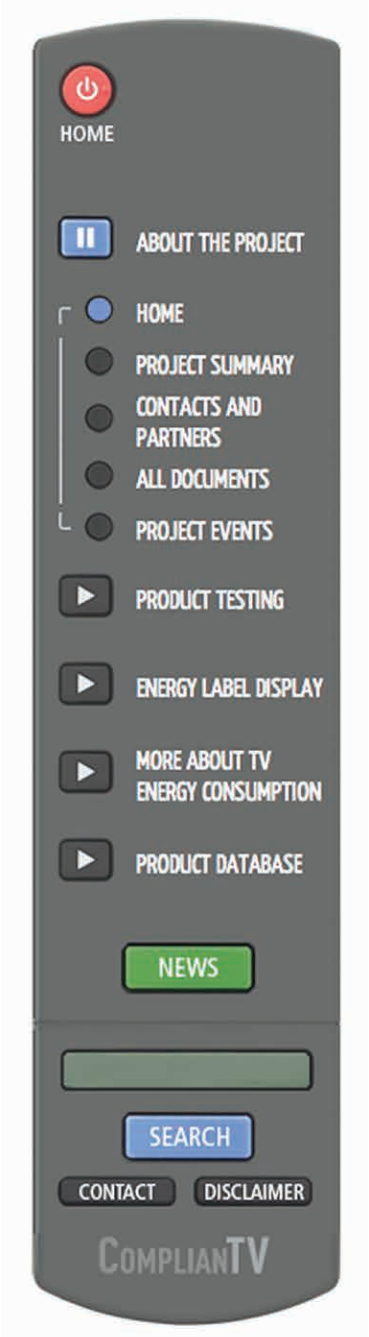
ComplianTV

Compliance of TVs
with Energy Label and Ecodesign Requirements



Guidelines on in-store shops and online shops surveys

ComplianTV: Compliance of TVs with Energy Label and Ecodesign requirements.

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1. Introduction

Televisions play an important role in the EU Energy Labelling scope which is one major policy scheme to reduce the energy consumption of private households and to drive the market towards more energy efficient appliances.

Energy Labelling requirements for televisions entered into force at the end of 2010 through Regulation No 1062/2010, thereby introducing a label containing an A/G scale to display energy efficiency information. Originally, it was planned to gradually move the scale to an A+++/D scale until 2020, reflecting the anticipated positive development of the television market. However, it should be mentioned that discussions are ongoing for a possible major revision of the energy classes and the EU labelling scheme itself.

The purpose of Energy Labelling of products is to provide transparent and fully comparable information on energy consumption, efficiency and other selected performance characteristics. The Energy Label has to be made available to consumers at the points of sale, enabling them to make better educated purchase decisions.

The EU-funded project ComplianTV assessed the implementation of the Energy Labelling Regulation on televisions by conducting random in-store and online shop visits in several Member States. Furthermore, the compliance of televisions with the Ecodesign and Energy Label Regulations was evaluated by laboratory tests. Non-compliant cases were reported to the retailers/manufacturers for remedy actions. Finally, the responsible Market Surveillance Authorities (MSA) were informed about the overall outcomes of the tests and the surveys. The project also elaborated documents and organized events in order to provide guidance to both manufacturers and retailers about the requirements of the Energy Labelling and Ecodesign Regulations.

This report presents lessons learned from the shop inspections that have been performed within ComplianTV and provides guidance and feedback to MSAs and other organisations potentially conducting retailer inspections. Furthermore, note that information about the new Energy Labelling requirements for televisions sold on the internet (Commission Delegated Regulation (EU) No 518/2014) is included in this document.

2. Legal Framework

The legal requirements for energy label display for televisions are specified in Commission Delegated Regulation No. 1062/2010 and Commission Delegated Regulation No. 518/2014.

Table 1 displays an excerpt of Commission Delegated Regulation No. 1062/2010 on Energy Labelling of televisions. It contains detailed information on how the Energy Label shall be displayed in shops. A difference is being made between cases where televisions are directly visible at the point of sale (Article 4(a) of Commission Delegated Regulation (EU) 1062/2010) and cases where "the end-user cannot be expected to see the television displayed" (Article 4(b)).

Table 1 - Excerpt from Commission Delegated Regulation (EU) 1062/2010 on Energy Labelling of Televisions

Article 4 - Responsibilities of Dealers
Dealers shall ensure that

(a) each television, at the point of sale, bears the label provided by suppliers in accordance with Article 3(1) on the front of the television, in such a way as to be clearly visible;

(b) televisions offered for sale, hire or hire-purchase, where the end-user cannot be expected to see the television displayed, are marketed with the information to be provided by the suppliers in accordance with Annex VI.

(c) any advertisement for a specific television model contains the energy efficiency class, if the advertisement discloses energy-related or price information;

(d) any technical promotional material concerning a specific television model, which describes its specific technical parameters, includes the energy efficiency class of that model.

Annex VI

Information to be provided in the cases where end-users cannot be expected to see the product displayed
1. The information referred to in Article 4(b) shall be provided in the following order:

(a) the energy efficiency class of the model as defined in Annex I;
(b) the on-mode power consumption as referred to in point 1 of Annex II;
(c) the annual power consumption in accordance with point 2 of Annex II;
(d) the visible screen diagonal.
[…]

Furthermore, televisions which are put on sale on the internet are covered by Commission Delegated Regulation No. 518/2014 amending Commission Delegated Regulation No. 1062/2010. This Regulation entered into

force on January 1, 2015 and only applies to products with new model identifiers that were put on the market after January 1, 2015 (for running models – model identifiers put on the market before January 1, 2015 – only the requirements presented above in Table 1 apply). Table 2 displays an excerpt of this Regulation.

Table 2 - Excerpt from Commission Delegated Regulation (EU) 518/2014 on Energy Labelling of Televisions on the Internet

Annex IX - Information to be provided in the case of sale, hire, or hire-purchase through the internet

(2) The appropriate label […] shall be shown […] in proximity to the price of the product […]. The size shall be such that the label is clearly visible and legible […]. The label may be displayed using a nested display […]. If nested display is applied, the label shall appear on the first mouse click, mouse roll-over or tactile screen expansion on the image.

(3) The image used for accessing the label in the case of nested display shall:
(a) be an arrow in the colour corresponding to the energy efficiency class of the product on the label;

(b) indicate on the arrow the energy efficiency class of the product in white in a font size equivalent to that of the price;

[…]

(4) In the case of nested display, the sequence of display of the label shall be as follows:
(a) the image referred to in point (3) […] shall be shown […] in proximity to the price of the product;

(b) the image shall link to the label

(c) the label shall be displayed after a mouse click, mouse roll-over or tactile screen expansion […]

(d) the label shall be displayed by pop up, new tab, new page or inset screen display;

(e) for magnification of the label on tactile screens, the device conventions for tactile magnification shall apply;

(f) the label shall cease to be displayed by means of a close option or other standard closing mechanism;

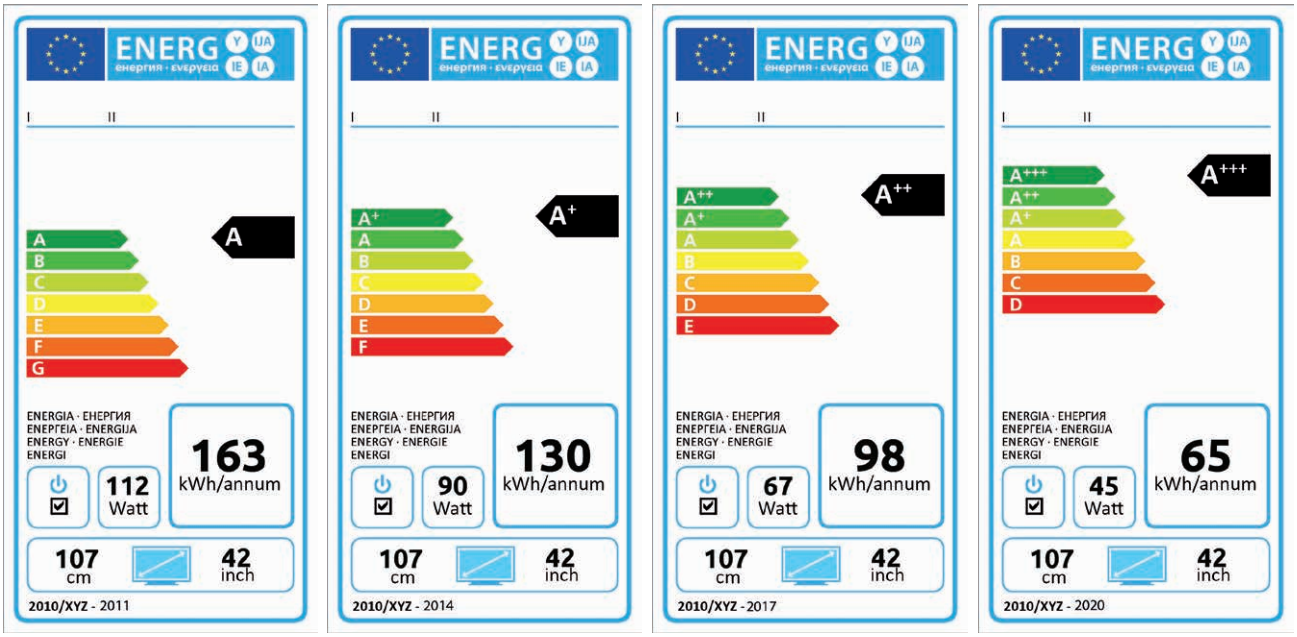
(g) the alternative text for the graphic […] shall be the energy efficiency class of the product in a font size equivalent to that of the price.

(5) The appropriate product fiche made available by suppliers […] shall be shown on the display mechanism in proximity to the price of the product. The size shall be such that the product fiche is clearly visible and legible. The product fiche may be displayed using a nested display, in which case the link used for accessing the fiche shall clearly and legibly indicate "Product fiche". If nested display is used, the product fiche shall appear on the first mouse click, mouse roll-over or tactile screen expansion on the link.'

2. Legal Framework

The cited Regulation also defines the visual appearance of the Energy Label (Annex V). Due to the expected technical progress in the coming years, it was initially planned to change the displayed efficiency classes on the label over time from A to G in 2011, to A+++ to D in 2020 (see Figure 1). There is also the possibility for manufacturers to anticipate the labels considering higher classes voluntarily beforehand.

However, discussions are ongoing for a major revision of the labelling scheme. The outcomes of this process are not finalised to date, but the aim is to improve the readability and user-friendliness of the label.



2011 2014 2017 2020

Figure 1 - Visual Appearance of Energy Labels for Televisions with Progressive Introduction of Higher Energy Classes. (Below the label, the particular year is indicated, in which the respective label becomes effective and mandatory to use).

3. In-store Shop Visits – Planning & Execution

This section provides guidelines for shop inspection campaigns for in-store shops. This includes possible different shop selection strategies (Section 3.1), the procedure of the shop visit itself and the requirements for useful data handling and processing (Section 3.2). Finally, a best practice example from ComplianTV is provided (Section 3.3).

3.1 Shop Selection Strategies for In-store Shop Visits

The selection of shops is a key component for the planning of shop visits. Different strategies can be applied for this task, depending on the objective of the survey, the specific purpose and available resources. The execution of shop visits can be a very time consuming task to undergo, depending on the scope of the survey (number, locations and size of shops to be inspected). As a consequence, enough time for this task should be budgeted. An electronic super store has several hundred units of televisions on display at a time. Inspecting the Energy Labelling of all units in a shop can take several hours. Furthermore, some extra time should be budgeted for the distances to be covered between the shops.

The main possible shop selection strategies are:

- Inspecting shops which represent the market situation in terms of typical shop types and sizes

  Gathered data is representative of the observed market in all its facets. A large variety of different shop types (e.g. electronic superstores, electronic specialists, department stores, supermarkets, etc.) are to be inspected.
- Inspecting shops which represent the lion's share of the market

  Gathered data is representative of the bulk of television models which are available on the observed market. Mostly electronic superstores and electronic retailer chains are to be inspected.
- Inspecting shops with the highest likeliness of failure (shops with a history of non-compliance or involved in complaints)

  Gathered data is representative of those parts of the market with the most critical need for action.
- Inspecting shops in a distinct geographical area of the observed market

  Gathered data is geographically representative of the observed region. Shops in a large variety of different cities/locations are to be inspected.

3. In-store Shop Visits – Planning & Execution

3.2 Execution of the In-store Shop Visits

Several success factors are important for effective and efficient in-store shop visits. In this section, a number of key elements for conducting shop visits are presented.

- Keeping track of inspected televisions

  Due to the large number of televisions that can be on display in shops during an inspection, it is crucial to keep track of the inspected units. It is necessary to develop a reporting template for the data gathering. This template shall contain the information about the shop inspection itself (name and address of the shop, time and date of inspection, shop type) as well as information about the inspected televisions (e.g. models and brands, number of televisions inspected – models and/or units, number of compliances/non-compliances, type of labelling mistakes). Such a template is an essential tool to keep track of the inspected televisions, but also to document the execution of the inspection. This ensures traceability and adds explanatory power to the results of the inspection.

  A screenshot of a template for data gathering at in-store shops, which was used in ComplianTV, can be found in the best practice example (Section 3.3).

  The actual execution of the shop visits depends on the scope and the main target of the inspections.

- Assessing compliance

  When inspecting the energy label on televisions, a distinction between boxed and unboxed devices on display at the point of sale shall be made. This distinction refers to typical scenarios where a large number of boxed televisions of a given model can be found at times. Three different scenarios shall be depicted in order to explain how to correctly inspect the Energy Label on boxed televisions (see also explanatory schematic in Table 3).

  - Scenario 1: In case there are a large number of boxed televisions, with one unit un-boxed and fully labelled, all related boxed devices (same model/model nr.) shall be documented as correctly labelled. It is clearly required in the legislation that each product unit displayed and offered for sale has to bear the energy label on it (see also the FAQ document on the Energy Labelling Directive by the European Commission: http://ec.europa.eu/energy/sites/ener/files/documents/2013_labelling_faq.pdf). However, within ComplianTV

it was decided to consider boxed devices to be compliant if there is a representative unit with a correct label. This interpretation is in line with considered practice from other conformity assessment bodies.

- Scenario 2: In case the unboxed representative television is price marked but without the Energy Label, it shall be classified as a non-conformity. Indeed, if the device is at the point of sale – as indicated by being separately priced – then it should be labelled.
- Scenario 3: In case there are only boxed televisions without any separate unboxed television put on display in a store the priced televisions should be checked. If the label is printed on the box, all boxed devices have to be placed in a way that the label is easy readable. Similar to scenario 1, ComplianTV considered boxed devices as compliant if a representative model was correctly labelled (see also the FAQ document on the Energy Labelling Directive by the European Commission: http://ec.europa.eu/energy/sites/ener/files/documents/2013_labelling_faq.pdf).

Table 3 – Schematic of scenarios inspecting unboxed/boxed televisions and comparison of model/unit approach (ComplianTV approach)

Description	Representative device (unboxed on top) bears correct label, boxed devices do not. Scenario 1	Representative device (unboxed on top) does not bear a label Scenario 2	Representative device (boxed on the left) bears correct label, other boxed devices do not Scenario 3
Compliance status	All boxed & unboxed compliant	All boxed & unboxed non-compliant	All boxed compliant

3. In-store Shop Visits – Planning & Execution

Counting approach

Different approaches regarding the counting of compliant or non-compliant units of the televisions may be appropriate: if the compliance of retailers with the EU labelling directive shall be checked, each television must bear the label such that it is clearly visible (even if the television on sale is still boxed). This approach ensures that every unit of televisions on sale is checked. On the contrary, a shop can be inspected by checking every model on sale. This approach is very time-efficient as boxed televisions are often put on sale in multiple units. Combining both approaches shows whether models with multiple units on sale are more or less compliant than models with just a single unit on sale. Therefore, a combination of both approaches will deliver very accurate and comprehensive results.

Table 4 – Schematic of the counting approaches for inspecting televisions at the point of sale

Model approach: 1 model to be counted	
Unit approach: 7 units to be counted	

3. In-store Shop Visits – Planning & Execution

Another crucial point for conducting shop visits and reporting is the definition of failure categories. For the inspection of the Energy Label on televisions it is recommended to apply at least four different failure categories ("missing label", "format", "not visible", "apply", as described in detail below). This ensures an exact identification of errors and encourages retailers to improve the implementation of labelling.

- Information that can be collected and monitored within the shop inspection
  - a) General information about the inspection
    - Date and time of the inspection
    - Name of the shop
    - Address of the shop
    - Type of shop
    - Name and organisation of person conducting the inspection
  - b) Specific information about the television
    - Manufacturer / brand
    - Model number
    - Number of units (unboxed, boxed)
    - Compliance of Energy Labelling

- Failure categories

  For the inspection of the Energy Label on televisions, it is advisable to define the following categories for labelling failures or non-compliances:

  Missing label: No Energy Label is displayed on the television at the point of sale.

  Format: The label does not fit the colour, size or format which is required from the Regulation (e.g. displayed label in black & white, displayed label incomplete or damaged, displayed label not containing all information).

  Not visible: The label may be found but is not clearly visible to the customer at the point of sale (e.g. covered by other labels or price tags, placed at the back of the television, covered by other televisions on display).

  Apply: The displayed label does not correspond to the television which it is attached to (e.g. discrepancy to brand or model number of television, label placed between two different devices).

3. In-store Shop Visits – Planning & Execution

Process of selecting televisions for inspection

Comprehensive approach: Inspecting all televisions on display in a store grants significant data within the scope of the survey and accurately reflects the labelling situation.

However, this approach is very time- and resource-consuming as some stores have a large number of televisions on display. In such a case keeping track of every television and every labelling failure could mean inspecting several hundred televisions.

Randomly selected models: The use of random samples can be helpful for limited shop surveys. Depending on the scope of the survey, this method can be a possible option. For the inspection of stores with a very high number of televisions on display, an examination of a certain number of models might be useful to assess the overall situation of the labelling in a very time-efficient manner. If this strategy is applied it is advisable to select televisions of different sizes, price categories, energy classes and manufacturers to cover a broad spectrum of models on display.

However, the significance of the data can be very low as the samples represent just an extract of all televisions on display.

Selecting brands with a history of non-compliance: The selection of television brands or retailers involved in complaints or with a history of non-compliance can also be an effective approach for shop inspections. If there are models on the market that are highlighted by complaints or documented non-compliances (e.g. by consumer groups, individuals, other organisations), a targeted approach on these models may lead to significant results.

Season

The outcomes of shop surveys can differ significantly depending on the season in which the inspections are carried out. During the Christmas season or before global events (e.g. sports events such as Olympic Games or Football World Cups), a large number of televisions are on display in the shops, with a risk of high non-compliance because retailers often have a heavy workload during these periods. However, given the higher sales delivered during these periods, ensuring proper labelling would help guarantee that lots of consumers are positively impacted.

3. In-store Shop Visits – Planning & Execution

3.3 Best Practice Example

The shop visits within the ComplianTV project were carried out by five national partners (in Austria, Czech Republic, France, United Kingdom and Germany). For this project, the national partners decided on inspecting 20 shops in each country in order to deliver statistical accuracy of the results and resource efficiency of the involved partners.

The shops were inspected twice within one year. This was due to the fact that the project partners wanted to be able to measure possible improvement in the implementation of labelling of televisions after conducting discussions with the retailers following round 1.

The main target was to gather illustrative data of the observed markets. For this reason, the selection of the shops aimed at displaying the market situation and thus inspecting a large variety of shop types (as described in Section 3.1). The following shop classification was developed in order to cover all possible shop types on the market, while also achieving the goal of the shop inspections stated in ComplianTV:

- Supermarkets: stores selling a large variety of products
- Department stores: stores selling premium products
- Electronic specialists: sole trader shops or independent electronic retailers specialised in consumer electronics and white goods
- Electronic superstores: large electronic retailers, very often chains

The following criteria for the shop inspections were applied within ComplianTV:

- Special focus was placed on small shops or shops with less products, for example - electronic specialists, supermarkets and department stores. At least 12 shops from these categories were inspected in each country and at least 2 electronic superstores were inspected in each country.
- If a selected shop only had a very small number of televisions on sale (less than 6) this was to be documented. In order to cover a larger number of inspected products, an additional shop visit had to be undertaken.

3. In-store Shop Visits – Planning & Execution

The template for data gathering was designed in Microsoft Excel. It is a tool capable of data handling and processing as well as displaying the results which were gathered during the inspections. The excel tool which was developed for the shop inspections of ComplianTV is shown in the figures below, and is also available for download and use on the project website www.compliantv.eu.

Shop No.	Date of visit	Shop name	Shop adress	Shop type	Reported by	Unboxed TVs on sale					Boxed TVs on sale					Total				Comments on labeling (e.g.: "mostly hidden by price label")
						Correctly labeled	not correctly labeled				Correctly labeled	not correctly labeled								
							Missing	Not visible	Format	Apply		Missing	Not visible	Format	Apply	TVs on sale	Correctly labeled	Missing label	Not correctly labeled	
01	28.02.2015	ABC-Shop	Samplestreet 1	Department Store	John Doe	15	30	7	0	0	0	0	0	0	0	**52**	**15**	**30**	**7**	
02	14.02.2015	XYZ-Shop	Samplestreet 2	Electronic Specialist	John Doe	12	4	0	0	0	7	0	2	1	1	**29**	**19**	**4**	**6**	

Figure 2 – Screenshot of the Excel Sheet for Reporting the Inspected Shops within ComplianTV

Figure 2 shows a screenshot of the Excel sheet for reporting the inspected shops.

Figure 3 shows a screenshot of the Excel sheet for reporting the incorrectly labelled televisions that have been inspected.

Shop No.	Shop Name	TV No.	Brand	Model number	Boxed or unboxed	Missing	not visible	Format	Apply	Comments (description of not)	Picture No.
3	TV-Shop SAMPLE	TV_1	Brand A	Model A1	UB		x			Label at bottom of TV	1
		TV_2	Brand A	Model A2	UB	x				TV not labeled	2
		TV_3	Brand A	Model A3	UB		x			Label at backside of TV	3
		TV_4	Brand A	Model A4	UB	x				TV not labeled	4
		TV_5	Brand A	Model A5	UB		x			Label at bottom of TV	5
		TV_6	Brand B	Model B1	UB	x				TV not labeled	6
		TV_7	Brand B	Model B2	UB	x				TV not labeled	7
		TV_8	Brand B	Model B3	UB	x				TV not labeled	8
		TV_9	Brand C	Model C1	UB	x				TV not labeled	9
		TV_10	Brand C	Model C2	UB	x				TV not labeled	10
		TV_11	Brand C	Model C3	UB	x				TV not labeled	11
		TV_12	Brand C	Model C4	UB	x				TV not labeled	12
		TV_13	Brand D	Model D1	UB	x				TV not labeled	13
		TV_14	Brand D	Model D2	UB	x				TV not labeled	14
		TV_15	Brand D	Model D3	UB	x				TV not labeled	15
		Unboxed Subtotal:				**12**	**3**	**0**	**0**		
		Boxed Subtotal:				**0**	**0**	**0**	**0**		

Figure 3 – Screenshot of Excel Tool for Reporting Incorrectly Labelled Televisions

3. In-store Shop Visits – Planning & Execution

Within ComplianTV, it was found helpful to conduct a pilot phase for round 1 of shop visits (5 shops were visited as a first step). This measure was taken for harmonisation of the inspection procedure with all involved partners. Furthermore, the data collection and the tools used for the inspection were tested in practice and amendments were made where necessary. For instance, it was found helpful to use a smart phone application (e.g. “Click Counter”) for counting the number of televisions. This app was synchronized with the computer of the person conducting the inspection and thus simultaneously transferring and saving the data in real-time.

Pictures for documentation purposes were taken from those television models where labelling failures occurred in order to have proof of the inspected televisions and engage discussions with retailers. Each visited shop received a letter and was contacted by the project partner carrying out the respective inspection. Furthermore, the results of the inspections as well as project guidance documents were submitted.

4. Online Shop Visits – Planning & Execution

Due to the increased importance of online commerce, similar to the in-store shop visits, the inspection of online shops has to be planned and executed thoroughly to grant significant results in the scope of the respective survey. This section of the document is dedicated to describing the selection of online shops to be inspected (Section 4.1), the execution of online shop visits (Section 4.2) and a best practice example in which the lessons learned within ComplianTV are described (Section 4.3).

4.1 Shop Selection Strategies for Online Shops

Depending on the scope of the survey, different strategies for the selection of online shops can be applied. Similar to the in-store shop selection strategies there are comprehensive, targeted and random approaches.

- Inspecting shops which represent a comprehensive picture of the market

  A large variety of online shops has to be visited (e.g. electronic specialist stores with online store, catalogue companies with online stores, market places etc.).
- Inspecting shops which represent the lion's share of the market

  Gathered data is representative of the bulk of television models which are available on the observed market.
- Inspecting shops with a history of non-compliance

  Gathered data is representative of those parts of the market with the most critical need for action.

Trying to pin down the online retailers with a high turnover of goods might also be fruitful. To identify this sort of market, it might be advisable to use common comparison shopping engines (e.g. Google Shopping, Nextag, Geizhals, Pricegrabber, etc.) as a basic tool for selecting shops. Based on the data of these platforms, the following shop selection strategies can be deployed:

- Inspecting shops with a large number of user ratings

  A high number of ratings implies a large number of people having actually purchased products on the retailer's website. A website with high traffic is interesting to be inspected.

4. Online Shop Visits – Planning & Execution

- Inspecting shops with a large number of lowest prices for high-selling products

  The significance of the gathered data is granted as lowest prices for high-selling products usually attract a large number of visitors on the retailer's website.

4.2 Execution of Online Shop Visits

This section describes the execution of effective and efficient online shop visits. There are several different factors compared to the execution of in-store shop visits (e.g. failure categories, necessary information).

- Keeping track

  Similar to shop inspections for in-store shops, a reporting template shall be developed in order to enable the person/organisation undertaking the shop inspection to keep track and document the results. A screenshot of a template for data gathering at in-store shops, which was used in ComplianTV, can be found in the best practice example (Section 4.3). This template is also available for download and use on the project website www.compliantv.eu.
- Necessary information to be gathered
  - Website address
  - Company name: the company information of the retailer is necessary to identify the responsible person or legal entity of the company
  - Registered business address: if available, this is important for locating the retailer company
  - Inspected models: name of the manufacturer, model number, screen size and other technical details to identify the inspected model (depending on the scope of the survey)
  - Date and time of inspection: date and time of download of the specific website displaying the television models, verified by screenshots taken of the inspected websites
  - Labelling failures observed: description of the labelling failure (detailed description below)

4. Online Shop Visits – Planning & Execution

- Failure categories

  For the inspection of the Energy Label in online shops, the definition of failure categories is required, similar to inspections of in-store shops (please find more details on failure categories below).

  Before defining the failure categories for Energy Labelling of televisions in online stores, a distinction must be made related to the date of market entry (i.e. displayed device entered the market before 2015 or not (due to Commission Delegated Regulation No. 518/2014 coming into effect on January 1, 2015)).

  - Model identifier of the product entered the market before January 1, 2015: In this case, the requirements are to display the product information and the energy related information of the device (presented in Table 1) in text format in the correct order. If an Energy Label is displayed, it shall be checked if the label relates to the model and if the label is in correct format. For information purposes, the additional requirements presented in Table 2 can be verified, but do not lead to non-compliance: „missing label“, „missing product fiche“, „information in product fiche is displayed in wrong order“, „incorrect format of the image for accessing the label (only if nested display is used)”.

    As a consequence, the failure categories for these cases shall be defined as:

    “Missing product information”, “Information displayed in wrong order”, “Label does not relate to the television”, “Incorrect format of the label”

  - Model identifier of the product entered the market after January 1, 2015: In this scenario, the requirements of Commission Delegated Regulation No. 518/2014 are to be fulfilled (see Table 2). Hence the following failure categories shall be defined:

    - Missing label
    - Incorrect format of the label: the displayed label does not fit the colour, or the format which is required from the Regulation (e.g. black & white or incomplete with missing information, see description above)
    - Label does not correspond to the television
    - Missing product fiche: a product fiche shall contain general information about the manufacturer (e.g. trade mark, model identifier etc.) and energy relevant information (e.g. energy efficiency class, on-mode energy consumption etc.) about the product itself.

4. Online Shop Visits – Planning & Execution

- Information in product fiche displayed in wrong order: the energy related information is not displayed in the right order or some information is missing
- Incorrect format of the image for accessing the label: only if nested display is used

- Process of selecting televisions for inspection

  Similar to the selection strategies of televisions for in-store shop inspections, a distinction can be made between a comprehensive, a random and a targeted approach. Depending on the scope of the survey, each of these approaches has its pros and cons (see above in Section 3.2).

4.3 Best Practice Example

A total number of 20 shops per country were inspected twice within one year by project partners in Austria, Belgium, Czech Republic, France and Germany. 20 television models per shop were chosen under the following criteria:

5 devices < 32 inches display size
5 devices = 32 inches display size
5 devices > 32 – 42 inches display size
5 devices > 42 inches display size

It was decided that each of the above-mentioned size segments should include 2-3 models of the following brands (if available): Samsung, Sony, Toshiba, LG, Panasonic, TCL, Thompson and Philips; the rest of the inspected models should be other brands (if available).

ComplianTV project organisers, not being the Market Surveillance Authority themselves, were aware that the date of the market entry of a large number of televisions at online shops could not be determined. This leads to additional difficulty in practice as it cannot be determined without doubt which set of requirements need to be fulfilled for online sales. However, this is due to the current transition period and as the television market is relatively dynamic, this practical issue will disappear soon. The case of products re-entering the market is not fully explicable in that context. For instance, there might be the question which rules to apply for a model that initially

4. Online Shop Visits – Planning & Execution

entered the market before January 1, 2015, subsequently being not on the market and – after January 1, 2015 - becoming available again.

Pictures were taken in the form of screen shots in those cases with incorrect labelling to have proof of the inspected televisions and to be able to verify date and time of the inspection.

Within ComplianTV, the online shop inspections were carried out solely for televisions that were directly sold by platforms/marketplaces when marketplaces were inspected. This measure was taken to exclude third party vendors which are linking to other online shops (e.g. amazon, eBay, etc.), as marketplaces may not be fully responsible for products sold on their platform by external vendors. An additional difficulty is that the registered offices of these corporations can be outside of the respective Member States in which the inspections are conducted or even outside of the EU and thus may be governed by different law. It was therefore very difficult to establish contact with many of the online shops inspected.

Similar to the in-store shop inspections, a template for data gathering was designed in Microsoft Excel. The Excel tool which was developed for the online shop inspections of ComplianTV is displayed in the figure below (Figure 4).

TV No.	Display technology	Market entry: 1 - before 2015 / 2 - after 2015 / 3 - not known	RETAILER DATA – Information to be provided (Product fiche Annex III) – compulsory if the label is displayed: 1. Suppliers name or trademark	2. Suppliers model identifier	RETAILER DATA – compulsory for TVs online before 2015: 3. Energy efficiency class	4. Visible screen diagonal in cm and inches	5. On Mode power demand (in W)	6. Annual energy consumption (in kWh/a)	7. The standby and off-mode power consumption	8. Screen resolution in physical horizontal and vertical pixel count	MANUFACTURER DATA – Information to be provided (Product fiche Annex III) – compulsory if the label is displayed: 1. Suppliers name or trademark	2. Suppliers model identifier	MANUFACTURER DATA – compulsory for TVs online before 2015: 3. Energy efficiency class	4. Visible screen diagonal in cm and inches	5. On Mode power demand (in W)	6. Annual energy consumption (in kWh/a)	7. The standby and off-mode power consumption	8. Screen resolution in physical horizontal and vertical pixel count	Price (in Euro)	Compliant	compulsory for TVs online before 2015: Missing product information	Information displayed in wrong order	Missing label	If the label is displayed compulsory for TVs before 2015 and if no date: Label does not relate to the TV model	Incorrect format of the label	Missing product fiche	Information in product fiche displayed in wrong order	Incorrect format of the image for accessing the label (if nested display is used)	Summary non compliant	Not determined
TV_01	LCD LED	3	ASDF	Qwert 40	A+	102cm/ 40"	65	89	0,4	1920x1080	ASDF	Qwert 40	A+	102cm/ 40"	65	89	0,4	1920x1080	899,-	x											
TV_02	OLED		XYZ	Asdf 20	A	51cm/ 20"	32	47	0,3	1920x1080	XYZ	Asdf 20	A	51cm/ 20"	32	47	0,3	1920x1080	320,-		x		x							x	

Figure 4 - Screenshot of the Excel Sheet for Reporting the Inspected Shops within ComplianTV

5. Examples of Incorrect Energy Label Display

The following sections provide practical examples of Energy Labels being displayed in an incorrect or insufficient way. The pictures used here are illustrative of situations found in various shops throughout the EU-28. The purpose of this section is to highlight examples of such cases and help dealers and suppliers prevent similar incorrect labelling cases to the largest degree possible.

The following samples are taken from real shops and all represent cases of incorrect labelling: not in line with the respective legislation requirements and not serving the consumer in its search for transparent and accurate information. These samples have been selected from the shop visits undertaken by the ComplianTV project and represent real case situations which have been witnessed on a more regular basis.

Missing Energy Label –
no label found at all

Incorrect format –
incomplete or damaged label, missing information (e.g. model identifier is cut out on the picture)

Modified format –
retailer made copy

5. Examples of Incorrect Energy Label Display

Modified format –
retailer made new design of the energy label, modification of the content

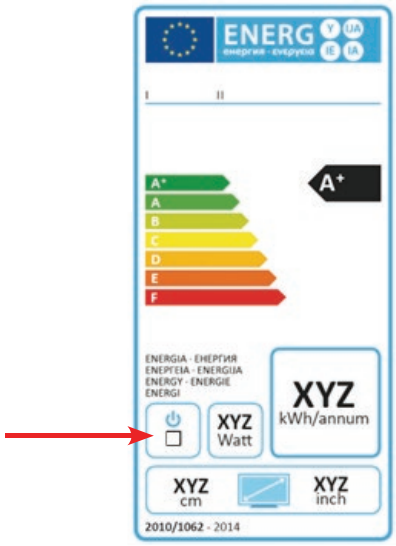
Label not visible –
incorrect placement of the label

Apply –
the model number on the label does not match the model where it is displayed

Boxed models –
all models displayed have to bear an energy label, even if sold only in boxes (unless there is one unboxed television clearly of the same model displayed with the energy label)

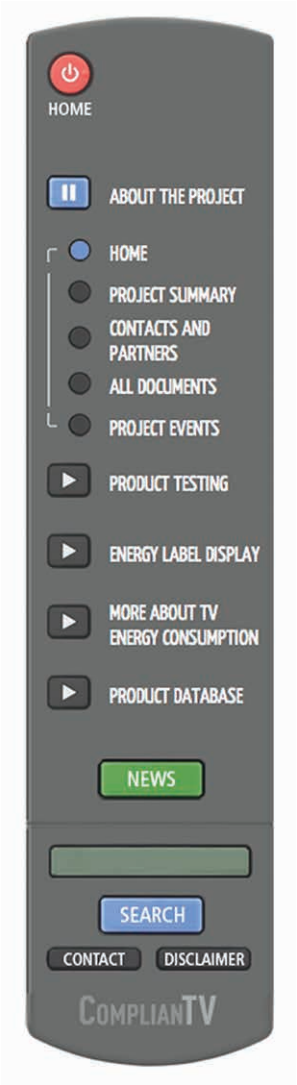
5. Examples of Incorrect Energy Label Display

Other label modifications –
the label design and content cannot be modified. The example shows a case where a specific icon was modified in a way as not allowed by the legislation (the box for the hard on/off switch must either be ticked or left out of the label completely).



Advertisements –
missing energy class declaration

About ComplianTV



With the implementation of the legal framework for Ecodesign (Directive 2009/125/EC) and Energy Labelling (Directive 2010/30/EU), the EU has established powerful instruments to support market transformation towards more energy efficient products. In particular, TVs covered by both policy instruments, are now subjected to Ecodesign implementing measures (Regulation No 642/2009) and Energy Labelling requirements (Regulation No 1062/2010), aiming at pushing the market to higher energy efficiency products.

Ensuring that the requirements of the legislative framework are fulfilled in practice represents a key stake for the efficiency of these policies. However, almost all market information on energy efficiency of these products in the EU-28 is currently provided as self-declaration by manufacturers, as planned in the Ecodesign and Energy Labelling framework. So far, there has been very little standardised independent product testing and independent confirmation of correctness of the product information and market development, because market surveillance at national level has not been widely implemented. Activities assessing the availability of required product information in shops and in information media have also been largely missing.

In this context, the ComplianTV project brings together ten experienced organisations, including three testing laboratories, with the objective of assessing the compliance of televisions in the framework of these new Energy Labelling and Ecodesign Regulations, through verification procedures. In doing so, the project will generate a database, and a lot of know-how and guidance for many different types of stakeholders (market surveillance authorities, testing laboratories, manufacturers, retailers, consumers).

Register on the project website and follow it and its News items to learn more about the project shop visits and product testing activities!

www.compliantv.eu

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More information about the project activities and all of its results are published on:

www.compliantv.eu

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