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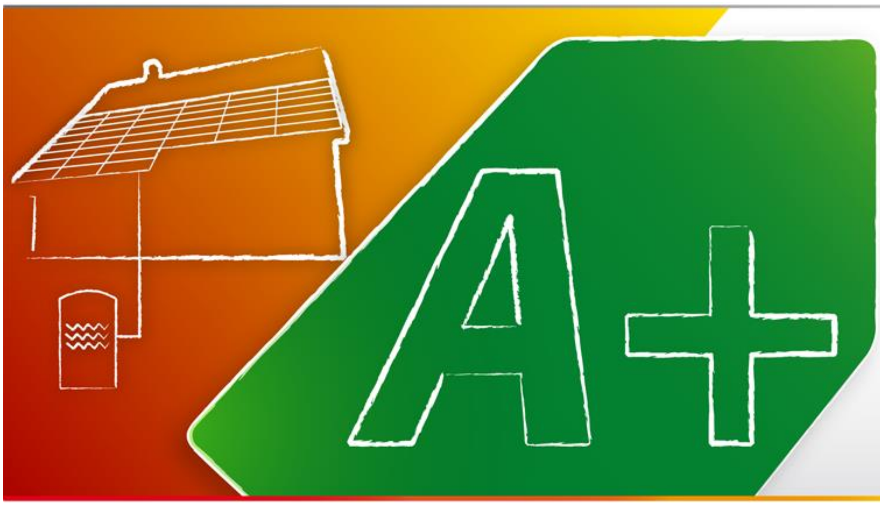
LabelPack A+



Analysis

Implementation of the "package label" in several European countries

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1. Introduction

The purpose of this document is to report on the implementation of the "package label" in several European countries. The countries addressed in this report were: Belgium, Croatia, Cyprus, Czech Republic, Denmark, Greece, Ireland, the Netherlands, Poland and Spain. This report complements a previous assessment that was done on the implementation of the package label in countries represented in the Labelpack A+, i.e. Austria, France, Germany, Italy, Portugal and the United Kingdom .

Since 26 September 2015, all new installations of space and water heating systems have to be labelled with the "package label" in all EU Member States. While the eco-design directive requires manufacturers to develop efficient products, customers should be provided with important information to make their purchase decision. But so far, the label's implementation is far behind earlier expectations. As acceptance of package label is low in the Labelpack A+ project countries and various substantial barriers have been identified, it is needed to evaluate the "package label" implementation in other countries, in this case non-project countries, instead of starting dissemination activities in these EU Member States.

For this, a survey with relevant stakeholders from solar/heating associations, market surveillance authorities as well as consumer associations were conducted in 10 EU Member States. The results of the survey are summarized in this report.

2. Target group

The target group for the survey are stakeholders from solar/heating associations, consumer associations and market surveillance authorities in non-project countries of the EU. In order to representatively evaluate the implementation of the LPA+ "package label", 10 non-project countries were selected based on the highest newly installed solar capacities in 2015.

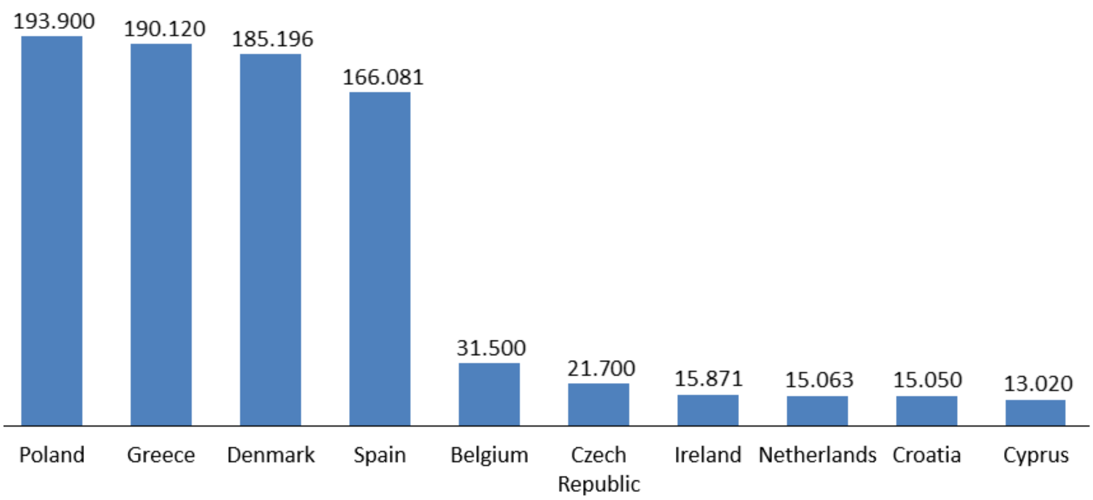

Figure 1: Selected 10 European non-project countries by newly installed solar capacity in 2015 [kW_{th}][1]

[1] Solar thermal markets in Europe – Trends and market statistics 2015, 2016

Based on these statistics, the following countries were selected: Poland, Greece, Denmark, Spain, Belgium, Czech Republic, Ireland, Netherlands, Croatia, and Cyprus. The big gap in the diagram between Spain and Belgium is due to the missing 6 project countries, which were, of course, excluded from this selection.

3. Questionnaire

For the evaluation of the LPA+ "package label" implementation in the selected non-project countries, a questionnaire was created in *GoogleForms* with 12 questions and multiple-choice answers. In general, the questions of the survey assume little knowledge of the label in order to avoid that stakeholders are excluded from participation. Most of the questions are non-obligatory.

Participants' answers were agreed to be kept confidential and the presentation of the survey results in the report to be anonymous.

4. Contacts

The survey was conducted for the first time in October 2017 and again in January/February 2018 in order to receive a more representative number of responses. The stakeholders were first approached by email and later by telephone in cases where responses were not received by email. In total, 74 stakeholders were approached. The distribution of the approached stakeholders in the 10 selected non-project countries can be seen in Figure 2.

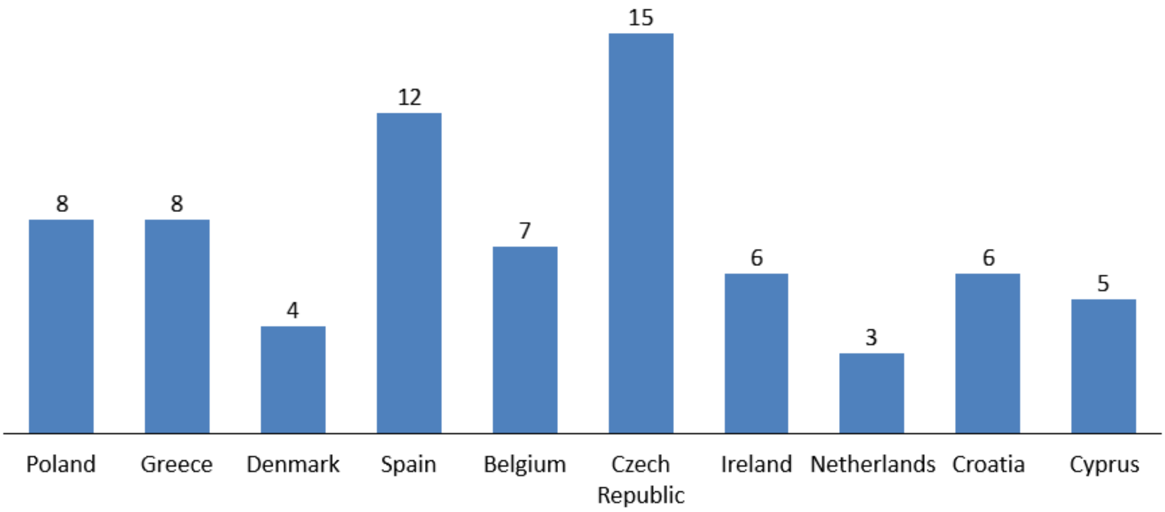

Figure 2: Contacted stakeholders by country

The contact details of the stakeholders that were addressed came from an internal database and further independent research online. During the second attempt at contacting the stakeholders in January/February 2018, the survey was conducted by native speakers of the respective countries. This is why the number of contacted stakeholders can vary between countries.

Figure 3 shows the percentage of the overall contacted stakeholders in the 10 selected countries. The three big stakeholder groups are consumer associations, solar/heating associations and market surveillance authorities, whereas energy agencies have a smaller share. The stakeholder group "others" includes organizations like consultancies, NGOs and wholesalers.

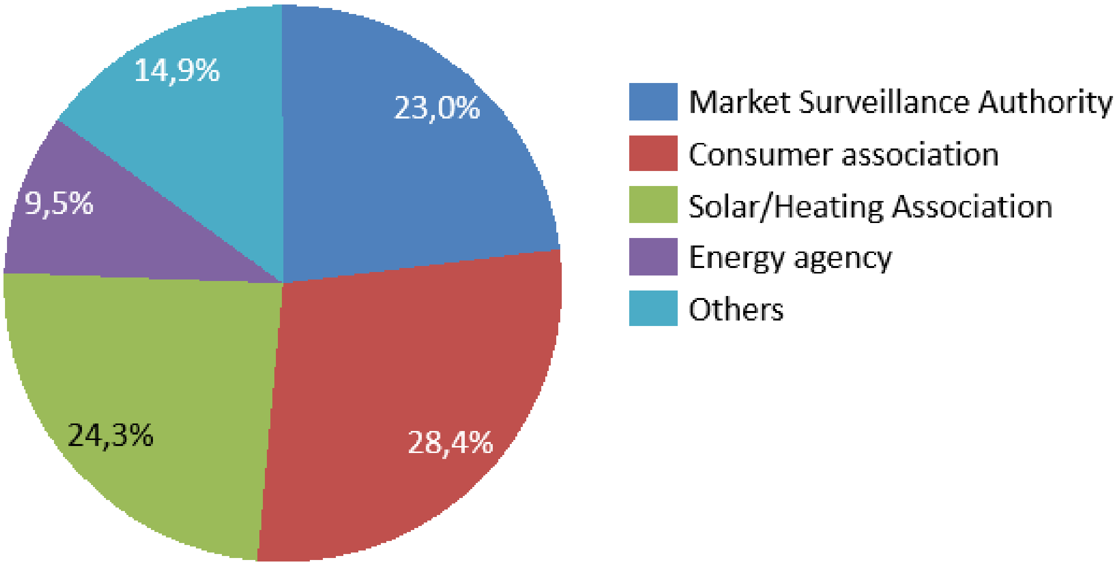

Figure 3: Distribution of contacted stakeholders by sector

5. Survey results

The results of the survey are based on the 24 answers that were received from the 74 stakeholders that were approached while the survey was being conducted. Figure 4 shows the interpretation of the results from the countries and stakeholder groups which provided answers and are analysed in this report.

Nevertheless, as most of the questions were non-obligatory, the number of answers can vary between questions. The number of answers received for each question is indicated and the results are analysed in diagrams. The answers received are analysed for most questions first for all given answers (overall) and then in a second diagram also country-specific.

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Question 1: Which market player do you represent? (answers: 24)

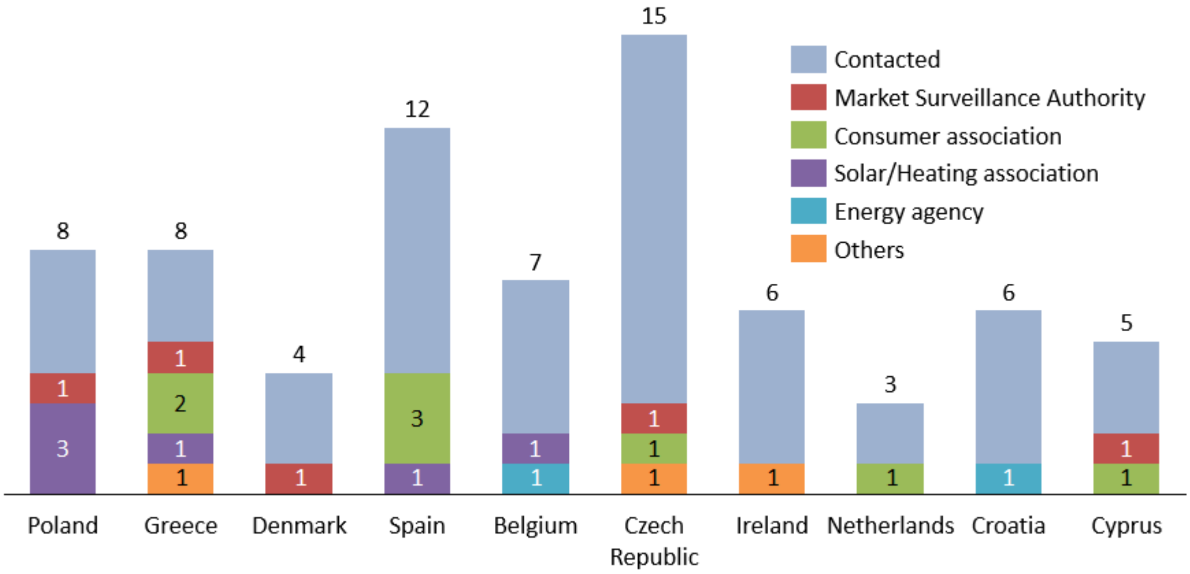

Figure 4:Distribution of responding stakeholders

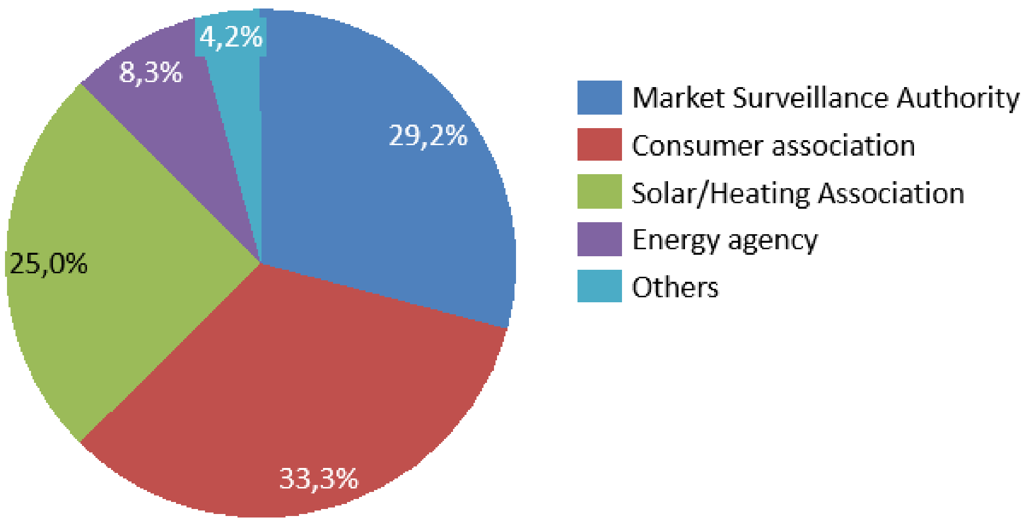

Figure 5: Distribution of answers by stakeholder groups

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Question 2: What is your opinion on the energy label for space and water heating systems? (answers: 24)

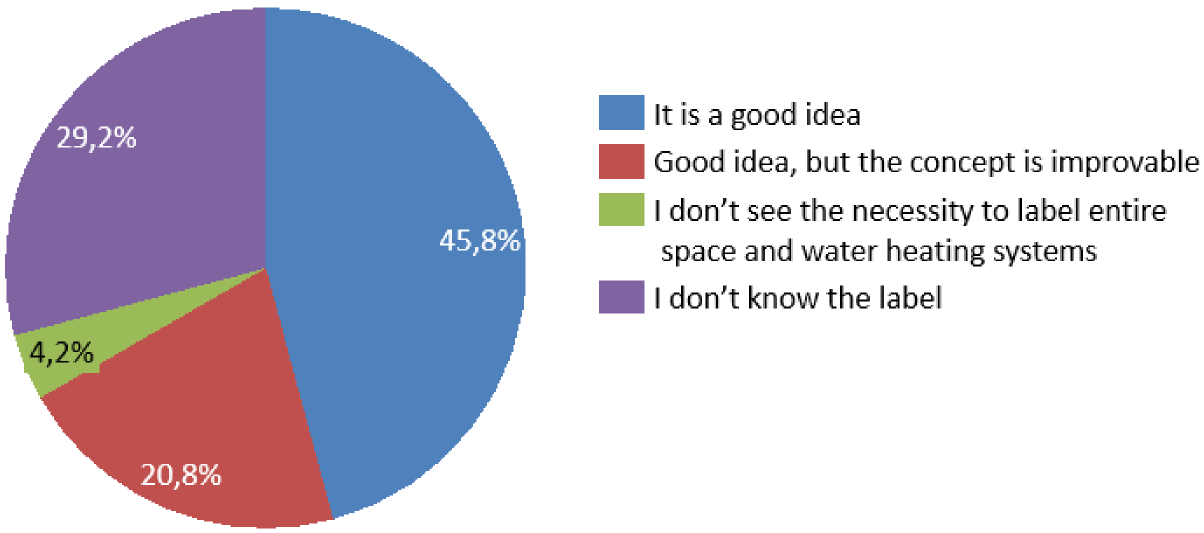

Figure 6: Answers to question no.2 - overall

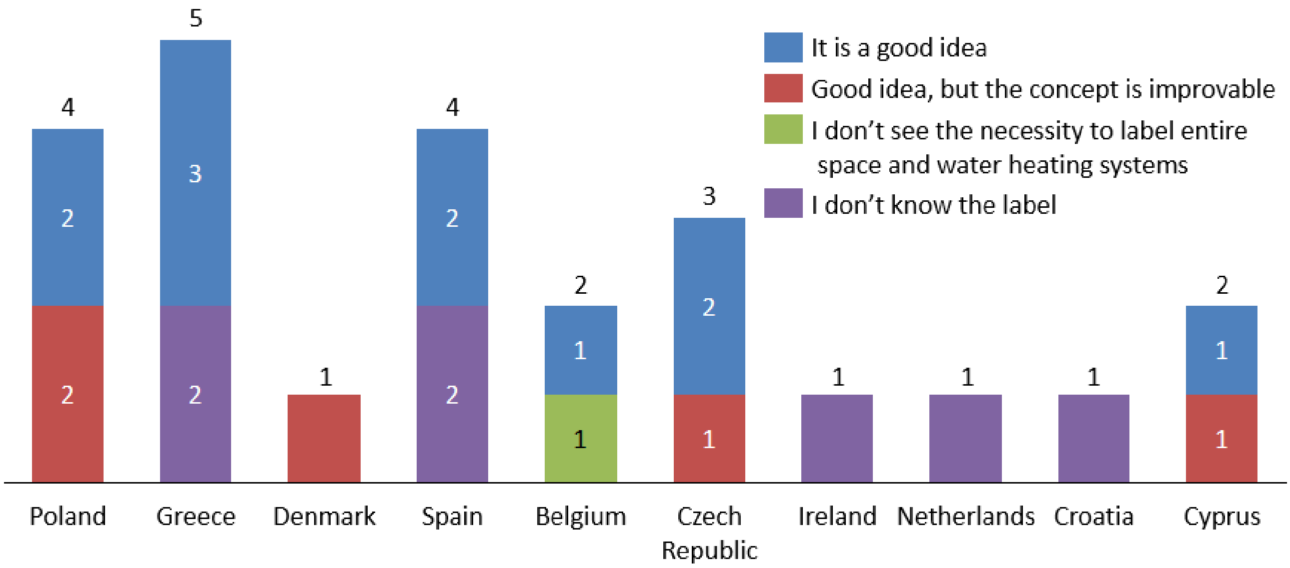

Figure 7: Answers to question no.2 - country-specific

Question 3: Do you know the LPA+ website (http://www.label-pack-a-plus.eu/) and the tool to generate energy labels? (answers: 23)

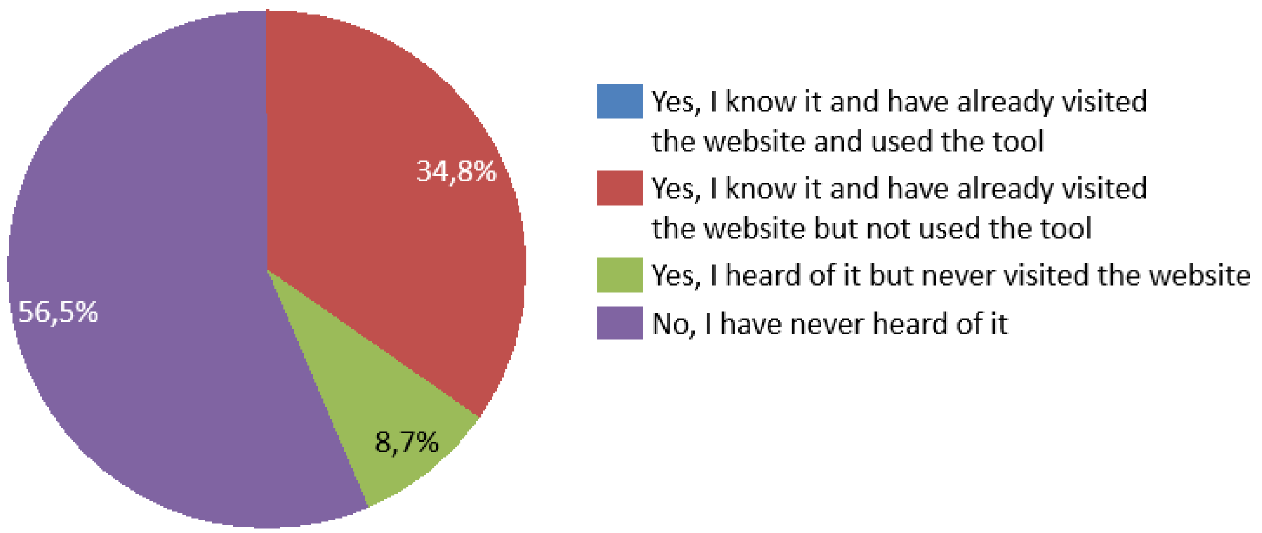

Figure 8: Answers to question no.3 - overall

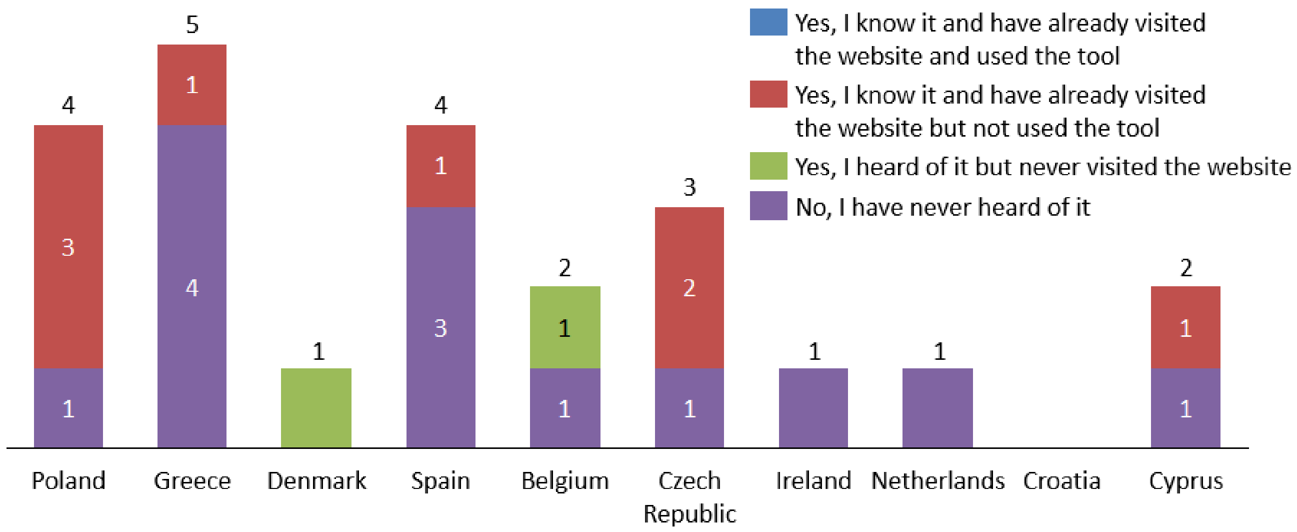

Figure 9: Answers to question no.3 - country-specific

Question 4: How satisfied are you with the implementation of the labelling system in your country? (answers: 23)

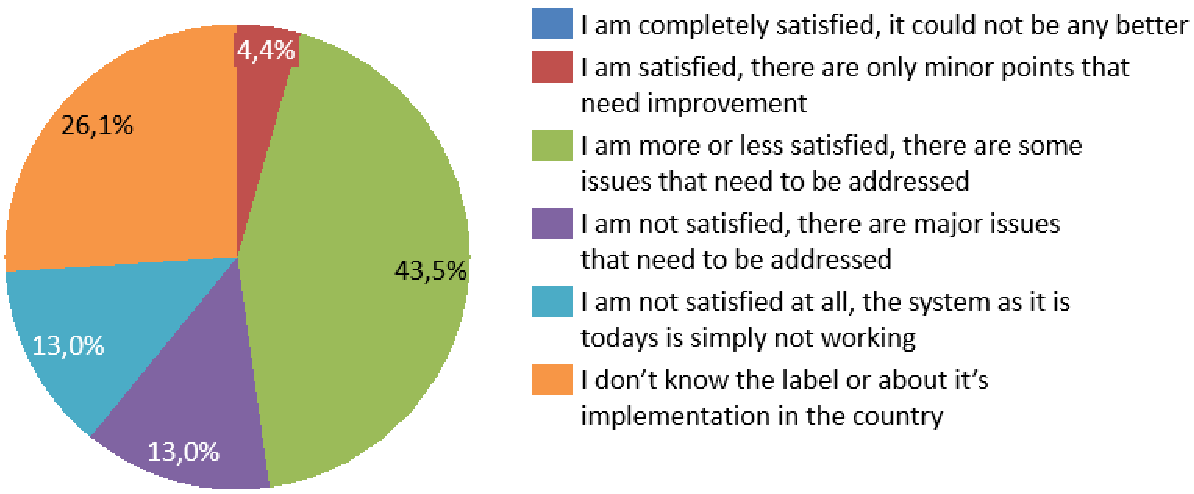

Figure 10: Answers to question no.4 – country-specific

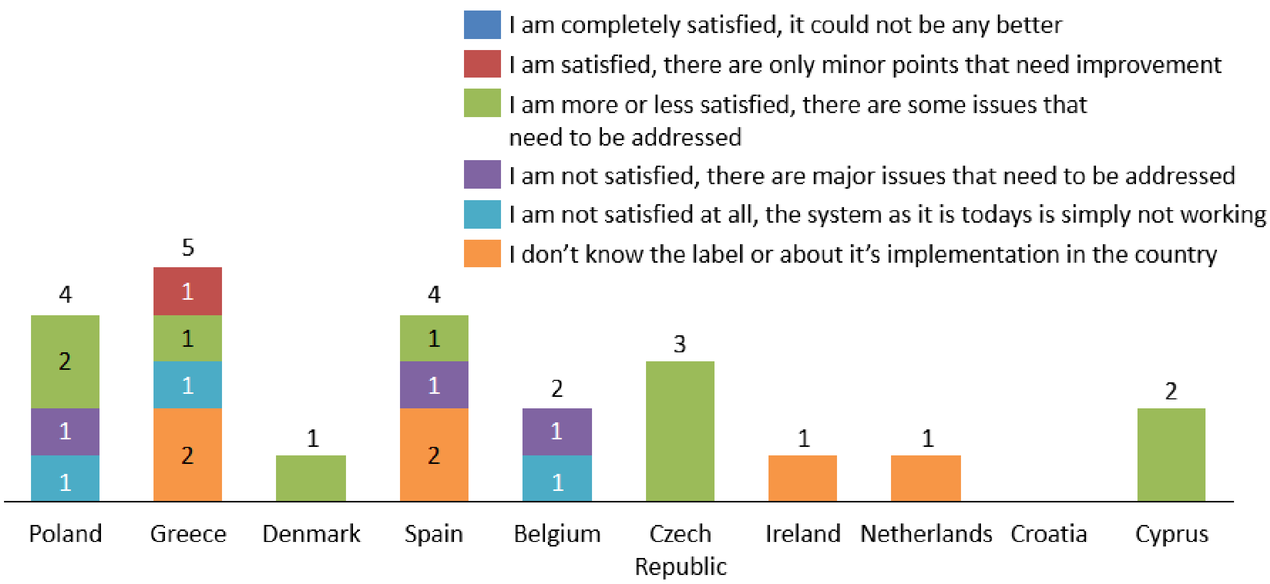

Figure 11: Answers to question no.4 - overall

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Question 5: What are the most important issues with regards to the labelling of heating systems? (select a maximum of 3) (answers: 17)

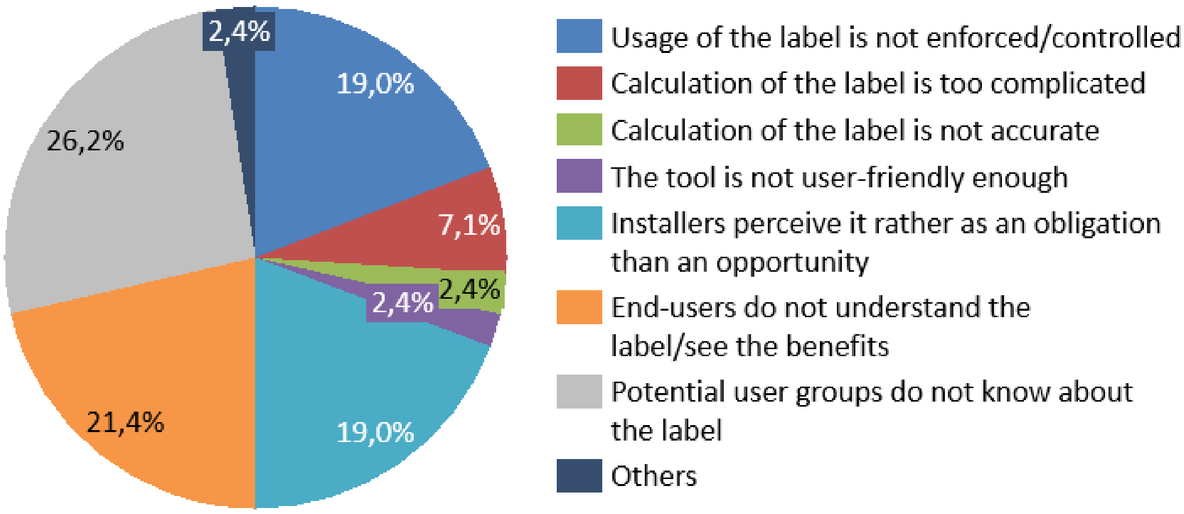

Figure 12: Answers to question no.5

Question 6: Please name the most commonly used online tool in your country to generate the energy label: (answers: 13)

- https://ec.europa.eu/energy/eepf-labels/
- Tool provided by the DEA (Danish Energy Agency)
- Producer websites
- Wholesalers websites

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Question 7: Do market surveillance authorities conduct controls on the application of the energy label for space and water heating systems in your country? (answers: 17)

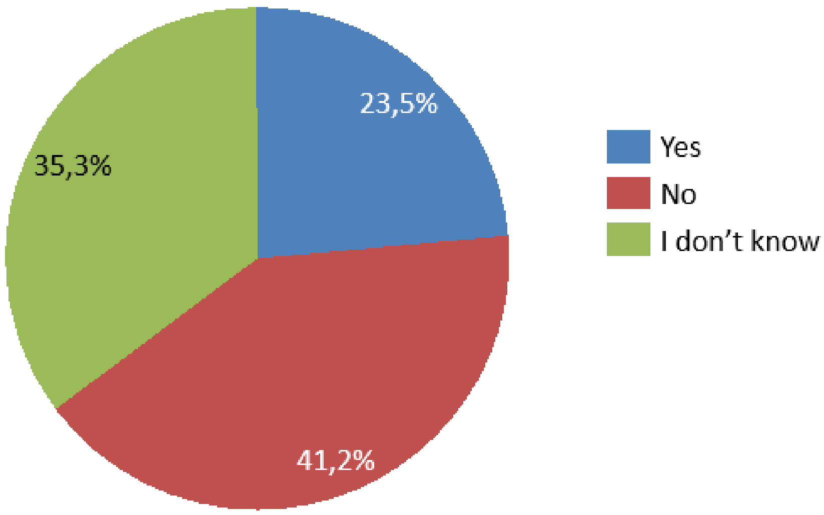

Figure 13: Answers to question no.7

Countries in which controls are being conducted based on the answers:

- Denmark
- Czech Republic
- Poland
- Cyprus

Countries in which controls are not being conducted based on the answers:

- Belgium
- Poland
- Spain
- Greece

Countries where stakeholders are not sure if controls are being conducted:

- Poland
- Cyprus
- Czech Republic
- Greece

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Question 8: Are you convinced that the implementation of the energy label could be more successful in your country than in the six project countries? Please name reasons. (answers: 13)

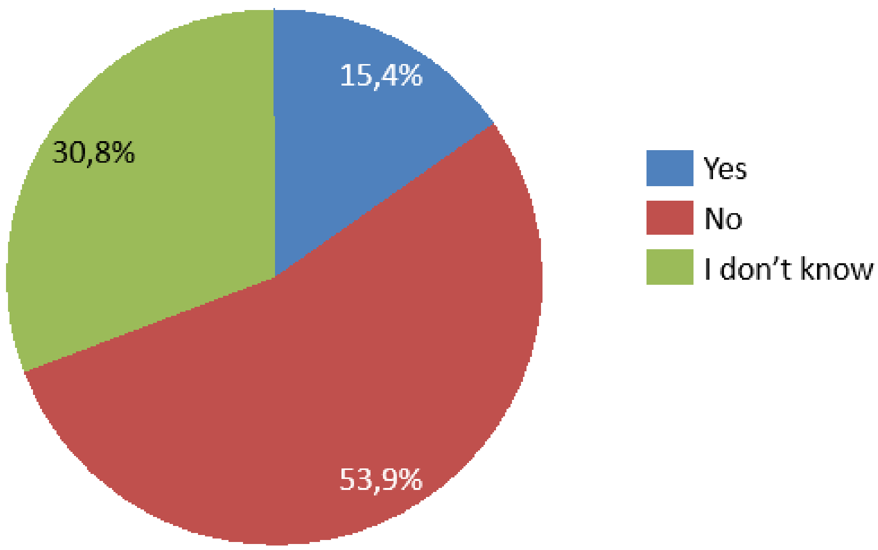

Figure 14: Answers to question no.8

Reasons:

<u>In favour:</u>

- The DEA (Danish Energy Agency) is currently carrying out an information campaign followed by market surveillance of the label, which the installers have to present to the consumers. We hope that this improves the overall compliance.
- In Poland devices of this type are often used due to the prevailing climate.

<u>Against:</u>

- Need more infrastructure for laboratory testing, certification of heaters and system for the accreditation/certification of installers of heating systems.

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Question 9: In order to improve the labelling system, I would suggest to: (select a maximum of 3) (answers: 17)

1. Intensify marketing: promote existing package label and the online platform to relevant stakeholders. (76.5 %)
2. Improve control mechanisms for market surveillance authorities. (58.8 %)
3. Improve the general concept of labelling heating systems (calculation methods, categories, characteristics, design etc.) in order to be more beneficiary to the end-user. (47,1 %)
4. Improvements will not solve the main issue. The package label addresses entire heating systems which are hardly sold as such on the market. (29,4 %)
5. Create new tools in addition to the existing online platform (e.g. social interaction, collecting more data, calculate economic benefits). (17,6 %)
6. Others: (17,6 %)
   - Combine with national labelling systems for buildings under EPBD
   - Consumer information campaigns on the labelling system and the calculation of economic benefits for households are necessary
   - For effective market surveillance, authorities need adequate funds to test these products in laboratories
7. Improve the functionality of the existing online platform: more user-friendly, enhanced database, calculation methods (SOLCAL). (5,9 %)

Question 10: Who are the most important stakeholders to make labelling of heating systems a success. Please rank the following from 1 to 8. (answers: 13)

1. Consumers
2. Consumer associations
3. Installers
4. Dealers
5. Public authorities/Market surveillance authorities
6. Solar/heating associations
7. Suppliers
8. System Designers

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Question 11: Which of the following potential options for financing the online platform in the future do you consider realistic? (Please select up to 3; consider: implementation, probability, acceptance and economic viability)

1. External public financing (national/EU) (75,0 %)
2. Association membership fees (31,25 %)
3. User fees (pay per request, yearly/monthly fee) (25,0 %)
4. Tool embedding (e.g. at websites of European distributors or large installers) (25,0 %)
5. Platform advertising (banner, online marketing) (25,0 %)
6. Collection and sale of market intelligence data (6,25 %)
7. Others: (6,25 %)
   - funding by combining national systems under EPBD and energy labelling for heating systems

Question 12: Do you have concrete proposals for the successful implementation of the energy label in your country?

- The label should be simplified so that it becomes consumer friendly, information campaigns should be organized by consumer organizations targeting consumers, market monitoring mechanisms should be enforced. Financial benefits for individual households should be integrated in the calculation tool.
- Not only in my country, but general in the EU - improve the labelling for solar collectors as appliance.
- Create awareness and knowledge with the market actors, especially towards installers and consumers.
- An administrative energy label for systems who are assembled on site without regarding the quality of assembling is useless. The energy impact of different products on each other is extremely dependent from the way the control unit on site takes care of the different energy flows. This is an onsite handling which can never be taken correctly into account for an objective purpose.
- We have made efforts to motivate the authorities to perform controls.
- Combining of national systems under EPBD and energy labelling for heating systems.
- The Consumer associations and Solar/heating associations simultaneously should be use to provide marketing campaigns to raise the awareness of consumers, dealers and installers regarding benefits of using energy labels.
- Adopt new delegated regulations for heaters under the scope of regulation 2017/1369 with obligations in relation to the product database.

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6. Conclusion

The survey was conducted in 10 Member States of the EU. The countries were selected according to the levels of newly installed solar capacity - those with the highest were selected. Therefore, it can be estimated, that the selected countries are Member States with relatively high levels of interest in the LPA+ “package label”. A little over 30% of the 74 stakeholders contacted responded to the questionnaire. Most of them participated in the questionnaire after being contacted over the phone. Almost none responded to the emails sent out before the telephone interviews were made.

The phone survey made it clear that there are only a few institutions in every country that deal with the “package label”. The responsibilities between these institutions do not seem to be clearly distributed. The interviews made by phone were difficult as the institutions contacted were either not responsible for or familiar with the label and if the interviewers were redirected then those institutions were also often not familiar with the subject.

The stakeholders often showed little knowledge of the label. The phone interviews also made clear that there is potential for confusion between the energy label for white goods, that is already well known, and the energy label for water/space heating systems.

Of the participants of the questionnaire 70% had heard of the “package label” and more than 45% consider it to be “a good idea”. More than 50% had never heard of the website (http://www.label-pack-a-plus.eu) and none of the participants had ever used the tool. Instead of using the online tool on the LabelPack website, various stakeholders mentioned using the European Union’s tool (https://ec.europa.eu/energy/eepf-labels/) and tools by (national) manufacturers. However, more than 40% of the stakeholders familiar with the package label are “satisfied” or “more or less satisfied” with the label.

The biggest issues with regards to the labelling of heating systems are that potential user groups are not familiar with the label or do not recognize its benefits. Moreover, there are insufficient controls of the application of the label. Only a little over 20% of the stakeholders surveyed are convinced that their national authorities conduct regular controls.

To improve the implementation of the “package label” the stakeholders suggest that it would be best to intensify marketing efforts in order to increase the awareness of the “package label” among potential user groups. In addition, control mechanisms need to be improved and stakeholders suggested that rethinking the overall labelling concept would be beneficial. This would include overhauling the efficiency categories, the design of the label and its calculation methods. If the label is more accepted by consumers/consumer associations, public authorities, like market surveillance, and suppliers/dealers, then the chances that it will be accepted by the market will increase.

It would have been desirable to have higher levels of participation in the survey. The feedback was particularly low in Croatia, Holland and Ireland. Nevertheless, the survey reveals the difficulties of the label’s implementation in other countries. These include low awareness, non-existent controls, and unclear responsibilities within the authorities. Without overcoming these obstacles, there is little hope for a more successful implementation of the “package label” in non-project countries of the European Union.

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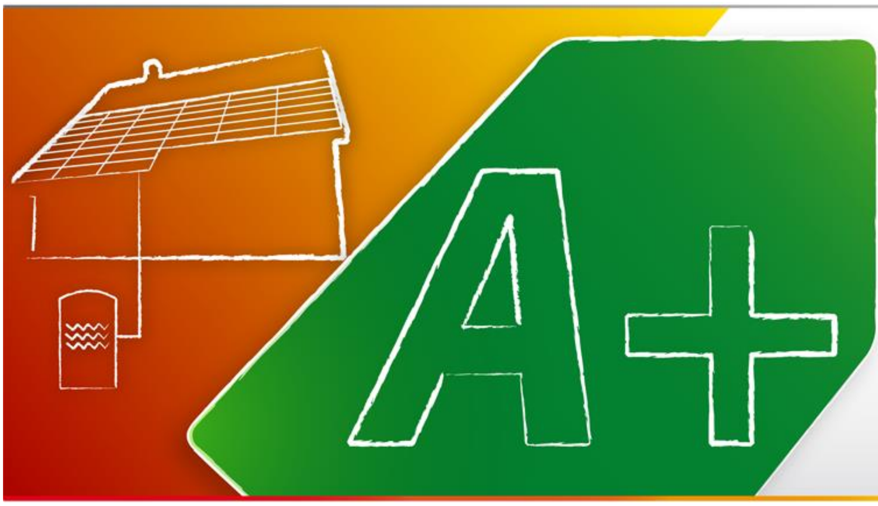

About the Labelpack A+ Project

The 'Label Pack A+' project aims at supporting the implementation of the energy labelling of heating appliances while boosting its impact, the focus being on the "package label" and its potential to push for the uptake or renewable technologies, in particular solar thermal, in combination with more efficient conventional technologies.

The project addresses one of the main challenges related to this particular energy labelling process in relation to other Energy-related Products : the issuing of the package label by installers. This challenge involves the preparation of the industry, retailers and installers for this process, including the communication to the final consumer.

More information at:
www.label-pack-a-plus.eu