

Team member  
Felix Van Eyken

Phone  
+32 (0)466 90 04 01

Email  
felix.vaneyken@eurovent-association.eu

Date  
2016-03-24

## Update on Refrigerated Commercial Display Cabinets

### In a nutshell

- DG Energy has drafted the Ecodesign and Energy Labelling Regulations for refrigerated commercial display cabinets (aka ENER Lot 12)
- The proposed drafts submitted on 17 September 2015 do not consider the very wide variety of products, in particular of supermarket display cabinets.
- The level of ambition of the proposed two tiers is too stringent
- The 28 September sets of plotted data points support the view that a more detailed product segmentation makes sense.
- These graphs also show that the stringency of the EEI requirements would require a revision.

The industry would wish that the Commission integrates the more detailed supermarket cabinet segmentation in its drafts and that the EEI requirements are considered anew

### Background

This Position Paper relates to the draft proposals for Ecodesign and Energy Labelling Regulations of refrigerated commercial display cabinets provided on 17 September 2015. It is also considering the data plot analysis that were kindly provided by JRC on 28 September 2015 as follow-up of the Eurovent Product Group "Commercial Refrigeration Equipment" meeting with extended invitations on 24 September 2015.

It represents the opinion of the Eurovent Product Group 'Commercial Refrigeration Equipment' and of EPEE who together represent all major manufacturers active in this field in Europe.

### Impact of the proposed draft regulations - Level of ambition

JRC has plotted the new graphs for the differentiated product categories with the data points using the M and N coefficients as proposed by the EU Commission and as proposed by Eurovent in 2014<sup>1</sup>.

These data plots have been reviewed and discussed by the manufacturing industry on 30 September 2015.

The data points covering the product temperature class H are missing in the graph and for these products it is not possible to analyse the impact of the draft regulations.

<sup>1</sup> EPEE and EUROVENT JIEG Position on the Preparatory Study Update Final Report for Energy related Products (ErP) in ENER Lot 12 of the EU Ecodesign Directive 2009/125/EC on 2014-09-01 (Enclosed)

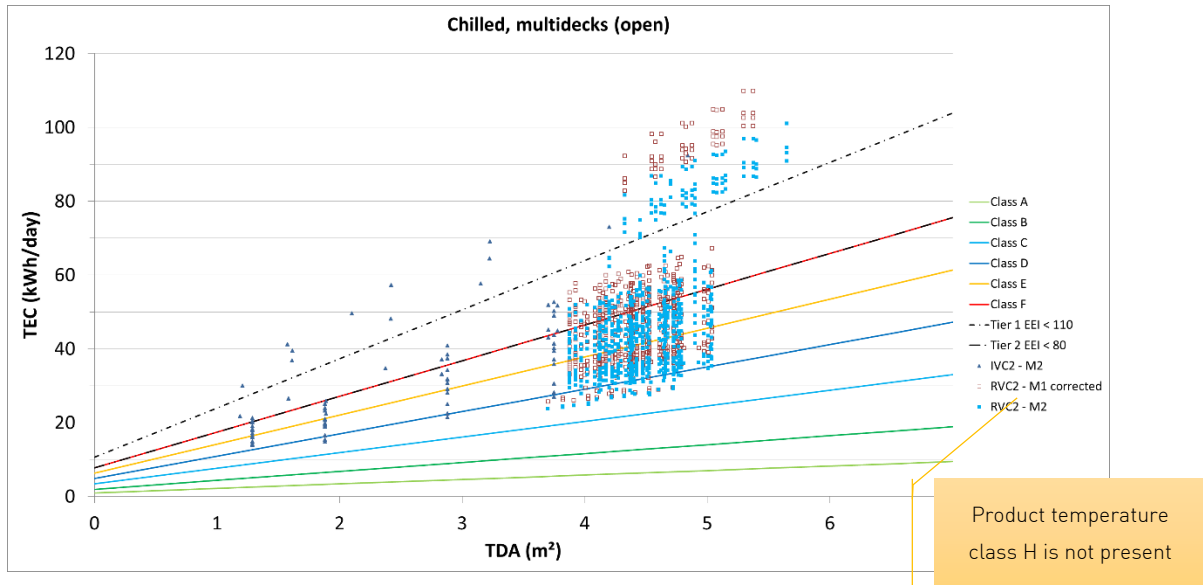


Figure 1: JRC analysis - Product temperature class H is not present

For chilled roll-in cabinets it has to be pointed out that the graph plotted using the M and N coefficients proposed by DG Energy is identical to the one plotted using the M and N coefficients proposed by Eurovent. This would require a further separate analysis.

The updated graphs using the M and N coefficients proposed by Eurovent, show that in a segmented approach a high number of cabinets will disappear from the market both in the first and second tier and this in each segment. The September 2015 proposals would result in banning about 60% of the cabinets from the market by 2017 and about 80% by 2020.

The level of ambition for tier 1 (EEI < 110) and tier 2 (EEI < 80) therefore is too stringent. One has to consider that the data points represent the best cabinets available on the market. The impact on cabinets for which no data are available would be important.

An idea about the impact of the draft regulations can be deduced from the figures 2 and 3. Respectively more than 80% of the horizontal chilled cabinets and more than 90% of the semi-vertical chilled cabinet would be phased out by 2020.

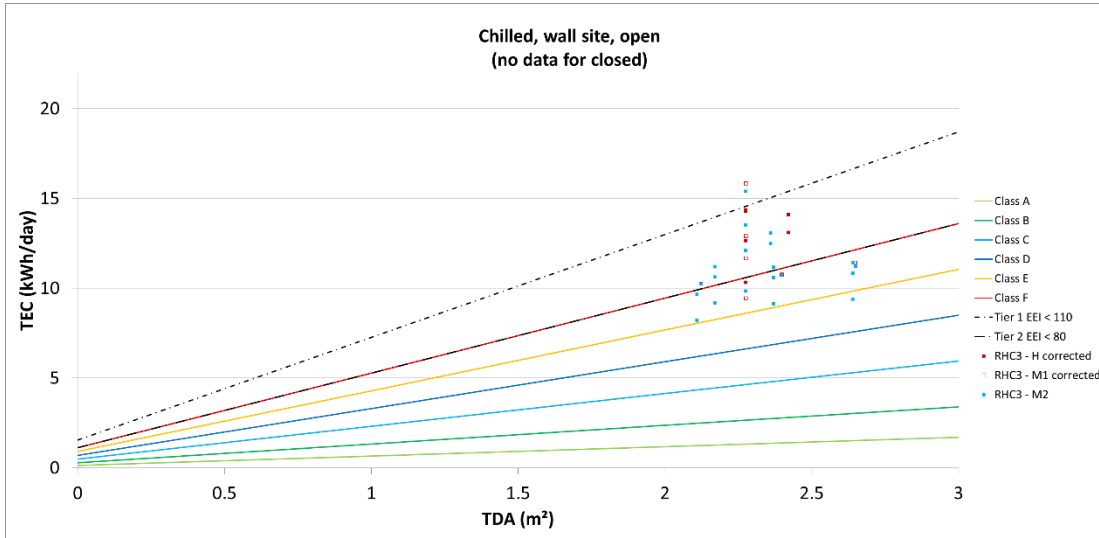


Figure 2: Impact of the draft regulations to the horizontal chilled cabinets

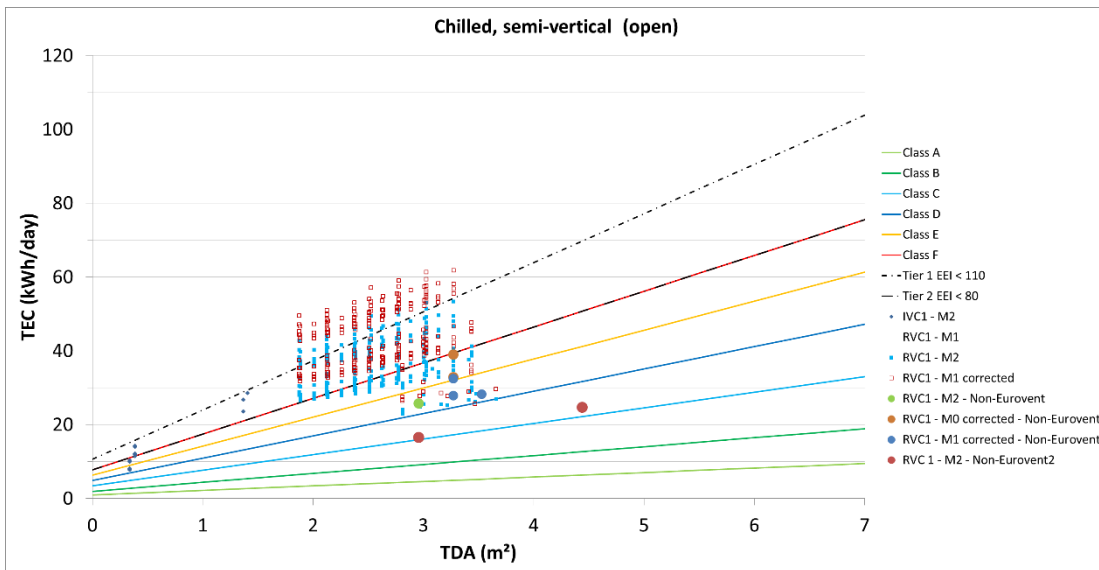


Figure 3: Impact of the draft regulations to the semi-vertical chilled cabinets

## Industry proposals

Industry strongly recommends to raise the EEI levels to 130 for tier 1 and to 110 for tier 2. With these EEI levels about 20 % of the cabinets would be banned by 2017 and approximately 50 % by 2020, taking into account that these percentages relate to the products for which data are available.

The request for revised EEI requirements is further motivated by the fact that the original proposal would exclude all semi-vertical and roll-in cabinets from the market. With the new EEI levels some of these cabinets can remain in the market after the entry into force of tier 2.

Closed frozen cabinets are equipped with doors and represent the best available technology, the improvement potential is limited (see the below figure 4) and therefore it might not be appropriate to start labelling these in the lowest energy classes.

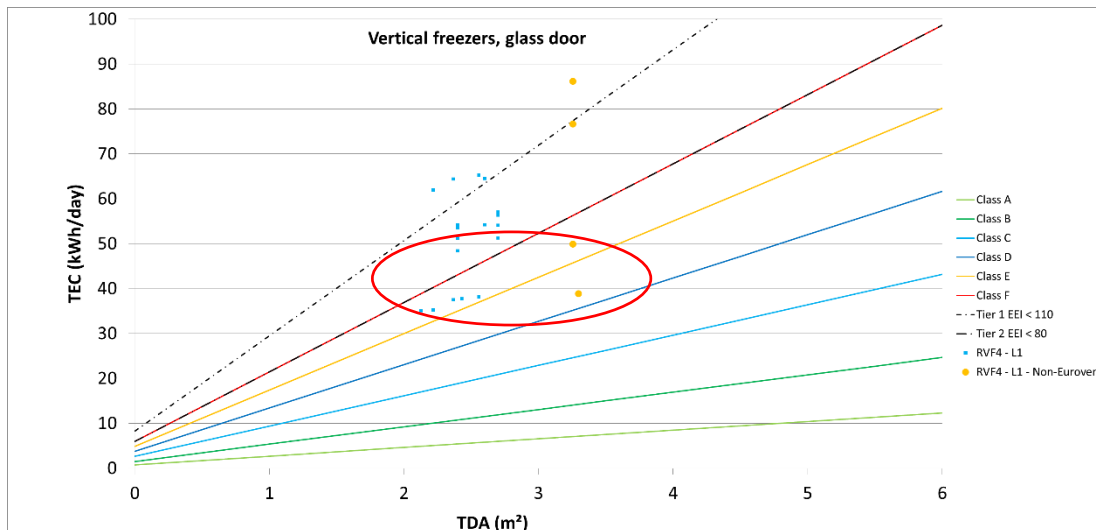


Figure 4: Vertical frozen closed cabinets, they would be labelled only in the lowest energy classes

Energy labelling will present a huge challenge for industry as it will not be easy to develop products that would fit the top energy classes.

## Conclusion

Industry strongly recommends that the draft regulations do provide for segmentation among the various types of refrigerated commercial display cabinets, in particular between vertical, semi-vertical and roll-in chiller supermarket cabinets.

The respective M and N coefficients and the calculation factor 1,1 to differentiate between remote and plug-in supermarket cabinets proposed by industry in September 2014 provide the best options for a product segmentation that fits this market.

Setting the EEI levels at 130 for tier 1 and at 110 for tier 2 is still very ambitious. It will eliminate a large quantity of current cabinets from the market and ensure that there is a variety of cabinets still on the market in 2020

Best regards,

**Felix Van Eyken**  
Eurovent General Secretary

**Andrea Voigt**  
EPEE Director General