



*The Association of Manufacturers
of Domestic Appliances*

Industry's Commitment to Product Compliance – A UK View

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UK Member of



Presentation structure

- The importance of product compliance to industry
- The regulatory regime in the UK
- Issues of concern to industry
- Industry involvement

AMDEA is the trade body for the UK domestic appliance industry



- Our membership consists of 30 companies who place domestic appliances on the UK market either as manufacturers, distributors or importers.
- Some of these companies are UK subsidiaries, others UK parent companies with markets in more than one country. In all cases, supply chains span the globe.
- AMDEA represents over 80% of the UK industry.
- We influence legislative developments, drive the creation of standards and run campaigns.
- We are also a member of CECED, the European domestic appliance trade association.

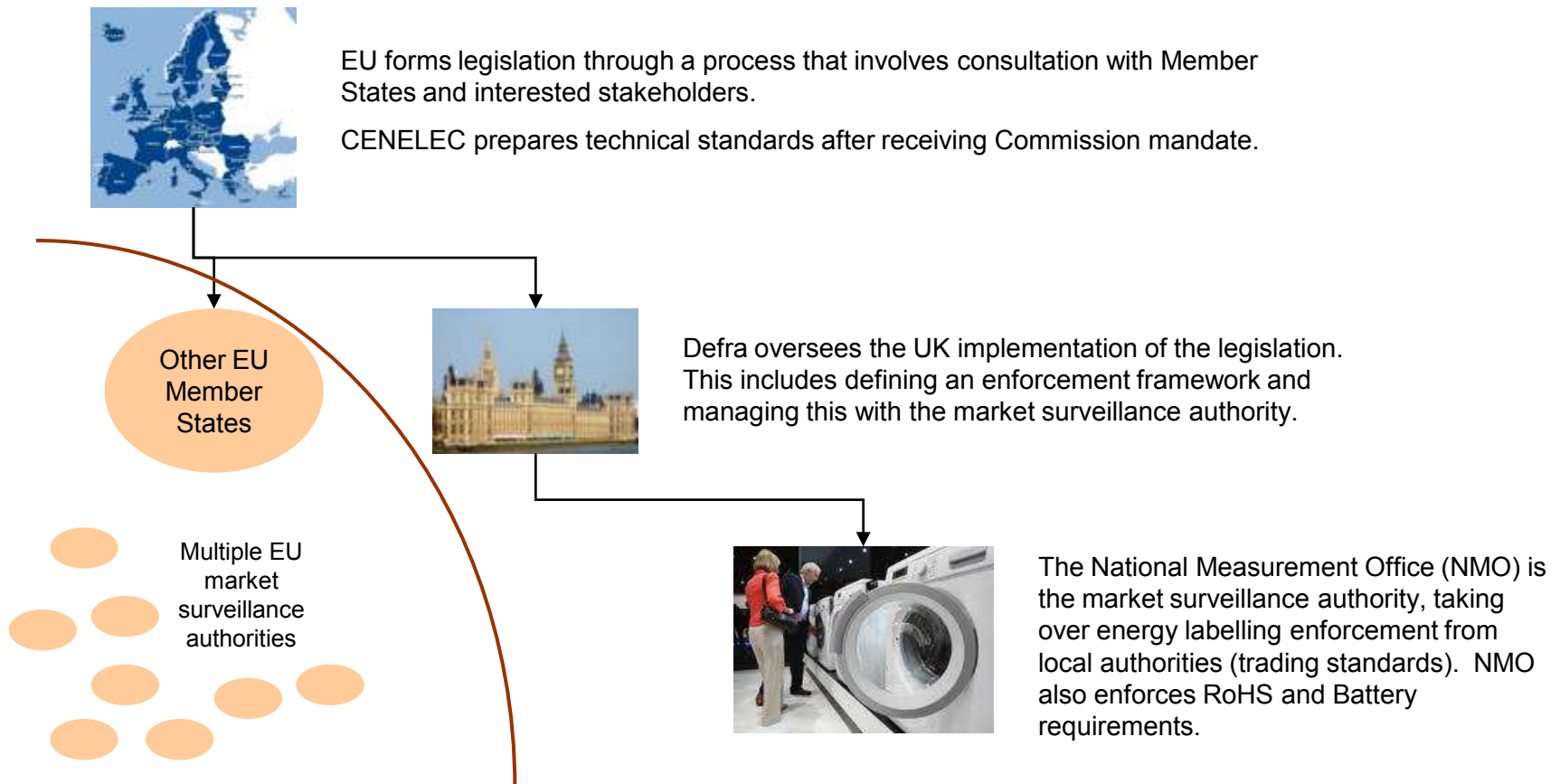
Product compliance is of great importance to our industry

- Electrical products placed on the market are expected to comply with all relevant legislation. This legislation now includes energy efficiency alongside safety, EMC, chemicals use and end-of-life treatment.
- For manufacturers, the consequences of non-compliance being detected are potentially severe. Manufacturers may be required to rework products, clear distribution channels, pay fines, etc. The risk is of paying a high cost – a cost that might also be compounded by bad publicity.
- Manufacturers invest a great deal in managing compliance. Products are designed to be in compliance and programmes are run to assure compliance. In many cases, manufacturers strive to exceed legal requirements (e.g. by setting corporate standards).
- Manufacturers expect there to be a level playing field. Legislation should be backed up by strong enforcement.

The UK regulatory regime

(for ecodesign and energy labelling)

Ecodesign sets minimum requirements while labelling categorises products by efficiency class



UK regulation also has a set of guiding principles – the Hampton principles

Regulators should use risk assessments to concentrate resources on the areas that need them most.

Regulators should be accountable for the efficiency and effectiveness of their activities.

No inspection should take place without a reason.

Businesses should not have to give unnecessary information, nor give the same piece of information twice.

Businesses that persistently break regulations should be identified quickly and face proportionate and meaningful sanctions.

Regulators should provide authoritative, accessible advice easily and cheaply.

Regulators should be of the right size and scope.

Issues of concern

(not necessarily specific to the UK)

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- Market surveillance should not assume non-compliance; investigations should begin by looking at industry practice and reviewing technical documentation.
 - Manufacturing variability and measurement uncertainty need to be factored in.
 - As EU product legislation is harmonised, so too should be market surveillance and non-compliance penalties. Otherwise the Single Market could be distorted.
 - It should not be assumed that energy efficiency can be continually improved, at least not without affecting other variables (including safety).

Dealing with the issues

Draw on past experiences

- In the EU, the New Approach to technical harmonisation has been a success. It provides for industry (and other stakeholders) to consider compliance issues in standards formation and through participating in ADCO Working Parties.
- New Approach legislation – the EMC Directive – has already accounted for variability and measurement uncertainty with its 80/80 rule.

Documentation of market surveillance policies

- Industry wishes to know what is expected of it. NMO guidance regarding RoHS is an example of good practice in this regard.

Keep the conversation going

- Trade associations like AMDEA provide a means for industry to voice concerns to national Governments and EU Institutions.

Industry is proactive – it does more than just comply

Manufacturers advertise their products' energy/water efficiency as a big advantage for consumers, not just in terms of the environmental benefits but also to save on running costs to reduce their energy bills.

Energy efficiency has improved dramatically – compared with 1980 a modern refrigerator uses 1/3 of the energy and a washing machine 1/3 of the water.

AMDEA conducted a case study last year to compare the energy use of a 30 year old fridge-freezer with a modern A++ model

Energy used Old = 23.26kWh per week New = 4.3 kWh per week
CO2 saved = 529kg

For three years we have been running our “Time to Change” campaign to encourage consumers to trade in their old appliances for modern ones.



www.t2c.org.uk



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