorenje
 Lieferzeit: 2-6 Werktage
 Abmessungen: ca. 50 x 40 x 180 cm

UVP € 599,00
€ 448,95
 inkl. gesetzl. MwSt. 19,00%

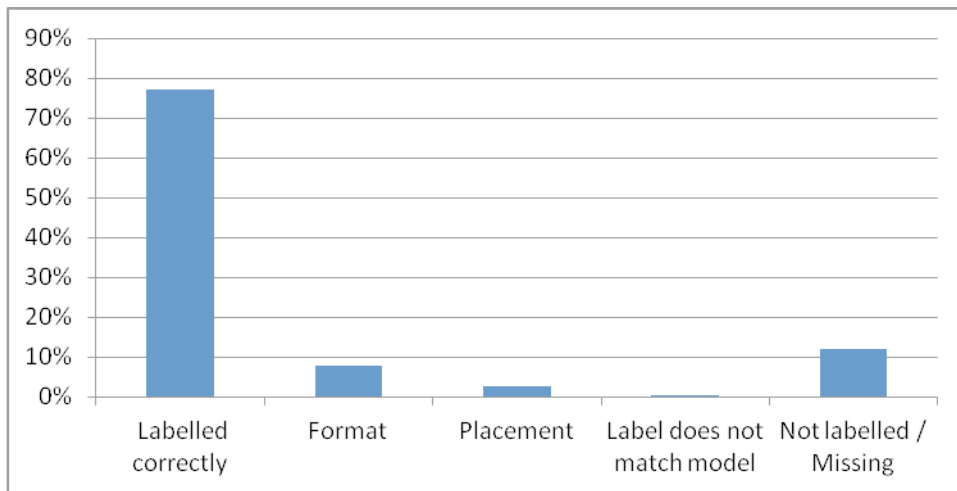
Technische Daten

Bezeichnung	Gorenje CE21N2Z
Energieeffizienzkategorie (Skala von A++ (niedrigster Verbrauch) bis G (höchster Verbrauch))	A+++
Geschätzter Energieverbrauch pro Jahr (kWh)	208
Klimaklasse	-
Türverriegelung	Nein, verriegelbar
Lagerzeit bei Bildung (h)	20
Bruttogewicht (kg)	50
Gehäusefarbe (ggW Stb.)	SS
Nutzenwert gesamt (kWh)	158
Nutzenwert Kühlteil (kWh)	-
Nutzenwert Gefrierfach (kWh)	158
Stromabgabeleistung (Wattmeter)	1100
Deckenmaß (H x B x T) (mm)	1880 x 600 x 600

Physical shops: Out of 15,953 products reviewed (excluding lamps), 12% had no label. Of those that did, a rather high proportion, 77 %, were labelled correctly.

The most common format-related problems observed by national MarketWatch partners related to energy labels being edited or printed in-house. Ovens and products sold in kitchen studios or showrooms rarely showed labelling information. However, with the total number of these shops checked being low, the influence on total results is minimal. The least labelled appliances are the same as for online retailers: air conditioners and wine storage appliances, but also TVs (34, 54 and 23 % respectively). Air conditioners and wine storage appliances also belong to the product categories with the least level of correctly labelled models.

Chart: Results for physical shops:



Products offered for sale without an energy label in a kitchen studio



Table: Comparison of shop visit results (all products combined) between physical and online shops

Category:	Labelled correctly	Wrong format	Wrong placement	Label does not match model	Not labelled / Missing
All shops:	53%	36%	2%	0.09%	9%
Physical shops:	77%	8%	3%	0.14%	12%
Internet shops:	38%	54%	1%	0.07%	7%

Specific energy label requirements concerning product information

One of the project activities of the MarketWatch within the shop visits has been to monitor also the presence of a “Product fiche” for randomly selected products.

While for the energy labels monitoring part the goal was to review all products displayed in a given shop, for the product fiche the plan was to ask for it for two different product categories with a fiche requirement, and, for each of them, for two different products from various manufacturers.

As far as the consortium members are informed this was the first activity of this kind in the EU.

The general purpose of the product fiche is to provide additional information to consumers, allowing them to learn a more detailed information about the product performance, and a better comparison between models.

Product specific energy label legislation specifies a fiche’s content and states that it is a responsibility of the suppliers to make the fiche available.

MarketWatch observed the following situations in various shops:

- The retailer’s staff were aware of it and the document was made available
- A consumer catalogue type of documentation was provided, but possibly with some information lacking
- A reference to the manufacturer’s website was offered by staff or claimed to be available
- No information was provided and/or a staff member was not aware of the fiche
- Staff claimed that there is no strict requirement to make the fiche available.

The legislation states that, for physical shops, the document “should be made available”, but does not specify that it should be made clearly visible, as it does for the energy label itself. The fiche can be made available in various formats and it is not specified exactly how it should be “made available”. Also the forms in which it was possible to find it varied by different countries, types of shops, individual shops, and product brands. Therefore, the presence of the fiche is more difficult to track, given that the method of displaying and the format of the document is not prescribed.

As for internet shops, where the legal requirement for a fiche applies equally, a link is very rarely made to a specific document, or a full set of information displayed in the product's page of technical specification.

The lack of the product fiches, or equivalent information for products sold online, was also frequently monitored, with no or rare links to such specific documents, or the products' technical specifications did not contain all information prescribed by the fiche.

By using the anecdotal experience from the project's shop visits, it can be also assumed that the awareness of both retail staff and most likely also the consumers is not high enough to use the information from the fiche fully.

An example of a product fiche

Product fiche pursuant to Delegated Regulation (EU) no. 1060/2010	
Model	BIAA 10
Energy efficiency class on a scale from A+++ (low consumption) to G (high consumption)	A+
Storage volume fridge compartment (l)	183
Storage volume freezer compartment (l)	48
Star rating multi-use compartment	
Design temperature of fridge compartment	+5 °C
Design temperature of freezer compartment	-18 °C
Design temperature for wine compartment	
Temperature rise time in case of blackout (h)	17
Climate class - (W)climate class (3)	N-OT
Built-in model	NO

1) Refrigerator with one or more fresh-food storage compartments. 2) Refrigerator-cellar, Cellar and Wine storage appliances. 3) Refrigerator-chiller and Refrigerator with a 3 star compartment. 4) Refrigerator with a one-star compartment. 5) Refrigerator with a two-star compartment. 6) Refrigerator-chiller. 7) Refrigerator with a three-star compartment. 8) Refrigerator-freezer. 9) Single freezer. 10) Chest freezer. 11) Multi-use and other refrigerating appliances.

2) Based on standard test results for 24 h. Actual energy consumption will depend on how the appliance is used and where it is located.

3) This appliance is intended to be used at an ambient temperature between X (lowest temperature) °C and Y (highest temperature) °C. 30=Extended temper., ambient temperature between +5°C and +32°C. No. Temperate, ambient temperature between +16°C and +32°C; 85=Subtropical, ambient temperature between +16°C and +32°C. 95=Hot, ambient temperature between +16°C and +32°C.

For further information, please visit www.ec.europa.eu/energy

Ecodesign requirements concerning product availability and information

One of the main features of Ecodesign legislation is to define certain efficiency **thresholds**, below which a product should not be placed on the market. The definition of a threshold and its possible changes over time are the result of detailed studies and processes related to the preparation of the product specific legislation.

The specific requirements of the threshold are typically defined by an energy efficiency index and the threshold limits apply after a certain date. Selling products that do not fulfil a threshold after the specific date is possible, provided these entered the market before the threshold was applied. MarketWatch project partners did not have the opportunity to verify when individual product were placed on the market, since only market surveillance authorities can effectively monitor this. However, given that the specific stages have in most cases been longer than 18 months before the project's shop visits, it can be expected that most of the products, which indicated energy class below such a threshold, entered the market after the specific dates.

See the table below for an overview of product categories checked and the respective dates when the specific legislation entered force (note that MarketWatch shop visits took place between December 2013 and February 2014).

	Total number of products displayed	Number of noncompliant products observed	% of products reviewed not meeting criteria
Incandescent lamps available	26,294	1,402	5.3%
(Since 9/2012 only class D and better non-directional lights can be placed on the market)			
Refrigerators: Compressor type energy class A and below	10,941	323	3.0%
(Cannot enter market after 1/7/2012)			
Washing machines Energy class B and below	7,613	128	1.7%
(Cannot enter market after 1/12/2011)			
Dishwashers Energy class B and below	5,799	11	0.2%
(Cannot enter market after 1/12/2011)			
Tumble driers Energy class D and below	1,635	8	0.5%

Based on the overall findings of this report, it can be concluded that a minority of products on the market did not fulfil this ecodesign requirements. This can most likely be attributed to a quick market development and evolution of a given product, where the upper energy classes are taking a higher share on the market, or, possibly, there was unambitious and insufficient Ecodesign minimum requirements set in the regulatory process.

The product category with the highest numbers not fulfilling the specific Ecodesign requirements were light bulbs, a category which has attracted by far the most attention of all products subject to Ecodesign legislation. It appeared within the shop visits (e.g. by prominent product display or marketing claims made) that numerous retailers probably continue to stock these products on purpose.

For white goods, the number of products below the predefined threshold was not significant, and no correlation was found by the project research among various regions of the EU relating to a higher or lower level of their market penetration.

The other feature prescribed by Ecodesign is to provide information concerning **standardised cycles for a given product**. The aim of the indication of the standard cycles is to help consumers to understand which performance cycles have been used for the definition of the product's energy efficiency class and that these cycles may be the most energy efficient ones offered by the given model.

The compulsory indication of the standard programmes on the product's panel or display apply to the following product categories:

<p>Washing machines 'Standard programme' clearly identifiable on the panel (Text or Symbol)</p>
<p>Dishwashers Default standard cleaning cycle on the panel (Text or "Eco")</p>
<p>Tumble driers Indication of 'standard cotton programme' on the display / programme selection device (applicable only since 11/2014)</p>

The legislation specifies the specific text which has to be used to indicate the performance cycle.

For washing machines, predefined symbols are also allowed:



For dishwashers, the word Eco is also commonly used. While not specified in the legislation, there is a claim of agreement around this formulation by standardisation bodies.

When the visibility of the text or icons was verified by MarketWatch, for 26% of washing machines and 22% of dishwashers it was not possible to identify the standard or eco programme or see the symbol. These rates did not differ much between physical shops and online shops (if picture quality of the model in online shop allowed to verify).

These figures need, however, to be taken cautiously, due to the fact that a number of models of washing machines and dishwashers also offer electronic display panels where this information could be made available, but which are turned off when displayed at points of sale.

MarketWatch believes that clear display of the standardised performance cycle is needed to allow consumers to identify and select the most energy efficient product based on a standard performance programme and that consumers should be made more aware of this type of information and its meaning.

Results by Country

The following section describes the main activities and findings of individual MarketWatch project partners when performing first round shop visits.

Shop visits were mainly undertaken between December 2013 and February 2014. The following is a country breakdown of shop visits by number:

Country	Physical shop visits	On-line shops
Austria	10	10
Belgium	3	0
Czech Republic	11	10
Germany	22	20
Denmark	10	13
France	10	10
Italy	10	10
Poland	10	10
Portugal	10	10
Spain	10	10
UK	8	8

The samples taken from individual markets are too small to be statistically significant, but do allow for the identification of certain trends. It will also allow MarketWatch to hone further inspection rounds towards specific market segments.

Number of products seen by individual project partners during the first round of the MarketWatch shop visits:

		Refrigerating appliances	Wine storage appliances	TVs	Washing Machines	Dishwashers	Lamps	Air conditioners	Electric Ovens	Tumble driers	Washer driers	Total:
UK	Online	170	0	80	161	129	10	0	76	53	49	728
	Physical	262	0	37	123	58	54	0	159	65	19	777
Spain	Online	895	90	53	446	54	0	77	337	370	146	2468
	Physical	175	34	429	381	74	3859	14	75	25	3	5069
Portugal	Online	485	13	271	621	514	204	115	269	115	73	2680
	Physical	133	2	154	48	48	19592	28	30	15	0	20050
Poland	Online	2420	0	1618	1931	1195	0	0	1606	0	0	8770
	Physical	623	0	619	543	216	286	0	277	0	0	2564
Italy	Online	141	60	117	0	0	0	98	115	0	0	531
	Physical	775	11	861	0	0	10	81	263	0	0	2001
France	Online	104	0	100	102	103	0	0	100	0	0	509
	Physical	266	0	242	205	97	0	0	165	0	0	975
Denmark	Online	1192	20	338	183	480	0	3	8	57	0	2281
	Physical	228	3	322	104	79	745	4	75	51	0	1611
Germany	Online	1109	156	766	490	588	598	36	429	314	144	4630
	Physical	1282	11	1195	761	804	936	0	907	153	52	6101
Czech Republic	Online	297	167	222	263	295	0	31	172	103	114	1664
	Physical	267	13	665	299	84	0	2	121	15	0	1466
Belgium	Online	0	0	0	0	0	0	0	0	0	0	0
	Physical	117	0	0	0	46	0	0	61	0	0	224
Austria	Online	0	0	0	601	786	0	0	284	202	69	1942
	Physical	0	0	0	351	149	0	0	0	97	0	597

Overview summary per country

Austria: Non-compliance was mostly found online, with necessary information often missing. In physical shops, no major problems were identified. The most frequent case of non-compliance was incorrect placement of the label and failure to identify standard programmes. No large regional differences or product-specific issues were identified. Super-declarations were routinely found. Austria did not check for TVs and lamps.

Belgium: A focus on kitchen studios confirmed previous findings by other projects and there were high rates of non-compliance in terms of missing labels. The situation in superstores was much better, but super-declarations were commonly found. Incorrect label format proved to be a common problem. Fiche documents were generally available.

Czech Republic: The majority of products checked took place in superstores and hypermarkets, plus a few from kitchen studios. There were a lot of labels missing entirely, especially for TVs and electric ovens. No major problems with placement or format were found in physical shops, but online, in a majority of cases the information format was wrong or incomplete.

Denmark focused on shops with large market share and did not find any systemic problem of missing labels, yet some cases were found. The main non-compliance issues were due to in-house printing of labels. Some super-declarations were found.

France: Visits to well-known physical and online shops took place. The main issue found was incorrect format of labels online. Labelling in physical shops was better, with missing labels as the prevailing issue of non-compliance. Fiches were widely available. Products with banned energy classes, especially washing machines, were seen. Super-declarations were observed mainly in e-shops.

Germany: There was a focus on big market players, superstores, electronic retail chains and kitchen studios. Results online were fairly good, with the exception of ovens and refrigerating appliances. The main examples of non-compliance in physical shops include missing energy labels for TVs as well as old labels displayed with missing data stripes for washing machines and dishwashers. There were also some super-declarations and problems in identifying the standard programme for washing machines.

Italy: Inspections were carried out in electronic retail chains, showrooms and supermarkets. The most common occurrences of non-compliance were found online and in supermarkets, with showrooms performing well online. Major problems in physical shops included missing fiche documents, incorrect placement of labels and labels missing altogether for TVs. On the positive side, no incandescent light bulbs were found.

Poland: MarketWatch mainly inspected superstores specialised in electronics, but also general hypermarkets and kitchen studios, both of which performed worst. Missing labels, followed by formatting issues and misplacement of labels represent the most common cases of non-compliance. Online, there were important cases of non-compliance in terms of the incorrect order of data. Standard programmes were difficult to identify, but fiche documents were frequently available.

Portugal: Inspections focused on furniture stores, DIY shops and hypermarkets. Cases of non-compliance were very often found online, where most product information is not in the correct order according to the regulation and some data was missing. Physical shops perform much better overall in terms of displaying (some form of) energy labels, despite in physical shops the percentage of no label products was higher

than in online shops. Incomplete and old labels; incorrect label format; misplacement of labels and super-declarations were the most frequently recorded problems. Fiche documents were often available.

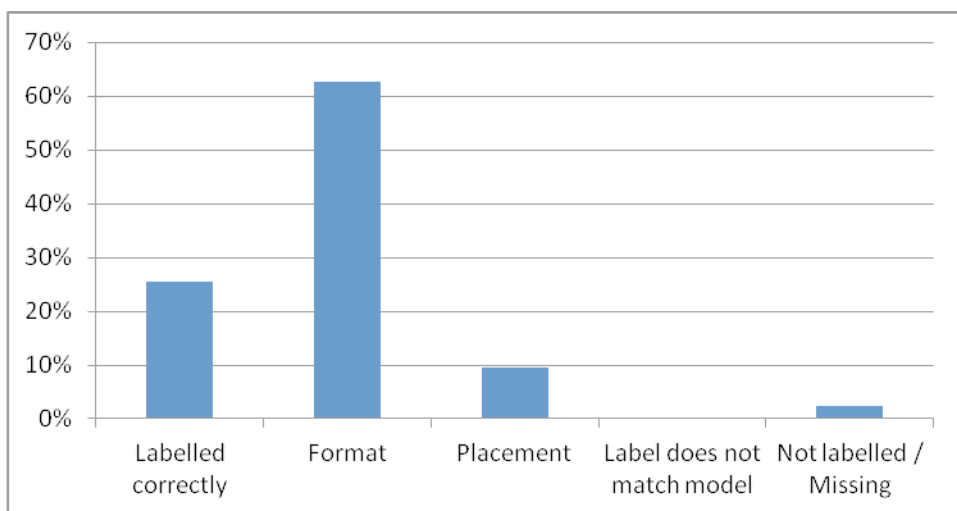
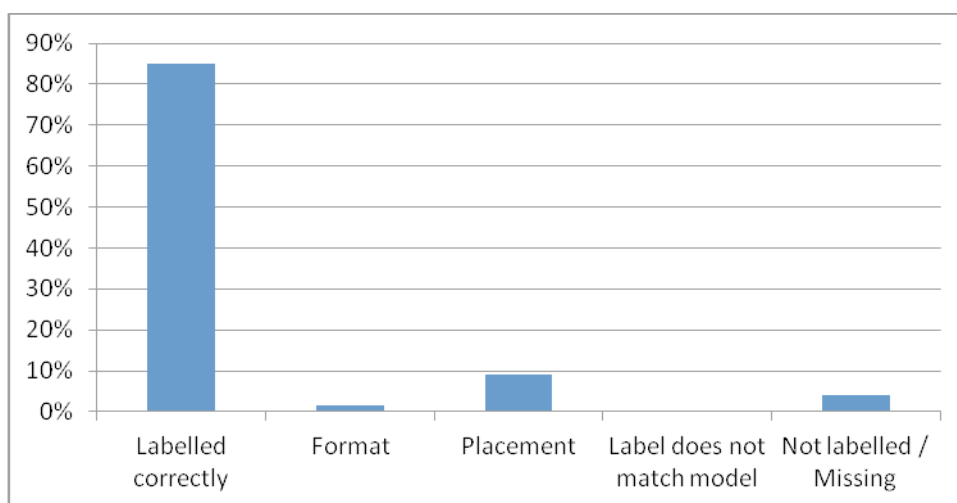
Spain: Inspections were concentrated on hypermarkets and kitchen studios expecting to see high rates of non-compliance. Online shop results were very bad, due to the incorrect ordering or missing information on labels. In physical shops, the most problematic area proved to be electric ovens and in general the missing labels. Some products with banned energy classes were observed. Fiche documents were occasionally available. No super-declarations or a price without energy class in advertising were seen.

United Kingdom: Based on previous results, independent electrical shops, furniture and DIY shops plus superstores were targeted. The main problems identified were missing labels, and general rates of non-compliance in furniture and DIY shops. Online shops showed very high rate of non-compliance due to label formatting errors. It was often difficult to identify standard programme for washing machines and the fiche documents were sometimes unavailable.



Austria

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



Number and types of shops visited

In the first round of shop visits we have chosen 5 electrical specialists, 5 electronic superstores and 10 online shops. We wanted a good variety of products in different price segments. Electrical specialists and electronic superstores offer that. The online shops were chosen randomly through internet search engines. In physical shops we checked washing machines, tumble driers and dishwashers, in online shops we also checked ovens and washers driers. Energy efficiency is an important decision factor for the purchase of white goods, more

than, for example, TVs, according to a study by London Economics². Other European projects active in Austria cover TVs (ComplianTV) and Lighting (PremiumLight), so we did not include them for shop visits in the first round.

Main findings in terms of label display

Products in electrical specialists and electronic superstores are labelled quite well – 96% in electronic superstores and 85 % in specialist stores have the energy labels displayed. Online shops are not performing well, with a 75% non-compliance rate. Usually, there are parts of the required information missing, or they are not in the correct order. Some shops only display the energy class, without any of the additional required information. Sometimes, the energy-relevant information is found among a long list of detailed product information, making it hard for a consumer to get an overview, as with a proper energy label.

There are shops, that provide a link to the manufacturer's website, where energy efficiency information can be found, but these links sometimes don't work.

If there are mistakes in labelling, it is usually down to incorrect placement of the label on the product, with washing machines and dishwashers the most common offenders. That said, non-compliance is quite low in physical shops, but very high in online shops, where information is routinely missing. Where information was missing, usually the information present would be incorrectly ordered too.

As for product categories, there is no significant difference between the product categories checked. All together, we checked 952 washing machines, 935 dishwashers, 284 electric ovens, 299 tumble driers and 69 washer driers. Small countryside stores in the region of Styria or Upper Austria displayed labels just as proficiently as big stores in Vienna. We spread our shop visits also to more remote regions in Austria. There is no significant difference between shops in the capital Vienna, shops in Salzburg and Linz and shops in smaller towns.

Main findings in terms of Ecodesign information availability

Only one product was found that should not be sold according to Ecodesign regulations. A tumble drier, energy class C, was found in an electronic superstore in Vienna.

Non-compliant cases were found concerning the clear identification of standard cycles for washing machines (40–11%), dishwashers (20–13%) and tumble driers (1 model – 0,3% of the sample seen) at the point of sale. Some products marked a wash cycle as eco, which was not considered as a clear indication for a standard cycle (while it is for dishwashers).

When sales assistants were asked to provide a product fiche, MarketWatch was invited to check on the manufacturer's webpage in 6 out of 10 physical shops. In 2 electrical specialist stores the sales assistant asked which data we wanted from the fiche and provided a manufacturer's brochure.

In 2 electrical specialist stores we were recommended to consider the energy label in our purchase-decision and told that we can save money on energy bills if we buy an energy efficient product, even if it costs a bit more. Product brochures were provided from three different manufacturers, from two manufacturers there

2 London Economics: Study on the impact of the energy label – and potential changes to it – on consumer understanding and on purchase decisions

was no fiche available in the shop. The choice of which product fiche to ask for was random, except that if non-compliant Ecodesign parameters were found, we asked for the fiche for these products.

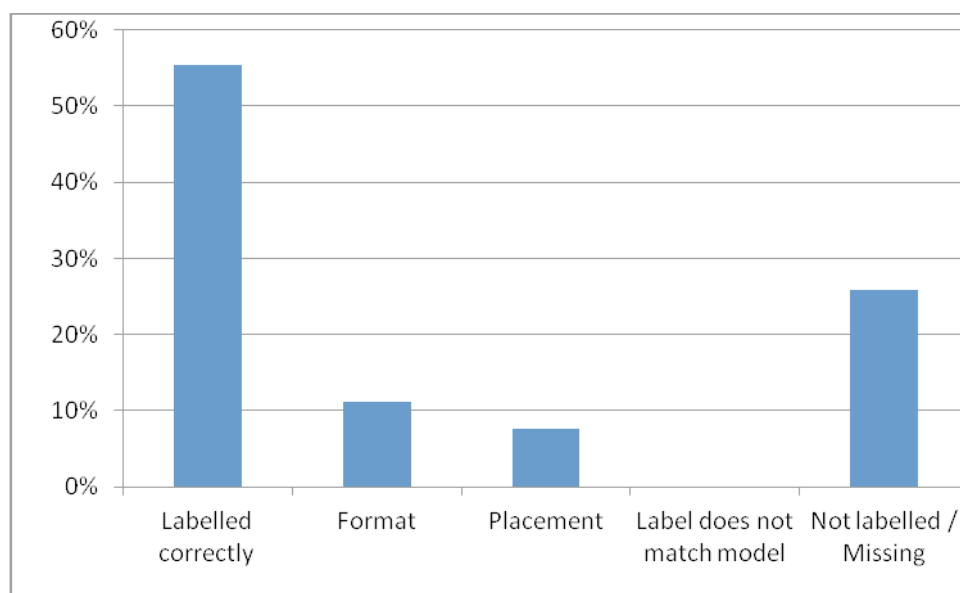
Energy class super declarations:

Super-declarations such as A+++ -10%, A+++ -20% or A-20%, A-30%, A-40% A-50% – often displayed with a sticker on the product – were found in physical and online shops. These super-declarations were used for advertising and had no correlation with the formal energy label.



Belgium

Overview of label display findings for physical shops



Number and types of shops visited

ANEC conducted physical visits of 3 shops, one electronic superstore, one kitchen studio/furniture store and one general hypermarket. There is no national level Belgian partner in this project, hence, to expand the geographical scope of the action, the European partners, ANEC and ECOS, which are both based in Brussels/Belgium, committed to conduct 3 shop visits in the first round. The selection of shop types was based on the previous findings of the Come On Labels project. The product categories (refrigerators, dishwashers and ovens) were chosen as widely used domestic appliances.

Main findings in terms of label display by shop types

From the 3 shop types visited, the kitchen studio/furniture store showed the largest proportion of non-compliance. Only 2% of products (considering refrigerators, dishwashers and ovens) were labelled correctly. 60% of products were not labelled at all, 16% of labels were placed incorrectly and 22% of labels were not in the correct format.

When the shop assistant was asked for a product fiche, he provided a guide in which all products were covered.

In a hypermarket, 81% of products were labelled correctly, while 11% were not labelled at all, 7% had an incorrect label format and 2% of the labels were not placed correctly.

The electronic superstore had 89% correctly labelled products and product fiches were available. However, 8 products bore a super declaration (e.g. A+++ -10%).

Overview of label display in shops

The most common case of non-compliance was a missing label. Of the 166 products checked in total, 58 were not labelled (mainly ovens in the kitchen studio). The format of the label was incorrect in 25 cases, while placement was incorrect for 17 products. In the kitchen studio, only 2 appliances were correctly labelled, all others had either an in-house re-designed label (e.g. A++ at the level of A-band, or A+ at level A) or were not at all labelled.

Number and types of products reviewed for label display

Ovens were the product category missing labels the most, in particular in the kitchen studio/furniture store. Twenty five ovens were outside the kitchen on display, but none with an energy label. The staff told me they were all class A. Fourteen ovens were integrated in the showroom kitchens, none of them with an energy label. Thus, all 39 ovens were missing energy labels.

Review of compliance with selected Ecodesign and energy label requirements

Dishwashers: Default standard cleaning cycle on the panel (Text of «Eco»)

1 product (dishwasher) was non-compliant with the Ecodesign Directive as the default standard cleaning cycle 'Eco' was not on the panel.

FICHE available: The kitchen studio/furniture store provided 1 guide covering all the products in the shop, in the format of a catalogue.

In the electronic superstore the product fiches were made available in the product/product drawer.

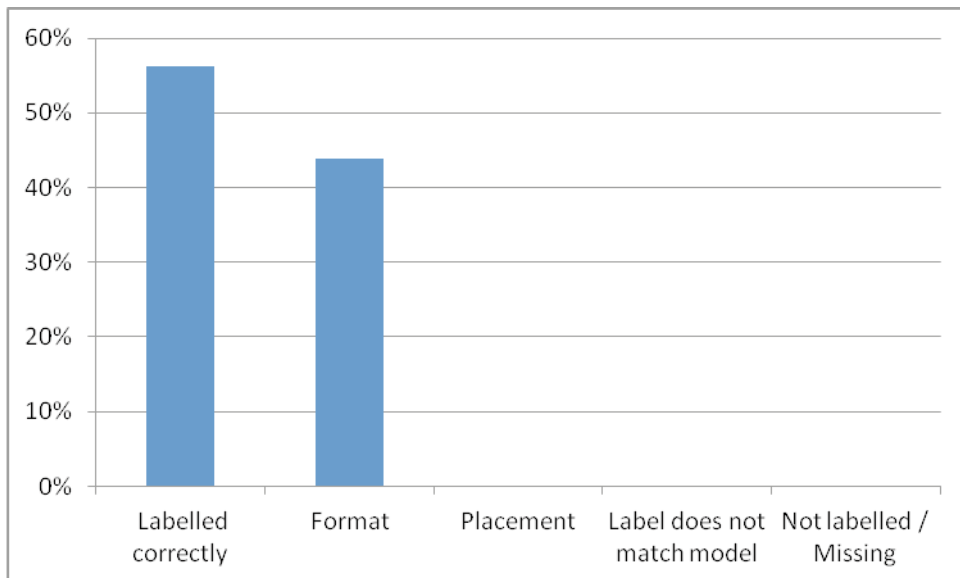
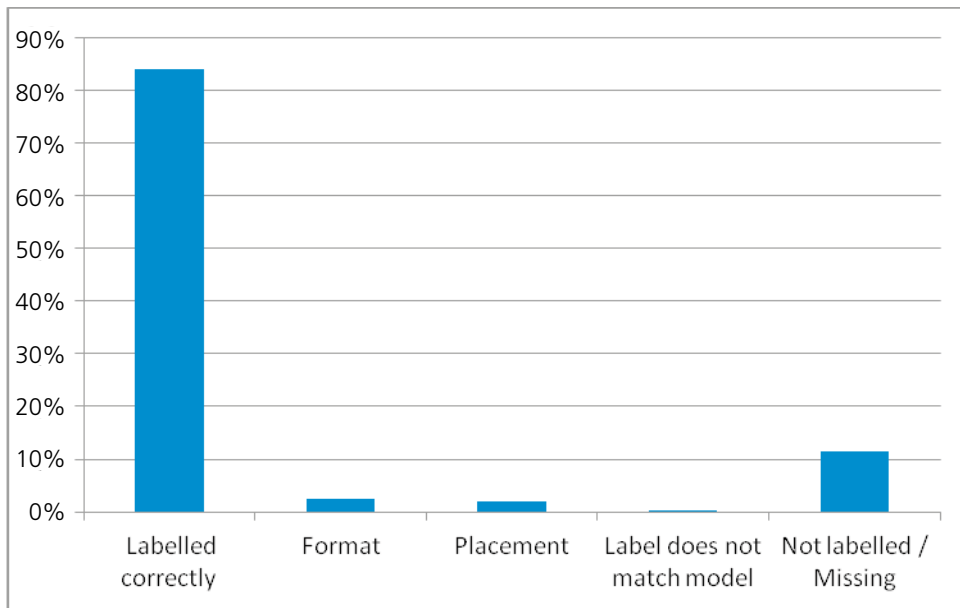
In the general super/hypermarket the retailer insisted that it was not mandatory to provide the fiche, because all the information was made available on the energy label. However, as there were some appliances where the fiche was available he was reproved that there is more information available in the fiche than on the energy label.

Energy label SuperDeclarations (Any A+++++ or A+++-X% energy classes): In the electronic superstore, 8 products were bearing a super declaration (e.g. A+++ -10 %). The super declaration was more popular for ovens (5 products were bearing A-10% or A-20%), followed by dishwashers (2 products were labelled A+++ -10 %) and 1 refrigerator (A+++ -10 %).



Czech Republic

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



Number and types of shops visited

11 physical shops were visited as well as 10 online shops. The choice was made to include the biggest electronic superstore chains (three chains with 2 shops and one chain with one shop visited). Additionally, 2 hypermarket shops were checked as they represent non-specialised retail points, plus 2 studios of a big kitchen studio chain, to check market segments that are suspected of non-compliance. Online shops were chosen for companies with large market share, 3 of them were online versions of chains that were checked also as physical shops. Physical shops were all visited in Prague, but the uniformity of retailer chains allows us to assume that the situation would be similar in other regions.

Main findings in terms of label display per shop types

In physical shops 11% of products had missing labels. Format issues or incorrect placement of labels were found in 3, and 2% of products respectively. Surprisingly, missing labels were found mostly in electronic superstores. In kitchen studios, energy labels were present, but sometimes suffered incorrect format or placement. The total number of products checked in kitchen studios is, however, too low given a small number of products displayed in this type of shops. Hypermarkets performed no worse than electronic superstores, however, only one hypermarket chain was visited, out of several operating on the market.

Online shops provided correct energy information in 56% of cases, with the remaining 44% wrong due to missing information or incorrect ordering of information.

Overview of label display in shops

Altogether, 6% of the 3,013 products checked were missing an energy label (or relevant information for online products). Sixty nine percent were labelled correctly. Incorrect format was the most common mistake found, with 24% of checked labels not the right shape. Incorrect placement or model to label mismatches were limited to single models in physical shops and seem not to be a common mistake, unlike the problem of missing labels.

Number and types of products reviewed for label display:

Clearly the most problematic product in terms of energy labelling are TVs. One hundred and thirty of the 887 checked TVs were missing a label (15%) the worst result in this country, discounting tumble driers, of which only one was checked. Most unlabelled TVs were found in electronic superstores, both for appliances exhibited in the store and boxed appliances. Those TVs with labels were mostly correct, with a few exceptions where labels were hidden. For electric ovens 8% of the 293 products missed a label, making it the second worst.

The best labelled product category were refrigerators, 82% of which were compliant. Above 70% of dishwashers and washing machines were correctly labelled. Out of 114 washer-driers and 293 electric ovens, half was labelled incorrectly. In shops, labels for these products often only carried the data part of the old-style label. Online, there was a lot of missing information in most products. Of the 180 wine storage appliances checked, mostly on-line, many failed compliance due to missing information.

Worst results in terms of wrong format category were obtained for air conditioners (85% out of 33 samples were incorrect), mostly online and due to missing data.

Compliance with selected Ecodesign and energy label requirements:

Refrigerators: Compressor type energy class A and below: 6 models found online;

Washing machines: Energy class B and below: 10 models found online

Washing machines: Standard programme clearly identifiable on the panel: 5% of washing machines (15) in physical shops non-compliant.

Dishwashers: Standard programme clearly identifiable on the panel: 2 models in physical shops non-compliant

Tumble driers: Energy class C and below: one model found online

Fiche availability: Fiche was available in one online store for two refrigerators. In two other online stores, the fiche was unavailable for refrigerators and washing machines. In physical shops, it was either unavailable or incomplete in all ten shops visited.

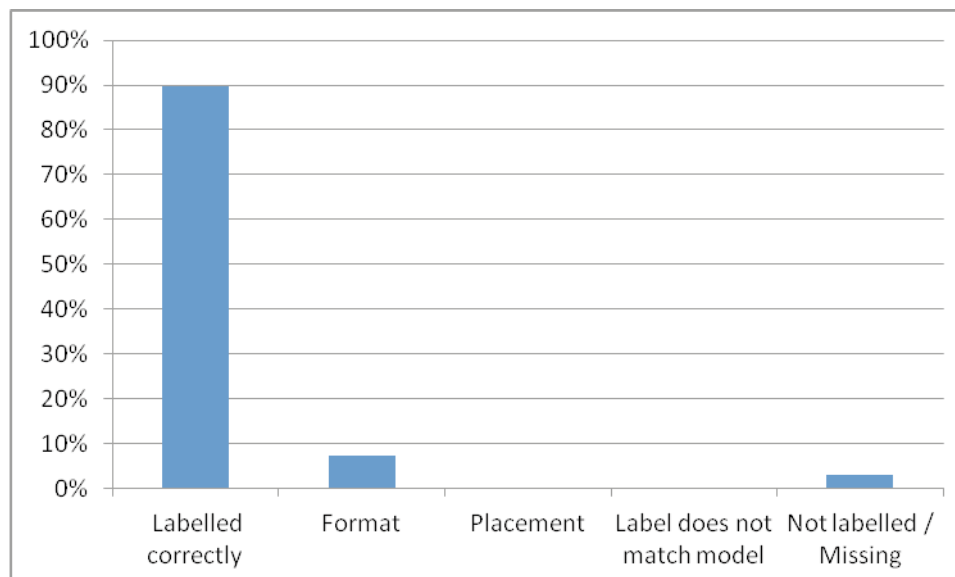
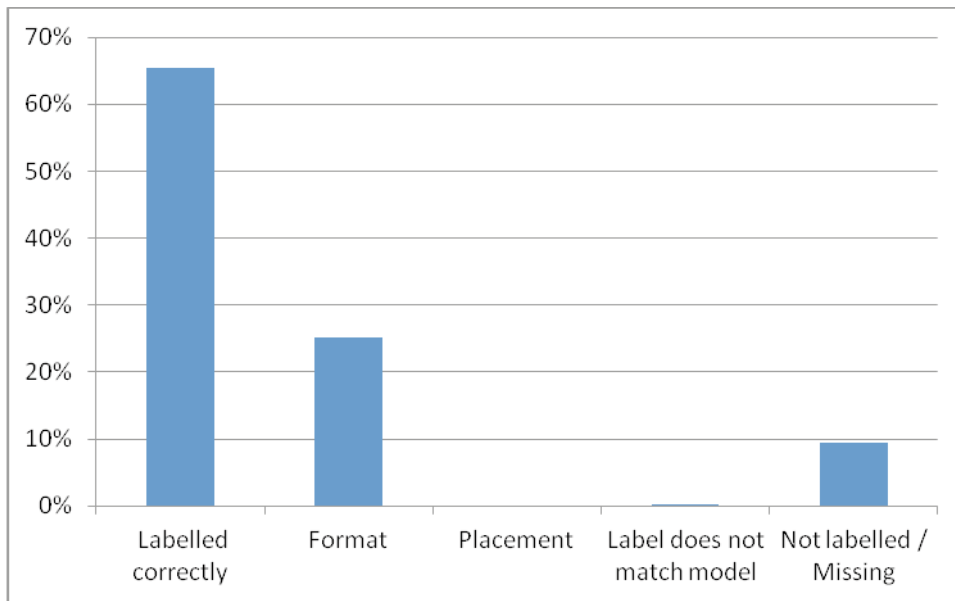
Super-declarations: Super-declarations were found on some product pages of all online shops but one, and in several physical shops in catalogues or directly on a sticker on the appliance.

Energy class missing in advertisements: Leaflets of superstore chains or newspaper advertisements with price information but missing energy class are commonly found, mostly for televisions.



Denmark

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



In Denmark, MarketWatch focused its first round of visits on shops with large market shares. Some of the selected stores have branches both close and far from Copenhagen, chosen to allow comparison between the capital and more outlying areas.

Inspections were carried out on 1,612 products from the following product categories:

- TVs (332)
- Refrigerating appliances (228)
- Washing machines (104)
- Dishwashers (79)
- Lamps (745)
- Air conditioners (4)
- Electric ovens (75)
- Tumble driers (51)
- Wine storage appliances (3)

Regarding energy label requirements, the following non-compliance cases were monitored and observed:

- No energy label (86% for Air-conditioning units and 23% for electric ovens, otherwise less than 9%)
- Placement incorrect: 0% observed for all product categories and shop visited
- Model not match: 0% observed for all product categories and shop visited
- Wrong format: 47% for tumble driers and 29% for washing machines, otherwise less than 10%.

In summary, MarketWatch concludes that there is no evidence of systematic and conscious non-compliance in Denmark, but a lot of shops had made labels in-house, a form of non-compliance.

Regarding our findings, we were surprised about the number of energy labels with format errors. A lesser extent had black and white hard copies of labels and in-house labels. Many more had colour copies of labels (not the original provided by the supplier). One electronic superstore had only colour copies of labels on washing machines. Another shop had in-house colour labels on dishwashers. Overall, we noticed very few numbers of products missing labels altogether, but it was a surprise to find one shop with 21 of 35 TVs not labelled at all.

We have not observed many super-declarations, but did find some products with declaration A-30% and similar on marketing materials.

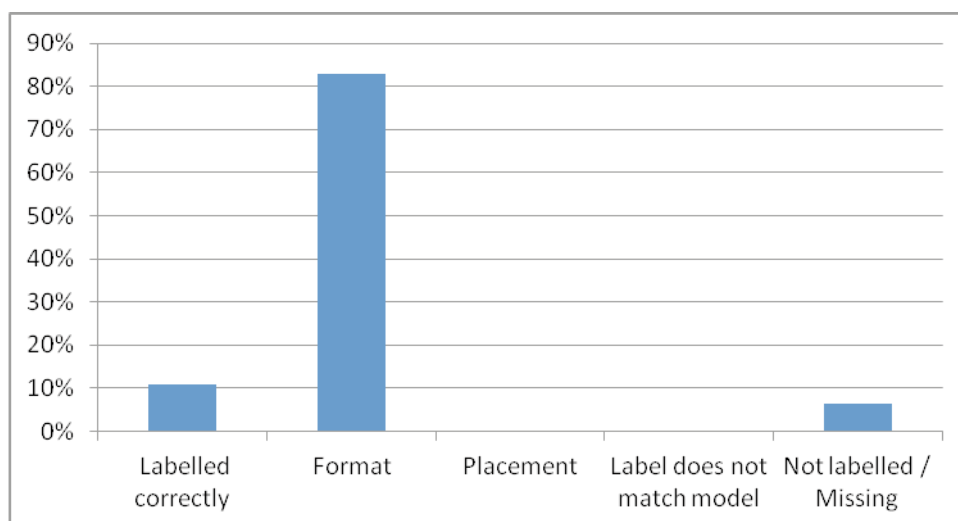
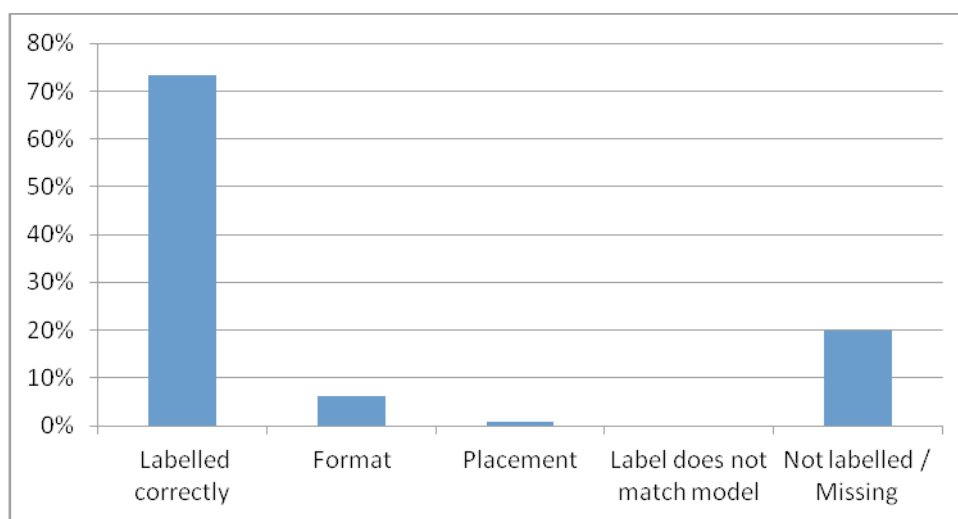
Shop assistants were generally kind and helpful. There was no obstruction and we were allowed to do our inspections. When confronted with questions of non-compliance, they blamed manufactures for sending labels in the wrong format or not sending labels at all.

After going to media, we were contacted by the member state authority and trade association, which expressed their interest in cooperation.



France

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



Ten physical shops and 10 e-Shops were inspected in France. The French strategy was to target physical shops specialised in electrical and electronic goods (famous French brand names) and hypermarkets. Regarding online shops, we tried to target the most famous and popular ones in terms of online electrical appliance sales.

On and offline inspections concentrated on 5 types of products in order to get a broad picture per appliance type: refrigerating appliances, TVs, washing machines, dishwashers and electric ovens.

Energy label / information display

In total, 1,484 products have been checked, 509 products in e-shops and 975 in physical shops. In summary, only half (52%) the products checked were compliant. Fifteen percent did not display any label at all and 33% were partly or incorrectly labelled, resulting in misleading or incorrect information to consumers.

In more detail, and differentiating between physical and online shops, a primary finding is that physical shops are more compliant than e-shops.

Shop visits: Out of the 975 products checked during physical visits, 73% were labelled correctly. However, the full picture is not all black and white and a more detailed analysis is required by product type. In total, 20% of appliances were not labelled at all. TVs and electric ovens were most non-compliant: nearly 30% of each of those appliances had no label.

Online shops: Online, the picture is far less positive. Non-compliance reaches nearly 90% of the sample. Non-compliance very often stems from incorrect ordering of information, affecting 83% of the products sampled. This impedes the ability for consumers to compare different appliances and websites. Other form of non-compliance is based on missing information. In terms of product category, no significant differences were found during online checks. Some internet based retailers in France are displaying the energy label together with the product, however not in a systematic way.

Ecodesign and energy label requirements:

We mainly focused on looking for specific models of refrigerating appliances, washing machines and dishwashers that were not allowed to enter the market at the time of the visits/ online checks.

Washing machines were the product category with most significant problems, with a quarter of models seen to be offered for sale in France should be supposedly banned since December 2011. For refrigerators, the rate was 5.7%. However, market entry dates of these products could not be checked.

Regarding the display of standard cycles for washing machines and dishwashers, compliance was quite high in physical shops (more than 90%).

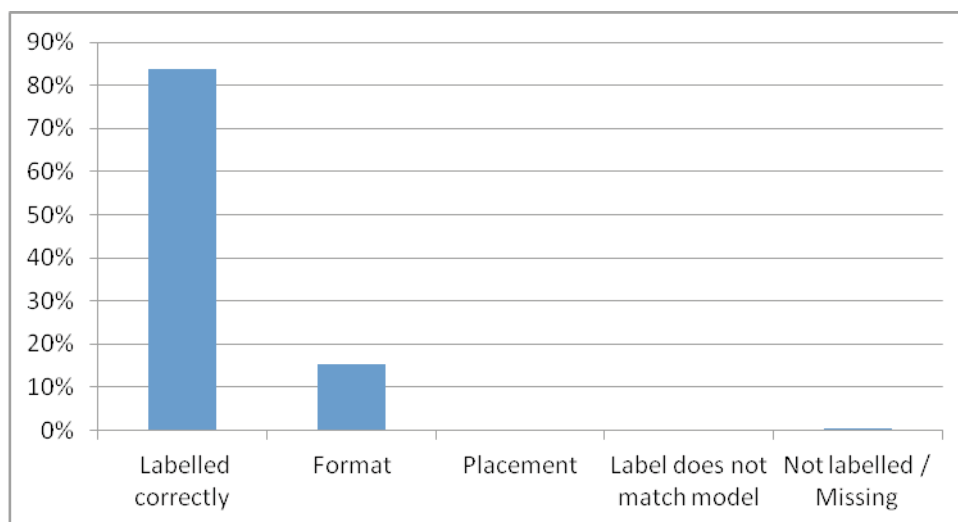
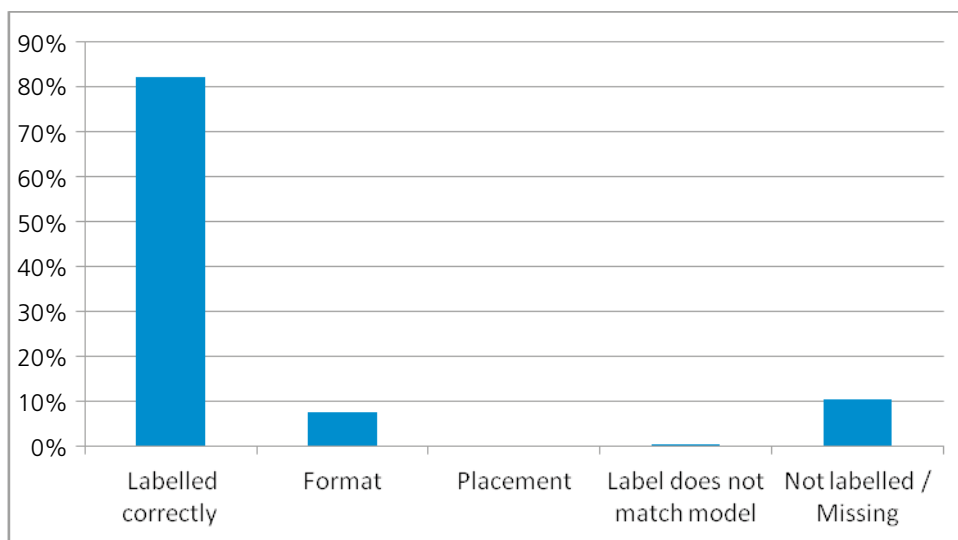
Fiche availability: Fiches were commonly available where requested.

Energy label super-declarations: The main problem here was found online, where some stores bore many product declarations such as A-X% or A ++ (-20% compared to A).



Germany

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



Number and types of shops visited:

VZBV visited 12 physical shops and 10 online shops. BUND undertook 10 physical and 10 online shop visits. The planning of all German shop visits was coordinated between VZBV and BUND to prevent double-checks, explore a wider spectrum of the market and ensure checks in different federal states – since market surveillance is a federal task in Germany.

Physical shop visits: One criterion applied when planning the physical shop visits was to get an equal distribution of furniture stores / kitchen studios and electric specialists. Furniture stores and kitchen studios are generally known to have a larger share of older products. Picking equal samples of about four for each subcategory allows a comparison of the results and an overview of the market situation in Germany. Additionally, two hypermarkets, a department store and one do-it-yourself store were picked. Hypermarkets were identified as a large risk group of non-compliance, prompting two extra physical shop visits.

Besides shop type, shop size was an important criterion. Not wishing to pinpoint small local stores and to select players with greater market share, chains of electronic superstores and furniture / kitchen studios were prioritised.

Last but not least, MarketWatch (renamed MarktChecker in Germany) visited seven different regions / Bundesländer: Berlin, Hamburg, Lower Saxony, Saxony-Anhalt, Saxony, Brandenburg and Mecklenburg West-Pomerania. Although MarktChecker will not be able to compare the quality of market surveillance of different regions, it is important to get an overview about the whole picture. Otherwise our observations would not be applicable to the whole country.

Online shop visits: Coordination was especially important when undertaking the online shop visits. Twenty points-of-sale were identified with a large market share. To help compare performance of stores, VZBV picked stores which were also part of the inspection of physical shops. BUND focused on shops that had been subject to its earlier experience on market checks.

Main findings

Physical shop visits: Comparing results on different shop types, BUND and VZBV experienced quite a heterogenic picture. Extreme good and bad results and various results in between have been found. Generally, it can be said that most retailers perform well most of the time. High rates of non-compliance appear to be caused by a few bad performers that raise the average of non-compliance. Assumptions about regional differences cannot yet be made, as the sample groups were too small. However, the sample allows assumptions on the situation in the whole country.

When it comes to the comparison of electrical specialists and furniture/kitchen stores, electrical specialists performed slightly better. As already mentioned, hypermarkets showed an impressive failure rate. Although selling only small ranges of product types, in most hypermarkets no label was found on products – the exception being where these were printed on packaging by the manufacturer. DIY stores and department stores were problem hotspots for lighting products.

Online shop visits: Online, MarktChecker found that furniture stores performed worse than electrical specialists. While for electrical specialists only small failure rates can be found, kitchen and furniture stores as well as DIY stores have shown high rates of non-compliance. Generally, the bigger the shop, the lower the non-compliance.

Compared to offline shops, extremes were less apparent. However, the average non-compliance rate seems to be slightly higher when it comes to online shops.

Overview of label display in shops

Physical shop visits: The main failure rate in physical shops was down to format issues, where problems were mainly linked to the old, two-piece label, where one part was often missing or made in-house, including black/ white copies, or undersized labels distributed by the manufacturer. Missing labels were less frequent. However, shop visits also identified several manufacturers believed not to be supplying labels, as required in the legislation and even believed to be more likely for unknown reasons subject to missing labels. Generally, out of the 22 shops, 8 showed product compliance rates under 90 percent and will likely be followed-up by MarktChecker.

Online shop visits: Generally, missing labels are almost impossible as most criteria of the energy label are part of relevant selling information. However, several stores neglected to give all mandatory information, thus scoring high on format non-compliance. Stores which already used the complete energy label as a picture attached to the product unsurprisingly performed better and were not found to be non-compliant.

In summary, 11 of the 20 online retailers surveyed showed compliance rates lower than 90 percent, and will likely be subject to further action by MarktChecker. It was observed that BUND discovered 8 non-compliant shops, whereas VZBV has only 3 cases of exceeding the non-compliance tolerance rate. We can only guess at the reason, but it can probably be traced back to the shop selection method. Whereas VZBV focused on stores subject to physical shop visits, BUND selected shops previously checked and found conspicuous during earlier shop visits and which obviously have not improved.

Number and types of products reviewed:

Physical shop visits: All products in the stores subject to energy labelling were checked. Differences in the number of surveyed products were caused by the different range of products in stock. When it comes to missing labels, TVs generally scored badly. Overall, only 81 per cent of the surveyed TVs were compliant. Many labels had the wrong icon for the hard on/off switch. It seems that the several manufacturer had a misunderstanding of how to use the icon on the label.

Other conflicting product groups are dishwashers, ovens and washer-driers. Here, non-compliance was mainly down to the old, two-piece label, where one part was missing. When it came to ovens, a main problem was also that the original label had been lost and replaced by a black/ white copy as they have been under the energy labeling regulation for quite a long time and are subject to a low turnover rate.

Online shops visits: We checked all product categories in the surveyed online shops. However, instead of checking all present products, we picked a random sample of at least 15 weighted over the number of product sold in the respective category. During the online shop visits, the most conflicting product groups were refrigerating appliances and ovens, where part of the required information, such as noise emission or climate class, were missing in several online stores. However, the majority of shops performed well.

Review of compliance with selected Ecodesign and energy label requirements:

Lamps: During our physical shop visits several incandescent lamps that were not allowed on the market were observed: clear bulbs below a C rating and dull bulbs below an A. Halogen lamps were not surveyed, as there were no minimum requirements at the time. Online and in physical shops, the average rate of non-compliance for lamps was four per shop, and often the same lamps were present. We noticed that several online sellers did not supply the mandatory labelling information for lamps.

Refrigerators: We found one refrigerator with the banned compressor type energy class A during the physical shop visits. For the online shops, we found three refrigerators with A class declaration. Taking into account that we checked 1,282 refrigerating appliances during physical shop visits and 1,109 online, compliance with the minimum Ecodesign requirements does not seem to be a major problem.

Washing machines: No failures were found, neither online or in physical stores. Already, only a few products were observed with an A rating (a minimum requirement starting December 2013), which leads us to believe that the share of inefficient washing machines on the market is quite low.

During the physical shop visits, many washing machines were observed where the standard programme was not clearly identifiable on the panel. Almost a fifth of the checked washing machines did not comply with the requirements. When it comes to the online shop visits no assumptions can be made, as observations depend largely on the quality of the available image.

Dishwashers: Both online and in physical shop visits, hardly any dishwashers were observed with an energy class B (cannot enter the market since December 2011). Meeting the minimum requirements for Ecodesign does not seem to be a problem when it comes to Ecodesign.

When it comes to showing the standard cleaning cycle, about 5 percent of dishwashers on average did not comply. Online, the quality of the picture did not always allow an accurate assessment.

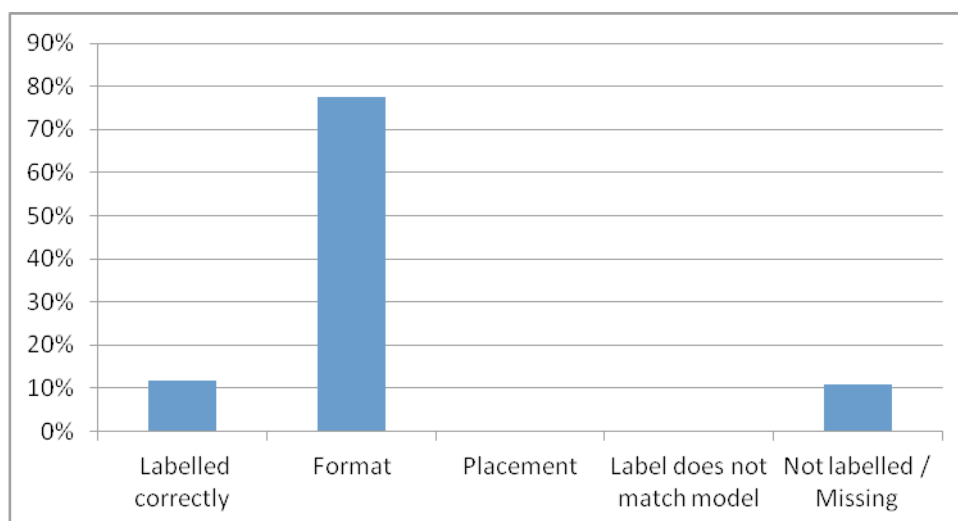
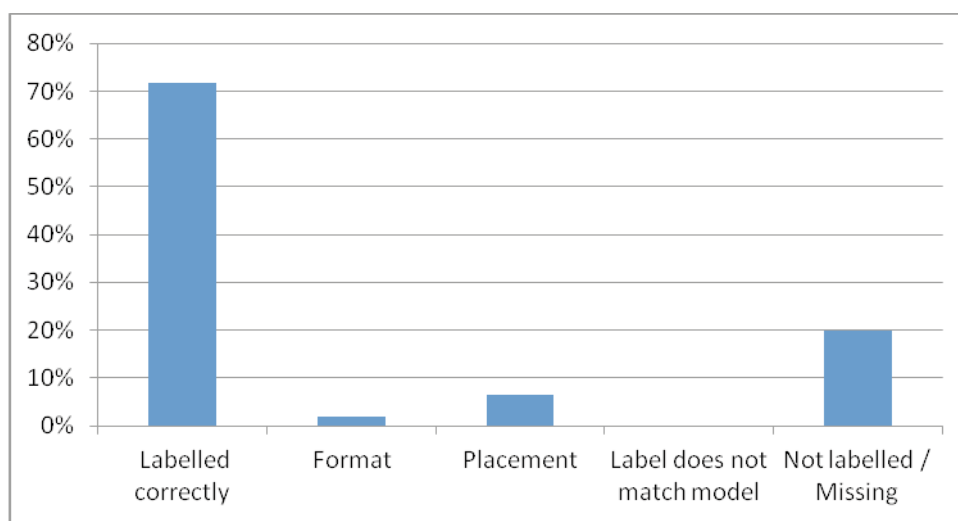
Fiche: Providing a fiche seems to be a problem for some retailers. In only 11 of 22 shops, the fiche was made available on request. However, some shops, such as hypermarkets and DIY stores, do not provide the necessary counselling infrastructure to make the fiche accessible for consumers. The situation is similar online where especially hypermarkets and DIY stores do not seem to be aware of their duty to provide the fiche.

Super declarations: MarktChecker found several examples for super declarations during all shop visits. Most of them were just given as an additional label (A+++ -20%, A+++ -30%) on the product; however, in some stores they were used as well next to the price tag. Although in most shops two or more examples have been found – the concerned products repeated.



Italy

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



We visited 10 physical shops and 10 on-line stores.

For physical shops, big chains of electronic superstores (7) were targeted to reach the biggest sellers on the market. Supermarkets (2) were also tested because this category was thought to be underperforming, taking into consideration that selling white goods is not their core business. Showrooms were also in the list and a big international store (1) was chosen, the biggest showroom-based chain in Italy. In this way, possible difficulties in the enforcement of the energy directive for showrooms could be identified while at the same

time inspections could take place at one of the top sellers of appliances and kitchens in Italy. Another benefit is the chain's presence almost all over Europe.

As for online shops, it was decided to cover both online-only specialised shops (3) to get an idea of the level of competence and compliance of a business that does not have to deal with direct selling, together with online versions of the shops visiting in person (6), to understand if the policy applied online was the same as those found in shops. Finally, we included an international online retailer as a big international seller (for the same reasons we chose supermarkets) and because a German court has recently ordered the company to comply with the directive.

In physical shops, we checked refrigerators/freezers, ovens, air conditioners and wine storage appliances. In some shops we also managed to check TVs and in one case we checked light bulbs. In the online shops we checked the same appliances, plus TVs.

We checked a total of 2,522 items, of which 1,991 were in physical shops and 531 online. More precisely, we checked 916 refrigerators/freezers, 71 wine storage appliances, 378 ovens, 179 air conditioners and 978 TVs.

Electronic superstores did not perform as well as we expected, based on findings from previous EU projects relevant for Italy. The compliance rate for individual shop types varies from 61% to 95%, with 3 out of 7 shop types ranging between 67% and 71% compliance. Supermarkets performed badly, both of the shops visited scored well below 80% compliance (67% and 75% respectively). Finally, the showroom compliance is the worst of all, with just 15% of items reviewed labelled correctly, mostly due to a low level display on ovens and refrigerators.

Generally speaking, non-compliance is due to misplacement of labels, while the lack of label per se is a very rare occurrence. In some cases the label was placed in a way that it was almost impossible to be read by customers, e.g. inside the appliance or covered by other material, partly destroyed, and similar.

Online shops, though, show a much worse picture. Nine out of 10 scored under 20% compliance, with 2 scoring 0%. The showroom's website performed much better, surprisingly enough, with a remarkable 92% compliance. The high non-compliance rate found in the showroom could be due to a deliberated shop attitude of displaying the labels. This is also consistent with other IEE projects' findings.

Non compliance for online shops varied from shop to shop, but the lack of some of the label related information was almost universal. Not only were energy classes not indicated with a picture (which is not formally required), but in some cases the class was not mentioned at all in the text. In most cases some information is provided, but not in the correct order, or not even on the same page or product technical specification.

As for product categories, in physical shops refrigerators/freezers seem to be the best labelled appliance type among those checked, while wine storage appliances fare the worst, of the few observed. Air conditioners, especially portable ones, saw a third largest share of missing labels (out of product groups reviewed bearing energy label) and a variety of different non-compliant labels and placement. TVs are a stand-alone case: rarely found with misplaced labels, if they have it, but they are often sold without the label. In addition, every shop checked had at least some TVs offered for sale in a box without any label on it.

Online shops present smaller differences between categories, although TVs (13% to 85%) and wine storage appliances (20% to 55%) stand out for their rate of non-labelling. The lack of labelling is probably a much

more serious issue online, where this category is displayed with no energy information whatsoever, despite the fact that other pieces of information are given.

Ecodesign: A fiche for air conditioners and refrigerators/freezers was requested in every shop. Only the showroom provided a printed info sheet (the same available in their online store) with the information needed. In all other shops we were either told that energy information present on the energy label was more than enough to choose the right item, or that we should visit the manufacturer's website, because nowadays no company provides technical sheets. In a couple of cases we also tried to get to the manufacturer's online product page via a QR code available from a sticker on the front of the product, but this led to no compulsory Ecodesign information. In one shop we also checked Ecodesign requirements for washing machines and found 20% non-compliance.

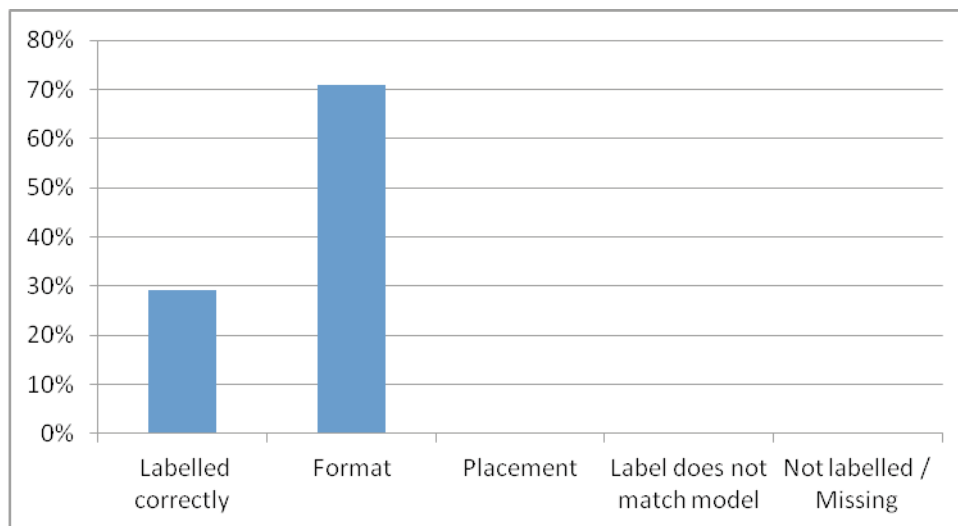
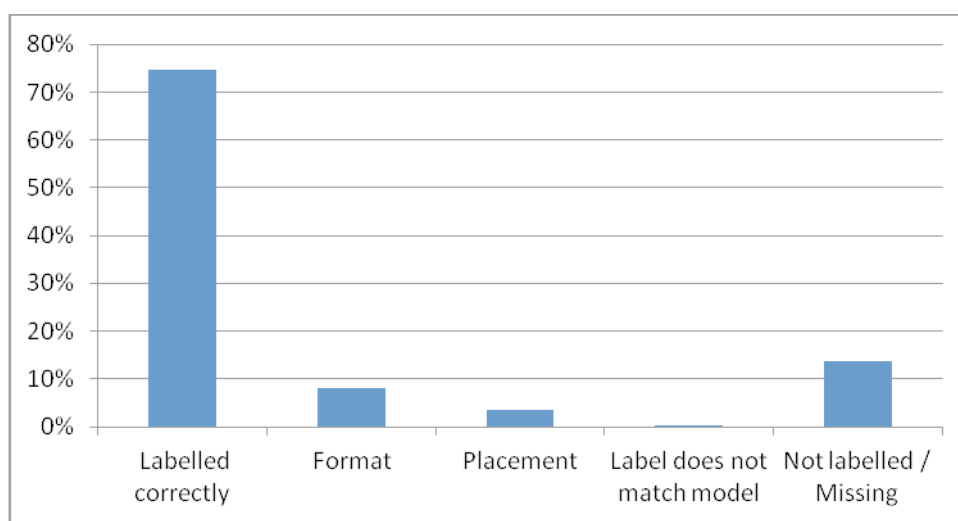
Online Ecodesign compliance was checked along with energy labelling requirements and was found to follow the same rate of non compliance. There were more super-declarations of products in online shops compared with physical shops.

No incandescent light bulbs were found in shops.



Poland

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



Number and types of shops visited

In Poland, shop inspections were conducted from December 2013 to January 2014. Two types of shops were selected – 10 electronic online stores and 10 physical stores, where:

- 70% were electronic superstores,

- 20% were hypermarkets,
- 10% were kitchen studios.

These type of shops are the most popular and cover the most of the national market share.

Main findings in terms of label display per shop types

MarketWatch checked 2,564 products in physical stores and 8,770 products online, by checking refrigerators, washing machines, dishwashers, TVs, electric ovens. The following results have been monitored:

In physical shops:

- 75% of products were labelled correctly
- 8% of products had a label in a wrong format – old type label, hand written label
- 3% of products had label in wrong places
- 14% of products were not labelled
- 1 model had a label to product mismatch

Online:

- 29% of products were label correctly
- 71% of products had format problems

Generally, the biggest problem occurs in kitchen studios, where only 11% of appliances were labelled correctly, 33% had a wrong format, 15% were misplaced and 41% were missing labels altogether. Such retailers may believe that energy labels will damage products in the showroom. Where labels were present, it was inside appliances or on one side. The next position belongs to hypermarkets, in which there were problems with missing labels and hand-written labels. In electronic superstores, most products were labelled correctly, but some incorrect examples were observed, such as old label formats, hand-written labels, and occasionally missing labels. In internet stores main problem is with displaying data in the required order, rarely some data was missing.

Overview of label display in shops

The most frequent cases of missing or incomplete energy labels included:

- no label displayed (32% for electric ovens and 19% for TVs, otherwise less then 14% in physical shops)
- wrong placement, e.g. the label was inside the appliance(14% for ovens and 5% for dishwashers, otherwise less then 2%)
- in internet stores – no data for some of the required parameters, or the data wasn't presented in required order (between 56% to 69% for some of the product categories, and 100% for electric ovens reviewed)
- retailers presented own label, for example hand written
- Ecodesign parameters – only the requirement for the minimum energy class was appropriate, but other requirements, like the display of the signs “eco” or “standard program” were only rarely properly presented

Number and types of products reviewed for label display

Physical stores

- Refrigerating appliances – 88% of appliances were labelled correctly, 6% had a wrong format. In case of the old labels, some only had the 'strip' displayed, which only contains the numbers and no legend. Two percent of products displayed had placement problems, three percent did not have a label at all
- Washing machines – 83% were labelled correctly, 9% of labels were missing
- Dishwashers – 71% were labelled correctly, 14% of labels were missing
- Electric ovens – only 32% were labelled correctly
- TVs – 74% were labelled correctly, 19% of labels were missing.

Online stores

Some online stores presented the energy label as an attachment, a picture of the energy label. 71% of stores presented labels in the wrong format – data missing, data given in a wrong order.

Review of compliance with selected Ecodesign and energy label requirements

We have checked compliance with selected Ecodesign requirements. In case of refrigerators, their compressors should fit energy class A and above. We checked:

- 623 refrigerators in physical stores – most met the class A+ and better, only 5 models were of worse class
- 2,420 refrigerators in online stores – most met A+ and better, while 34 models represented a worse class.

According to the legal regulations, the washing machines should reach energy class B and above. All washing machines met class A and better.

Standard programme not always clearly identifiable on the panel:

- among 543 washing machines in stores only 140 were compliant
- among 1,931 washing machines online only 664 were compliant.

All dishwashers met class A and better. In case of default standard cleaning cycle on the panel we checked:

- among 216 dishwashers in stores – only 42 were compliant
- among 1,195 dishwashers online – only 178 were compliant.

Fiche availability: Most retailers made a fiche available. We checked for refrigerators and washing machines. Fiches were available inside the appliances. All required information was present, but sometimes the fiche was only available in English.

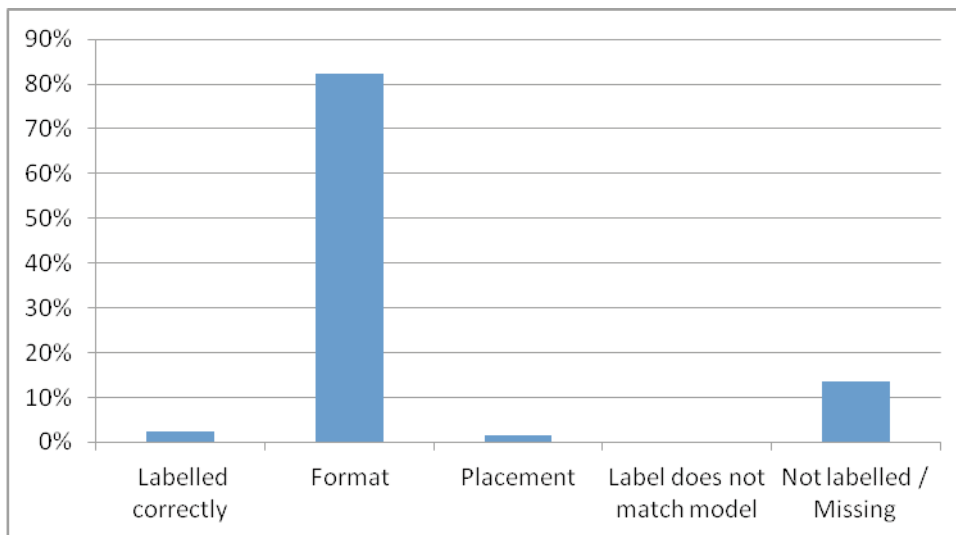
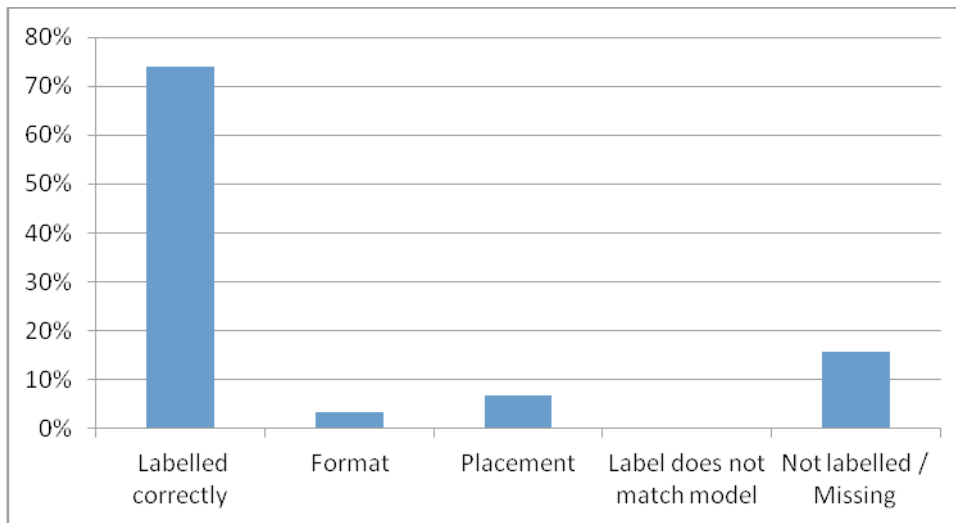
Energy label super-declarations: Some online stores presented wrong energy class formula. The most common was for electric ovens (for example A-20%), but dishwashers also (for example A-10%)

Energy class was properly presented in advertisements seen.



Portugal

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



Number and types of shops visited

Between December 2013 and January 2014, 20 shops were visited, of which 10 were physical shops (on the 17th and 18th December) in the metropolitan area of Lisbon and 10 were online shops (on the 29th, 30th and 31st January).

The physical shop types visited were narrowed to only two: furniture stores / DIY shops (4 shops) and general hypermarkets / Cash & Carry (6 shops), since in previous related projects (Come On Labels) these were the major non-compliant shop types.

Some of the online shops visited in this first MarketWatch checking round belong to big retailers whose street shops have been checked in a previous project (Come On Labels), which have shown a high degree of proper label display. Others were visited both online and in the physical shop to compare the compliance levels.

Main findings in terms of label display per shop types

The online shops show the lowest level of compliance (only 3%) among all the visited shops. Although most of the models being sold online display information about them, in 82% of the cases parameters shown do not fulfil the list included in EU regulations. Only 14% of the models checked are not labelled at all. This figure is about half that found in Come On Labels.

Although the physical shops selected for this first round of visits belong to the least compliant types, the level of compliance is quite high (74%) whereas the rate of unlabelled products is slightly higher than the one found online (16%). General hypermarkets / Cash & Carry is the shop type that presents the highest rate of unlabelled products (25%). However, compared to the previous project, this number is considerably lower (reduced by almost half). The high level of non compliance may be due to the fact that home appliances are not the main products sold in this type of shop and therefore their awareness of energy labelling requirements is still low (though apparently improving). It could also be down to a lack of interaction between shop assistants and consumers on this issue.

Overview of label display in shops

Wine storage appliances and TVs are the categories with the highest rates of unlabelled models online (77% and 47% respectively). TVs are by far the most labelled models online (21%). Almost all of the partly / incorrectly labelled cases across products are related to format issues (such as a lack of data or incorrect order), especially for tumble driers and washing machines (99% and 97% respectively).

In physical shops, wine storage appliances missed the energy label on both models seen in shops. Next worst were air conditioners (39%). The partly / incorrectly labelled cases connected to format are still mainly related to the old labels presenting the data strip without the background for electric ovens and tumble driers models (13% for both). Around 6% of TV energy labels display the switch logo without a tick. Incorrect placement was found mostly in refrigerators and tumblers driers (14% and 13%), because the energy labels (always the new ones) were hidden inside the appliances.

Luminaires are recently subject to the new label and, contrary to the format and simplification intentions of the new labels, it has sentences that should be translated into the national languages. Only a few models bearing the new labels exhibited the text in Portuguese.

Number and types of products reviewed for label display

The shop visits covered the products categories shown in the table below. Overall, 2,934 appliances and 19,796 lamps & luminaires were checked.

Categories	Online shops	Physical shops	Total
Refrigerating appliances	485	133	618
Wine storage appliances	13	2	15
TVs	271	154	425
Washing machines	621	48	669
Dishwashers	514	48	562
Lamps	204	19,592	19,796
Air conditioners	115	28	143
Electric ovens	269	30	299
Tumble driers	115	15	130
Washer driers	73	0	73

Wine storage appliances are the most unlabelled product, both online and in physical shops (77% and 100%). Next come TVs online (47%) and air conditioners in physical shops (39%).

In physical shops, the most typical fault in displaying the energy label of refrigerating appliances is misplacement, where in 14% of the models checked the label was inside the appliance. The same comment is valid for tumble driers (13%). Electric ovens are still subject to the old energy label and in 13% of the models checked only the data strip was available, rendering the label incomplete. Once again this comment is valid also for the tumble driers (13%).

In online shops, format issues were the most common fault, where models did not display all the required information required by regulation, especially for tumble driers, washing machines, dishwashers and refrigerating appliances (99%, 97%, 95% and 94% respectively). The most frequent mistakes for machines concern energy consumption, still indicated by cycle and water consumption not mentioned at all. For refrigerating appliances, the typical fault is the climate class not being indicated. When all the parameters are displayed, the order of appearance is not often correct.

Review of compliance with selected Ecodesign and energy label requirements

In 2 physical shops, 242 luminaires display the new energy label but the text is not in Portuguese.

In 4 online shops, 12 models of refrigerating appliances from different manufacturers were indicated as belonging to energy class A or below, (10 class A, 1 class B and 1 class C).

In 3 physical shops the panel of 14 models of washing machines did not mention the standard programme.

In 1 physical shop the panel of 1 model of dishwashers did not mention the standard programme.

Fiche availability

Washing machines – 2 fiches were checked and both indicated the required data

Ovens – 5 fiches were checked of which 3 indicated the required data, 1 mentioned the oven size only and 1 was not available

Air conditioners – 4 fiches were checked of which 3 indicated the required data and 1 was not available

Refrigerators – 6 fiches were checked and all indicated the required data

Dishwashers – 1 fiche was checked and indicated the required data

Tumble Dryers – 2 fiches were checked and both indicated the required data

Televisions – 1 fiche was checked and indicated the required data

Energy label super-declarations

Online, 42 models declared energy classes above A+++, these being dishwashers, electric ovens, tumble driers and washing machines. Ovens are the category with the highest rate of super-declarations (48%), which can be explained by the fact that almost all models are energy class A and there is not a new label yet to distinguish them. The level of washing machines models with super-declarations is 36%, which can be explained by the fact that nowadays models can perform better than A+++ and because some models are still rated according to the old energy label. The latter comment is always valid for tumble driers (12% of super-declarations). Dishwasher models presenting super-declarations is the lowest (4%).

One model of dishwasher stated washing efficiency class A+ and one model of tumble drier a condensation efficiency class A+.

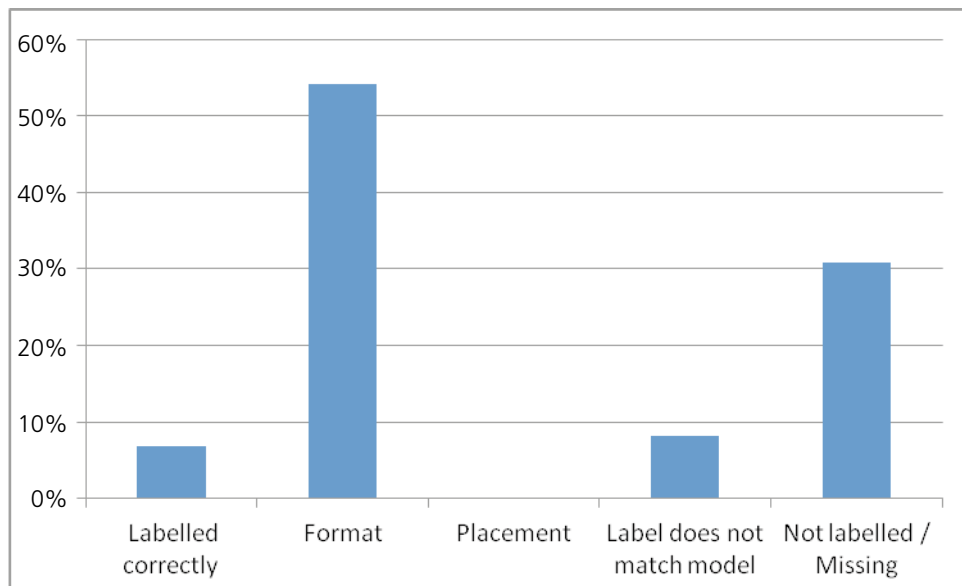
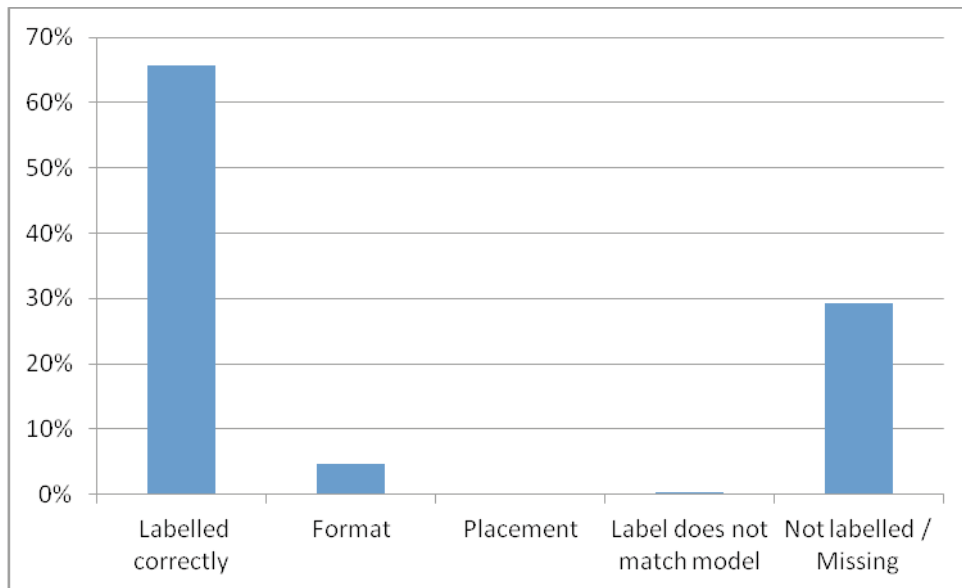
The online shops results show an improvement, compared to the Come On Labels project, since more data is now displayed. However, the level of compliance is still very low (3%). On the other hand, the physical shops visited, whose compliance rate has increased (74%) compared to the previous project, still exhibit unlabelled products (16%).

Luminaires are recently subject to the new label display information but were not translated in Portuguese, which, besides being a contradiction because all the other new labels show no text but only pictograms, doesn't help the consumers to interpret and understand the new label.



Spain

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



Number and types of shops visited

- Hypermarkets: 7
- Kitchen studios/furniture stores: 3
- Mail order and internet stores: 10
- Total: 20 shops visited

The strategy for the first round of visits within the MarketWatch project for Spain was to focus on general **hypermarkets** and **kitchen studios/furniture stores**. These shops showed lower compliance rates when visited by the Come On label project in Spain. Hypermarkets are visited by high numbers of consumers and are selling a variety of product types with energy labels. They operate in chains, so checking products in one city could give us a general vision about how they perform throughout the country, and we stand to improve the situation in more shops.

The strategic focus on hypermarkets is also in accordance with the opinion of Spanish stakeholders, including the national market surveillance authority, ANFEL and OCU.

The strategy is completed with a third type of shop; **internet shops**, which have an ever increasing market share. The Come On Label project only checked 3 internet shops (6%), so with hypermarkets and online shops we are complementing the work already done in Spain.

Main findings in terms of label display per shop types

Mail order and internet stores is the category with the largest rate of non-compliance. Only 3% of the products checked were labelled correctly. In 46% of cases, the format of the label was wrong. For internet shops, this means that the order of the information was wrong or incomplete.

Overview of label display in shops

If we consider the whole dataset (eshops + physical), the most important problem is missing labels (38% non-compliance), but if we focus on internet shops, then format (46%) is the most important category. In physical shops, unlabelled or missing (29%), is the most important.

Number and types of products reviewed for label display:

Considering:	the least labelled in shops			
online + physical	Electric ovens	51% not labelled	Wine storage appliances	50% not labelled
Only physical shops	Wine storage appliances	88% not labelled	Air conditioners/ electric oven	79% not labelled
Only online	TVs	100% not labelled	Refrigerators	52% not labelled

The most common mistake considering online shops (for all products categories) is incorrect order, or missing, information.

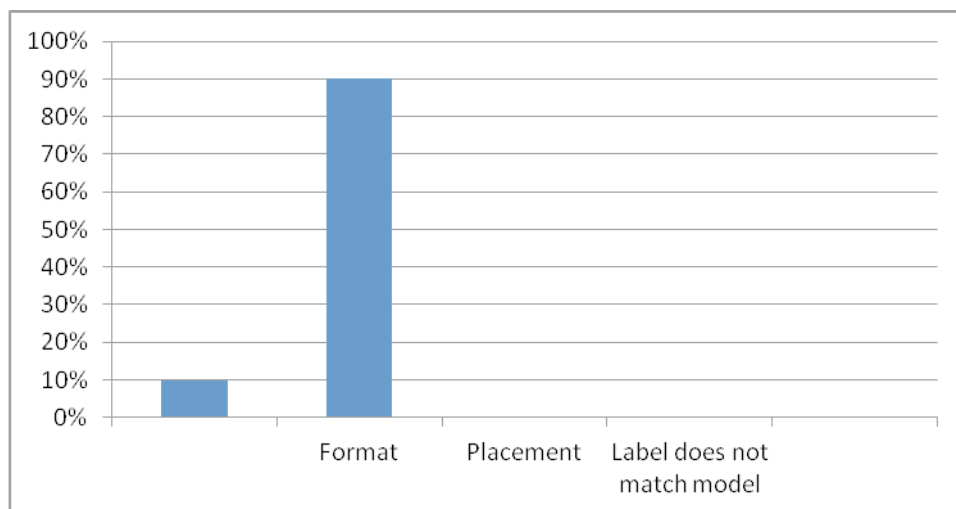
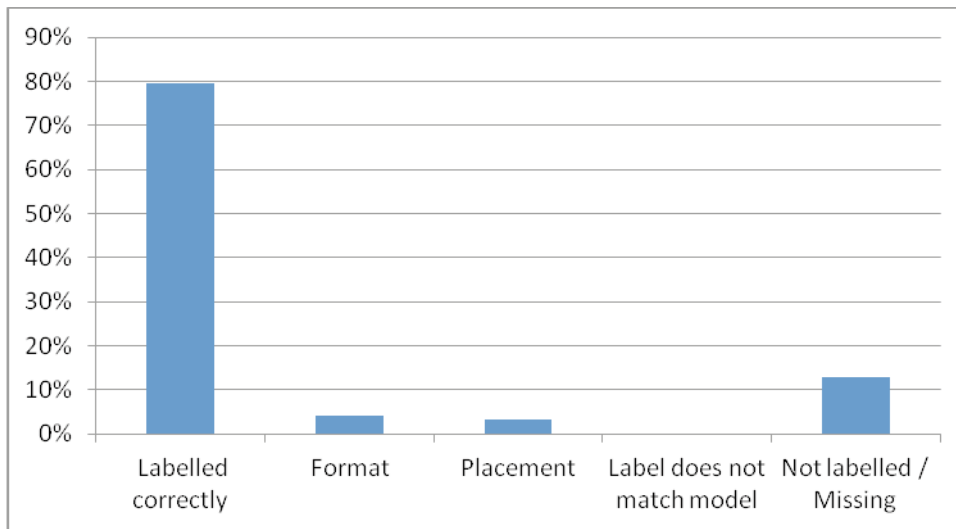
Energy class missing in advertisements containing price of the product (eg. products in energy classes below A)

All advertisements carried energy class



UK

Overview of label display findings for physical shops (1st chart) and internet shops (2nd chart)



In its first round of MarketWatch in-store and online shop inspections – checking compliance with the energy label display and Ecodesign requirements – the UK’s Energy Saving Trust focused and prioritised on a mixture of independent electrical retailers (specialists), furniture / DIY stores, supermarkets and department stores. The reason for this focus was, in part, because of the findings from a previous UK study of compliance rates for display of the energy label in-store, carried out by the National Measurement Office in 2012. The report identified particularly high levels of non-compliance by independent electrical retailers. Of the 8 in-store visits, 4 were conducted on independent electrical retailers, 2 on furniture / DIY stores

and there was also 1 example each of an electronics superstore and a large department store. All stores were based in and around London, where the Energy Saving Trust is based. In terms of the online visits, 5 independent electrical retailers were assessed, as well as 1 each from the supermarket, department store and electrical superstore categories.

In all, 723 products were inspected for energy label compliance in-store – 20% of which were either missing labels (13%) or partly labelled (7%). Of the partly labelled products, 4% was on account of formatting, with 3% on placement.

In terms of a shop type analysis for the in-store inspections of energy label compliance, in all, independent electrical retailers (n=4) had 30% of products which were either missing labels (23%) or partly labelled (7%). Furniture / DIY stores had 65% of products that were either missing labels (27%) or partly labelled (38%) – although with such a small sample size (n=2), the results can be easily skewed. Of greater significance in these stores was the partial labelling of products, particularly the incorrect placement of energy labels and the incorrect formatting of labels. Department stores and electrical superstores both had 12% of products either missing labels or partly labelled.

In all, 718 products were inspected for energy label compliance across the online shops – 90% of which were partly labelled. More specifically, there were no recorded instances of missing labels, and all of the 90% of partially labelled products were down to formatting.

At a shop type analysis level, the level of partially labelled products sold through independent stores ranged from 93% to 100%, with one store at 80%. The department store had a similar level of non-compliance, but the supermarket and electrical superstore recorded relatively lower levels – compared to the average – of partial label display, ranging from 62–70%

The strategy was to select the broadest range of product categories possible, whilst also including categories such as electric ovens and tumble dryers, where possible, following the findings from the NMO 2012 report which highlighted these categories as having particularly high levels of energy label display non-compliance.

In terms of the in-store data, for the independent electrical retailers, the numbers of individual products inspected per store varied from between 30 and almost 90. Cold appliances were checked in each store, with laundry, wet appliances and televisions also frequently inspected. The main issue for non-compliance was missing labels, and this was observed across product categories. In the furniture / DIY stores, there were less products on sale subject to the relevant regulation. A total of 37 products were inspected from a sample of 2 stores, but with such a small sample size there was no discernable trend at a product category level. The analysis did reveal a trend for formatting errors in electric oven energy labels, with one example showing 24% of products classified as such.

Five product categories were checked for each of the online stores; typically these were large domestic appliances. Due to the dominance of energy label non-compliance for online stores, there is little to differentiate between product categories. All categories largely recorded formatting errors.

As for Ecodesign, 508 products, ranging across 4 different product categories – cold appliances, washing machines, dishwashers and tumble dryers – were inspected.

In terms of suspicious cases, it wasn't possible for those products missing energy labels, to verify whether or not the product conformed to the minimum energy performance standard (MEPS). However, on the whole, the number of cases where this was an issue was small, relative to the number of compliant products on the market place. There were a small but significant number of cases where products were on the market, below the MEPS. There were 9 such suspicious cases, but out of 508 (<2%). These instances were spread across the product categories.

There were 34 instances, out of 123 washing machines inspected (28%), where the standard programme could not be easily identifiable. The issue was far less significant in dishwashers.

From both the in-store and online energy labelling inspections there were no recorded findings of any energy label super-declarations and there were no findings of any product advertisements that were missing the energy label class.

The availability of product fiches was sampled during the in-store inspections. From such a small sample size it was difficult to draw meaningful conclusions; it is an aspect of the inspections that will benefit from further sampling. From those products sampled, refrigerators appeared to carry the fiches, whilst electric ovens did not.

The results will now be rolled out individually to the retailers involved. The Energy Saving Trust has already raised awareness of the shop inspections with the UK market surveillance authorities.

Other literature and references

These further literature resources are available for interested readers, covering the topic of energy label display in shops and the various shop visit activities undertaken in the past:

Come On Labels – National shop visit reports

www.come-on-labels.eu/displaying-energy-labels/status-of-appliance-labelling

Fraunhofer / GfK et.al. – Survey of Compliance Directive 92/75/EEC (Energy Labelling)

www.isi.fraunhofer.de/isi-media/docs/e/de/aktuelles/Energy-Labelling_Final-Report.pdf

NMO UK: Energy Labelling Framework Directive – UK Compliance Project 2012

www.bis.gov.uk/assets/nmo/docs/elf/news/energy%20labelling%20framework%20directive%20uk%20compliance%20project%202012%20final.pdf

ANEC, 2007: A review of the range of activity throughout Member States related to compliance with the EU Energy Label regulations in those countries

www.anec.eu/attachments/ANEC-R&T-2006-ENV-008%20%28final%29.pdf

Dünhoff Elke, Negatsch Katrin, Strüh Carmen, 6.5.2013, Energy labelling of electric appliances – Results of the second market check in December 2012, Mainz

www.verbraucherzentrale-rlp.de/link1119589A.html

CONTACTS

Lead partner of the project's shop visit activity:



Juraj Krivošík, SEVEn, The Energy Efficiency Center, Czech Republic
Juraj.Krivosik@svn.cz

National chapters drafted by individual project partners.

Project coordinated by



Frances Downy, Energy Saving Trust, United Kingdom
Frances.Downy@est.org.uk

www.market-watch.eu



@MarketWatchEU

Please, do not hesitate to contact your national project contact point to find out more³!



Co-funded by the Intelligent Energy Europe Programme of the European Union

The sole responsibility for the content of this publication lies with the authors. It does not necessarily reflect the opinion of the European Union. Neither the EASME nor the European Commission are responsible for any use that may be made of the information contained therein.