Comments on concept for Top Tier Energy Star Qualified Products

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General comments

US EPA has proposed a new concept for a top tier for Energy Star qualified products. This approach would allow to highlight most efficient products on the market.

It has been indicated that this new concept might only be applied for product groups where super efficient products are available. A draft list of first priority product categories has been proposed which does not include office equipment. Thus it is not yet decided if the new concept will also affect the US/EU cooperation on Energy Star for office equipment.

The following statements from EU stakeholder perspective are based on the assumption that the new concept also will be applied to office equipment and therefore will be relevant for the US/EU agreement.

In general a top tier approach could be beneficial for the Energy Star program as it also would support buyers primarily interested in most energy efficient products. The top tier approach – if implemented appropriately - could further support the credibility and reputation of the program.

For the design of the new top-tier concept among other issues the following aspects should be considered:

- **Approach for the definition of the top-tier level**

The overall goal of the new concept is not completely clear since partly differing objectives are communicated in different sections of the document. In the introductory section it is stated that the concept should primarily be applied for product categories where one or more super efficient products do exist. This

approach would imply a kind of benchmarking for the top end of the efficiency range. In other parts of the document a categorization approach involving two efficiency levels is indicated.

Four options for specifying the top-tier level have been listed explicitly in the strategy document. However from our perspective the options indicated are not explained in sufficient detail.

Option 1 is not clearly described and appears to potentially lead to a not well standardised approach respectively to a rather heterogeneous concept not easy to communicate to the target groups.

Option 2 proposes to use a defined 5% top-efficiency level. This approach seems to be challenging in practice since a continuous revision of the criteria to maintain the threshold requires a highly dynamic process. However compared with the standard Energy Star approach which is also based on a target percentage (25% level of the efficient market segment) the proposed approach would be most logic at least in theory.

The difference between option 2 and option 3 is not sufficiently clear as both approaches seem to refer to the top 5% of the Energy Star qualified products. Thus the specific different aspects of option 3 should be further explained.

The 4th approach indicated seems transparent and easy to communicate and understand. However it is questionable if this approach would harmonize with the basic Energy Star concept. The approach would not allow general labelling of products (e.g. on product packages) by manufacturers since the top-tier lists may change quite dynamically. Thus only a kind of dynamic labelling at the point of sale might be possible.

Furthermore it has to be considered that such an approach has recently been implemented by a US initiative called “topten” USA. The approach is based on similar international concepts also used in Europe and in China. Eventually a cooperation with the topten-initiative could be evaluated.

Thus overall options 2-4 seem possible approaches in theory which however need to be further evaluated. Option 2 and 3 seem to match best with the basic Energy Star approach. Option 1 so far can not be assessed based on the current very vague description.

- **Designation of top-tier product segment**

The currently proposed approaches for designating the top-tier product class do not seem optimized yet. However some potential concepts seem to be more appropriate than others. The options “top-tier”, “top-performer” and ”best in class” probably should be excluded right from the beginning. The selection of the appropriate terminology also should be based on the nature of the concept respectively if the concept will introduce two efficiency classes or if it rather will provide a kind of top level benchmark highlighting only a few most efficient products. If a two class level concept is intended than also a kind of Gold-/Silver concept might be appropriate (Energy Star-Gold, Energy Star Silver compared to the approach of the 80 plus power supplies scheme).