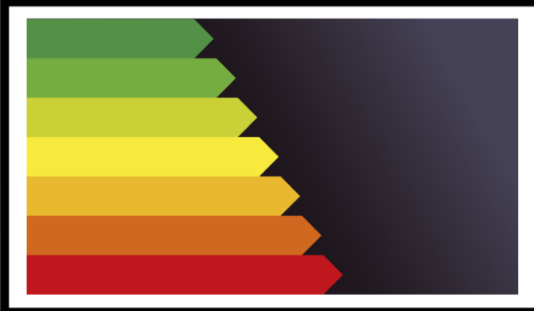


# COMPLIANTV



Compliance of TVs

with Energy Label and Ecodesign Requirements

## Deliverable 3.2 Online Shop Inspections Results & Analysis

Stewart Muir (EST) and  
Gergana Dimitrova (TUB)  
September 2015



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# Project summary

The CompliantTV project aims at providing a fully-fledged and detailed methodological guidance to allow European Union (EU) Member State (MS) Market Surveillance Authorities (MSAs) to face the new legislative and market challenges for TV sets in an effective and cost-efficient way (with a support of aligned concerted testing and the development of a database). The project has the objective of:

- Analysing the implication of the new Energy Labelling Directive (labelling declarations, Commission Delegated Regulation (EU) No 1062/2010) and Ecodesign Directive (Commission Regulation (EC) No 642/2009 defining the minimum ecodesign requirements) on the market surveillance activities by carrying out ad-hoc surveys.
- Assessing the compliance of TV sets in the framework of the new Energy Labelling and Ecodesign regulations, through verification procedures.
- Improving the know-how and testing capability of laboratories with regard to the new and complex measurement method for measuring energy efficiency of TVs. This capacity building action will be carried out through harmonisation and coordination between laboratory partners of this project and other laboratories.
- Evaluating the outcomes of the product tests carried out and proposing corrective approaches to manufacturers and retailers.



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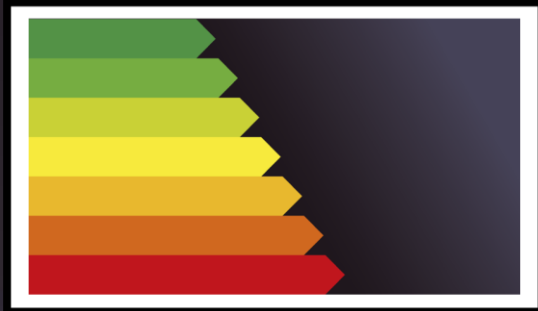
# Contents

- Requirements for online retailers from January 2015
- Methodology
- Round 1 Recap
- Round 2 Results and Analysis
- Assessment of implementation of new requirements for online retailers
- Conclusions and Outputs



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## Requirements for Online Retailers from January 2015



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# Change in requirements

- Prior to 1<sup>st</sup> January 2015, TVs (and other products covered by delegated regulations) were required to display certain minimum information, in a specified order in online product listings
- For TVs, (as per Annex VI of regulation 1062/2010) this was:
  1. Energy efficiency class
  2. On-mode power consumption
  3. Annual power consumption
  4. Visible display size
- **For products placed on the market from 1<sup>st</sup> January 2015, online retailers must now display the energy label and product fiche in listings**
- Products on the market before this date comply if still listing the above information in the correct order



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# Criteria for compliance, post-January 2015

- The energy label, or means of accessing it, must be immediately visible and in direct proximity to the priced TV listing
- It is acceptable to display only the energy class arrow, providing it links directly to the full label
- Use of a ‘nested display’ is allowed, providing it links to the label when hovered over or on the first mouse click
- A link can be provided to access the product fiche
- The energy label must be shown in the correct format; ie using correct fonts, dimensions, format of the ‘hard-off’ switch tick box



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# Examples – compliance with post-Jan 2015 requirements

Our experts love

Product features

TV As advertised on TV

- 4k Ultra HD picture is 4 times the resolution of HD
- 1000 PQI
- Smart: Catch up TV & App Store
- Tuner: Freeview HD
- Connectivity: HDMI 2.0 x 4

Claim up to £1000 cashback More info

**A+** [Produit fiche](#)

★★★★☆ Read 2 customer reviews Ask an owner

£699.00  
Save £400.00  
Was £1,099.00 (from 30/03/15 to 29/04/15)

Add to basket

Available for Home Delivery More info

Available to Order Online & Collect in Store from 1 hour More info

Compliant, arrow links to label, fiche accessible from link

TV LED Full HD, 40", 2 entrées HDMI, Perfect Motion Rate 100 Hz

★★★★☆ Avis (6)

Profitez d'images saisissantes, d'un son limpide et découvrez toutes les fonctions pratiques de ce **téléviseur LED Full HD Philips 40PFK4100/12**. ... [Plus >](#)

**€ 399,00**  
ou € 30,00 par mois

- ✓ Livraison gratuite
- ✓ Mise en service gratuite
- ✓ Reprise ancien app. gratuite

J'ACHÈTE >

+ Comparer + Sur ma liste d'envies

Type de rétroéclairage : LED [i](#)

Motion Hertz : 100 Hz [i](#)

Taille d'écran (cm) : 102 cm [i](#)

Taille d'écran (pouces) : 40 pouces [i](#)

Norme HD : Full HD [i](#)

[Afficher toutes les caractéristiques >](#)

Web: **En stock** [i](#)

Magasins: **Retrait possible**  
[voir disponibilité >](#)

Disponibilité Top ^

Livraison [i](#)  
A domicile: à partir de jeudi 03 septembre

Magasins: introduisez ici votre code postal

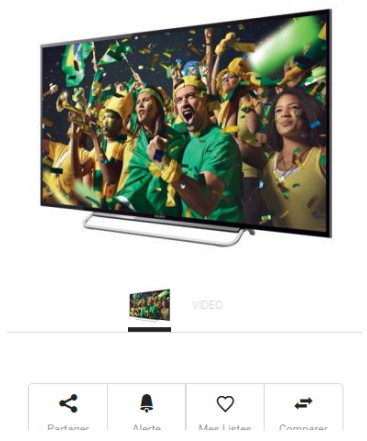
[Superzoom](#) [Mode d'emploi](#) [Fiche produit](#)  
[Vidéo](#) [Avis \(6\)](#)

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Compliant, direct link to label and fiche

# Examples – non-compliance with post-Jan 2015 requirements



Accueil - TV, Vidéo, Home cinema - Téléviseur - Par taille d'écran - TV 40" (102 cm)

TV LCD 40" à 44" - Sony

Notes clients ★★★★★ (14 Avis)

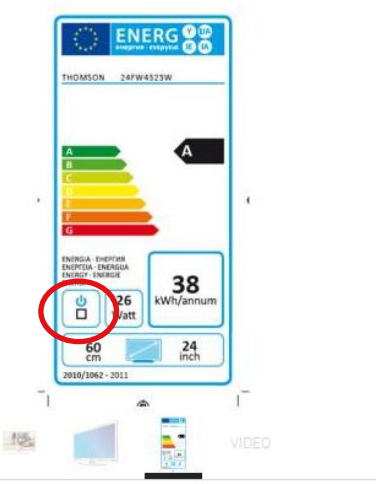
Prix de la Fnac    Revendez le vôtre

**En quelques clics seulement, revendez sur fnac.com**

vosre TV Sony KDL40W605 et gagnez de l'argent

Revendre un produit

Non-compliant – no presence of label or fiche in direct proximity to listing



Accueil - TV, Vidéo, Home cinema - Téléviseur - Tous les téléviseurs

Notes clients ★★★★★ (13 Avis)    Test technique labo Fnac

Prix de la Fnac dès **179€90**    Revendez le vôtre

Prix **179€90** 0€79 d'éco-part.

+ Bénéficiez du crédit à 0%, jusqu'au 27 sept

En stock    Livraison gratuite

Ajouter au panier

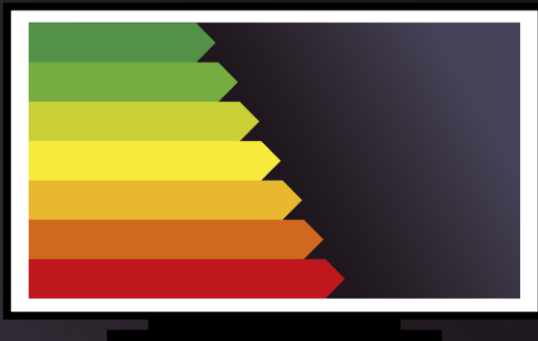
Non-compliant – label present and linked to, but in wrong format (hard-off box without tick)



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# COMPLIANTV



Compliance of TVs

with Energy Label and Ecodesign Requirements

## Methodology



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# Methodology

- In both rounds, 20 shops per partner (total 100) were checked as a sample to establish an overall picture of compliance for online retailers
- Shop and products were selected randomly against criteria to ensure a wide picture of the market. Selection criteria for each partner was the same in round 2 as round 1 – see round 1 report
- A range of screen sizes and brands were covered
- Failure classification categories were as round 1, but with further considerations when assessing against post-2015 requirements
- **Missing:** where the label, fiche, or pre-2015 product information was not present
- **Format:** eg pre-2015 product information or fiche in the wrong order; label of incorrect format or size
- **Visibility:** Only analysed in round 2 for post-2015 listings; Assessment of whether the label or fiche were visible in the listing according to the regulation (ie in direct proximity; nested display compliant)
- **Apply:** label does not relate to TV shown
- TVs were again checked on the manufacturer's website as well as that of the retailer to assess any discrepancies between declared values



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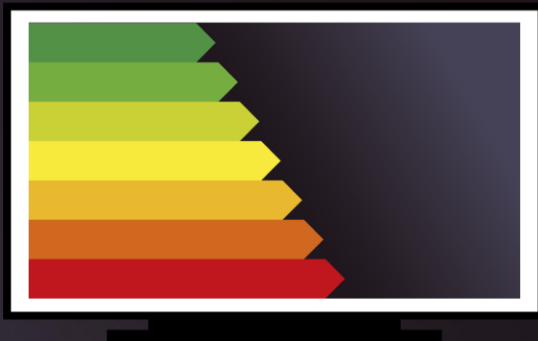
# Which version of the requirements were TVs assessed against in round 2?

- In many cases the date of placing on the market of the TV was unknown; so whilst TVs were primarily assessed against the post-January 2015 requirements, it was often not possible to be certain which criteria was the correct one to assess against.
- Checks were done in the first half of 2015; it is likely that there were still pre-2015 models in the supply chain
- TVs that did not comply with either the pre- or post-2015 requirements were able to be deemed non-compliant
- The compliance status of some TVs could not be assigned
- Where it was possible to determine the date of placing on the market, the TV was assessed against the appropriate requirement
- Listings compliant under the new requirements were considered compliant in all cases



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# COMPLIANTV



Compliance of TVs

with Energy Label and Ecodesign Requirements

## Round 1 Recap



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# Round 1

- Round 1 consisted of a pilot phase for all partners (5 shops) followed by checking a further 15 shops each to complete the exercise
- Compliance rates in each country were as follows:

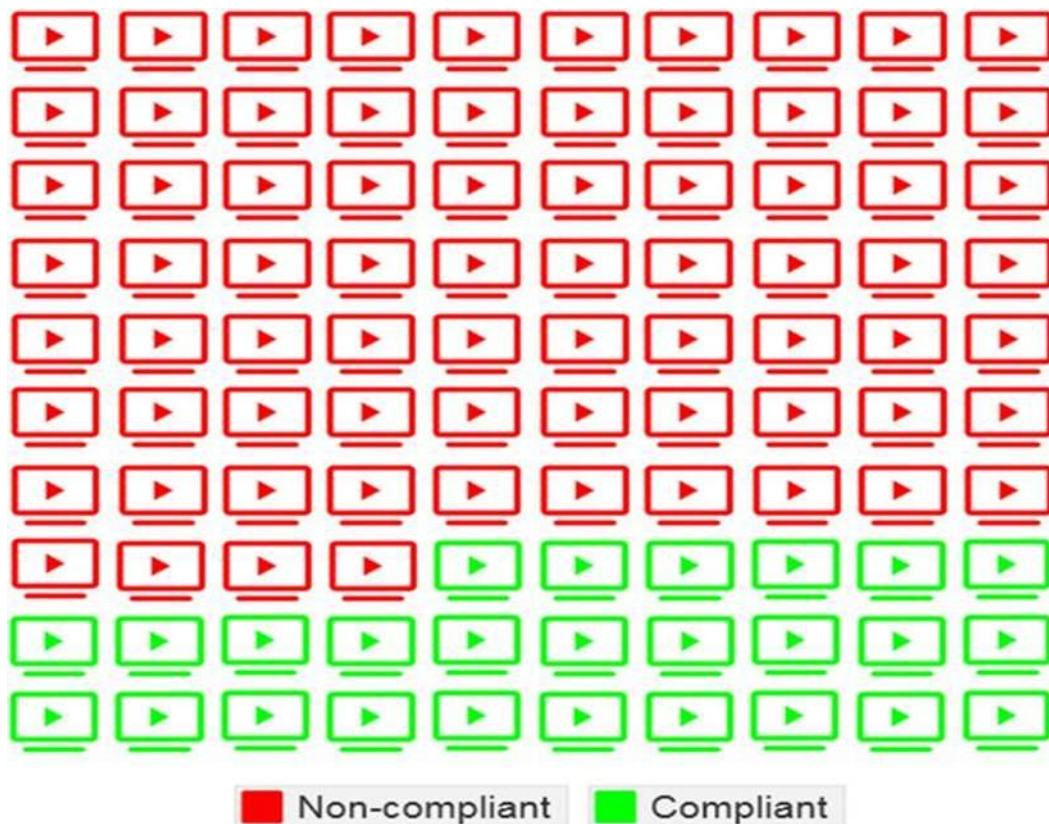
Country	TVs seen	Compliant TVs	Compliant %
Germany	401	189	47 %
Austria	401	89	22 %
France	400	90	22 %
Belgium	400	77	19 %
Czech Rep	400	19	5 %



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# All TVs checked, round 1

TVs inspected	Compliant	Non-compliant
2002	464	1538

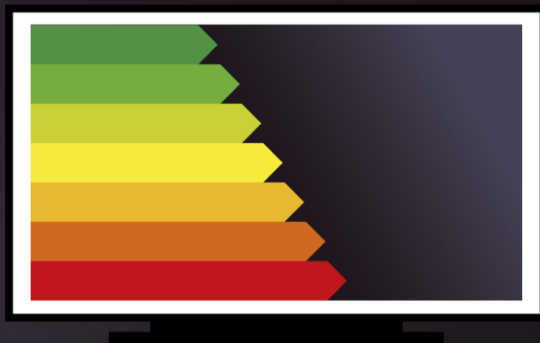


Overall non-compliance  
rate:  
**74%**



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# COMPLIANTV



Compliance of TVs

with Energy Label and Ecodesign Requirements

## Round 2 Results and Analysis



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# By country (20 shops per partner)

Country	Partner	TVs checked	Compliant	Non-compliant	Could not determine	% Compliant
Belgium	ECOS	397	206	179	12	52%
Austria	AEA	400	110	180	110	28%
France	BIO	400	70	224	106	18%
Czech Republic	SEVEN	395	0	284	111	0%
Germany	TUB	400	239	161	0	60%
<b>Total</b>		<b>1992</b>	<b>625</b>	<b>1028</b>	<b>339</b>	<b>31%</b>

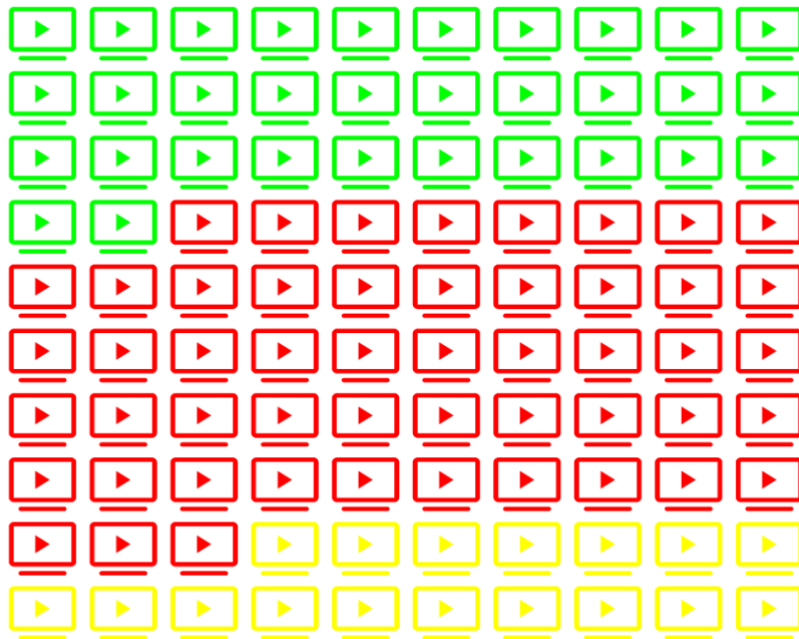


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# Round 2

TVs checked	Compliant	Non-compliant	Could not determine compliance
1992	625	1028	339



■ Compliant (31%) ■ Non-compliant (52%) ■ Could not determine (17%)

Overall non-compliance rate:

**52%\***

Decrease in non-compliance of 22% from round 1

\*Compliance could not be determined for 17% of TVs



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# COMPLIANTV



Compliance of TVs

with Energy Label and Ecodesign Requirements

## Commentary and analysis

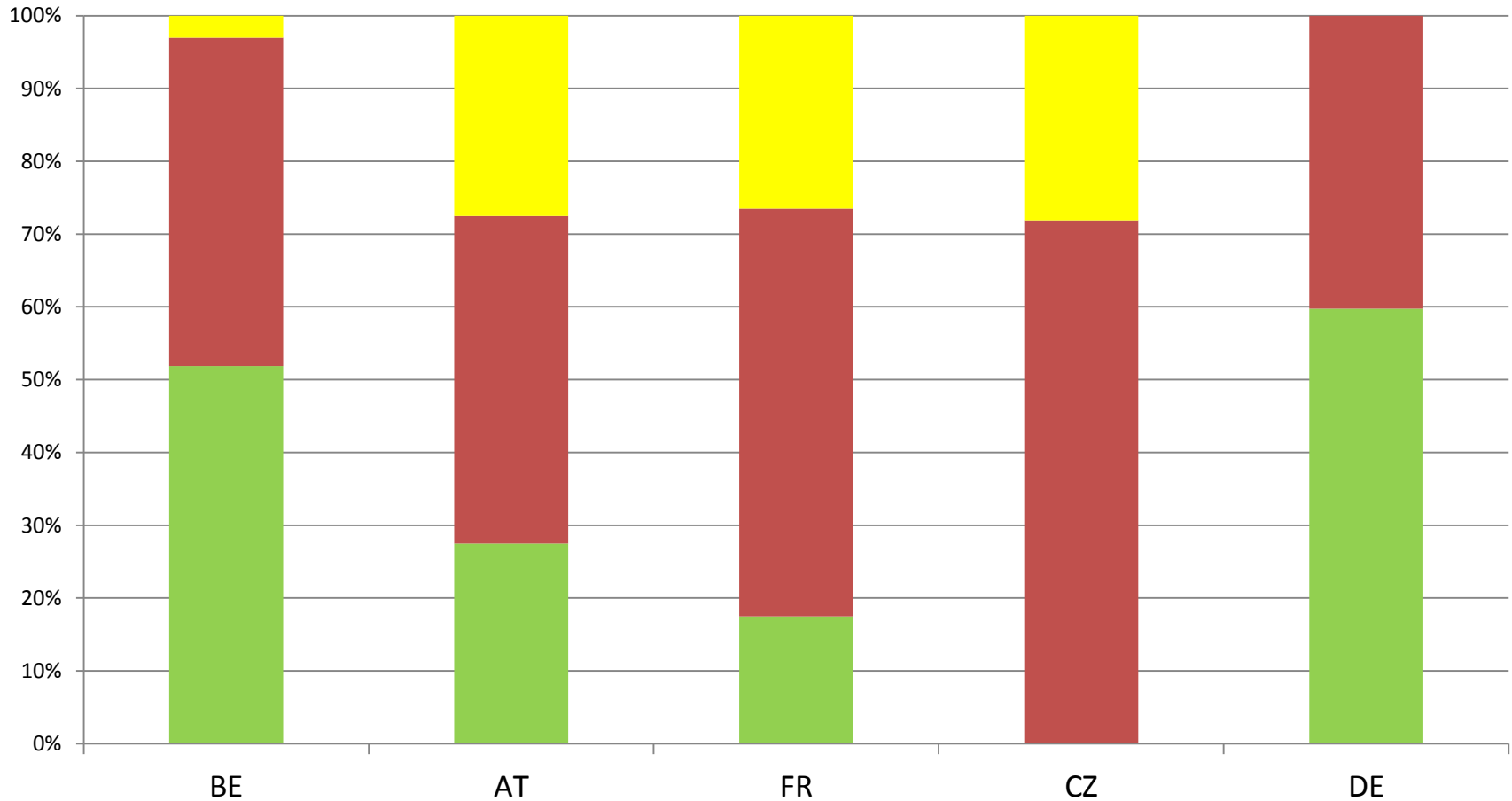


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# By country (20 shops per partner)

Germany and Belgium had the highest compliance, the Czech Republic the lowest

Compliance



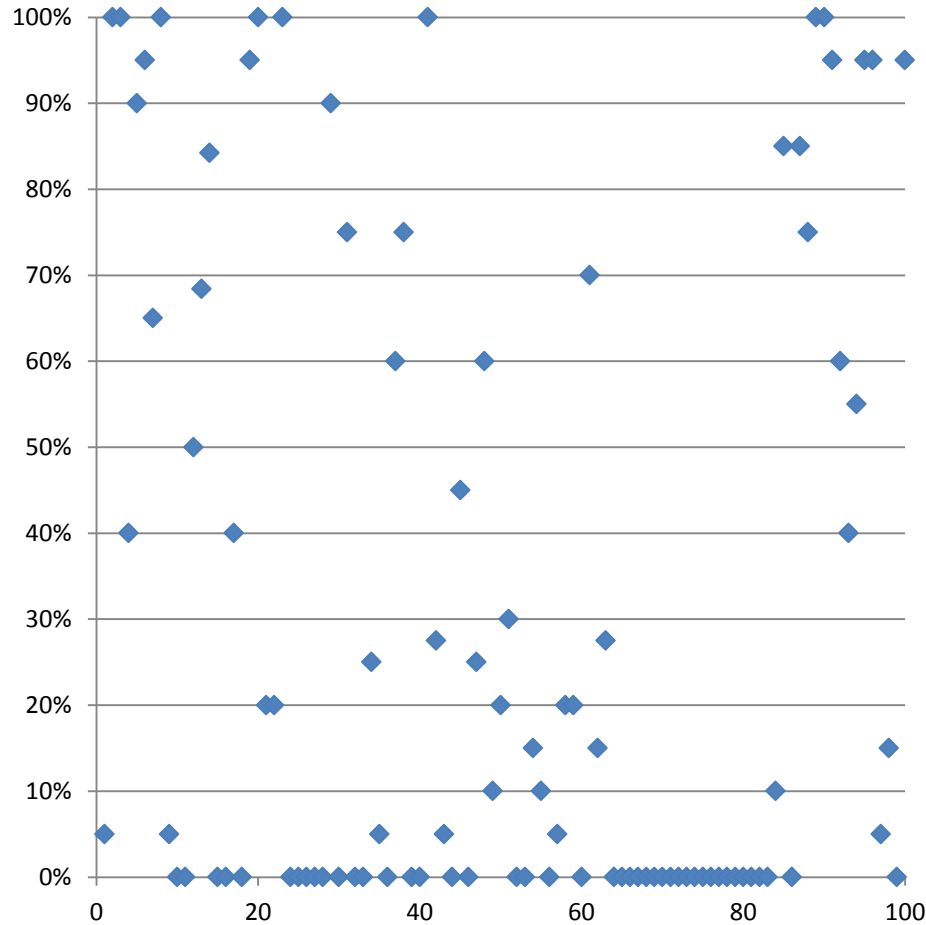
■ Compliant ■ Non-compliant ■ Could not determine



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# Compliance distribution by shop

Compliance



Scatter graph of compliance rate of all e-shops

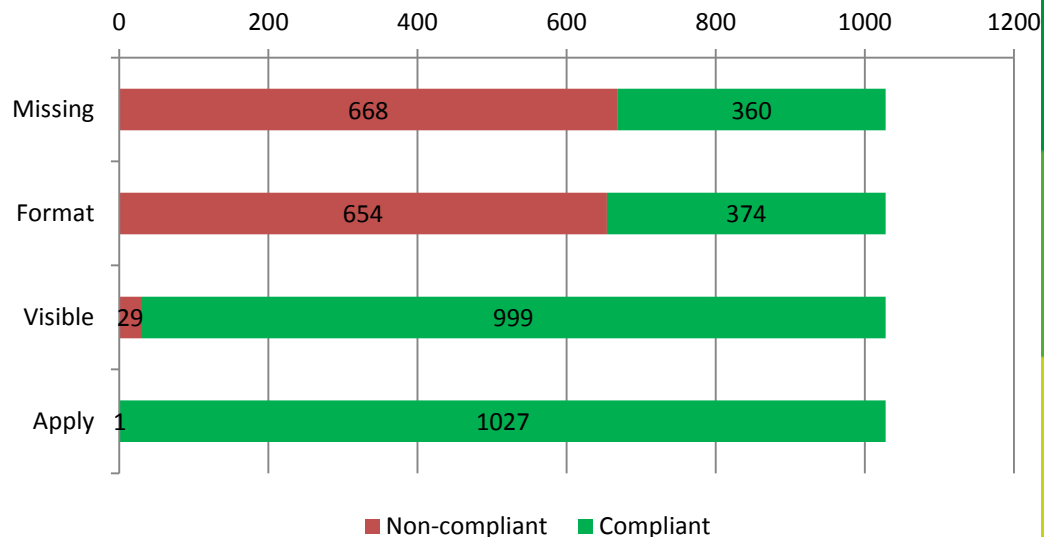
Compliance rate	Number of shops
0%	45
1-49%	22
50-79%	11
80-89%	3
90-100%	19



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# Failure categories

Missing	Format	Visibility	Apply
668	654	29	1



- A total of 1028 TVs were non-compliant against at least one of the categories of missing, format, visibility, or apply
- In many cases, a listing was non-compliant for more than one reason
- ‘Missing’ was defined as where the label, fiche or some information was not present according to the appropriate requirement
- ‘Format’ errors were those where there was an issue with the order of data or fiche; the format of the label
- ‘Visibility’ was where the means of accessing the label (eg arrow, nested display) was not compliant
- ‘Apply’, meaning where the label and TV model did not match



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# Discrepancies from manufacturer data

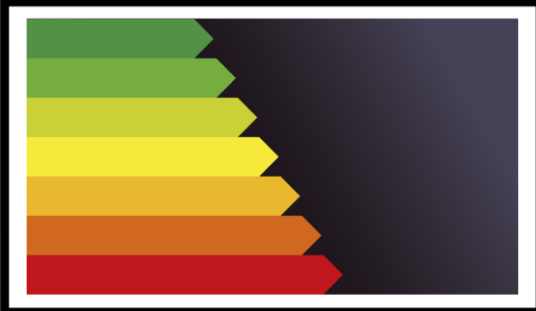
- Discrepancies between the retailer data and that listed on manufacturers' websites were logged
- This was defined as where there was no product information on the manufacturer website; at least one piece of data was not available on the manufacturer website when available on the retailer website; data was inconsistent between the two sites
- This was observed by country as below:

Country	Listings checked	No discrepancies	At least one discrepancy	% TVs with no discrepancy
BE	397	108	289	37%
AT	400	63	337	19%
FR	400	129	271	48%
CZ	395	71	324	22%
DE	400	48	352	14%
Total	1992	419	1573	27%



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# COMPLIANTV



Compliance of TVs

with Energy Label and Ecodesign Requirements

Assessment of  
implementation of  
new requirements  
for online retailers



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# Date of placing on the market of TVs

The date TVs were placed on the market was for the most part unknown

TVs checked	On market before 2015	On market after 2015	Date placed on market unknown
1992	156	23	1813

- It was not possible to determine the compliance status of 339 TVs.
- However, partners reported that for all these listings, none of the product information was missing or in the wrong order, even though the label and fiche were not present in some cases
- Therefore, these TVs would have complied with pre-2015 requirements
- **This would have increased the compliance rate to 48% if these TVs were pre-2015**

Country	TVs compliance could not be determined	TVs compliant with pre-2015 requirements
Belgium	12	12
Austria	110	110
France	106	106
Czech Republic	111	111
Germany	0	0
<b>Total</b>	<b>339</b>	<b>339</b>



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# Implementation of the post-2015 requirements

- Listings were analysed to assess the penetration of listings in a format adhering to the new requirements
- Some shops had implemented this into listings, with a high level of compliance; others had attempted to make their listings in a form adhering to the new requirements but had non-compliance issues (eg labels in the wrong format, not linking correctly to label, including the label but not the fiche)
- It was observed that some retailers have yet to make an attempt to adapt listings to conform with the new requirements
- Around 2 in 3 of retailers have made some attempt to comply with the post-2015 requirements
- Again, this appeared to be highest in Germany and Belgium

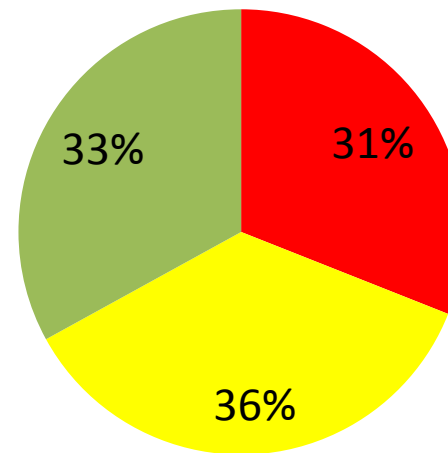


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# Implementation of the post-2015 requirements

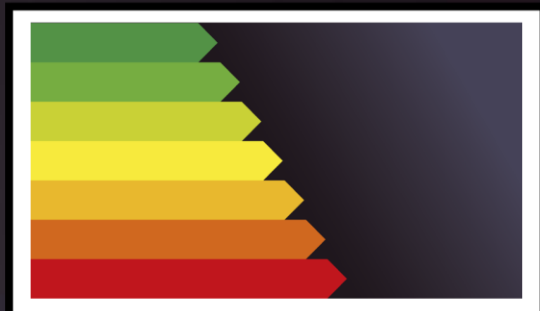
Country	No implementation observed	Some implementation; <50% compliant	Higher level of implementation; >50% compliant
BE	6	3	11
AT	11	3	6
FR	5	12	3
CZ	7	13	0
DE	2	5	13
Total	31	36	33

- No implementation observed
- Some implementation <50% compliant
- Higher level of implementation >50% compliant



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# COMPLIANTV



**Compliance of TVs**

with Energy Label and Ecodesign Requirements

## Conclusions and Outputs



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# Conclusions

- Online compliance in round 2 (31%) remained lower than in-store compliance (78%) in round 2. There remains significant scope to increase online compliance.
- Germany (60%) had the highest compliance and the Czech Republic (0%) the lowest, as in round 1.
- Compliance increased in Belgium and Austria and slightly decreased in France.
- Discrepancies between information on retailer and manufacturer websites remain a concern; only 27% of listings were accessible and fully consistent between both websites. A centralised product database could help address this problem.



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# Conclusions

- Compliance was seen to increase in round 2 by 5%. However this may have been even higher if including listings of products where the date of placing on the market was unknown, but complied with pre-2015 requirements; this may have been an increase of up to 22%.
- Implementation of the new listings featuring label and fiche appears to have helped more retailers comply by simplifying the process; anecdotally some good practice was seen and around 2 in 3 retailers checked had begun to implement listings under the new requirements.
- Again, a centralised database that would allow retailers to download labels and fiches would very likely help increase compliance by simplifying the process for accessing these.



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# Communication of results

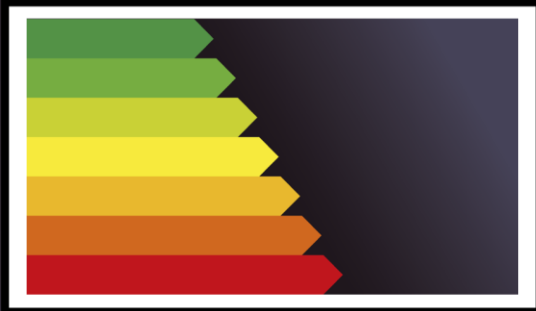
## Procedure:

- Outputs of the online shop Inspections were provided to shops and retail associations, after round 2 issuing any corrective actions, and providing advice
- All contact with retailers and proposal of remedy actions was logged internally by the project
- MSAs were informed of the outputs and actions agreed to be undertaken by the shop in case of non-compliance.
- MSAs were also provided with top level results of the online checks



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Compliance of TVs

with Energy Label and Ecodesign Requirements

## Thank you for your attention.

Contact and more information:

CompliantTV project

[www.complianttv.eu](http://www.complianttv.eu)

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