



Australian Government

Department of the Environment and Heritage Australian Greenhouse Office

Dear Stakeholder

REFRIGERATOR TEST ALLOWANCE

As part of the National Framework on Energy Efficiency, all Australian Governments agree common product energy efficiency initiatives under the Equipment Energy Efficiency programme. The overall responsibility for these initiatives lies with the Ministerial Council of Energy.

Since 1992, common labelling requirements throughout Australia for refrigerators have been a foundation element of this programme. It is therefore of some concern to regulators to learn that several refrigerator products on the market have been using smart controls to reduce apparent energy consumption when tested under AS/NZS4474.1 conditions. The control and operation of the product is significantly different during laboratory tests compared to normal use and the products in question therefore obtain favourable comparative energy labels as a result of the laboratory testing.

Regulators have been informed of one product which has an electric anti-sweat heater that operates at all ambient temperatures from 10°C to 43°C, but turns off when the ambient temperature is 32°C without door openings (as required in the standard). The result is a reduction on annual energy consumption of about 20%. With the advent of “smart” electronics, it seems some suppliers can use control strategies to reduce the apparent energy used to obtain a favourable label in comparison with competitor products.

All testing of refrigerators under the nationally consistent laws is carried out using AS/NZS4474.1. The Part 1 standard has now been fully revised, including a new test method, and should be published in early 2007. A new Part 2 with the new labelling algorithm, label and revised MEPS requirements is also scheduled for release in 2007.

Several competitors have raised this issue with this agency directly and some others have chosen recent trade association meetings to complain of this conduct. Regulators want to respond with an additional amendment to Part 2 to in effect add an energy allowance for any control system that reduces energy consumption for the purposes of the energy test. The allowance will be calculated as if the anti-sweat heater was on every hour of the day and then doubled to compensate for the refrigerator not having to overcome this heat load. This will encourage manufacturers to program the units to operate under the test conditions or accept the allowance being added to the test result if the anti-sweat heater does not operate at 32°C without door openings (as required in the standard). Regulators have asked Standards Australia to include this as part of the new amendment to Part 2 of the standard in January 2007.

After consultation, regulators will organise for manufacturers and importers to declare whether their product falls into this category during 2007.

The AGO has requested stakeholders to:

- a) be aware of this proposal so that they can use the consultation opportunity offered by Standards Australia and
- b) discuss the issue at our forthcoming annual whitegoods forum in February 2007 to settle upon a consensus.

Thank you for your help in this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'SHANE HOLT', written in a cursive style.

Shane Holt
Director Equipment Energy Efficiency Team
Australian Greenhouse Office
22 December 2006