

Q&A Document

Ecodesign Regulation EU 2019/2024 and Energy Labelling Regulation EU 2019/2018 on refrigerating appliances with a direct sales function.

EVA Questions & Answers – Key information

These Q&As are designed to highlight the main requirements and their application to vending, but we advise that they are read in conjunction with the detailed requirements as outlined in the official Regulations:

[EU 2019/2024 \(Ecodesign\)](#)

[EU 2019/2018 \(Energy Labelling\)](#)

What do the two Regulations aim to achieve for refrigerated vending machines?

The Ecodesign Regulation bans the least efficient machines from being placed on the market as well as introducing new resource efficiency requirements.

The Energy Labelling Regulation introduces a mandatory A-G label for all relevant vending machines, in order to provide a visual guide to machine performance.

When will the Regulations be implemented?

Ecodesign applies from 1 March 2021. Machine bans will be implemented in 1 March 2021 (for machines with an Energy Efficiency Index (EEI) of 100 or more) and 1 September 2023 (for machines with an EEI of 80 or more)

Energy Labelling applies from 1 March 2021.

What machines are in scope?

Refrigerated vending machines, which include but not limited to:

- Closed front machines
- Glass front machines
- Drum machines*
- Vending machines operating at frozen temperatures*

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Machines defined as Categories 1,2,3,4 and 6 in the European standard EN 50597 are within scope of the legislation.

CATEGORY	MACHINE TYPE
1	Refrigerated closed fronted can and bottle machines where the products are held in stacks
2	Refrigerated glass fronted can and bottle, confectionery & snack machines
3	Refrigerated glass fronted machines entirely for perishable foodstuffs
4	Refrigerated dual-temperature glass fronted machines
6	Combination machines consisting of two different categories of machine in the same housing and powered by one chiller

***What requirements are different for drum vending machines?**

Drum vending machines must comply with the same requirements as other vending machines, with the exemption that the energy efficiency target of September 2023 will not apply. Drum machines will be able to be placed on the market after this date if their EEI is above 80 but less than 100.

***What rules apply to vending machines for frozen products?**

Vending machines designed to operate at frozen temperatures (below -12°C) are not subject to energy consumption calculations, placing on the market restrictions, nor energy labelling. Information and resource efficiency requirements under Ecodesign do however apply.

How do I calculate the EEI of my machines?

The EEI is an index number for the relative energy efficiency of a refrigeration appliance expressed as a percentage (i.e. EEI 100 means 100% of a theoretical baseline energy consumption). Annex III of the Ecodesign



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Regulation details how to use this to calculate the machine EEI. Annex IV of the Energy Labelling Regulation provides the same calculation methodology.

European standard EN 50597 must be used to calculate the energy consumption of refrigerated vending machines. EN 50597 tests machines in categories 1,2,3,4 and 6.

Does the EN 50597 test have to be made by an external body?

The test can be carried out internally providing correct test procedures are followed. In case of verification of compliance, machines can be sent to an external body for testing.

What energy performance should my machine target?

At the time of publication the following benchmarks were the best performing vending machines placed on the market:

Machine type	Volume (l)	Temperature (°C)	Annual energy consumption (kWh/a)	Energy Class
Can & Bottle vending machine <i>(EN 50597 Category 1)</i>	548	7	1547 (4,24 kWh/24h)	E
Spiral vending machine <i>(EN 50597 Category 3 or 4)</i>	472	3	2070 (5,67 kWh/24h)	F

What are the resource efficiency requirements?

From 1 March 2021 new resource efficiency measures are required including making repair information and instructions available to professional repairers, designing machines so that certain parts can be easily removed by common tools, and detailed information requirements on the machine set up, performance and availability of spare parts.

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How long do I have to keep spare parts? Which ones?

From 1 March 2021 Manufacturers, importers or representatives must ensure that certain spare parts are available for 8 years after the last unit being placed on the market. The parts required are listed in Annex II of the Ecodesign Regulation.

Spare parts must be delivered after order within 15 days.

What EEI do my machines need to achieve Energy Class A?

The label has been designed so that no vending machine can be placed in Class A or Class B upon introduction and that the majority of refrigerated vending machines cannot be in Class A for at least 10 years.

Can & Bottle machines are inherently more energy efficient than Glass fronted machines Drum machines are on the whole less efficient. That being said, the EVA estimates that the best performing vending machines will likely be Class C at the start.

Energy classes are defined as follows:

Energy Class	EEI
A	EEI < 10
B	10 ≤ EEI < 20
C	20 ≤ EEI < 35
D	35 ≤ EEI < 50
E	50 ≤ EEI < 65
F	65 ≤ EEI < 80
G	EEI ≥ 80

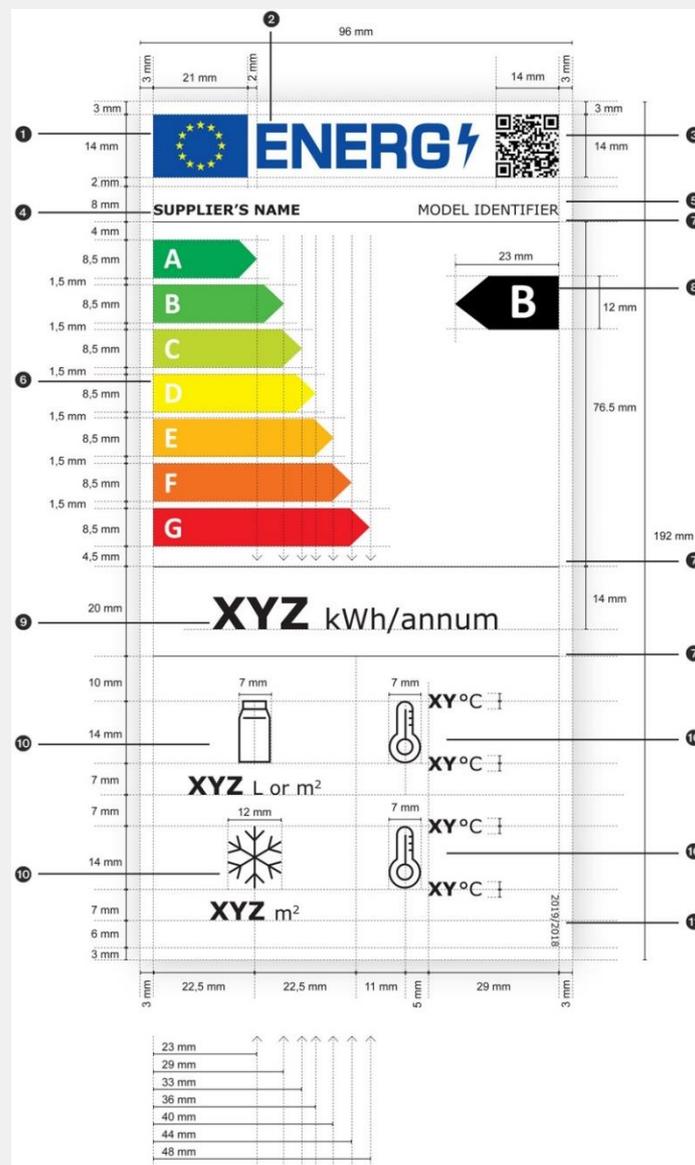
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What does the energy label look like and where can I find it?

The label, including its exact dimensions and font sizes and colours are detailed in Annex III of the Regulation.

There are no requirements as to the material used for the label, nor where exactly the label should be placed on the vending machine, except that it has to be visibly displayed on the front of the machine when sold (Article 4 (a))



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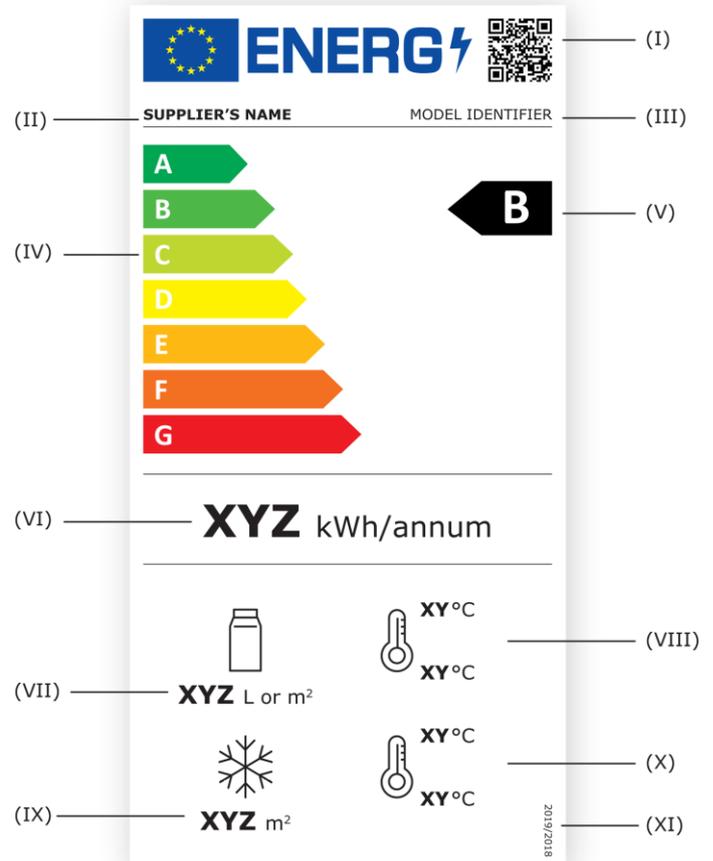
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What needs to be mentioned on the label?

- I. QR code linking to the EPREL database
- II. Supplier's name
- III. Model name/number
- IV. A – G energy scale
- V. Energy class result
- VI. Energy in kWh per year
- VII. Sum of combined net volumes in the vending machine
- VIII. Maximum temperature as defined by the correct machine category (Table 4, Annex IV)
- IX. Vending machines designed to operate at frozen temperatures are exempted from energy labelling. This pictogram should always be omitted.
- X. Vending machines designed to operate at frozen temperatures are exempted from energy labelling. This pictogram should always be omitted.
- XI. Number of the Regulation i.e. 2019/2018



Does the label have to remain on the machine? Can I remove it?

The energy label has to be placed on the front of the machine during trade fairs and at the point of sale. Once the machine has been sold, the operator is not obliged to keep the label directly on the machine. There are obligations

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to make the label available when required, including in promotional materials and adverts.

Where do I declare my machine data and energy performance?

A detailed product information sheet (Annex V of the EL Regulation) for vending machines must be uploaded to the [Energy Labelling Product Database \(EPREL\)](#). Manufacturers are required to register for the database before being able to upload data.

Once data is uploaded to the database, you can download an already completed energy label directly.

When do I need to upload the results after testing machines?

To place a machine on the market on or after 1 March, data must be uploaded to the database ahead of this date.

Some fields on the information sheet I don't understand. How do I complete these fields on the database correctly?

There are a few fields which could cause confusion:

- Cabinet family code. This is not applicable to refrigerated vending machines as there is no code that can be used from EN 50597. You must complete this field but the text is flexible. The EVA recommends writing "Not applicable for refrigerated vending machines."
- Multi temperature vending machines. **Section to be updated shortly based on EPREL update by EU Commission.**
- Food type. You need to specify the type of foodstuffs the machine compartment is intended for. The text field is flexible. We advise for compartments with 3 degrees, you mention that it is designed for perishable food.
- Light source. This field is not currently mandatory for refrigerated vending machines but will become mandatory by September 2022 when EU 2019/2015 on energy labelling of light sources is implemented. Upon implementation a vending machine manufacturer will be required to

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state the energy sources and energy efficiency classes in their declaration.

What is 'placing on the market'? Can I still sell my stock machines?

The EU has published a '[Blue guide](#)' which is a guide to the main terms used in various legislation such as 'making available on the market' (Page 17) and 'placing on the market' (Page 18). The latter provides guidance as to the moment machines without label can be sold in the EU market.

I am a company refurbishing machines – are my machines in scope?

Once a machine is refurbished with different components the original manufacturer is no longer liable for any problem that could occur. The refurbisher of a vending machine is therefore legally responsible for the machine's conformity when replaced on the market, meaning he needs to comply with relevant EU Directives.

In respect to these Regulations, refurbished vending machine however will not be able to upload data to EPREL or create a new energy label.

I sell my machine to an operator as a certain machine category but he later converts it to another category – can he just amend the label himself to reflect the new energy rating?

The machine is sold to customers and placed on the market as a particular category (e.g. Category 2 Glass front snack machine) and the EPREL database has to reflect this category. Manufacturers need to be very clear in their documentation what the machine is designed for, what category it was tested in and consequently its label class.

If after the machine is sold an operator changes the configuration, the original label will still apply. The label and the machine technical sheet as sold need to match.

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Is the label to be a permanent label and last the lifetime of the equipment?

A machine must be supplied with a label on it at the point of sale. Once the machine has been sold, the purchaser is not obliged to keep the label directly on the machine. Therefore while the Regulation does not specify that the label itself has to last the lifetime of the machine, there are obligations on suppliers to upload the machine data to the database and make the original label available when required.

Is the EVA Energy Measurement Protocol (EMP) 3.1a still valid?

No, the EVA EMP 3.1a is withdrawn and results are no longer valid since July 2019.

Can I choose between the EVA EMP 3.1a and EN 50597?

No. All energy consumption tests must be done with the EN 50597. The EMP 3.1a is no longer valid.

I have vending machines in the field with EMP ratings on them. Do I have to remove these labels?

The EMP never permitted the results to be placed on machines as a label. If any EMP results are displayed on machines these must be removed immediately or this could lead to compliance issues with the Energy Labelling Regulation.

Similarly any reference on websites or promotional materials to a previous EMP rating and claims must be removed immediately or could leave you liable to enforcement action.

When do chilled vending machines require energy labels on them?

All machines being placed on the EU single market on or after 1 March 2021 require energy labels.

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Can the label also be used for hot drinks machines based on EVA EMP 3.1b?

Absolutely not. The Energy Label applies only to refrigerated vending machines.

My coffee machine has a milk fridge. Does this need an energy label?

The legislation does not apply to hot drinks vending machines nor aspects of such machines for example an ancillary milk fridge. Broadly speaking, only machines defined within the categories in EN 50597 are subject to placing on the market restrictions and energy labels.

Can I put two labels on the machines? One according to the latest Regulation and the one based on EVA-EMP 3.1a just to show that the machine was A+ before

No. Only the official EU Label can be used on refrigerated vending machines. Any previous EMP rating (like A+) hasn't been valid since July 2019.

My client wants an A+ machine. How do I explain him that the energy rating has changed?

Inform your client that A+ machines no longer exist, and the best performing refrigerated vending machine will likely be a Class C. Your client can consult all vending machine data on the public part of the EPREL database.

Any procurement requests requiring e.g. A+ machine cannot be fulfilled. Any manufacturer declaring these values from the EMP is not compliant with the EU Regulation and is open to verification checks and sanctions (see below).

You can furthermore direct a client to contact the EVA or consult our [Press Release on the topic](#).

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Who will check my declarations are correct?

National enforcement agencies can check any machine model placed on the market and will verify test results to ensure the declaration values are correct and within the permitted tolerances.

If a machine is found to not comply with the Regulations, the national agency will inform the EU Commission. The particular machine model and all equivalent models will be declared non-compliant i.e. will no longer be permitted to be placed on the market.

Why do the Ecodesign and Energy Labelling Regulations not apply to hot drinks machines?

Due to the relative lack of energy savings for hot drinks machines compared to refrigerated vending machines, there are no current Regulations for hot drinks machines. The EU Commission has however indicated that they are relooking at this product group and may introduce measures in the coming years.

Do these Regulations apply to the UK, now that the UK has left the EU?

The EU Regulations will apply in Northern Ireland, but the UK government plan to introduce different but similar requirements for the Great Britain (GB) market – England, Scotland and Wales. The UK government has indicated that due to a delay their Regulations will not be come into force on 1 March 2021.

The EVA understands that requirements will (at least initially) be similar to the EU Regulations, but the energy label will have a slightly different design, and a GB-only product database will be developed.

UK legislation is expected to be approved in the coming weeks.

Other questions?

Please contact: di@vending-europe.eu

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