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ATLETE II

Appliance Testing for Washing Machines
Energy Label & Ecodesign Evaluation

Beyond market surveillance: the EC funded pan-EU compliance verification.

The approach of the ATLETE II project

EUSEW 2014 - ATLETE II Final Conference

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Overview
of the methodological approach

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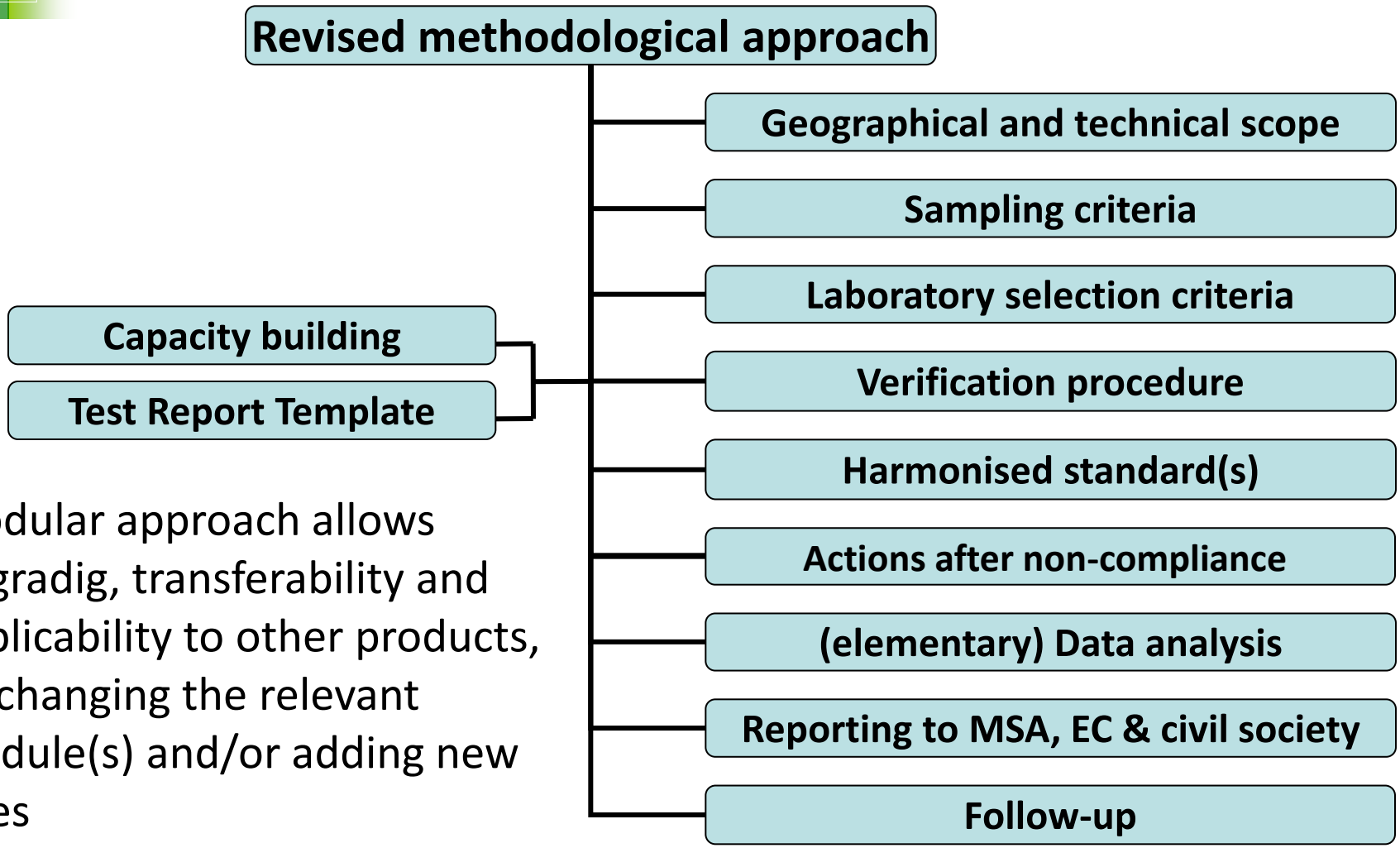
Pan-EU compliance verification



Modular approach allows upgradig, transferability and applicability to other products, by changing the relevant module(s) and/or adding new ones

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WM compliance verification “checks”

“CHECK” means any appropriate type of documental and/or physical assessment:

- Documental inspection:
  - documents (label, fiche, instructions booklet) presence
  - presence of all declarations
  - presence of product information
- Laboratory tests according to (harmonised) standard: for measurable parameters (EN 60456: 2011)
  - test and checks outcome to be reported through an *ad-hoc* developed *“*Test Report Template**“**
- Machine physical evaluation: standard programmes identification on the machine front.

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Template for test results reporting

Goals:

- To improve the readability and comparability of the test results:
  - to facilitate the decision about models compliance
  - to support the statistical analysis of test elementary results
- It includes:
  - (elementary) measurements of the parameters
  - documental inspection results
  - a summary table comparing values an identifying compliant & non-compliant elements
- Laboratories are not in charge of the verdict about product compliance
- Template used in parallel with lab own test report.

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Models sampling criteria

- **A *random selection within best seller products*** was re-confirmed as the most appropriate for the pan-EU exercise:
  - it guarantees that tested products cover almost all manufacturers and brands within the Community market
  - focus only on highest efficiency products (A++ or A+++) was considered not appropriate:
    - ✓ are usually under the spot light also from competitors
    - ✓ have high visibility, but represent limited sale volumes
  - best-seller products have instead:
    - ✓ the highest impact on the market (high sale volumes, many variants)
    - ✓ usually are the products where commercial pressure is higher (i.e. higher pressure towards inappropriate use of the tolerance)

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Laboratories selection (2)

20 laboratories were initially contacted

13 replied with a positive interest in the project

9 replied to an ad-hoc Questionnaire

Best labs were contacted through a Call for Tender and visited by ATLETE II technical experts

6 labs were finally selected for testing:

CTTN - FR

IMQ - IT

INTERTEK - UK

LCOE - ES

SLG and **VDE**- DE

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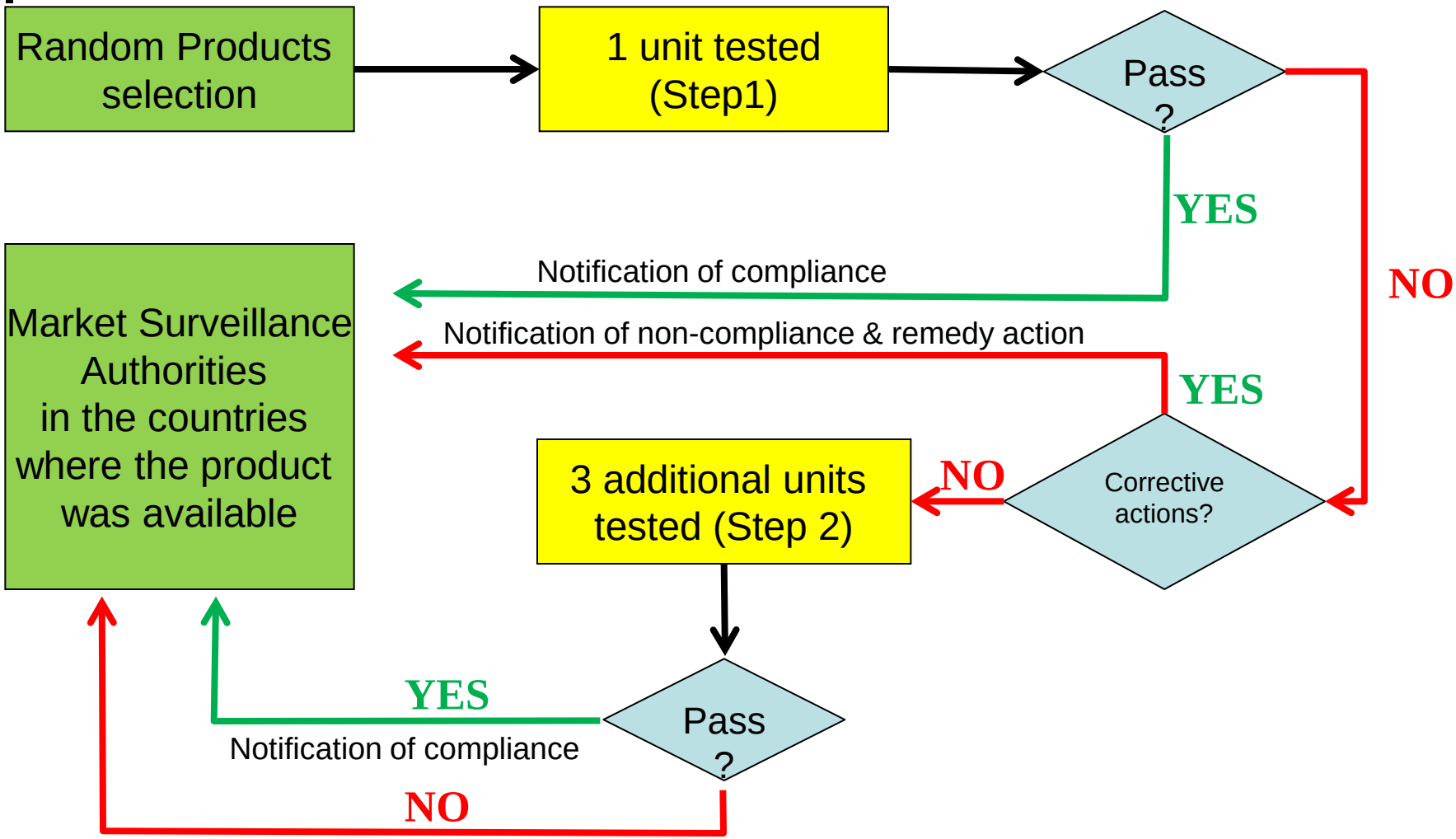
Verification procedure scheme



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Producers voluntary participation

- **Producers invited to subscribe a voluntary protocol**
  - a "Protocol for manufacturers proactive participation" where they accept to take proactively remedy actions would the tested products fail to show compliance.
- **Producer "obligations"**
  - acceptance ex-ante of the reliability of the testing laboratory
  - consideration of Step 1 results for possibly setting immediate valid remedy actions
  - set valid remedy actions for non-compliant models.
- **Producer "positive feedback"**
  - possibility of assisting the test of own models and to raise concerns on the regularity of the test before the result is known
  - remedy action communicated along with product non-compliances.

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Results notification and follow-up

- Notification of suspected non compliance:
  - after Step 1: notification to national MSAs, together with the verified voluntary actions taken, for their consideration
  - after Step 2: notification to national MSA for further actions, if any
- National MSA reactions to project communications were monitored
- In the end products were donated to selected charities or recycled, depending on conformity and compliance with the ecodesign Regulation 1015/2010/EC

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Lessons learned

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Template for test results reporting

- Some corrections/improvements suggested by labs:
  - ✓ partly already implemented in a Template revision
  - ✓ others require a more thorough redesign of excel sheets.

- Conclusions:
  - ✓ the use of the Template is feasible and improves the effectiveness of compliance verification
  - ✓ its implementation may require the adaptation of the lab own templates and electronic data collection systems
  - ✓ the Template could improve the elementary data to be measured and collected by labs.

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Legislation ambiguities (1)

1. **Information in the booklet of instruction**:
   - recommendation on the type of detergents suitable for the various washing temperatures
   - indicative information (of some aspects) for the “main washing programmes” at full or partial load, or both

2. **Requirements for the washing machine programmes**:
   - identification, on the programme selection device or the machines display, if any, or both of the standard programmes.

The above points were clarified by the Commission after specific questions or discussion during a Regulatory Committee

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Legislation ambiguities (2)

3. **Date of placing on the market**:
   - compliance depends on the “date of placing on the market” of the unit tested within ATLETE II and not on when the washing machine model was firstly introduced on the market, compared to the mandatory application of a requirement
   - therefore, it is possible that some units of a WM model are compliant and some are non-compliant

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ATLETE II main outcome (1)

- Pan-EU compliance verification exercise can be done in a systematic, effective and cost-efficient way
- An effective, accurate and timely procedure for compliance verification has been defined, that creates a stable framework for all stakeholders
- The project has re-assessed the importance and need for Step 2 in the EU verification procedure.
- Laboratory testing is reconfirmed to be technically feasible and economically sustainable. And paradoxically it appears to be the “easiest” phase of the entire procedure

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ATLETE II main outcome (2)

- Producers involvement through the signature of the Voluntary Protocol allows timely “remedy actions” to be put in place.
- The project offers MSAs qualified and independent products checks and test results, to reduce the burden and the use of national resources to develop market surveillance
- The project was able to tackle (and in most cases resolve) all non-compliance cases, before delivering the final results to MSA
- Public financing – i.e. through EU Programmes and/or specific Tenders – is essential for the developing of pan-EU compliance verification projects and for prioritization of the products to be investigated.

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www.atlete.eu/2

Thank you for your attention !

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