



Brussels, 5.5.2015
SWD(2015) 96 final

PART 1/2

COMMISSION STAFF WORKING DOCUMENT
EXECUTIVE SUMMARY OF THE IMPACT ASSESSMENT

Accompanying the document

Commission Regulation

**implementing Directive 2009/125/EC of the European Parliament and of the Council
with regard to ecodesign requirements for professional refrigerated storage cabinets,
blast cabinets, condensing units and process chillers**

{C(2015) 2881 final}
{SWD(2015) 97 final}

1. Problem definition

As is the case for other professional refrigeration products, the market for both condensing units and chillers is driven primarily by purchase price, with little attention given to the significant savings that can be made by purchasing energy-efficient products. This assessment of the current situation is confirmed by all stakeholders. Consumer behaviour appears to be unaffected by the fact that cost-effective energy-saving technologies are available and that both products are bought by industry professionals who might be expected to have more expertise than the average user. While this expectation proves to be true of a minority of buyers, typically large companies and/or companies that operate in sectors in which energy costs are a high share of total costs, the vast majority focus on price alone. There are a number of reasons for this. Firstly, particularly in the case of condensing units, it is often an installer rather than the final user who makes the purchase. The former is not affected by the cost of running the appliance and has to operate in a very competitive market. As a result, installers tend to reduce their own costs to a minimum by including the cheapest products in the packages they offer. Secondly, for many users electricity represent a small percentage of their total costs, and they therefore have little incentive to focus on it. Thirdly, it would require a great deal of time and effort on the part of users to acquire the information necessary to compare the energy performance of different products, since there is no convenient, user-friendly source of such information, such as a label, to allow them to do so easily. Consequently, buyers continue to focus on purchase price, while readily available technological solutions that improve energy performance struggle to find their way to the marketplace and the potential for improvement remains largely unexploited, as has been confirmed throughout the consultation process.

2. Analysis of subsidiarity

Action at EU level is an appropriate way of ensuring the free circulation of goods, since there is significant EU and international trade in professional refrigeration products. Germany, Italy, Spain and the UK account for the majority of EU production, while China, Turkey and South Korea are the main importers, according to the research done for the preparatory study, which has been corroborated by stakeholders' comments. Regulation at national or regional level would lead to fragmentation of the market, as a range of different requirements would be imposed in different countries. Such fragmentation would greatly increase the burden on manufacturers, especially as a result of the amount of product testing required, and would force them to spend more on product development in order to optimise their production under each of the different regulatory arrangements. The public consultation showed that there is strong consensus among all stakeholder categories that action should be taken at EU rather than at national or regional level.

3. Objectives

The **general objective** is to develop a policy which corrects the market failures described above and

- reduces energy consumption as well as related CO₂ and pollutant emissions and
- promotes energy efficiency, thus reducing energy dependence and contributing to the EU objective of reducing the EU's energy consumption by 20 % by 2020.

The above targets should be achieved without in any way prejudicing the continued functioning of the internal market, or the fair and equal treatment of manufacturers and importers.

The **specific objectives** are

- to facilitate the removal of the worst performing products from the market, in cases in which the cost disadvantages over their life cycle have proven insufficient to bring this about;
- to help buyers to make an informed and rational choice based on performance information that reflects real life usage, thereby tackling the failure to provide relevant information and leading the market to adopt improved technology solutions;
- to provide incentives for manufacturers to further develop and market energy-efficient and climate-friendly technology and products; and
- to generate cost savings for end-users.

The **operational objectives** are

- to develop an appropriate system of measurement and classification for energy performance that reflects real life usage;
- to ensure that buyers receive appropriate and understandable performance information and to encourage the development of an efficient market driven by competition on energy performance by 2014;
- to create a framework for gathering information about energy performance that could be used as a basis for allowing possible subsequent (self-) regulation at the time of a review four years after the entry into force of this Regulation; and
- to achieve the objectives listed above without any significant negative effect on the functionality, safety or affordability of the product, nor on the industry's competitiveness or the administrative burden imposed on it, as provided for in Article 15 of the Directive.

4. Policy options

The following options have been considered:

- Option A: no new EU action
- Option B: adoption of existing foreign policy
- Option C: self-regulation
- Option D: mandatory information requirements
- Option E1: minimum energy performance standards (MEPS)
- Option E2: minimum energy performance standards with delayed entry into force and lower thresholds for condensing units
- Option E3: addition of minimum requirements for high-temperature chillers
- Option F: labelling giving information on energy performance
- Option G: bonus-malus based on the global warming potential (GWP) of refrigerants

Options B, C, D and F have been dismissed as not viable for one or more of the following reasons: a limited impact on the problem, potential practical problems with implementation, a lack of support from stakeholders, the limited amount of available data, an unfavourable ratio of the time and cost of implementation to the results expected. The other options have been retained and assessed in detail against the baseline (option A, which has also been retained for the purpose of comparison). All options refer to both condensing units and chillers unless explicitly stated otherwise.

4.1 Option D: mandatory information requirements

While not retained, this option has been integrated into all the following options. It would oblige manufacturers to give information about the energy performance of their products. Obliging manufacturers to use a standard method for measuring energy performance would ensure that the information given is comparable. In this respect, this option is similar to a labelling scheme, with the important difference being that a labelling scheme also obliges manufacturers to make the information provided user-friendly, thus making comparison among products easier and less time-consuming.

4.2 Option E1: minimum energy performance standards

This option entails setting ecodesign minimum energy performance standards (MEPS) for condensing units and medium- and low-temperature chillers, in addition to the information requirements. This option would clearly aim to remove the least efficient products from the market. It is widely supported among stakeholders (industry, Member States, and non-governmental organisations (NGOs)), who each, however, have different opinions as to how stringent the requirements should be, and about some minor aspects of their implementation.

Option E1 would enable users to make significant annual energy savings estimated at 11.6 TWh (Terawatt hours) in 2030, as well as very substantial total savings (energy bill savings minus product cost increases), estimated at 1 539 million euros in 2030. It would also impose an estimated cost of about 8 million euros on manufacturers for the introduction of products, mostly due to testing costs.

4.3 Option E2: minimum energy performance standards with delayed entry into force and lower thresholds for condensing units

This option would not affect the measures proposed in option E1 for chillers, but it would have different implications for condensing units, since it would delay the entry into force of the MEPS for this category of appliance by one year and would also reduce the stringency of the second tier of requirements. It would follow up on most of the feedback about feasibility and timing received during the stakeholder consultation, in particular as small and medium-sized enterprises (SMEs) are more prevalent amongst manufacturers of condensing units than they are amongst manufacturers of chillers, and it is these companies which are likely to find it more difficult to comply with the regulation. In accommodating these concerns, this option would however sacrifice some savings (in terms of energy, emissions and users' expenditure). The levels of the reduced MEPS have been determined so as to take into account the feedback from stakeholders, while also still being ambitious enough to have a significant impact on the market and on energy consumption.

Given its more moderate requirements, it is to be expected that option E2 would achieve fewer savings than option E1. In comparison with the baseline scenario, energy savings in 2030 are estimated at 10.2 TWh for option E2, compared to 11.6 TWh for option E1. Users would benefit much less from option E2 than from option E1: about one hundred million

euros less would be expected to be saved in 2020 and two hundred million less in 2030. The impact on manufacturers would be the same as that of option E1 in absolute terms, but it would be spread over a longer period and would therefore be less burdensome for manufacturers in general and the smaller among them in particular.

4.4 Option E3: addition of minimum requirements for high-temperature chillers

Option E1 could be extended by including MEPS for high-temperature chillers as well. Although high-temperature chillers fall within the scope of the regulation, the intention, since preparing the Consultation Forum working document, had been not to impose ecodesign performance requirements on them. The main reason for this choice was the assumption that high-temperature chillers would fall under the air conditioning chillers regulation which is currently under consideration. In addition to data availability, it should be pointed out that there are currently no adequate technical definitions of the two types of product (air conditioning and industrial process chillers), nor is there a legally appropriate means to distinguish them for market monitoring and enforcement purposes.

Option E3 offers significantly greater savings potential than the other options. All figures relating to savings are roughly double those for option E1, and the difference is even more marked when comparing the potential savings from option E3 with those expected to be achieved by putting option E2 into practice. Furthermore, compared to the other options, the burden on the industry would similarly be greater under option E3, and would in fact be slightly more than double that of the other options, as the testing and administrative costs are the same for high-, medium- and low-temperature chillers, but the average energy consumption is not (i.e. the extra cost to the industry of option 3 relative to the other options is proportionally greater than the extra energy saving).

4.5 Option G: bonus-malus based on the GWP of refrigerants

Option G consists of the creation of a system that would reward manufacturers of products that have lower emissions of GWP gases with a lower minimum requirement (bonus). A bonus would be beneficial in particular for the development of new technologies, since the switch to such gases would be costly for manufacturers. Namely, producers could invest into such development without having to put as much efforts and investments in energy efficiency as the producers using high GWP gases. For both process chillers and condensing units, a bonus, quantified in the range 10%-15% (as already done in the air conditioning regulation), could indeed have the positive effect of encouraging investment into low GWP alternatives and make it easier for them to reach the market.

Option G has been assessed on the basis that it would have the same results as option E1, as it entails the same requirements and it is not possible at present to quantify the impact of the bonus on the market for condensing units and process chillers.

5. Comparison of options

The following table summarises the quantifiable effects (both for chillers and for condensing units) of options E1, E2, E3 and G in terms of annual energy savings, TEWI (Total Equivalent Warming Impact, expressed in million tonnes of CO₂ equivalent) savings, savings for users and costs to manufacturers.

Options E1 and G would have the same effect (as measured by all of the criteria above), while option E2 would achieve a lower total saving of energy, but not by a large margin. Option E3, thanks to the addition of high-temperature chillers, can deliver significantly greater energy

savings than the other options. With respect to the burden imposed on the industry, option E2 would be the least costly for manufacturers. While having the same quantifiable effect as options E1 and G, it would spread the cost over two years, thanks to the delayed entry into force of the regulation for condensing units. This would make it easier for manufacturers to cope with the regulation, in particular those, often SMEs, with limited financial and administrative resources.

Summary of quantifiable effects

Option	Total energy savings (2030, TWh)	Total TEWI savings (2030, million tonnes)	Total savings for users (2030, million euros)	Total cost to manufacturers ¹ (first year, million euros)
Option A: no new EU action	0	0	0	0
Option E1: minimum energy performance standards	11.6	3.9	1 539	8.1
Option E2: lower MEPS and delayed entry into force for condensing units	10.2	3.45	1 315	8.1*
Option E3: addition of MEPS for high-temperature chillers	22.4	7.6	2 899	20.5
Option G: bonus-malus based on the GWP of refrigerants	11.6**	3.9**	1 539**	8.1**

*The amount is the same as in option E1, but it would be spread over two years, thereby substantially reducing its impact on manufacturers.

** It is not possible to determine how many manufacturers would use the bonus at present. The results are therefore the same as those for option E1.

A qualitative assessment of all options is summarised in the following table.

Summary of policy option comparison

Option	Effectiveness in achieving objectives	Efficiency	Consistency with other EU policies
Option A: no new EU action			

¹ As explained in Section 6.3.2.4, these costs are estimated for the first year following the introduction of the requirements, when they would have the highest impact on manufacturers. They will then decrease substantially.

	0	0	0
Option E1: minimum energy performance standards	✓✓✓	✓✓	✓✓
Option E2: lower MEPS and delayed entry into force for condensing units	✓✓	✓✓✓	✓✓
Option E3: addition of MEPS for high-temperature chillers	✓✓✓✓	✓✓	✘
Option G: bonus-malus based on the GWP of refrigerants	✓✓✓	✓✓✓	✓✓

Scoring key: ✓✓✓✓ = very large positive, ✓✓✓ = large positive, ✓✓ = sizeable positive, ✓ = small positive, 0 = neutral, ✘ = small negative, ✘✘ = large negative.

All of the options retained scored well on effectiveness. This is because they would both remove the least efficient products from the market and would provide buyers with appropriate performance information, thereby significantly reducing energy consumption and creating savings for users.

Option E2 would be more efficient than both options E1 and E3, since the costs imposed on manufacturers, SMEs in particular, would be spread over a longer period. On the other hand, the lower thresholds would reduce energy savings and be of less benefit to users. Correspondingly, option E2 would not offer the same savings of option E1 (around two hundred million euros less). Overall, option G can be deemed more efficient than option E1.

Assessment of the preferred option

Overall, the most effective, efficient and consistent option is option G. It scores as well as option E1 in terms of quantifiable effects, and could facilitate innovation in the research into and use of low GWP gases for condensing units, where such support is needed.

Moreover, there is a qualitative element from option E2 that could be easily integrated into option G without diminishing its potential. The delayed entry into force of the requirements incorporated into option E2 for condensing units could be added to option G, but without the lower MEPS threshold, thus helping SMEs in particular. The combination of option G with this element from option E2 can therefore be considered the **preferred option**.

6. Monitoring and evaluation

Monitoring will mainly be done by means of tests carried out to verify that energy efficiency information given is accurate and that minimum requirements are being fulfilled. Member State authorities should monitor their respective markets to ensure that requirements are fulfilled. The absence of products failing to fulfil the requirements will be the main indicator of progress towards a more energy-efficient market.

The baseline used for this regulation was determined using limited evidence, in particular relating to stock levels, sales and average performance levels across the market. This is why the first tier regulation is not especially stringent and why there is no third tier regulation. An early review is therefore recommended. The review process should begin as soon as the opportunity arises in order to ensure that all the necessary information is available for a robust assessment.

The specific indicators used to monitor the evolution of the policy will be the following:

1. The availability of the necessary harmonised methods for testing chillers and condensing units. This requires collaboration with the relevant European Committee for Standardisation (CEN).
2. The availability of the coefficient of performance (COP), the seasonal energy performance ratio (SEPR) and other data on manufacturers' websites and in technical documentation, in accordance with the mandatory requirements.
3. The accuracy of the performance information given. This can be assessed on the basis of the correlation of the declared label class with the performance data in the manufacturer's technical file and/or by means of the practical testing of products.
4. The absence of products that do not fulfil the minimum requirements.



Brussels, 5.5.2015
SWD(2015) 96 final

PART 2/2

COMMISSION STAFF WORKING DOCUMENT
EXECUTIVE SUMMARY OF THE IMPACT ASSESSMENT

Accompanying the document

Commission Regulation

**implementing Directive 2009/125/EC of the European Parliament and of the Council
with regard to ecodesign requirements for professional refrigerated storage cabinets,
blast cabinets, condensing units and process chillers**

{C(2015) 2881 final}
{SWD(2015) 97 final}

1. Problem definition

The market for both storage and blast cabinets is driven primarily by purchase price, meaning that purchase decisions are driven by short-term benefits with little or no attention given to energy efficiency and life-cycle costs. This is clearly contrary to the objective set out in the Europe 2020 Strategy¹ of decoupling economic growth from the use of resources under the flagship initiative *resource-efficient Europe*. The impact assessment identified two main reasons for this situation.

- The main purchase criteria of most buyers (often small and medium-sized enterprises (SMEs) with little technical knowledge in the field of energy performance) are functionality and compliance with food safety rules, rather than energy efficiency. Although aggregate energy costs may be high over a product's lifetime, they constitute a very small percentage of buyers' total costs, which are usually driven by the number of staff and the cost of rent and ingredients.
- Even the minority of buyers who would take energy costs into consideration find it difficult to do so as there is no obvious source of energy performance information, such as labelling, which could be referred to easily. On the contrary, the information available to users is very limited. Often, particularly in the case of blast cabinets, manufacturers do not provide any energy consumption information. Even when information is given, the absence of an agreed and widely used harmonised method to test energy efficiency means that it is not comparable from one manufacturer to another. Consequently, buyers have no way of determining energy efficiency performance levels across the whole market, and thus of estimating the resulting life-cycle costs and relative ranking in efficiency of products.

This has resulted in limited market penetration of cost-effective energy-saving technologies, with cheap and inefficient products continuing to be a key offering even from manufacturers that also produce significantly more efficient and better designed products. Furthermore, even the existing more efficient products are typically not sold on the basis of their energy efficiency but rather thanks to their associated quality, reliability and, especially in the case of blast cabinets, their capacity to meet the national food hygiene regulations. The situation remains this way because the market does not take advantage of the accessible and cost-effective savings that can be made.

2. Analysis of subsidiarity

Action at EU level is an appropriate way of ensuring the free circulation of goods, since there is significant EU and international trade in commercial refrigeration products. Regulation at national or regional level would lead to fragmentation of the market as a range of different requirements would be imposed in different countries. It would also increase the burden of testing and product development on manufacturers.

The public consultation showed that there is strong consensus among all stakeholder categories that action should be taken at EU level.

¹ COM(2010) 2020 of 3.3.2010.

3. Objectives

The **general objective** is to develop a policy which tackles the problem described above by

- reducing energy consumption as well as related CO₂ and pollutant emissions and
- promoting energy efficiency, thus encouraging innovation, reducing energy dependence and contributing to the EU objective of reducing the EU's energy consumption by 20 % by 2020.

The above targets should be achieved without in any way prejudicing the continued functioning of the internal market, or the fair and equal treatment of manufacturers and importers.

The **specific objectives** are

- to facilitate the removal of the worst performing products from the market, in cases in which the cost disadvantages over their life cycle have proven insufficient to bring this about;
- to help buyers to make an informed and rational choice based on performance information that reflects real life usage, thereby leading the market to adopt improved technology solutions;
- to provide incentives for manufacturers to further develop and market energy-efficient technology and products; and
- to generate cost savings for end-users.

The **operational objectives** are

- to develop an appropriate system of measurement and classification for energy performance that reflects real life usage;
- to ensure that buyers receive appropriate and understandable performance information and to encourage the development of an efficient market driven by competition on energy performance by 2015;
- to create, in the case of blast cabinets, a framework for gathering information about energy performance that could be used as a basis for allowing possible subsequent (self-) regulation at the time of a review four years after the entry into force of this Regulation; and
- to achieve the objectives listed above without any significant negative effect on the functionality, safety or affordability of the product, nor on the industry's competitiveness or the administrative burden imposed on it, as provided for in Article 15 of the Ecodesign Directive.

4. Policy options

The following options have been considered:

- Option A: no new EU action
- Option B: adoption of existing foreign policy
- Option C: self-regulation
- Option D: mandatory information requirements
- Option E: energy performance information and minimum energy performance standards (MEPS)
- Option F: labelling giving information on energy performance
- Option G: MEPS and labelling giving information on energy performance
- Option H: bonus-malus and/or other measures targeting the global warming potential (GWP) of refrigerants

Options A, B, C and H have respectively been dismissed as not viable for one or more of the following reasons: limited impact on the problem, potential practical problems with implementation, a lack of support from stakeholders and/or an unfavourable ratio of the time and cost of implementation to the results expected.

Option D has been retained for blast cabinets only, while Options E, F and G have been retained for storage cabinets only. The options retained have been assessed in detail against the baseline option.

4.1 Option D: mandatory information requirements

Under this option, retained only for blast cabinets, manufacturers would be obliged to declare information about the energy performance of their products. This option would thus increase the amount of information available to buyers, and could therefore contribute to solving the problem as set out above. The usefulness of this option would depend on there being a common method used by all manufacturers to measure their products' energy performance (something which is at the moment still lacking), since users could not assess the performance across the market if each manufacturer had developed its own way of measuring energy performance.

The effect of option D on the market and on energy efficiency is estimated to be limited, given the persistent lack of focus on energy consumption amongst most buyers. The administrative costs to manufacturers are estimated at 1.75 million euros in 2015, plus an additional 6.000 euros testing cost per product range.

4.2 Option E: energy performance information and minimum energy performance standards

Under this option — as for the subsequent options also, viable only for storage cabinets at present — only products that declare information about their energy performance and that perform above a given energy efficiency level would be allowed onto the market. This is a very common option in ecodesign regulations, and it would help to tackle the problem by removing the worst performing products from the market. The diffusion of energy saving

technologies would be encouraged, while the effect on innovation would be limited, since only the lower end of the market would be affected.

Option E would allow significant annual energy savings to be made, estimated at 3 TWh (Terawatt hours) in 2030, as well as substantial total savings (energy bill savings minus product cost increases) for users, estimated at 277 million euros in 2030. It would also impose an estimated cost of 2.39 million euros on manufacturers in 2014, mostly due to testing² costs.

4.3 Option F: labelling giving information on energy performance

Labelling is a user-friendly way of giving information about the energy performance of products, including by means of rankings awarded according to their performance. Users would not have to set about the difficult and time-consuming process of comparing products themselves by collecting the necessary information, as this would be immediately conveyed by the label. Such a system has already been introduced for many household products, including refrigerators. The effect of this option on the market would be quite different from that of option E. Minimum requirements would improve the average energy performance of products by pushing the worst performing ones out of the market, while labels would encourage manufacturers to improve all products, including those which are already efficient, by creating an increased demand for energy efficiency from better informed buyers.

Option F would allow energy savings estimated at 1 TWh to be made in 2030, as well as total savings for users estimated at 114 million euros in 2030. It would also impose an estimated cost of 11.1 million euros on manufacturers in 2014, mostly due to the extensive testing it requires.

4.4 Option G: MEPS and labelling giving information on energy performance

Combining options E and F for storage cabinets could achieve the effect of removing the worst performing products from the market and at the same time driving competition and innovation on energy efficiency issues, thanks to the motivating effect of mandatory transparency of energy efficiency information. The simultaneous introduction of both measures (MEPS and labelling) could thus combine the ‘stick’ effect of the minimum requirements with the ‘carrot’ effect of the new energy efficiency labelling system. This strategy has been seen to be effective at the implementation stage of many ecodesign and energy labelling regulations.

Option G would allow energy savings estimated at 4.1 TWh to be made in 2030, as well as total savings for users estimated at 391 million euros in 2030. It would impose the same cost on manufacturers as option F (11.1 million euros in 2014).

5. Comparison of options

Storage cabinets

The following table summarises the impacts of options E, F and G in terms of annual energy savings, TEWI (Total Equivalent Warming Impact, expressed in million tonnes of CO₂ equivalent) savings, savings for users and costs to manufacturers. All options lead to considerable savings, albeit Option F is clearly inferior in this respect because of allowing very inefficient models to stay in the market. Option G achieves the highest level of savings in all three categories but it also imposes the joint highest costs on manufacturers (equal to those of option F).

² The cost to manufacturers is expected to decline substantially in subsequent years, as only new products would need to be tested.

Summary of quantifiable effects

Option	Total energy savings (until 2030, TWh)	Total TEWI savings (until 2030, million tonnes)	Total savings for users (until 2030, million euros)	Total cost to manufacturers (2014, million euros)
Option A: no new EU action	0	0	0	0
Option E: minimum energy performance standards	3	1	277	2.39
Option F: labelling giving information on energy performance	1	0.4	114	11.1
Option G: MEPS and labelling giving information on energy performance	4.1	1.4	391	11.1

A qualitative assessment of all options is summarised in the following table.

Summary of policy option comparison

Option	Effectiveness in achieving objectives	Efficiency	Consistency with other EU policies
Option A: no new EU action	0	0	0
Option E: minimum energy performance standards	✓✓	✓✓	✓
Option F: labelling giving information on energy performance	✓	✓	✓
Option G: MEPS and labelling giving information on energy performance	✓✓✓	✓✓	✓

Scoring key: ✓✓✓ = large positive, ✓✓ = sizeable positive, ✓ = small positive, 0 = neutral, ✗ = small negative, ✗✗ = large negative.

Option F is inferior to both the other options retained because it is less effective and less efficient. The comparison between options E and G gives a less clear-cut picture. Option G is clearly more effective: it achieves greater energy savings, causes fewer TEWI emissions and generates greater savings for the user. It is also expected to have a greater positive impact on innovation and competitiveness. On the other hand, the compliance burden placed on manufacturers (SMEs in particular) is also greater, mostly because of the time and cost involved in testing. As a result, the two options score similarly on consistency with other EU policies, with option E scoring better in terms of the principles of the Small Business Act, while option G better achieves the goals of Europe 2020 and is more in line with the household refrigerators ecodesign regulation, for which it was chosen as the preferred option. Nevertheless, option G could be deemed superior overall, if the testing burden were reduced by means of a staggered entry into force of its requirements and the extensive use of agreed calculation methods which would reduce the number of tests necessary to comply with the regulation.

The preferred option for storage cabinets is therefore option G, which entails both MEPS and labelling giving information on energy performance.

Blast cabinets

At present, option D is the only viable option for blast cabinets, given the limited market and performance data available. The chance of setting out the wrong requirements when working on the basis of only limited data is unacceptably high. Since the imposition of mandatory information requirements under option D imposes a cost on manufacturers while doing little to achieve the objectives of the Ecodesign Directive, it can be accepted only as a preliminary step towards further policy measures. Given the technology and market similarities between blast and storage cabinets, it is reasonable to assume that, once data on storage cabinets is made available by the mandatory information requirements, the same policy options now retained for storage cabinets will become viable³ for blast cabinets as well.

Were option D not adopted, the situation would most likely remain the same for a very long time. Energy performance data would continue not to be published, and the market would continue not to focus on energy efficiency, at a high cost both to users (including a large number of SMEs active in the food and catering sectors) and to the environment.

6. Monitoring and evaluation

Monitoring will mainly be conducted by means of tests carried out to verify that energy efficiency information given is accurate and that labelling requirements are being observed. Member State authorities should monitor their respective markets to ensure that requirements are met. A shift in the range of products on the market towards the higher energy classes in the labelling system will be the main indicator of progress towards market take-up of more efficient storage cabinets.

The specific indicators used to monitor the evolution of the policy will be the following:

- (1) The availability of the necessary harmonised methods for testing storage cabinets and blast cabinets by the end of 2013.

³ The impact assessment study has estimated at 2.1 TWh in 2025 the annual energy savings achievable through the imposition of minimum requirements on blast cabinets at the time of the regulatory review.

- (2) The availability of energy labelling information on manufacturers' websites and in technical documentation, in accordance with the mandatory requirements.
- (3) The accuracy of performance information reported. This can be assessed on the basis of the correlation of the declared label class with the performance data in the manufacturer's technical file, and by means of practical testing of products.
- (4) The absence of products not meeting the minimum requirements.

A regulatory review is planned for 2017.