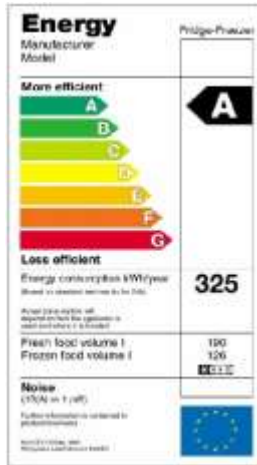




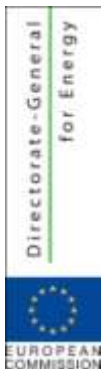
● Mandatory vs voluntary EE programmes: what MVE approaches?

● Different instruments, different approaches



Self-declaration with some degree of pre-registration checks

Third-part certification



● Key differentiators?

● Governance

» Post-market verification vs third-party certification?

● Risk of fraud

» Intensity of MVE?

● Governance

- **Mandatory:**
 - » command & control
 - » aim: target all actors on the market
 - » mean: need to avoid creating unequal conditions for market operators (in terms of MVE)
- **Voluntary:**
 - » cooperation & negotiation
 - » aim: target a limited number of actors
 - » mean: unequal conditions for market operators can be tolerated

● Risk of fraud

- Penalties
 - » Mandatory: withdrawal of products from the market/financial fines/impact on brand
 - » Voluntary: withdrawal from the programme/impact on brand
- Correlation between type of programme (m vs v) and risk of fraud not proven empirically
- Some indicators of greater risk of fraud:
 - » Products sold without an established brand
 - » Products sold mainly as components
 - » Manufacturers/markets with a history of non-compliance
 - » Indications from stakeholders (e.g. competitors, consumer organisations)

● Conclusion

- Governance structure is a differentiator
 - » The application of different MVE regimes is an option
- Risk of fraud is not
 - » The intensity of MVE should depend primarily on the product addressed, not the programme

- Case study- ENERGY STAR: why the EU doesn't want to align certification and verification and with US?
- ENERGY STAR: voluntary programme BUT linked to mandatory requirements (public procurement) – need to create equal access for all market operators
- Covers products (in the EU) that are not particularly exposed to fraud
- Light registration procedures part of the success story

● Results of the survey of EU ENERGY STAR Partners

- **If the EU Energy Star Programme would require products to be tested in an outside, certified laboratory in order to be qualified would you still participate in the Programme?**
 - » 23% - yes
 - » 20%- probably, but for a limited number of products
 - » 57% -no



Thank you

SOURCE