Brussels, 16/03/2018

FINAL MINUTES

1st meeting of the Ecodesign Consultation Forum sub-groups on the European Product Registration database for Energy Labelling (EPREL), in Brussels, 4 July 2017 (14:00 – 17:00)

Participants: See “Attendance List” in Annex

1. WELCOME AND PRESENTATION

The Chair welcomed the participants to the first meeting of the Ecodesign Consultation Forum sub-groups on the European product registration database for energy labelling (EPREL) established by the Energy Labelling Framework Regulation (EU) 2017/1369. This first meeting gathers the three sub-groups (compliance, suppliers and public) of the Ecodesign Consultation Forum. Paul Hodson highlighted the three priorities for the product registration database, in decreasing order: support to the work of Market Surveillance Authorities (MSAs), a tool which works for industry and for customers. The timetable is tight with a deadline for the database to be operational on 1 January 2019. DG ENER C3 works together with the Information Management and Systems Unit (SRD 2) to achieve this, in cooperation with stakeholders.

2. ADOPTION OF THE AGENDA

The agenda is adopted without changes.

3. PRESENTATION OF THE REVISED ENERGY LABELLING FRAMEWORK REGULATION

The key elements of the new framework Regulation are:

- the rescaling of the energy label to an A to G classes (no more plusses to the A class), with a differentiated timing:
  - a first group of five different product groups (washing machines, dishwashers, fridges, lighting and televisions) to be adopted within 15 months (delegated acts before the end of 2018), with the aim to have the labels to appear in shop a year after;
  - a general rule of 6 years for rescaling;
  - heating products to be rescaled after 9 to 13 years; for information, the reviews of the heating regulations have started (Lot 1 & 2) and there is a parallel development regarding the PEF which takes place in the context of the review of the EED which could have an impact on these products and their labels.
- the top class (or top 2 classes) remain empty waiting for further technological improvements and the bottom classes are "grayed" when the ecodesign regulation bans the related product models;
industry will have to provide four months in advance of the date of the rescaled label to be displayed, the two appropriate labels in 'boxes'; dealers will have 14 days to change the displayed label in shops from the old to the new one;

- the database;

- Other elements such as energy smartness, defeat devices, protection against mimicking energy labels, consumers testing, communication campaigns, etc.

BE and UK questioned the short timing for the adoption within 15 months of 5 product groups and if, for coherence, ecodesign and energy labelling legislations will be kept aligned. EC replied that the same sequencing as before will be kept. A series of Ecodesign Consultation Forum meetings will take place during the last quarter of 2017. With "Better Regulation", other steps towards adoption need to be taken including public consultations (OPC, feedback periods), on top of the usual stakeholders meetings, ISC, WTO and Committee/Experts meetings.

4. PRODUCT DATABASE: MAIN IMPLEMENTATION CHALLENGES (USER PROFILE CREATION, UNIVOCAL IDENTIFICATION OF PRODUCT MODELS, ETC.)

EC presented the first development of EPREL, including the topics to be discussed in the subgroup's meetings.

Definitions and obligations related to the online portal and database are listed in the Regulation mainly in Articles 4, 12 and Annex I. The data to be collected for the database are in the product information sheets and technical documentation sections; for the portal, other information will be available such as the Ecodesign Working Plans, MSAs contact details, minutes of meetings, all legislation, which is already present but in several parts of the Europa website. The aim is to create a One-Stop-Shop allowing access to energy labelling and ecodesign information and EPREL.

BE asked if on a voluntary basis, additional data could be included in EPREL and if restricted access would be possible, with a fee eventually, for the public to get repair manuals, for example. The EC replied that what suppliers are obliged to provide is limited to the label information and the information sheet (in the public part) and part of the technical documentation into the compliance part of the database, with access only to the MSAs, the EC and the supplier. In this context, there can be voluntary upload of further documentation. At this time of development, it is not foreseen to upload other type of information.

NL explained that operational details of EPREL could be further defined via implementing acts. The first goal is to enter the specific elements in EPREL, to have the core up and running on time. The EC is not certain to make use of an implementing act. NL would like to have the detailed specifications in an implementing act to have a solid legal basis and clear rules for market actors. IT said that with an implementing act, MSs will have to chase manufacturers.

UK asked if ecodesign requirements for information to be available online could be fulfilled through the public part of the database, EC replied that this can be looked into but that the different legal instruments require careful consideration.

EPPE supported this idea to avoid administrative burden on manufacturers. IT replied that energy labelling mandatory information must be encoded in the database; EPREL is not the database of the manufacturers, but of the MSAs. It could be interesting to have other information included, but this is too early and legal aspects need to be checked.

5. PRELIMINARY IDEAS FOR A DATABASE PORTAL, AND

6. DATABASE ARCHITECTURE AND MAIN PROCESSES

EC presented practical implementation aspects (see image below): public and compliance parts of the database; single and secured access point to EPREL for suppliers; interface for a product model between EPREL and ICMS for MSAs use; etc. Public data will be accessible without registration, in a separate system with good responsiveness, to which the data is copied every
night or regularly from the compliance part. The One-Stop-Shop (the portal) will contain all information related to a regulated product group, including hyperlinks to Eur-Lex, to standardisation databases, etc.

EC said that technically speaking the data model will be developed for the 16 families of projects and will be shown at next meetings.

**First exchanges took place between stakeholders on four key initial issues:**

1. *Unique identification per product model:* It could be a combination of 3 identification numbers: for the supplier, the model and something else, like the EAN reference.

BE said that the EAN code can be used and the database could generate a number, before placing on the market. IT said that the unique identification is the model number which by definition is mentioned on the fiche and the label, and thus in EPREL. If there is the need for a different parameter, the manufacturer needs to generate a new identification number. NL considered that a unique identification number is the first thing to establish as it is of prime importance for the MSAs.

CECED said that a unique identification per model is complex. Indeed, there is the definition of a model with respect to the label, but e.g. a different colour can already lead to a different model. CECED will come back with a proposal, which would work not only from the point of view of MSAs, but also for customers.

TOPTEN asked if the country of placing on the market was envisaged to be included. NL said that one should not have too high expectations as regards the public site of the database for consumers: It will not provide information on the place of sale of a model, also because manufacturers do not have this information.

On the model identifier, IT said that there are two solutions to fix what a model is, either in the delegated acts, product per product, either to leave this to manufacturers. It could well be that the database ends up containing half a million models.
On a model with different colours, BE said that the solution to avoid multiple entries for a similar model could be to use a single 'lead' identifier for the model, covering different colours. For consumers looking for products, when generating lists with a ranking of products, the best should be displayed on top of the list and the energy efficiency could be added automatically. BE also asked how the database will deal with products having multiple units combined in a package that has the label, e.g. heating 'packages'. EC replied that the labels for heating packages have been exempted from inclusion into the database by the Regulation, to remove the burden from installers, who are mainly SMEs.

ANEC/BEUC took note that consumers are ranked as third priority even if this is not established as such in the Regulation itself. User-friendliness is important for the public, otherwise the portal could be at risk of not being consulted. EC answered that further meetings will allow each subgroup to comment on the further development.

2. Risk of hacking: How data can be protected against fake inputs?

BE explained that filtering out fake imports could be done by restricting the type of data to be uploaded. IT said that the inputs need to be checked by human beings, not only artificial intelligence (Energy Star is a (negative) example). NL said that in the US and Australia, they must have established a system for their databases for proving identity and legal commercial rights.

For CECED, the challenge and the priority are to get all suppliers in EPREL, because there are thousands of suppliers, not only manufacturers. In addition, if a supplier inputs wrong data, it becomes a question of security and liability.

3. Three input channels (via the screen and desktop, sending files and web services (protocols between servers)

No comments were provided.

4. What is the level of sensitivity/security of the provided information?

CECED said that their first priority is to have the security as high as technically possible, because of competition. EPEE confirmed that security and confidentiality of the data are key concerns (fake brands and models are a real issue). The EC replied that all measures will be developed to ensure security of the data and also of credentials.

Digital Europe said that timing is also a concern because some information needs to be on labels.

First Exchanges took place between stakeholders on key initial issues for market surveillance:

- On screen ergonomy: what and how the information should be presented?
- Level of security of access for MSAs?
- Which requirements concerning ICSMS linking to EPREL?

CENELEC said that technical documentation is often prepared in a combined way for ecodesign and energy labelling. Will it be possible to continue this way with the database? Or should they be separated in order to deliver only the energy labelling parts? This could create more work. The EC replied that the Regulation allows suppliers to provide more information in the technical documentation than what is legally required, so this could solve the issue.

Concerning the link between ICSMS and EPREL, BE said that for any product which has been looked at or flagged in ICSMS, a direct link should be available in EPREL in the compliance part to see the details of investigations. For MSAs, having predefined fields for technical documentation in EPREL would simplify their the work. Also, comments and questions from manufacturers to the MSAs (and vice versa) should be made possible.

NL said that regulations are clear on what is the technical documentation, and this has not changed. In the negotiations, it was decided as final solution that only a specific part should be entered in the compliance part of the database. So, there is a list of parameters to be entered in the database which are a sub-set of the technical documentation and which will then be checked by MSAs, as a starting point for their investigations.
IT informed that based on their experience it is easier to have the technical documentation for labelling because only the results of the test reports are requested in the current Directive. It is more difficult to have the full test report requested by ecodesign. Though, both are needed. IT would prefer to have the PDF of the test report from qualified laboratories and to work with 'standardised' test reports in the database. EC replied that the data to be uploaded were narrowly circumscribed and that a template might well help although this is not an immediate priority and might be different for each individual measure.

BE considered that as regards security and identification of people, the ICSMS system has sufficient security levels, allowing for MSAs to upload test reports and there are other types of access. This should be enough for EPREL.

Discussions will continue per sub-group on specific issues and questions in meetings after the summer.

7. DISCUSSION WITHSTAKEHOLDERS

Examples of topics to be discussed in the next meetings were presented.

For Suppliers: How to manage the user's authentication? User's rights per industry or branch? How to avoid redundant registrations?

A QR code is requested by the Regulation. An early registration could start in the database and finalisation of the entry could be done at a later date. Thereby the creation of the model number could trigger the creation of the QR code.

From discussions with CECED, importing some established formats (i.e. the PI standard) for automatic uploading of data could be done for 7 of the 16 product groups. For heating and cooling products, some standards are available, but there is no single international standard. The format per product could be based on existing standards used by industry.

For Consumers: The problem of user-friendliness of the website was mentioned, which could be partially solved with experts in designing user interfaces. The details are to be discussed with consumers' NGOs and other user representatives.

For Compliance: The user creation is a topic to be discussed, possibly based on what DG GROW has put in place for ICSMS (although, unauthorised access to ICSMS is a limited risk). In the case of the product database, it will provide access to documentation which is confidential. Therefore, a secure access will be a top priority. A first idea would be to delegate to national contact points the user authentication.

The Chair explained the process of the ECF sub-groups for the database: after the summer the EC will convene regular meetings per sub-group with a focus on "compliance", "suppliers" or "public". To ensure transparency the discussions will be focused on a sub-group, but the meetings will be open to all sub-groups. The next invitation will be sent earlier than the one for the present meeting and it is expected to take place in September. Suggestions, contributions and remarks are welcome also in written form.

Further comments:

NL recommended for the product identification to keep close to the definitions in the regulations in terms of model identifier, equivalent or new model. For the data to be uploaded into the database, again the regulations are the basis for specifying what is needed for the label and the product information sheet.

UK proposed to send the invitations for the sub-group meetings on compliance for information to the labelling ADCO members. The Chair replied that this can be taken into account.

DIGITAL Europe and EPEE asked if associations could be involved in the pilot database development. The EC replied positively, but it has to be done in a streamlined and organised manner. The call for expression of interest was addressed to ECF members and the people in the room were appointed as a result of it. If there is a need later on for a further extension, it will be considered.
PT, BE and IT explained that the same product manufactured in Asian countries could enter the EU market under different brands and, therefore different model identifiers. Also, the same model (with the same identifier) could be imported by 2 different importers. This is not so common, but it is a problem. IT and NL clarified that the brand is the manufacturer; the supplier (i.e. the manufacturer, the authorised representative, or the importer) is responsible for placing the product on the EU market and it has to be established in the EU. The framework regulation should be the basis for building the database definitions.

IT asked how the database will manage different models of product information sheets, for either products covered by the current labels or by the new labels.

BE asked what the web portal could offer for different user profiles (e.g. linked to Eurostat energy prices) and for helping consumer choices. EC replied that the web portal could provide interesting features for consumers, like translating “obscure” data (kwh, energy price) into a real cost, although this is not a priority. NL said that it should be the role for H2020 projects to develop apps, creative things with the data of the database and for dissemination. CLASP presented succinctly the "Digi-Label Project" (H2020 project) which develops "pocket watt", an app for consumers that give them more, better and personalised data on the energy consumption of appliances. CLASP took the opportunity to say that the project was looking for retailers for their Partners Round Tables.

8. ANY OTHER BUSINESS

BE asked for clarification on a possible implementing act as this would imply a vote by the MS. It would be key to include the data formats in such implementing act. NL concurred and added that suppliers should be prevented from each doing it their own way. The Chair replied that the practicalities and stakeholders expectations for the development and implementation of EPREL are being discussed in the sub-groups. If at one point, it is relevant for example to fix the timing or the practicalities for suppliers to fulfil their obligations, it will be in the form of an implementing act with a vote by the MS. This should become clearer by the end of the year.

IT asked what would happen if a product cannot be registered on time in the database. The Chair replied that a helpdesk function will be put on place. Depending on the issue, solutions can be different but it is the intention to have help and maintenance for a continuous implementation of the database.

IT said that in the ADCO meetings, interpretation of the legislation sometimes results in including or excluding a specific product and asked how the EC will deal with these modifications. The Chair replied that this would not be different as today's practice and with EPREL it could have as a consequence a change of the entry in the database.

CECED said that the industry can deliver all kind of formats driven electronically. EHI complemented saying that the test reports are not always in a standardised format.

The Chair thanked the participants for the fruitful discussion and closed the meeting.
# ANNEX I – Attendance List

<table>
<thead>
<tr>
<th>Country</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Belgium</td>
<td>ENER C3, ENER-MOVE SRD, GROW B1</td>
</tr>
<tr>
<td>Czech Republic</td>
<td></td>
</tr>
<tr>
<td>Denmark</td>
<td></td>
</tr>
<tr>
<td>Finland</td>
<td></td>
</tr>
<tr>
<td>France</td>
<td></td>
</tr>
<tr>
<td>Germany</td>
<td></td>
</tr>
<tr>
<td>Italy</td>
<td></td>
</tr>
<tr>
<td>Spain</td>
<td></td>
</tr>
<tr>
<td>The Netherlands</td>
<td></td>
</tr>
<tr>
<td>Portugal</td>
<td></td>
</tr>
<tr>
<td>Sweden</td>
<td></td>
</tr>
<tr>
<td>The United Kingdom</td>
<td></td>
</tr>
<tr>
<td>Norway</td>
<td></td>
</tr>
<tr>
<td>ANEC / BEUC</td>
<td></td>
</tr>
<tr>
<td>CECED</td>
<td></td>
</tr>
<tr>
<td>CEN</td>
<td></td>
</tr>
<tr>
<td>CENELEC</td>
<td></td>
</tr>
<tr>
<td>CLASP</td>
<td></td>
</tr>
<tr>
<td>DIGITAL EUROPE</td>
<td></td>
</tr>
<tr>
<td>ECOS</td>
<td></td>
</tr>
<tr>
<td>EEB</td>
<td></td>
</tr>
<tr>
<td>EHI</td>
<td></td>
</tr>
<tr>
<td>EHPA</td>
<td></td>
</tr>
<tr>
<td>EPEE</td>
<td></td>
</tr>
<tr>
<td>EUROCOMMERCE</td>
<td></td>
</tr>
<tr>
<td>EUROVENT</td>
<td></td>
</tr>
<tr>
<td>EVIA</td>
<td></td>
</tr>
<tr>
<td>LIGHTING EUROPE</td>
<td></td>
</tr>
<tr>
<td>TOPTEN</td>
<td></td>
</tr>
</tbody>
</table>