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**Report to the Ecodesign and Energy Labelling
Consultation Forum on the appropriateness of
setting separate requirements for refrigerated
containers according to point 4 of the Ecodesign
Working Plan 2016-2019**

1. CONTEXT

Refrigerated containers were included in the indicative list of new product groups for the working plan 2016-2019, because a study in preparation of that working plan¹ showed that they had significant savings potential (estimated primary annual energy saving of 4.72 TWh/a in 2020 and 5,83 TWh/a in 2030).

Therefore, a partial² preparatory study was carried out to further explore the appropriateness of setting ecodesign and/or energy labelling requirements for these products.

The study started in March 2019 and was finalised in June 2020. During the course of the study stakeholders from Member States' authorities, industry, relevant standardisation technical committees and working groups, civil society, consumers and environmental NGOs were actively involved. One public stakeholder meeting was held in March 2020 (see [here](#) for the minutes of that meeting). The final version of the study can be found [here](#).

This report, in conjunction with the underlying study, is submitted to fulfil the Commission's obligation to consult with the Consultation Forum on ecodesign and energy labelling as set out in Article 18 of the ecodesign framework Directive³ (EFD) and Article 14 of the energy labelling framework Regulation⁴ (ELFWR).

2. DISCUSSION

Products that are covered by an implementing measure under the ecodesign framework must meet the criteria laid down in Article 15.2 of the EFD. Similarly, products that are covered by an energy labelling delegated act must meet the criteria laid down in Article 16.2 of the ELFWD.

Prior to the start of the preparatory study, some preliminary findings revealed that refrigerated containers might not meet these criteria, despite the results of the study that served as the basis for the working plan 2016-2019. Therefore, the preparatory study for refrigerated containers focussed first on assessing this. In case, refrigerated containers would not meet the criteria, the study would not be continued.

For this purpose, the preparatory study followed the first two tasks of the so-called MEErP methodology⁵, i.e.:

- Task 1, which outlines the scope, lists relevant standards and legislations related the energy consumption, durability and resource efficiency of refrigerated containers;

¹ <https://ec.europa.eu/docsroom/documents/20374>

² Section 2 of this document will further elaborate on the reason for only carrying out the study partially

³ Directive 2009/125/EC of the European Parliament and of the Council of 21 October 2009 Establishing a framework for the setting of ecodesign requirements for energy-related products (OJ L 285, 31.10.2009, p. 10). (EDF)

⁴ Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU (OJ L 198, 28.7.2017, p. 1). (ELFD)

⁵ See http://ec.europa.eu/growth/industry/sustainability/ecodesign_en for more information about this methodology

- Task 2, which gives an overview of the refrigerated container market including sales, stock and base data on consumer costs;

Some aspects of task 3 on the user behaviour and task 4 on the technical assessment of refrigerated containers were also performed to able to provide a conclusion on the feasibility in continuing the study.

This preliminary assessment roughly estimated that less than two thousand refrigerated containers used for shipping and little more than one thousand refrigerated containers for stationary use are actually placed on the Union market annually. The consequence is that the product group does not represent a sufficient volume of sale and trade and hence does not meet the criterion in Article 15.2(a) of the ecodesign framework Directive (which requires “indicatively more than 200 000 units a year”). Consequently, the study concluded that refrigerated containers are not eligible for ecodesign requirements.

The low volumes of refrigerated containers that are actually placed on the Union market also mean that the energy and resource savings will be less. A rough calculation leads to estimated energy savings of less than 0,5 TWh/a by 2030⁶ (less than one tenth of the energy savings estimated during the preparatory study for the working plan 2016-2019). This is less than the indicative threshold for including products in the working plan 2016-2019, which was 1,94 TWh/a. As such, we can conclude that the savings are insufficient to qualify for criteria in Article 16.2(a) of the energy labelling framework Regulation and Article 15.2(b) of the ecodesign framework Directive, which means that refrigerated containers are also not eligible for energy labelling requirements.

The total environmental impact of refrigerated containers that are used to supply goods to the Union (EU related containers), of which the majority are not placed on the Union market, is significantly higher than many other products covered by ecodesign. As such, the study team proposed alternative policy options to reduce the energy consumption of EU related refrigerated containers and of refrigerated containers for stationary use. Of the proposed policy options, the inclusion of refrigerated containers for stationary use as a subcategory of walk-in cold rooms in Regulation (EU) 1095/2015 was the most promising one.

3. CONCLUSION

Based on the results of the preparatory study, it is recommended not to set ecodesign and energy labelling requirements for refrigerated containers. As an alternative, it is recommended to evaluate refrigerated containers for stationary use as a subcategory of walk-in cold rooms in the review of Regulation (EU) 1095/2015 planned to start in Q4 of 2020.

⁶ Less than 10% of the energy savings estimated during the preparatory study for the working plan 2016-2019, which was 5,83 TWh/a in 2030.