

DIGITALEUROPE input on the establishment of an Energy Labelling Database

Brussels, 17 November 2017

As a follow-up to the meeting of the Ecodesign Consultation Forum on the product registration database for Energy Labelling on the 24th of October 2017, and in order to contribute to the practical implementation of the database requirements, DIGITALEUROPE would like to provide a set of key recommendations.

Data Registration

DIGITALEUROPE welcomes the proposed database feature that would automatically generate the energy label for each model according to the relevant parameters introduced by the suppliers, as well as the effort dedicated by the Commission in finding a solution for the compliance part of the database that would ensure language neutrality. If, in particular situations, technical documents or text inputs are required, we strongly support the suggestions made by Italy and Netherlands during the Ecodesign Consultation Forum to continue the currently established practice and allow suppliers to use English for this purpose. Providing translations for such documents should never be mandatory, as it would significantly increase the burden on the manufacturers without any clear added benefit for the Market Surveillance Authorities, and may result in the provision of poor, incomprehensible translations.

With regard to the formats in which the technical data of the model is introduced in the compliance part of the database, we request that the interface permits the upload of the technical documentation both in form of a pdf file and as structured data, and the supplier is allowed the flexibility to choose either one of these options in order to fulfil its obligations. Such an approach is preferable because it would take into account the differences between the internal database systems already implemented by the suppliers, and would not disproportionately affect any of them.

Data Modification

DIGITALEUROPE appreciates that the functionality of the database will allow suppliers to update/correct/modify their model parameters after the registration, but would like to mention, as also pointed out by CENELEC and CECEC during the Ecodesign Consultation Forum, that product testing standards are often renewed, and as a result the energy label parameters for a particular model can change. This is a situation that can potentially create confusion to consumers and complicate product verification activities, as for a model there may be multiple applicable energy labels at any given time, and the correct one will have to be identified based on the date of placement on the market of the particular unit. We therefore suggest that a specific feature is introduced in the database to account for the different labels that can result from the renewal of the product testing standards.

System Security

There are strong concerns among DIGITALEUROPE's members with regard to the security of the compliance part of the database. We believe that how market surveillance authorities access this data is critical, and we are worried that the procedure proposed by the Commission to revoke access for former employees only after a specific notification in that regard is received may not be enough to maintain the security of the system. There can often be delays in sending these notifications and as a result former employees of the market surveillance authorities may keep their access credentials for extended periods of time after leaving their job. This, we believe, will increase the risk for data leaks to happen. As a possible solution to this important issue, we suggest to further investigate to possibility of limiting the access to the compliance part of the database only to IPs related to the market surveillance authorities or the Commission.

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ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 60 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

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