

Topten Focus

Professional refrigerated storage cabinets: Topten's recommendations

The year has started with the stakeholder meeting for professional refrigeration products. Topten would like to share in the present Topten Focus the main points that should be taken into consideration based on the outcome of meeting that took place on January 13th, 2022.

No delays because of the COVID pandemic

The duration of the COVID pandemic is much longer than what was expected in its early days. **COVID should not be used as a reason anymore to delay the Ecodesign regulatory process.** The higher uncertainty of the economy is used as an excuse for the purchase of less expensive and less efficient products. The opposite is true: all regulations should be economically beneficial to the market and society as a whole. Especially in the context of a weak economy amid the pandemic, the market cannot afford the overall higher (and long-term) costs of inefficient appliances.

Fair chance to the energy label to transform the market

The review team has shown how the energy class of newly registered models has moved from C to D in the last years. According to them, this is explained by consumers being more worried about the purchase costs instead of the operating costs of the product (this shift has started before the beginning of COVID). However, **market research has shown that storage cabinets are often not properly labelled.** Indeed, even though the energy label for this product category has been available for many years, there are still many retailers that do not show the required energy related information on the product description. **The energy label hasn't had a fair chance to influence the buyers because products are too often mislabelled or not labelled at all. The draft regulation should focus on clearly stating the labelling requirements, to avoid any loopholes.**

Removal of all gaps in the scope

There are gaps in the scope that leave the opportunity for loopholes. Topten believes that MEPS for the following products should be included in the scope of the regulation:

- Medicine cabinets and laboratory grade refrigerators and freezers
- Ice machines
- Refrigerator-freezers
- Blast cabinets
- Static refrigerators

No exemptions for Heavy Duty refrigerators

Heavy duty appliances benefit from an exemption allowing them to be less efficient than traditional products. This exemption is not necessary because heavy duty storage cabinets are already populating the highest energy classes. Of the 131 professional refrigerated storage cabinets listed on Topten (Table 1), 90% (118 models) of these are “heavy-duty”. **These products reach the highest energy classes and do not require the exemption for them to be competitive.**

Table 1: Market distribution of Heavy-Duty models on the Swiss market

Refrigerators	A++	A+	A	B	C	D	E	F	G	Sum
Under counter	-	-	14	-	1	-	-	-	-	15
1-door	-	-	25	9	19	5	-	-	-	58
2-door and more	-	-	4	1	9	5	-	-	-	19
Freezers	A++	A+	A	B	C	D	E	F	G	Sum
Under counter	-	-	-	-	-	1	-	-	-	1
1-door	-	-	1	4	25	10	-	-	1	41
2-door and more	-	-	-	-	6	3	2	1	1	13
%	0%	0%	30%	10%	41%	16%	1%	1%	1%	147

More stringent proposed MEPS

The draft regulation proposes to remove 7% of the products from the market in Tier 1 (new EEI of 140) and 31% of the products in Tier 2 (new EEI of 110). Since the allowance for heavy duty cabinets should be removed, the MEPS in Tier 1 (adjusted according to the new reference lines) should at least be more stringent than the MEPS for storage cabinets that are in force today (EEI of 85).

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