

# Ecodesign, Energy Labelling and Tyre Labelling Market Surveillance



An overview of our approach and activities

# Overview

Background (Ecodesign & Labelling)

What we do

Lighting case study

Our approach to market surveillance

Business obligations

MSA powers / enforcement

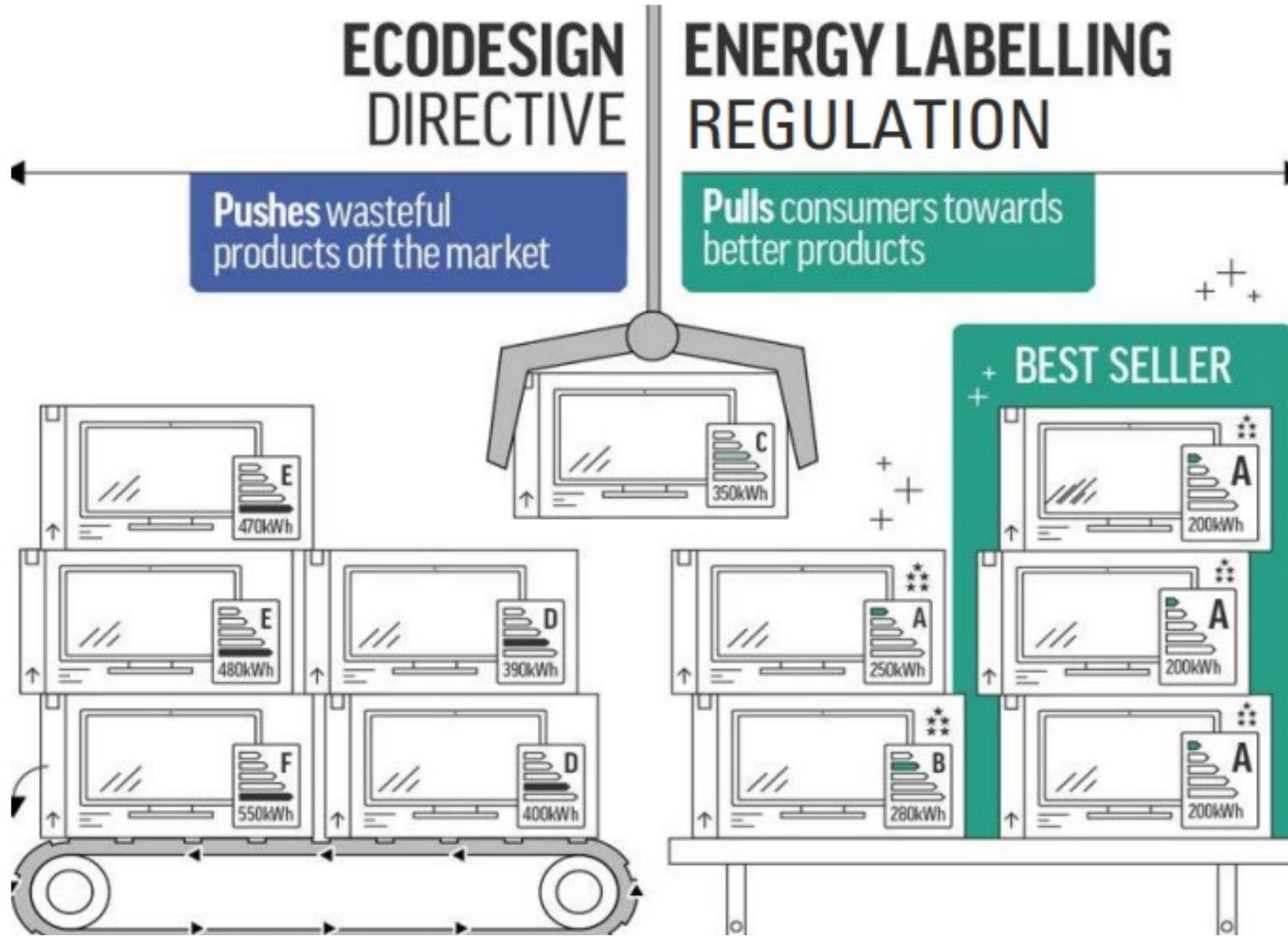


# ECODESIGN DIRECTIVE

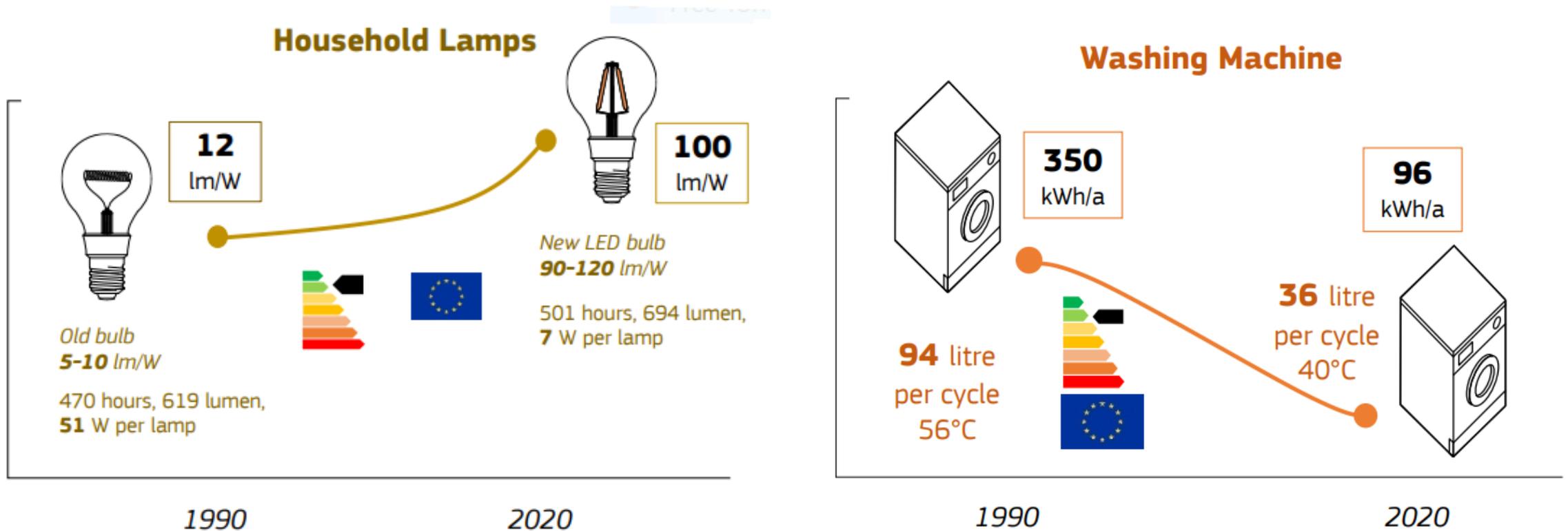
# ENERGY LABELLING REGULATION

Pushes wasteful products off the market

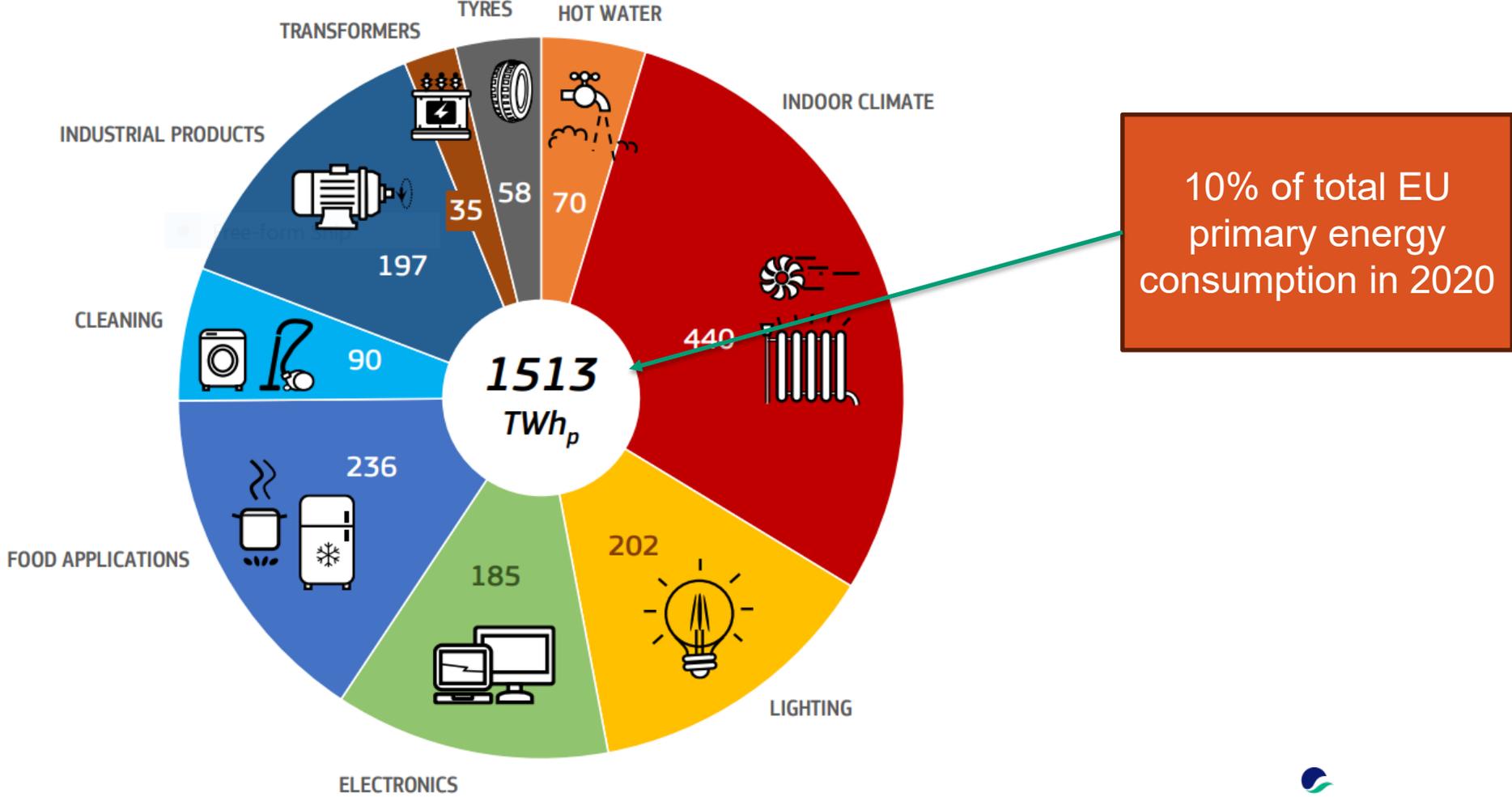
Pulls consumers towards better products



# Effect of ecodesign and energy labelling on the energy efficiency of household lamps and washing machines

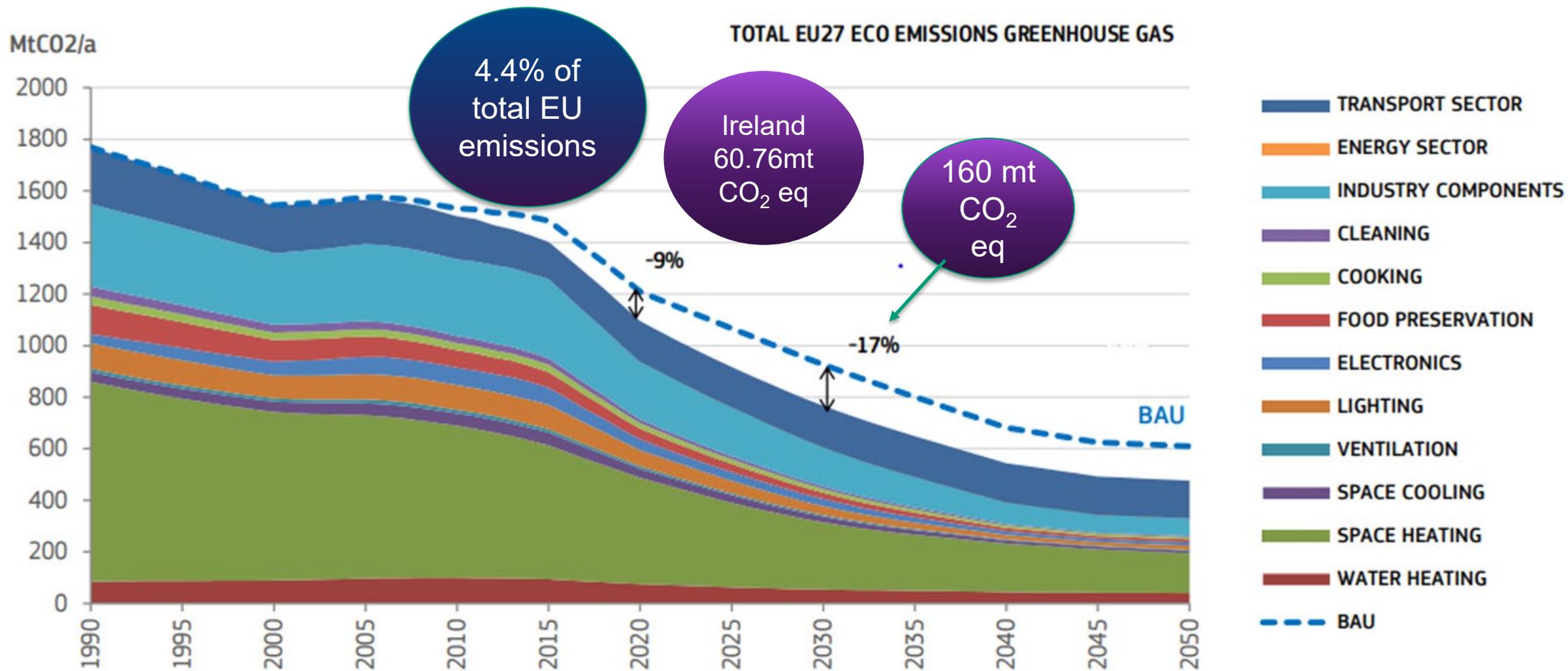


# Effect of ecodesign, energy labelling and tyre labelling on EU-27 primary energy consumption in 2030



10% of total EU primary energy consumption in 2020

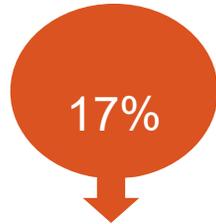
# Effect of ecodesign and energy labelling on EU GHG emissions



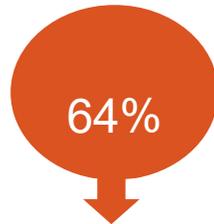
# Summary of modelled impacts of ecodesign, energy labelling and tyre labelling in 2030 versus business as usual (EU)



17% reduction in EU GHG emissions for the average product



64% reduction in EU NOx emissions



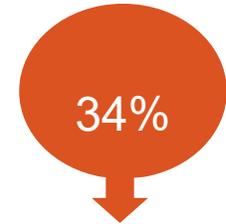
32% reduction in carbon monoxide



30% reduction in organic gaseous compounds



34% reduction in PM emissions



€151 bn energy cost savings



€31bn extra business revenue



Increase of 433,000 direct jobs

These estimates are based on 100% compliance. The European Court of Auditors suggests assuming a 10% reduction in GHG emissions saved due to non-compliance

# Examples of non-compliance: Washing machine

- More energy used than declared or allowed
- Technical documentation deficiencies
- Functionality deficiencies
- Not registered / required information not on EPREL

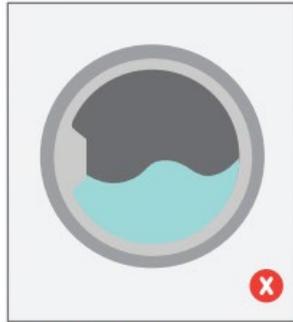


- Washing performance
- Lack of availability of spare parts
- Lack of access to repair and maintenance information
- Failure to provide required product information

These are just examples of ecodesign and energy labelling non-compliance – washing machines also have to comply with other EU legislation e.g. Low Voltage Directive

# Examples of non-compliance / compliance: Retailer energy labelling obligations

In store



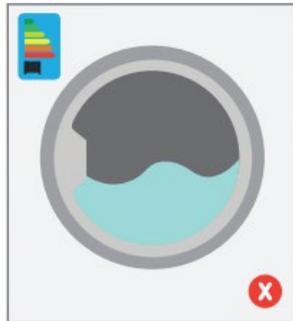
Missing energy label



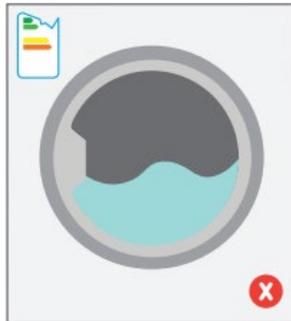
Obscured energy label



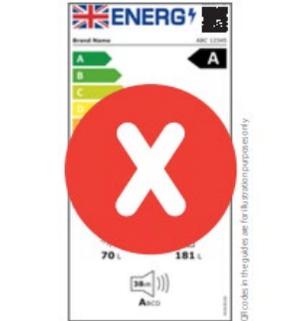
Incorrect location of energy label  
(i.e. rear of product)



Incorrect format of energy label



Torn or damaged energy label

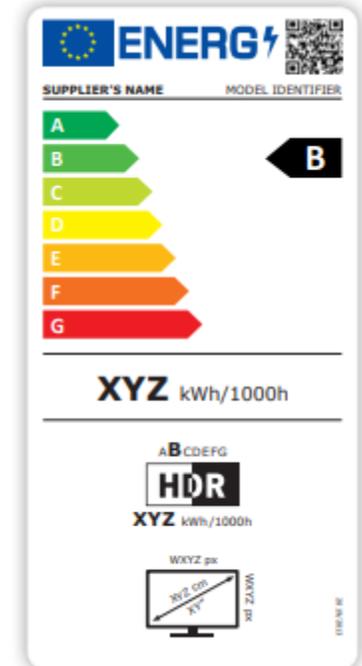


Non-EU energy labels (such as the UK energy label)

Online



The energy label icon opens to this.



## Why we do market surveillance

To maximise the impacts of ecodesign and energy labelling

To maintain a 'level playing field' for compliant economic operators

Non-compliance is detrimental to consumers, other end-users and the environment. It also represents unfair competition, negatively affecting the functioning of the EU Single Market

# What we do.

# Key components of market surveillance



# Examples of products covered by ecodesign and energy labelling



Light sources



CH boilers and heat pumps



Air conditioners



Solid fuel boilers



Servers and data storage



Kitchen appliances

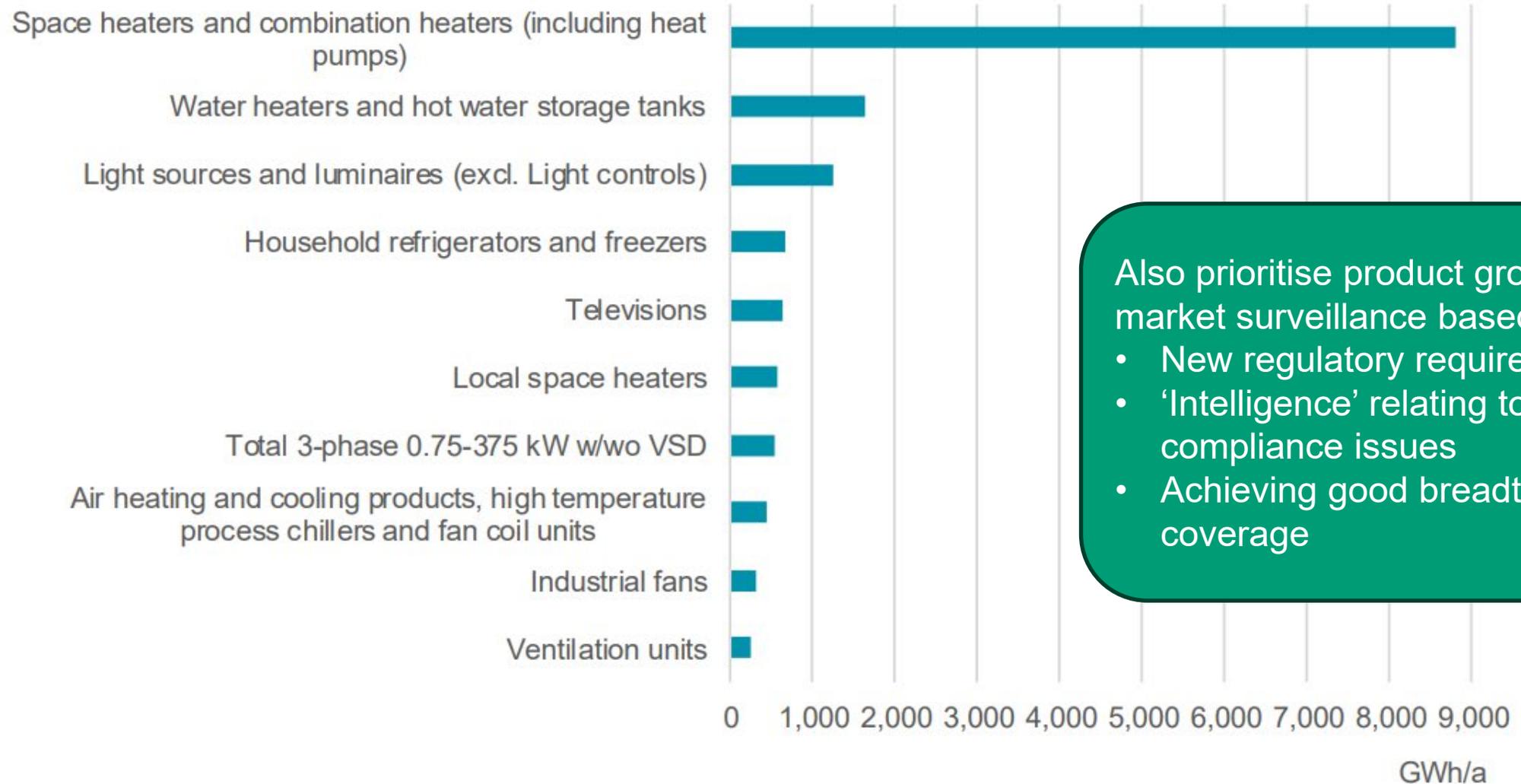


Shop refrigeration



Water pumps

# Prioritisation of market surveillance campaigns



Also prioritise product groups for market surveillance based on:

- New regulatory requirements
- 'Intelligence' relating to compliance issues
- Achieving good breadth of coverage

# SEAI's market surveillance plan 2023 to 2025 (3 years)

*Electronic displays*  
*Servers and data storage products*  
*Computers*  
*External power supplies*  
*Networked standby*  
*Standby*  
*Mobile phones*

*Lighting*  
*Gas and oil boilers*  
*Heat pumps*  
*Water heaters*  
*Solid fuel local space heaters*  
*Air conditioners*  
*Air heating and cooling products*  
*Ventilation*

*Electric motors*  
*Power transformers*  
*Industrial fans*  
*Tyres*

*Household dishwashers*  
*Household refrigeration*  
*Professional refrigeration*  
*Refrigeration with direct sales function*  
*Ovens*  
*Tumble dryers*  
*Vacuum cleaners*  
*Household washing machines / dryers*

**We also respond to allegations of non-compliance and open up investigations**

# SEAI's market surveillance activities - a typical year



110 retail outlets inspected annually for energy labelling compliance



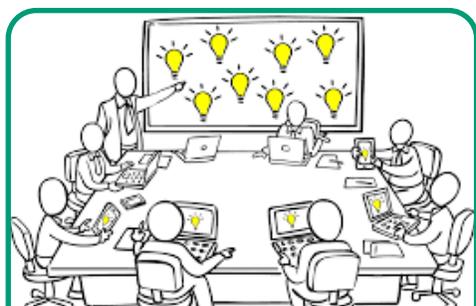
70 websites and 40 advertisements assessed annually for labelling compliance



200 to 250 detailed product compliance assessments



30 to 50 products laboratory tested per annum



Meetings with industry and other stakeholders (5 to 10 per annum)



1:1 meetings with individual economic operators



Compliance guides and campaign reports



Communication campaigns e.g. energy labelling



# Lighting Market Surveillance Campaign Case Study

A photograph of a laboratory or testing facility. In the center, a person wearing a red sweater is standing, partially obscured by a complex arrangement of metal frames and lighting fixtures. The room is filled with numerous rows of hanging light fixtures, some of which are illuminated, creating a bright, industrial atmosphere. The fixtures appear to be part of a testing rig or display system.

2017 to 2022

# Overview



180 products subjected to formal compliance checks over a 5-year period



29 products laboratory tested at laboratories in the UK and Belgium



Assistance from the Lighting Association of Ireland

Identifying potential areas of concern (from huge range of lighting products)  
Conduit for communication (both ways) with lighting industry

# Summary of campaigns and results

Campaign	Longlisted	Formal Compliance Assessment	Subjected to corrective actions	Laboratory tested	Technically Non-Compliant
GU10 Campaign (2017)	215	78	n/a	6	4
Domestic Lamp Campaign (2018)	50	50	n/a	6	4
LED Panel Campaign (2020)	125	22	15	4	2
Domestic Lamp Campaign (2020)	21	21	10	7	4
Smart lighting (2022)	40	20	14	6	3
Floodlights and downlights (2022)	1263	10	8	0	0
<b>Total</b>	<b>2614</b>	<b>180</b>	<b>42</b>	<b>29</b>	<b>17</b>

## Notable successes – lighting market surveillance

- Approx. 29,000 non-compliant units of a range of products held in manufacturer's stocks not 'placed on the EU market ' by the manufacturer
- Inappropriate testing methodology/exemption applied to 17 product models from another company - voluntary actions taken
- Numerous other voluntary withdrawals
- Enforcement has been undertaken by the MSA in some instances

Key elements of our approach to  
market surveillance:

Collaboration



# A collaborative approach is fundamental to market surveillance

Nationally



Different MSAs for different Directives / Regs

Internationally



ICSMS EU projects

With stakeholders

Multiplies resources and impact



Information sharing + working together

Enforcement challenges across national boundaries

# Current and upcoming EU collaboration....



## ENERTP2020:

- Heat pump testing
- Cooking appliance testing



## EEPLIANT4:

- Off-mode / networked standby
- Vacuum cleaners
- Cooking appliances
- Electronic displays
- Solid fuel stoves



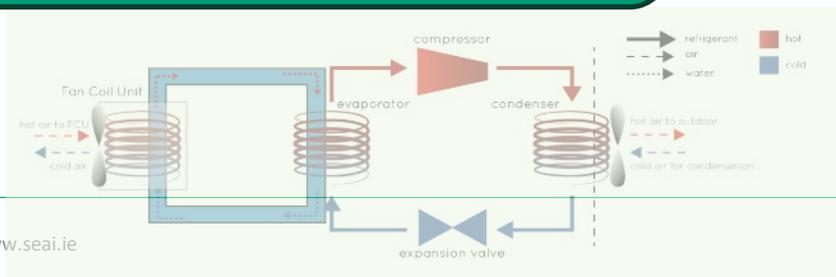
## JACOP2024:

- Shop refrigeration
- Air cooling products



## JAHARP:

- Electronic displays
- Professional refrigeration



Key elements of our approach to market surveillance:

Compliance promotion



# SEAI's approach to compliance promotion

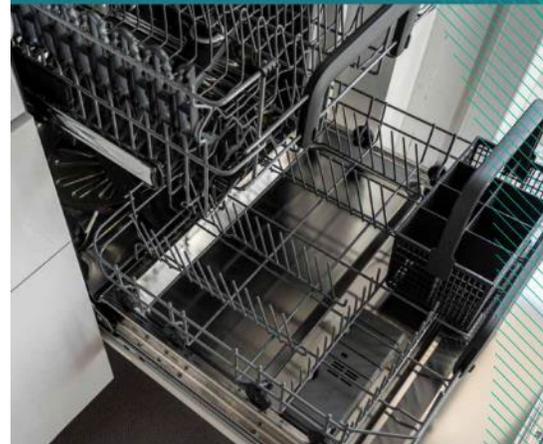
For every market surveillance campaign we organise, we:

- develop, publish and disseminate a campaign report
- engage with industry and other key stakeholders (including consumers, if relevant)
- use the learnings to inform the development and publication of compliance guidance, if required.

## Our mantra:

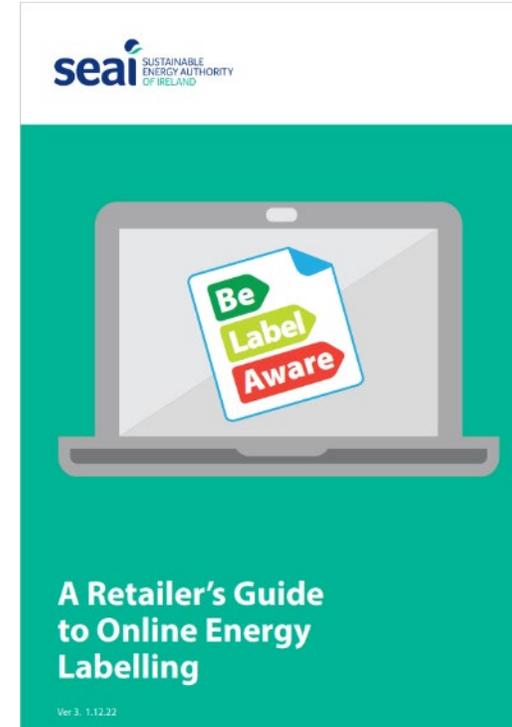
**The MSA magnifies the impact of its inspections and enforcement activity through communicating this work to key stakeholders, and through using the learning gained to develop compliance supports for economic operators**

# Our market surveillance campaign reports.....

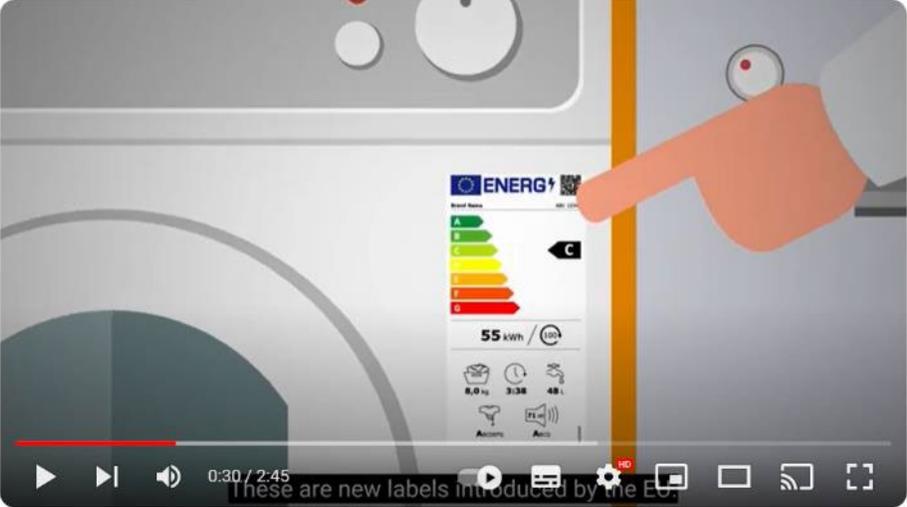


**Coming this year: Gas and oil boilers, lighting, household refrigeration and more**

# Our retailer guides.....



# Our videos and animations.....



Update for retailers: EU energy labels are being rescaled in 2021

Sustainable Energy A...  
2.89K subscribers

Subscribe

3

Share

Energy labelling rescaling

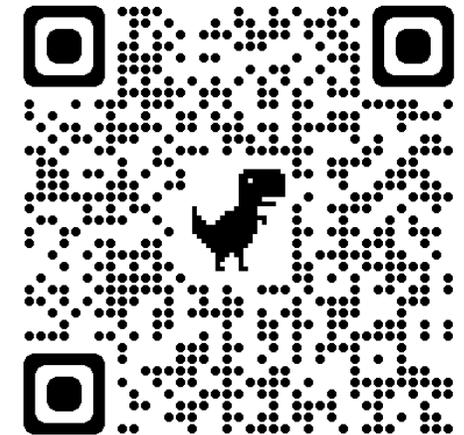
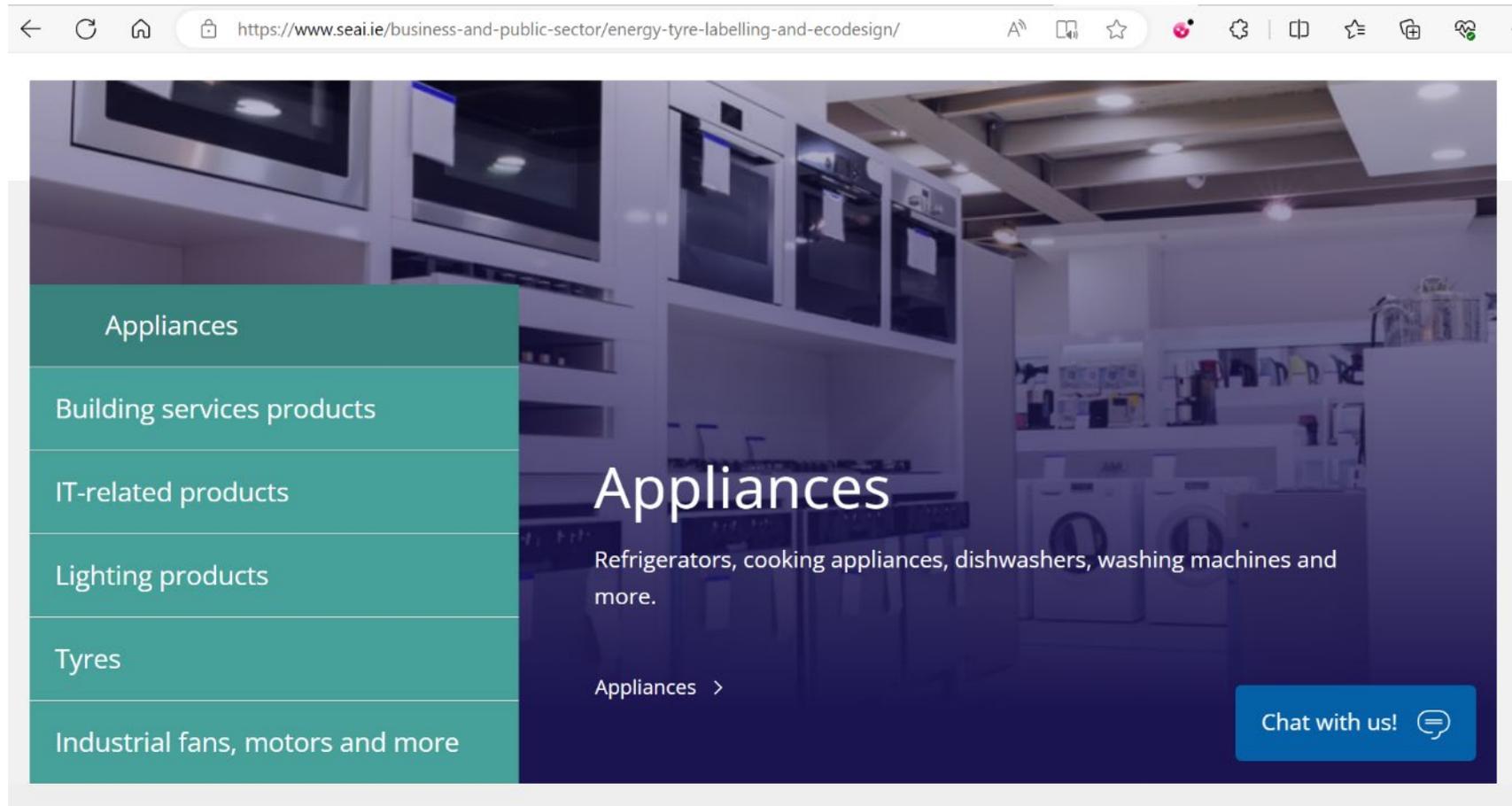
Energy labelling training for retail staff



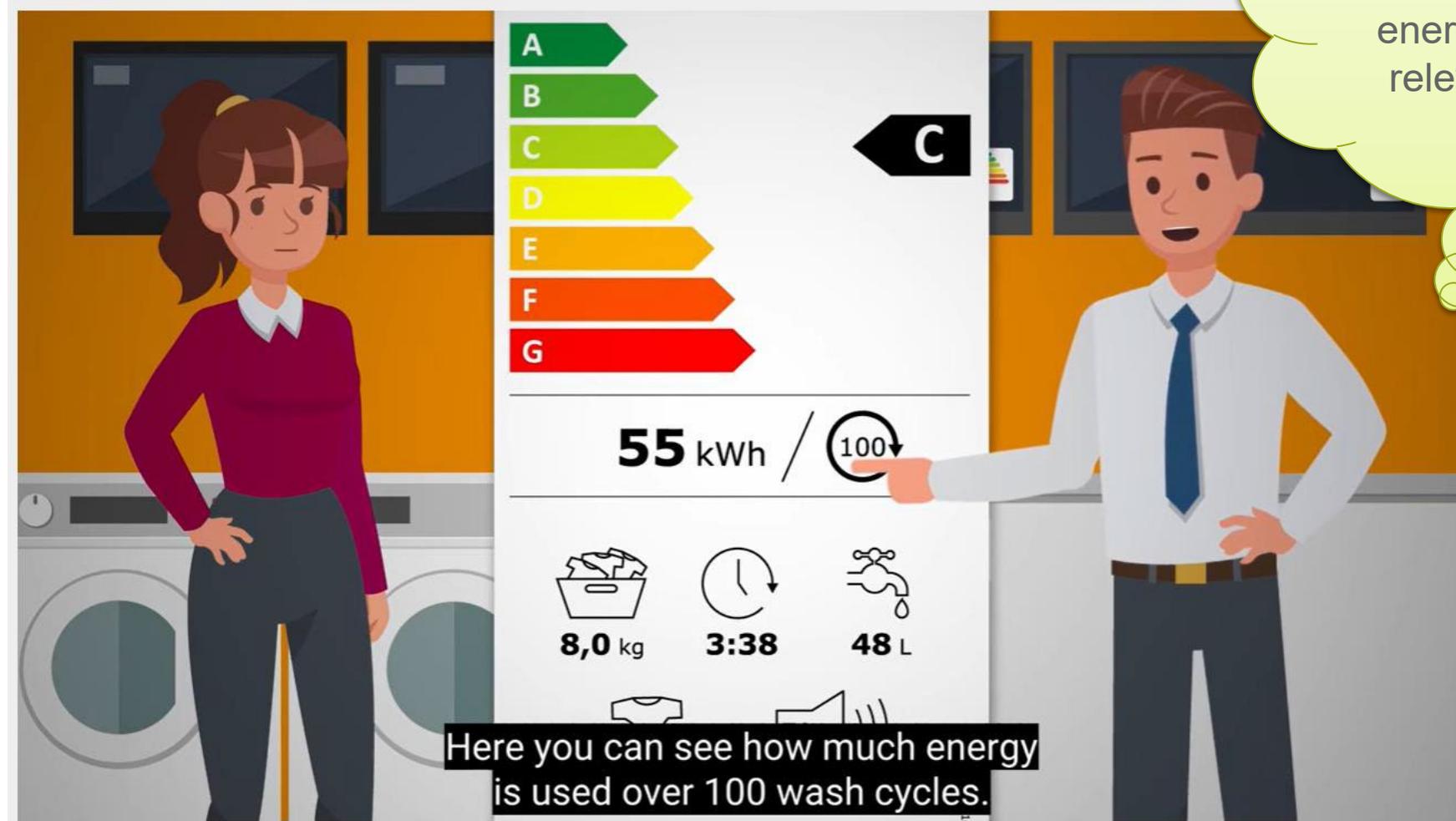
In-store  
Energy Labelling Training

seai SUSTAINABLE ENERGY AUTHORITY OF IRELAND

# Our website: Ecodesign and Energy Labelling | Business | SEAI



# Leveraging the wider SEAI remit to promote energy efficiency and sustainable energy



Compliance is great, but what if people don't understand or use the energy label (and other relevant information)?

# Business Obligations:



# Eco-design

## 1) Manufacturer

***Definition: Any natural or legal person who manufactures a product or has it designed or manufactured, and markets it under his or her name or trademark***

***If you import product from outside the EU, remove the original manufacturers name and make/model, and replace it with your make and model, you assume the role of the manufacturer***

### Obligations

- \* **Ensure the products complies with relevant EU enactments (Eco-design).**
- \* **Draw up the technical documentation and carry out the applicable conformity assessment procedure.**
- \* **Affix the CE Mark.**
- \* **Affix your registered business name and address to product or accompanying documentation.**
- \* **Affix your make and model number to the product.**
- \* **Furnish technical documentation to MSA upon request.**
- \* **Keep technical documentation for 10 years after placement on the EU market.**

# Eco-design

## 2) Authorised Representative

***Definition: Any natural or legal person established in the EU who has a written mandate from the manufacturer to act on its behalf in relation to specified tasks with regard to the manufacturers' obligations***

## 3) Importer

***Definition: Any natural or legal person established in the EU who places a product from a third country on the Union market.***

## Obligations

- \* Ensure the products complies with relevant EU enactments (Eco-design).
- \* Affix your business name and registered address to product or accompanying documentation.
- \* Furnish technical documentation to MSA upon request.
- \* Keep technical documentation for 10 years after placement on the EU market.

# Eco-design

## 4) Distributor

*Definition: Any natural or legal person in the supply chain , other than the manufacturer or importer , who makes the product available on the market.*

### Advice

- \* Ensure the products complies with relevant EU enactments (Eco-design).
- \* Ask the manufacturer or importer for copy of DOC.
- \* Check DOC references all relevant EU enactments.
- \* Reconcile DOC with the markings on the product.

# Energy Labelling

## 1) Supplier

*Definition: Manufacturer established in the EU, the authorised representative of a manufacturer who is not established in the EU or an importer, who places the product on the EU market.*

### Obligations

- \* Ensure the product is accompanied for each individual unit , free of charge, with accurate printed labels and with product information sheets in accordance with relevant EU enactments.
- \* Deliver printed labels and product information sheets to the dealer free of charge within 5 days of request.
- \* Ensure the accuracy of labels and product information sheets and shall produce technical documentation sufficient to enable the accuracy to be checked.
- \* Before placing the product on EU market on EPREL.
- \* Keep information concerning that model in the compliance part of EPREL for 15 years after model sales stopped.

# Energy Labelling

## 1) Dealer

*Definition: means a retailer or natural or legal person who offers for sale, hire, or hire purchase, or displays products to customers or installers in the course of a commercial activity, whether or not in return for payment.*

## Obligations

- \* Display, in a visible manner, including for online distance selling, the label provided by the supplier.
- \* Make available to customers the product information sheet, including, upon request in physical form at the point of sale.
- \* No, product information from supplier, shall request one from the supplier or download it from EPREL.

# Energy Labelling

## Obligations of Suppliers and Dealers

**Make reference to the energy efficiency class of the product and the range of the efficiency classes available on the label in visual advertisements or technical promotional material.**

**Cooperate with SEAI MSA and take immediate action to remedy non-compliance**

**Not provide or display other labels, marks, symbols or inscriptions that are likely to mislead customers.**

# MSA Powers / Enforcement



# MSA Powers and Sanctions

- \* Enter premises without warrant.
  - \* Take samples and test.
  - \* Take documents.
  - \* Take statements.
  - \* Require place left undisturbed.
  - \* Direct websites to take down content.  
etc.
- 
- \* Compel withdrawal (sales ban), with court appeal.
  - \* Compel recall with court appeal.
  - \* Prepare criminal prosecution file for DPP.

# Summary

- SEAI is very active, working across several product areas simultaneously, collaborating with our EU counterparts, and engaging with industry stakeholders
- We are also seeking to capitalise on the synergies between our market surveillance work and SEAI's wider brief to promote sustainable energy
- We support businesses to comply through our substantial compliance promotion activity
- We will take action, if businesses fail to take voluntary action or commit serious offences

# Thank you. Questions?



# Thank you

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