

Texte zu EU-Regelungen zur umweltgerechten Produktgestaltung und zur Energieverbrauchskennzeichnung in der Beleuchtung – Zusammenstellung ^[1] des Umweltbundesamtes (UBA), Deutschland



Entwürfe der EU-Kommission vom 6. Oktober 2020

**Stellungnahme von CLASP ^[2]
vom 3. November 2020**

– Produktinformation –

Hinweis: Bitte beachten Sie, daß der angehängte Text nur in Englisch verfaßt ist.

EN: Information on EU Lighting Regulations – Ecodesign and Energy Labelling – Compilation ^[1] of the Federal Environment Agency (UBA), Germany

The EU Commission's drafts of 6 October 2020

Comments by CLASP ^[2] as of 3 November 2020

– Product Information –

FR: Informations sur réglementations de l'UE concernant l'éclairage – l'écoconception et l'étiquetage énergétique – Compilation ^[1] de l'Agence Fédérale de l'Environnement (UBA), Allemagne

Les projets de la Commission Européenne du 6 octobre 2020

Commentaires de l'association de CLASP ^[2] du 3 novembre 2020

– Informations sur les produits –

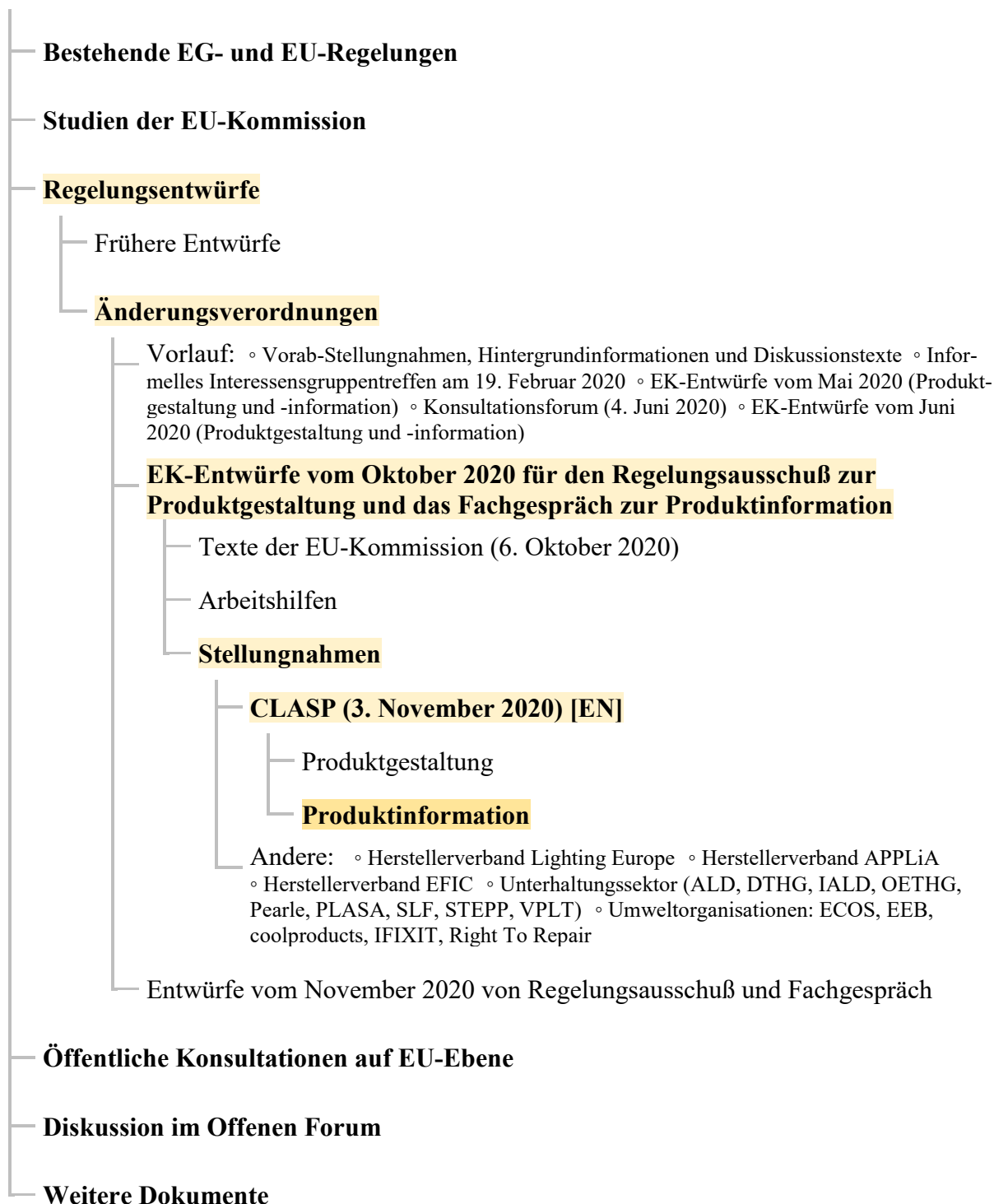
Indication : Veuillez noter que le présent texte n'est disponible qu'en anglais.

^[1] <https://www.eup-network.de/de/eup-netzwerk-deutschland/offenes-forum-eu-regelungen-beleuchtung/dokumente/texte/>

^[2] <http://www.clasp.ngo>

Texte im Offenen Forum

(abc = vorliegender Text)



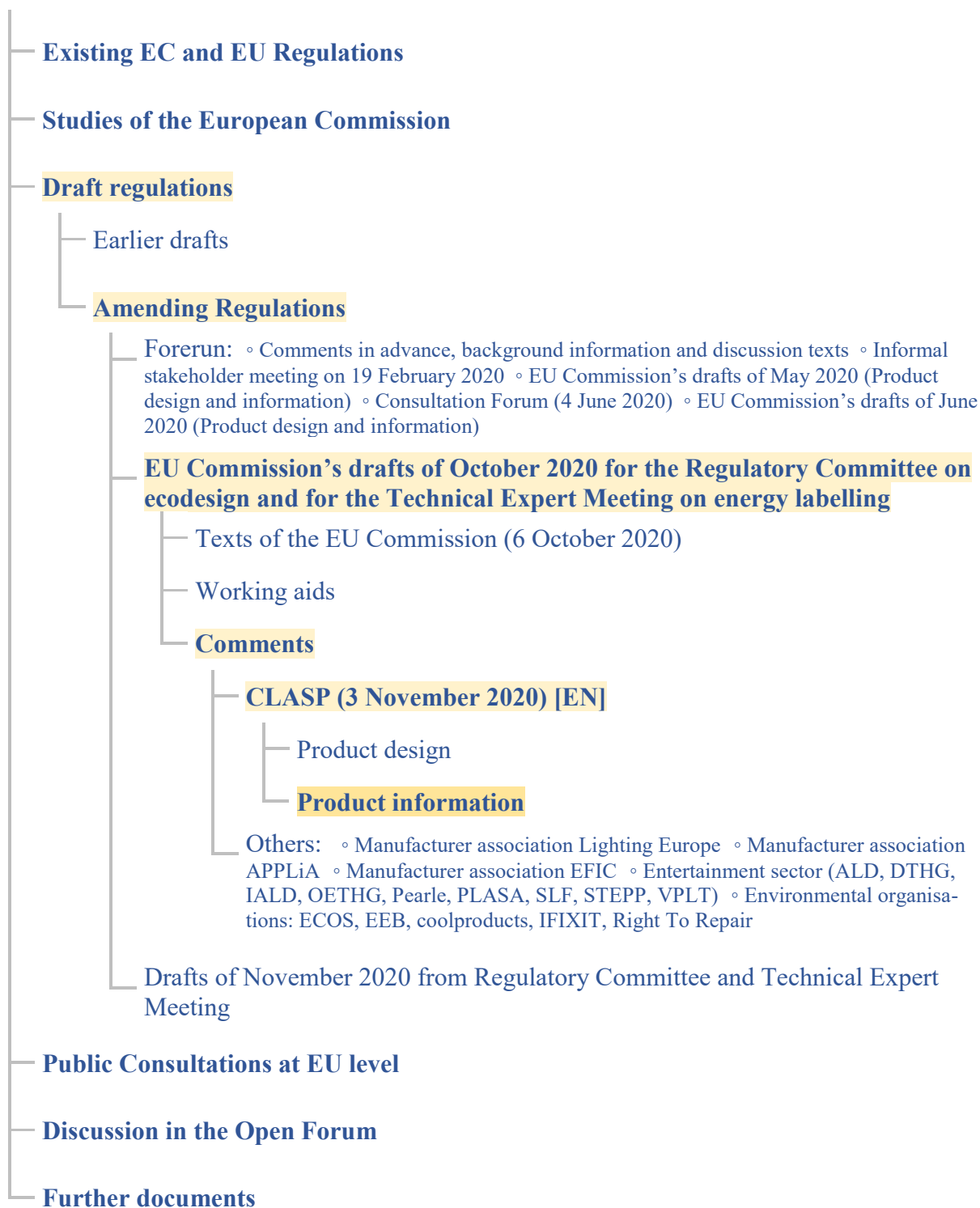
Abkürzungen: • EG = Europäische Gemeinschaft • EK = EU-Kommission • EU = Europäische Union

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Documents in the Open Forum

(abc = text at hand)



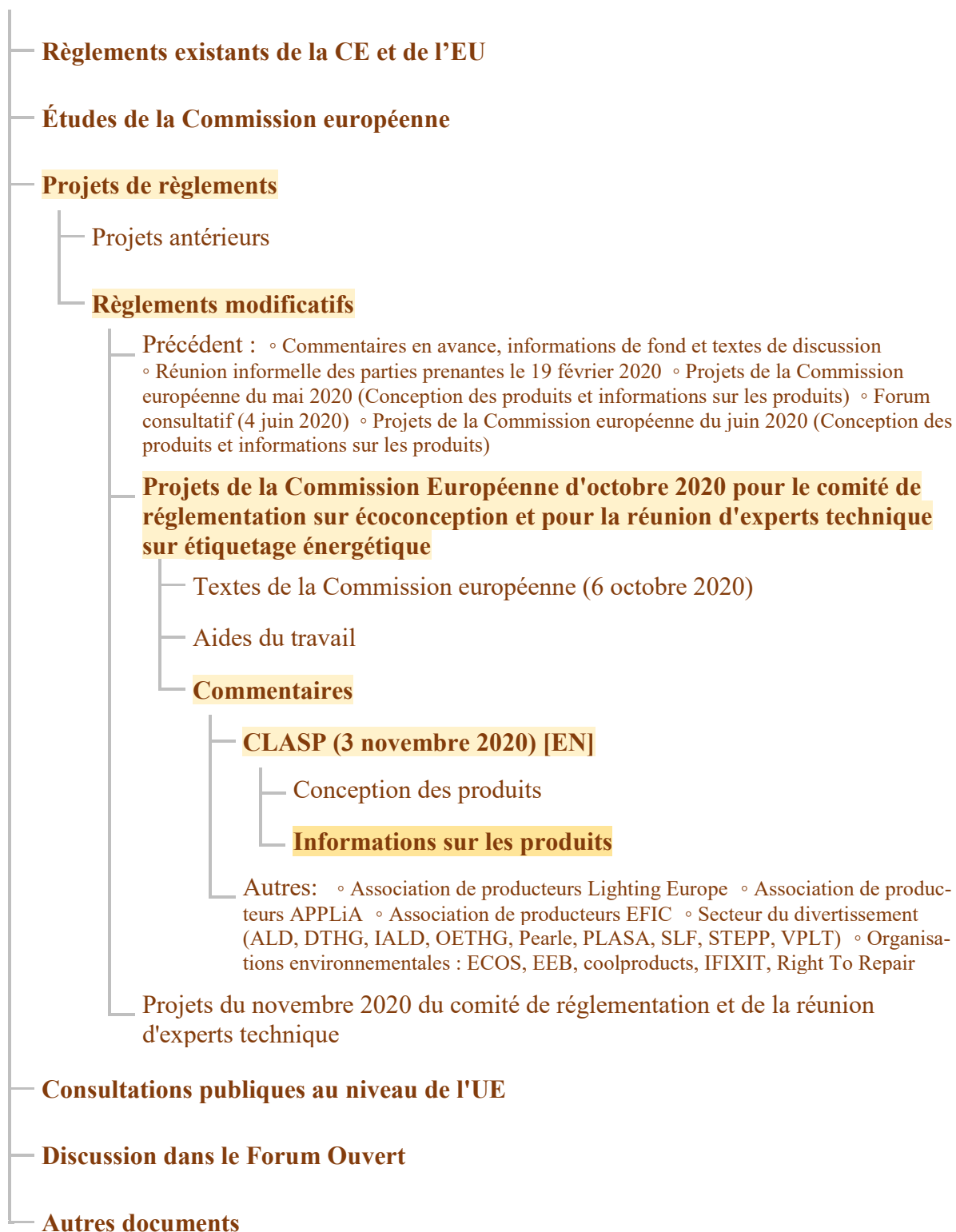
Abbreviations: ● EC = European Communities ● EU = European Union

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Documents dans le forum ouvert

(abc = présent document)



Abréviations : ● CE = Communauté européenne ● UE = Union européenne

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Contents list

The following table of contents gives details only in the case of lighting products.

The points on which CLASP has commented are on marked by **(CLASP)**.

The original document contains no page numbers. For better orientation the text has been supplemented by the editor with a footer text and continuous page numbering, as shown in the example on page VII.



Ecodesign

(...)



Labelling

EXPLANATORY MEMORANDUM (...)

Recitals (...)

Electronic displays – Regulation (EU) 2019/2013

Article 1/ANNEX I (...)

Household washing machines and household washer-dryers – Regulation (EU) 2019/2014

Article 2/ANNEX II (...)

Light sources – Regulation (EU) 2019/2015

Article 3

- (1) Article 2, point (3) **(CLASP)** 1/16
- (2) Article 3(1), point (b).....
- (3) Annexes I, III, IV, V, VI and IX (→ ANNEX III).....

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ANNEX III

- (1) Annex I (...)
- (2) Annex III (...)
- (3) Annex IV (...)
- (4) Annex V
 - (a) Table 3 – Product information sheet **(CLASP)** 2/16
 - (...)
- (5) Annex VI (...)
- (6) Annex IX (...)

Refrigerating appliances – Regulation (EU) 2019/2016

Article 4 **(CLASP)** 5/16

ANNEX IV **(CLASP)** 7/16

Household dishwashers – Regulation (EU) 2019/2017

Article 5/ANNEX V (...)

Refrigerating appliances with a direct sales function – Regulation (EU) 2019/2018

Article 6 **(CLASP)** 13/16

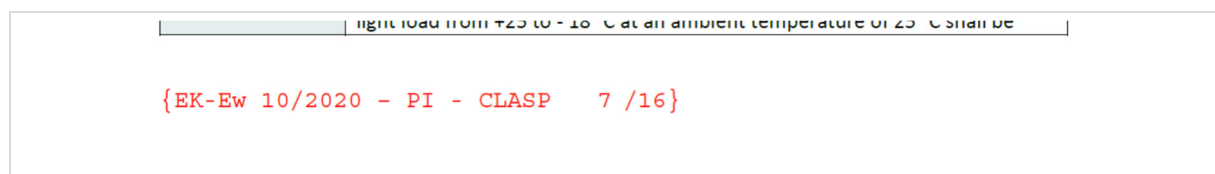
ANNEX VI **(CLASP)** 15/16

Article 7 – Entry into force and application (...)

Es folgt ein Originaltext, der keine Seitenzahlenangaben enthielt. Zur besseren Orientierung wurde der Text vom Herausgeber durch einen Fußzeilentext sowie eine Seitennumerierung ergänzt; siehe das Beispiel unten. Zwecks Unterscheidung wurden diese Ergänzungen in {roter Schrift} vorgenommen. Dabei verwendete Abkürzungen: • EK-Ew = Entwürfe der EU-Kommission • PI = Produktinformation

EN: This is followed by an original text which did not contain page numbers. For better orientation the text has been supplemented by the editor with a footer text and page numbering; see the example below. For purposes of distinction, these additions have been made in {red}. Here used abbreviations: • EK-Ew = EU Commission's drafts • PI = Product information

FR: Ce qui suit est un texte original qui ne contient aucun numéro de page. Pour une meilleure orientation, le texte a été complété par l'éditeur avec un texte de bas de page et une numérotation des pages ; voir l'exemple ci-dessous. À des fins de distinction, ces ajouts ont été faits en {rouge}. Abréviations utilisées dans ce cadre : • EK-Ew = Projets de la Commission européenne • PI = Informations sur les produits



To: DG Energy, European Commission

From: CLASP

Date: 3 November 2020

Re: **Comments on Energy Labelling Omnibus Amendment**

Products covered in these comments:

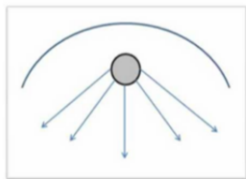
- Delegated Regulation (EU) 2019/2014 – Light sources
- Delegated Regulation (EU) 2019/2016 – Refrigerating appliances
- Delegated Regulation (EU) 2019/2018 - Refrigerating appliances with a direct sales function

Delegated Regulation (EU) 2019/2014 – Light sources	
Draft omnibus amendment	<p>Energy Labelling, Delegated Regulation, EU 2019/2015, Article 2: definition of ‘containing product’</p> <p>‘containing product’ means a product containing one or more light sources, or separate control gears, or both. Examples of containing products are luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s).</p>
Subject and current text	<p>‘containing product’ means a product containing one or more light sources, or separate control gears, or both, including luminaires that can be taken apart to allow separate verification of the contained light source(s), household appliances containing light source(s), furniture (shelves, mirrors, display cabinets) containing light source(s).</p>
Comment	<p>Modifies the definition of ‘containing product’, but the text is not identical to the Ecodesign and should match</p> <p>Problem that a vacuum cleaner, refrigerator, etc. is treated like a containing product and must be tested if the light source is not removable (N.B., this would be difficult)</p> <p>But removing “If a containing product cannot be taken apart for verification of the light source and separate control gear, the entire containing product is to be considered a light source;” removes the incentive to make luminaires serviceable</p> <p>One solution would be to add a “primary function” clause to the sentence that was proposed to be removed.</p>

Recommendation	<p>Please ensure that the definition of Containing Product is the same in both Ecodesign and Energy Labelling.</p> <p>Consider adding a “primary function” of the containing product:</p> <p>IEC definition: “primary function - function providing the intended purpose” (IEV ref. 904-03-02)</p> <p>Alternative: “primary function - the service requires a major part of the total energy consumed by the product when in use”</p> <p>So in context, the new sentence would read: “If the primary function of the containing product is to produce light and the containing product cannot be taken apart for verification of the light source and separate control gear, then the entire containing product is to be considered a light source;”</p>
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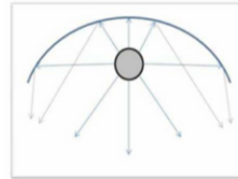
Draft omnibus amendment	<p>Energy Labelling, Delegated Regulation, EU 2019/2015, Annexes; Annex V, Table 3 –concern on LED equivalent for fluorescent tube:</p> <p>'yes': Claim that a LED light source replaces a fluorescent light source without integrated ballast of a particular wattage. This claim may be made only if:</p> <ul style="list-style-type: none"> the luminous intensity in any direction around the tube axis does not deviate by more than 25 % from the average luminous intensity around the tube; and the luminous flux of the LED light source is not lower than the luminous flux of the fluorescent light source of the claimed wattage. The luminous flux of the fluorescent light source shall be obtained by multiplying the claimed wattage with the minimum luminous efficacy value corresponding to the fluorescent light source in Table 8; and the wattage of the LED light source is not higher than the wattage of the fluorescent light source it is claimed to replace.
Subject and current text	(Same text)
Comment	<p>The first two bullets in this list of three bullets are problematic because they already make it impossible for manufacturers to make any claim of equivalency.</p> <p>LED retrofit tubes are directional in nature, thus do not need the same luminous flux intensity to perform the same function. The figure below illustrates this point – no light is emitted in the upward direction as this is often wasted, being adsorbed (not reflected) by the luminaire or reflected back into the tube.</p>

LED Tube Retrofit



LED lamps emit light downward, so no reflectance in the fitting

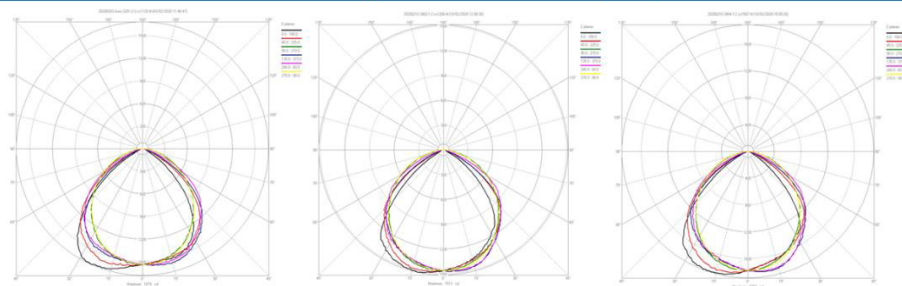
Linear Fluorescent Tube



Fluorescent tubes emit light all around, requiring a reflector

In addition, on the second bullet, the level of light output from the LED tube can be lower yet the end-user experiences the same resulting illumination on the workplane. This point is illustrated by these Luminous Intensity Distribution plots which compare the light intensity distribution pattern in four planes between a fluorescent tube and two LED tubes. The fact that the light patterns are the same for all three lamps shows that the light projected out of the luminaire is the same, even though both LED lamps have lower light output than the fluorescent lamp.

Luminous Intensity Distribution Plots for LFL, LED1, LED2




T8 Fluorescent Lamp (3201-1-3)

T8 LED Lamp (3402-1-2)

T8 LED Lamp (3404-1-2)

Keeping this requirement will cause confusion in the market and slow the transition to LED tubes, as equivalency to fluorescent lamps is precisely how LED retrofit lamps are marketed today. Please see this example below for a Philips CorePro LED tube.

	<ul style="list-style-type: none"> Equivalency is important for consumers to know this lamp will perform the same in a given socket  <p>ANY-LAMP.CO.UK</p> <p>What are you looking for?</p> <p>LED Lights LED Fixtures Fluorescent Tubes CFL Bulbs Gas Discharge Lamps Halogen Bulbs Switches</p> <p>Philips CorePro LEDtube EM 14.5W 840 120cm Cool White - incl. LED Starter Replaces 36W £ 6,84 incl. Tax</p> <p>Description Philips CorePro LEDtube EM 14.5W 840 120cm Cool White - incl. LED Starter - Replaces 36W</p> <p>Philips CorePro Instantfit HF allows the replacement of a fluorescent tube T8 (socket G13) in a fixture with conventional ballast (ferromagnetic). With a CRI (Color Rendering Index) above 80 which gives fine and precise colors. This LED tube provides a natural white cool light (4000K) and is appropriate for lighting in industry.</p> <p>This product has a high resistance to switching cycle (20000x) and an average lifetime of 30000 hours. Complying with RoHS (Restriction of Hazardous Substances, 2002/95/CE) and KEMA-Keur certificate, this product is respectful of the environment. This LEDtube of 120cm can easily fit in place of the standard tube of 36W.</p> <p>PHILIPS</p> <p>A+</p>
Recommendation	<p>Remove the fluorescent lamp equivalency requirement entirely and instead put a provision in the Review Section of the regulation to review this issue of manufacturer claims of equivalency in LED retrofit lamps and develop better guidance if needed in the revision.</p>

Delegated Regulation (EU) 2019/2016 – Refrigerating Appliances

Draft omnibus amendment	<p>(1) in Article 2, point (31) is replaced by the following:</p> <p>‘(31) ‘mobile refrigerating appliance’ means a refrigerating appliance that can be used where there is no access to the mains electricity grid and that uses extra low-voltage electricity (< 120V DC) or fuel or both as the energy source for the refrigeration functionality, including a refrigerating appliance that, in addition to extra low voltage electricity or fuel, or both, can be electric mains operated via an external AC/DC converter to be purchased separately. An appliance placed on the market with an AC/DC converter is not a mobile refrigerating appliance;’</p>
Subject and current text	<p>(31) ‘mobile refrigerating appliance’ means a refrigerating appliance that can be used where there is no access to the mains electricity grid and that uses extra low-voltage electricity (< 120V DC) or fuel or both as the energy source for the refrigeration functionality, including a refrigerating appliance that, in addition to extra low voltage electricity or fuel, or both, can be electric mains operated. An appliance placed on the market with an AC/DC converter is not a mobile refrigerating appliance;</p>
Comment	<p>The proposed definition only allows refrigerators that “can be electric mains operated via an <u>external</u> AC/DC converter <u>to be purchased separately</u>” to be considered as mobile appliances.</p> <p>The type of product that has been identified as at risk of being unintentionally banned are thermoelectric refrigerators with a fan. Those products have a number of features that are related to their type of use as mobile appliances. These characteristics can be used to limit the risk of broadening the scope of mobile appliances in a way that would create a loophole:</p> <ul style="list-style-type: none"> - No refrigerant – leads to a better resistance to vibration and no risk of leakage; - Limited cooling capacity, leading to: <ul style="list-style-type: none"> ○ Limited volume (typically 15-90 litres) ○ Limited ΔT (around 26°C) – no frozen compartment.
Recommendation	<p>In order to clarify the definition and address the claims reported by the Commission, we recommend that the exemption should be based on specific technical characteristics of the product at risk of being unintentionally banned. We suggest the following text:</p> <p><i>‘mobile refrigerating appliance’ means a refrigerating appliance specifically designed and marketed to be used in vehicles or any other means of transport, and that can be used where there is no access to the mains</i></p>

	<p>electricity grid and that uses extra low-voltage electricity (< 120V DC) or fuel or both as the energy source for the refrigeration functionality. <i>including a A refrigerating appliance that, in addition to extra low voltage electricity or fuel, or both, can be electric mains operated by means of an AC/DC converter that is integrated into the appliance is considered as a mobile refrigerating appliance for the purpose of this regulation if it meets one or several of the following criteria:</i></p> <ul style="list-style-type: none"> ○ <i>It contains no refrigerant gas</i> ○ <i>Its adjusted volume is smaller or equal to 90 L.</i> <p>The detailed justification for this recommendation can be found in the CLASP comments submitted in July.</p>
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Draft omnibus amendment	<p>(2) in Article 3 point (b) of paragraph 1 is replaced by the following:</p> <p>‘(b) the values of the parameters included in the product information sheet, as set out in Annex V, are entered into the public part of the product database;’</p>
Subject and current text	<p>(b) the parameters of the product information sheet, set out in Annex V, are entered into the product database;</p>
Comment	<p>No comment</p>
Recommendation	<p>CLASP supports this addition.</p>

Annexes

Draft omnibus amendment	(1) in Annex I, the following point (42) is added: '(42) 'declared values' means the values provided by the supplier for the stated, calculated or measured technical parameters, in accordance with Article 3(1)(d) and Annex VI, for the verification of compliance by the Member State authorities.';
Subject and current text	No definition of 'declared values'
Comment	No comment
Recommendation	CLASP supports this addition.

Draft omnibus amendment	<p>(2) in Annex II, Table 1 is replaced by the following:</p> <p style="text-align: center;"><i>'Table 1</i> Energy efficiency classes of refrigerating appliances</p> <table> <tr> <th>Energy efficiency class</th><th>Energy efficiency index (EEI)</th></tr> <tr> <td>A</td><td>$EEI \leq 41$</td></tr> <tr> <td>B</td><td>$41 < EEI \leq 51$</td></tr> <tr> <td>C</td><td>$51 < EEI \leq 64$</td></tr> <tr> <td>D</td><td>$64 < EEI \leq 80$</td></tr> <tr> <td>E</td><td>$80 < EEI \leq 100$</td></tr> <tr> <td>F</td><td>$100 < EEI \leq 125$</td></tr> <tr> <td>G</td><td>$EEI > 125$</td></tr> </table>	Energy efficiency class	Energy efficiency index (EEI)	A	$EEI \leq 41$	B	$41 < EEI \leq 51$	C	$51 < EEI \leq 64$	D	$64 < EEI \leq 80$	E	$80 < EEI \leq 100$	F	$100 < EEI \leq 125$	G	$EEI > 125$
Energy efficiency class	Energy efficiency index (EEI)																
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B	$41 < EEI \leq 51$																
C	$51 < EEI \leq 64$																
D	$64 < EEI \leq 80$																
E	$80 < EEI \leq 100$																
F	$100 < EEI \leq 125$																
G	$EEI > 125$																
Subject and current text	Typo in one value.																
Comment	No comment																
Recommendation	CLASP supports this change.																

Draft omnibus amendment	<p>(3) in Annex IV, point 1 is amended as follows:</p> <p>(a) Paragraph (h) and (i) are replaced by the following:</p> <p>'(h) the freezing capacity of a compartment is calculated as 24 times the light load weight of that compartment, divided by the freezing time to bring the temperature of the light load from +25 to - 18 °C at an ambient temperature of 25 °C expressed in kg/24h and rounded to one decimal place;</p> <p>(i) for 4-star compartments, the freezing time to bring the temperature of the light load from +25 to - 18 °C at an ambient temperature of 25 °C shall be</p>
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	<p>such that the resulting freezing capacity complies with the requirement in Annex I, point 4;’;</p> <p>(b) The following point (k) is added:</p> <p>‘(k) the light load weight for each 4-star compartment shall be:</p> <ul style="list-style-type: none"> – 3,5 kg/100 l of the volume of the 4-star compartment evaluated, rounded up to the nearest 0,5 kg; and, – 2 kg for a 4-star compartment with a volume for which 3,5 kg/100 l leads to a value lower than 2 kg; <p>in the case that the refrigerating appliance includes a combination of 3- and 4-star compartments, the sum of the light load weight(s) shall be increased so that the sum of the light load weights for all the 4-star compartments shall be:</p> <ul style="list-style-type: none"> – 3,5 kg/100 l of the total volume of all 4- and 3-star compartments, rounded up to the nearest 0,5 kg; and, – 2 kg for a total volume of all 4- and 3-start compartments for which 3,5 kg/100 l leads to a value lower than 2 kg.’;
Subject and current text	<p>(h) the specific freezing capacity is calculated as 12 times the light load weight, divided by the freezing time to bring the temperature of the light load from +25 to - 18 °C at an ambient temperature of 25 °C expressed in kg/12h and rounded to one decimal place; the light load weight is 3,5 kg per 100 litre of the compartment volume of the frozen compartments, and shall be at least 2,0 kg;</p> <p>(i)for 4-star compartments, the specific freezing capacity shall be such that the freezing time to bring the temperature of the light load (3,5 kg/100 l) from +25 to - 18 °C at an ambient temperature of 25 °C, is smaller than or equal to 18,5 h;</p>
Comment	<p>The addition of a separate definition of ‘light load’ clarifies the definition of the freezing capacity. The EN/IEC standard does not refer to “a combination of 3- and 4-star compartments but simply to “the total volume of all compartments operating at -18 °C”. There is therefore a misalignment between the proposed amendment and the current measurement standards.</p>
Recommendation	<p>CLASP supports the clarifications made to the definitions and requirements concerning the freezing capacity and light load and recommend to further align the definitions with EN/IEC 62552:2020.</p>

Draft omnibus amendment	<p>(c) Table 4 is replaced as follows:</p>
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	<p align="center"><i>'Table 4</i></p> <p align="center">The values of the modelling parameters per compartment type</p> <table><tr><th>Compartment type</th><th>r_e^a</th><th>N_e</th><th>M_e</th><th>C</th></tr><tr><td>Pantry</td><td>0,35</td><td rowspan="4">75</td><td rowspan="4">0,12</td><td rowspan="13">between 1,15 and 1,56 for combi appliances with 3- or 4-star compartments^b, 1,15 for other combi appliances, 1,00 for other refrigerating appliances</td></tr><tr><td>Wine storage</td><td>0,60</td></tr><tr><td>Cellar</td><td>0,60</td></tr><tr><td>Fresh food</td><td>1,00</td></tr><tr><td>Chill</td><td>1,10</td><td>138</td><td>0,12</td></tr><tr><td>0-star & ice-making</td><td>1,20</td><td rowspan="5">138</td><td rowspan="5">0,15</td></tr><tr><td>1-star</td><td>1,50</td></tr><tr><td>2-star</td><td>1,80</td></tr><tr><td>3-star</td><td>2,10</td></tr><tr><td>Freezer (4-star)</td><td>2,10</td></tr></table> <p>^a $r_e = (T_a - T_c)/20$; with $T_a = 24$ °C and T_c with values as set out in Table 3.</p> <p>^b C for combi appliances with 3- or 4-star compartments is rounded to two decimal places and determined as follows:</p> <p>where $frzf$ is the 3- or 4-star compartment volume V_p as a fraction of V with $frzf = V_p/V$:</p> <ul style="list-style-type: none">– if $frzf \leq 0,3$ then $C = 1,3 + 0,87 \times frzf$;– else if $0,3 < frzf < 0,7$ then $C = 1,87 - 1,0275 \times frzf$;– else $C = 1,15$.					Compartment type	r_e^a	N_e	M_e	C	Pantry	0,35	75	0,12	between 1,15 and 1,56 for combi appliances with 3- or 4-star compartments ^b , 1,15 for other combi appliances, 1,00 for other refrigerating appliances	Wine storage	0,60	Cellar	0,60	Fresh food	1,00	Chill	1,10	138	0,12	0-star & ice-making	1,20	138	0,15	1-star	1,50	2-star	1,80	3-star	2,10	Freezer (4-star)	2,10
Compartment type	r_e^a	N_e	M_e	C																																	
Pantry	0,35	75	0,12	between 1,15 and 1,56 for combi appliances with 3- or 4-star compartments ^b , 1,15 for other combi appliances, 1,00 for other refrigerating appliances																																	
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3-star	2,10																																				
Freezer (4-star)	2,10																																				
Subject and current text	C for combi appliances with 3- or 4-star compartments is determined as follows:																																				
Comment	No comment																																				
Recommendation	CLASP supports this addition.																																				

Draft omnibus amendment	Changes in Annex V, Table 6
Subject and current text	-
Comment	No comment
Recommendation	CLASP supports the proposed changes.

Draft omnibus amendment	<p>(5) in Annex VI, point 1 is replaced by the following:</p> <p>‘1. The technical documentation referred to in point 1(d) of Article 3 shall include the following elements:</p> <p>(a) a general description of the model allowing it to be unequivocally and easily identified, including a list of all equivalent models, including model identifiers;</p> <p>(b) references to the harmonised standards applied or other measurement standards used;</p>
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	<p>(c) specific precautions to be taken when the model is assembled, installed, maintained or tested;</p> <p>(d) the values for the technical parameters set out in Table 7; these values are considered as the declared values for the purpose of the verification procedure in Annex IX;</p> <p>(e) the details and the results of calculations performed in accordance with Annex IV, if not covered sufficiently in Table 7;</p> <p>(f) testing conditions if not described sufficiently in point (b);</p> <p>(g) a list of all equivalent models, including model identifiers;</p> <p>(h) the declared values of the parameters listed under Annex V if not covered by Table 7.</p> <p>These elements shall also constitute the mandatory specific parts of the technical documentation that the supplier shall enter into the database, pursuant to point 5 of Article 12 of Regulation (EU) 2017/1369.’;</p>
Subject and current text	<p>(a) the information as set out in Annex V;</p> <p>(b) the information as set out in Table 7. If the refrigerating appliance contains multiple compartments of the same type, the lines for these compartments shall be repeated. If a certain compartment type is not present, the compartment parameters and values shall be ‘-’. If a parameter is not applicable, the values of that parameter shall be ‘-’.</p>
Comment	No comment
Recommendation	CLASP supports the proposed changes.

Draft omnibus amendment	<p>(6) Annex IX is amended as follows:</p> <p>(a) the first paragraph is replaced by the following: ‘The verification tolerances defined in this Annex relate only to the verification by Member State authorities of the declared values and shall not be used by the manufacturer, importer or authorised representative as an allowed tolerance to establish the values in the technical documentation or in interpreting these values with a view to achieving compliance or to communicate better performance by any means. The values and classes published on the label or in the product information sheet shall not be more favourable for the supplier than the values declared in the technical documentation.’</p> <p>(b) point (7) is replaced as follows: ‘(7) The Member State authorities shall provide all relevant information to the authorities of the other Member States and to the Commission without delay after a decision is taken on the non-compliance of the model according to points 3, 6 or the second paragraph of this Annex.’;</p> <p>(c) Table 8 is replaced by the following:</p>
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	<i>Table 8</i> Verification tolerances for measured parameters	
	Parameters	Verification
	Total volume and compartment volume	The determined value ³ shall not be more than 3 % or 1 litre lower — whichever is the greater value — than the declared value.
	Freezing capacity	The determined value ³ shall not be more than 10 % lower than the declared value.
	E_{32}	The determined value ³ shall not be more than 10 % higher than the declared value.
	Annual energy consumption	The determined value ³ shall not be more than 10 % higher than the declared value.
	Internal humidity of wine storage appliances (%)	The determined value ³ shall not differ from the declared value by more than 10 %.
	Airborne acoustical noise emissions	The determined value ³ shall not be more than 2 dB(A) re 1 pW more than the declared value.
	Temperature rise time	The determined value ³ shall not be more than 15 % higher than the declared value.
Subject and current text	<p>“The verification tolerances set out in this Annex relate only to the verification of the declared parameters by Member State authorities and shall not be used by the supplier as an allowed tolerance to establish the values in the technical documentation. The values and classes on the label or in the product information sheet shall not be more favourable for the supplier than the values reported in the technical documentation.”</p> <p>(7) The Member State authorities shall provide all relevant information to the authorities of the other Member States and to the Commission without delay once a decision has been taken on the non-compliance of the model according to points 3 and 6.</p>	

	<p align="center"><i>Table 8</i></p> <p align="center">Verification tolerances for measured parameters</p> <table> <tr> <th>Parameters</th> <th>Verification tolerances</th> </tr> <tr> <td>Total volume and compartment volume</td> <td>The determined value (*) shall not be more than 3 % or 1 litre lower — whichever is the greater value — than the declared value.</td> </tr> <tr> <td>Freezing capacity</td> <td>The determined value (*) shall not be more than 10 % lower than the declared value.</td> </tr> <tr> <td>E_{16}, E_{32}</td> <td>The determined value (*) shall not be more than 10 % higher than the declared value.</td> </tr> <tr> <td>E_{aux}</td> <td>The determined value (*) shall not be more than 10 % higher than the declared value.</td> </tr> <tr> <td>Annual energy consumption</td> <td>The determined value (*) shall not be more than 10 % higher than the declared value.</td> </tr> <tr> <td>Internal humidity of wine storage appliances (%)</td> <td>The determined value (*) shall not differ from the declared value by more than 10 %.</td> </tr> <tr> <td>Airborne acoustical noise emissions</td> <td>The determined value (*) shall not be more than 2 dB(A) re 1 pW more than the declared value.</td> </tr> <tr> <td>Temperature rise time</td> <td>The determined value (*) shall not be more than 15 % higher than the declared value.</td> </tr> <tr> <td colspan="2">(*) in the case of three additional units tested as prescribed in point 4, the determined value means the arithmetic mean of the values determined for these three additional units.</td> </tr> </table>	Parameters	Verification tolerances	Total volume and compartment volume	The determined value (*) shall not be more than 3 % or 1 litre lower — whichever is the greater value — than the declared value.	Freezing capacity	The determined value (*) shall not be more than 10 % lower than the declared value.	E_{16} , E_{32}	The determined value (*) shall not be more than 10 % higher than the declared value.	E_{aux}	The determined value (*) shall not be more than 10 % higher than the declared value.	Annual energy consumption	The determined value (*) shall not be more than 10 % higher than the declared value.	Internal humidity of wine storage appliances (%)	The determined value (*) shall not differ from the declared value by more than 10 %.	Airborne acoustical noise emissions	The determined value (*) shall not be more than 2 dB(A) re 1 pW more than the declared value.	Temperature rise time	The determined value (*) shall not be more than 15 % higher than the declared value.	(*) in the case of three additional units tested as prescribed in point 4, the determined value means the arithmetic mean of the values determined for these three additional units.	
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Comment	<p>Temperature rise time was added</p> <p>E_{16} and E_{aux} were deleted.</p> <p>Auxiliary energy (kWh/a) and Daily energy consumption at 16 °C (kWh/24h) are listed in the additional information to be included in the technical documentation for the labelling regulation. Specifying no tolerance thus means that no tolerance should apply for market verification.</p>																				
Recommendation	CLASP supports the proposed changes																				

Delegated Regulation (EU) 2019/2018 - Refrigerating appliances with direct sales function

Draft omnibus amendment	(1) In Article 1(2), point (j) is replaced by the following: '(j) corner, curved and carousel cabinets;';
Subject and current text	(j) corner cabinets;
Comment	<p>Addition of curved and carousel cabinets to the list of exemptions from the requirements in point 1 (Energy efficiency requirements) and point 3(k) (Information requirements: instructions on how to find the model information in the product database) of Annex II.</p> <p>As noted below, carousel cabinets do not correspond to what is described in the definition of corner cabinets. They also do not have the particularities that justified the exemption of corner cabinets from the requirements described in requirements in point 1 and point 3(k) of Annex II and should therefore not be added to the exemption.</p>
Recommendation	Delete 'and carousel' from this exclusion, use only 'corner and curved'

Draft omnibus amendment	<p>(2) in Article 2, point (15) is replaced by the following:</p> <p>'(15) 'corner, curved and carousel cabinets' means a refrigerating appliance with a direct sales function used to achieve geometrical continuity between two linear cabinets that are at an angle to each other and/or that form a curve. A corner, curved and carousel cabinets do not have a recognisable longitudinal axis or length since it consists only of a filling shape (wedge or similar) and is not designed to function as a stand-alone refrigerated unit. The two ends of the corner cabinet are inclined at an angle of between 30° and 90°;'</p>
Subject and current text	15. 'corner cabinet' means a refrigerating appliance with a direct sales function used to achieve geometrical continuity between two linear cabinets that are at an angle to each other and/or that form a curve. A corner cabinet does not have a recognisable longitudinal axis or length since it consists only of a filling shape (wedge or similar) and is not designed to function as a stand-alone refrigerated unit. The two ends of the corner cabinet are inclined at an angle between 30 ° and 90 °;
Comment	A carousel cabinet does not correspond to the definition under point 21 of Article 21, which was meant for corner cabinets. It is designed to function as a standalone unit and not to achieve continuity between two linear cabinets.
Recommendation	Delete 'and carousel' from this definition, use only 'corner and curved'

Draft omnibus amendment	(3) in Article 3(1), point (b) is replaced by the following: '(b) the values of the parameters included in the product information sheet, as set out in Annex V, are entered into the public part of the product database;'
Subject and current text	(b) the parameters of the product information sheet, set out in Annex V, are entered into the product database;
Comment	No comment
Recommendation	CLASP supports this addition.

Annexes

Draft omnibus amendment	(1) in Annex I, the following point (28) is added: ‘declared values’ means the values provided by the supplier for the stated, calculated or measured technical parameters, in accordance with Article 3(1)(d) and Annex VI, for the verification of compliance by the Member State authorities.’;
Subject and current text	No definition of ‘declared values’
Comment	No comment
Recommendation	CLASP supports this addition.

Draft omnibus amendment	(2) in Annex III, Point 1.2, paragraph VIII, the first indent under the first item is replaced by the following: ‘- the temperature at the top: the maximum measured product temperature of the compartment(s) with chilled operating temperatures, in degrees Celsius (°C) and rounded to the first decimal place, as set out in Table 4;’;
Subject and current text	— the temperature at the top: the highest temperature of the warmest M-package of the compartment(s) with chilled operating temperatures, in degrees Celsius (°C) and rounded to the nearest integer, as set out in Table 4;
Comment	No comment
Recommendation	CLASP supports this addition. Correct typo and harmonise for lower temperature.

Draft omnibus amendment	(3) in Annex IV, Table 4, the following is added:					
	Category	Temperature class	Highest temperature of warmest M-package (°C)	Lowest temperature of coldest M-package (°C)	Highest temperature of all M-packages (°C)	Value for C
	Vertical and combined supermarket cabinet	M0	≤ +4	≥ -1	n.a.	1,30
	Horizontal supermarket cabinet	M0	≤ +4	≥ -1	n.a.	1,13

Subject and current text	Table 4 does not include values for M0.
Comment	<p>C is the temperature coefficient, meant to compensate for the different DT between the ambient temperature and the average temperature in each category of compartment. It should follow the same rule as for vending machines and ice-cream freezers in the same regulation and be proportional to the difference to a reference category for which the C factor is 1 (M2 in Table5).</p> <p>A 2014 CLASP study (CLASP Commercial refrigeration equipment: mapping and benchmarking) found that the average temperatures in M0, M1 and M2 compartments were 1.5°C, 2°C and 3°C, respectively. In the case of Vertical and combined supermarket cabinets, C= 1 for M2 cabinets. C was set at 1.15 for M1 compartments.</p> $C_{M1} = C_{M2} + (\text{Average Temperature}_{M2} - \text{Average Temperature}_{M1}) * 1.15 = 1.15$ <p>Applying the same formula to M0 compartments:</p> $C_{M0} = C_{M2} + (\text{Average Temperature}_{M2} - \text{Average Temperature}_{M0}) * 1.15 = 1.225$ <p>Similarly, for Horizontal supermarket cabinets:</p> $C_{M1} = C_{M2} + (\text{Average Temperature}_{M2} - \text{Average Temperature}_{M1}) * 1.08 = 1.08$ <p>Applying the same formula to M0 compartments:</p> $C_{M0} = C_{M2} + (\text{Average Temperature}_{M2} - \text{Average Temperature}_{M1}) * 1.08 = 1.12$
Recommendation	CLASP recommends C values of 1.225 and 1.12 for M0 compartments of vertical cabinets and horizontal cabinets, respectively.