

# **NRCS IMPLEMENTATION APPROACH ENERGY EFFICIENCY REGULATIONS**

**Presented by: P Andrews  
14 November 2019**

# TABLE OF CONTENT

- **IMPLEMENTATION APPROACH**
- **IMPLEMENTATION OF MEPS**
- **NON-COMPLIANCES**
- **ANTICIPATED CHALLENGES**
- **WAY FORWARD**

# IMPLEMENTATION APPROACH

## SPECIALIZATION OF NRCS INSPECTORS

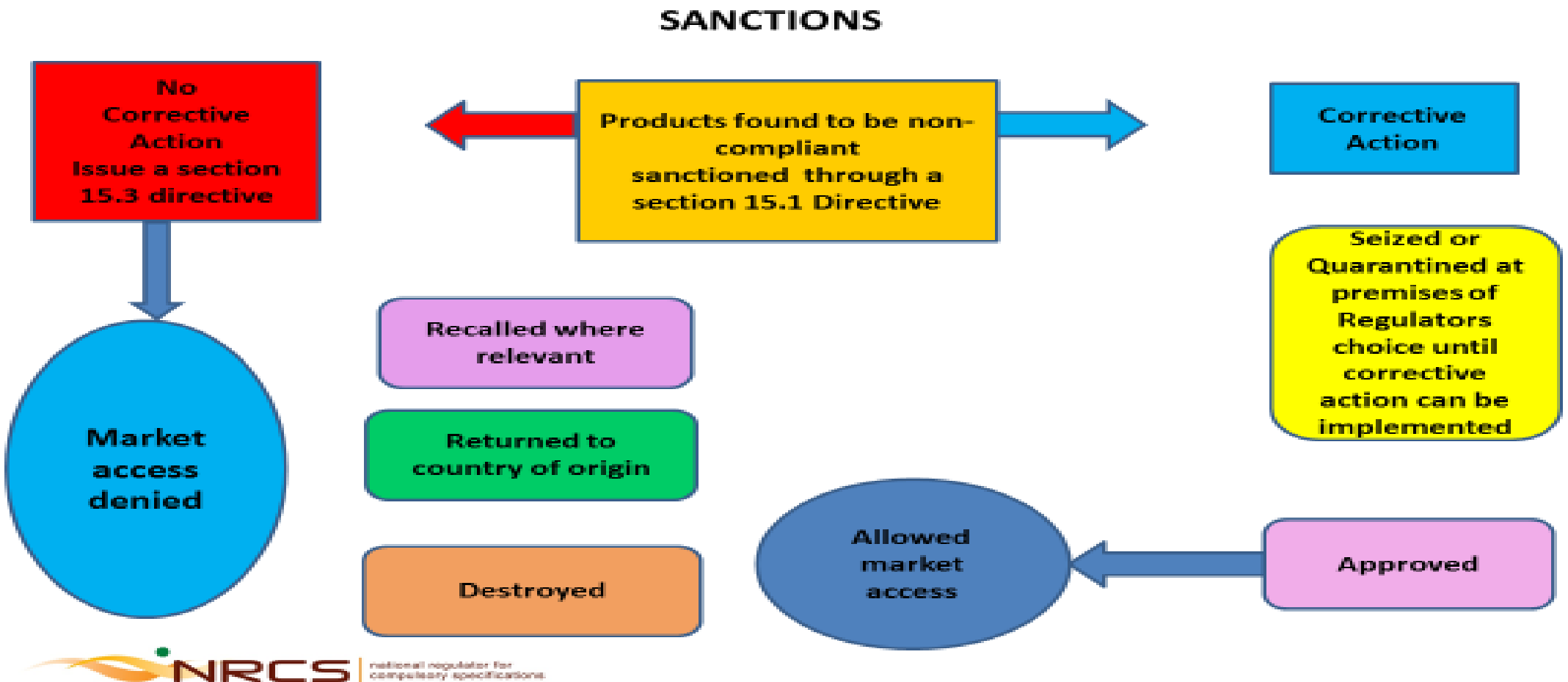
**Inspectors to specialize in specific product and technology areas and will be responsible for the enforcement, sampling and sanctioning of Energy Efficiency related VC 's**

# Implementation of MEPS

Implementation of MEPS	
Effective Date of VC/amendment to a standard	VC will indicate the date of implementation as well as the implementation date of a new edition of the standard ( anticipated implementation date Q2 of 2020/2021 )
Existing LOA's	<p>VC will indicate the different phases of implementation and prescribe the due date to comply fully with the latest VC.</p> <p>Industry can apply for a sales permit to deplete old stock imported/manufactured before the implementation of the new MEPS. Not a given that sales permit will be awarded to all applicants</p>
New LOA's	Applicants must comply with the latest requirements of the applicable VC

# NON-COMPLIANCE

**Types of failures:** (administratively (no LOA), testing (failing MEPS or any other safety or performance requirement when tested at an accredited laboratory and visual failure (markings, construction, plug or label requirements)).



# ANTICIPATED CHALLENGES

- **Lab testing – capacity, capability and turnaround times**
- **Smaller industry players resisting to comply with the EE requirements due to cost of testing**
- **False declarations at the ports of entry will allow non-compliant products entering the country**
- **Non-registration of regulated entities and refusal to pay levies**
- **Labelling requirements at retail level – Displaying the EE label on appliances to inform the consumer.**
- **Retail level understanding the purpose of the EE label to be able to advise consumers on the benefits of buying a more energy efficient product.**
- **Dumping of inferior quality products – when MEPS requirements mature in foreign markets**

# Way Forward

- **Importers and manufacturers to educate buyers and sales personal on the EE regulations – will result in compliance at retail level**
- **Test laboratories to indicate their scope of accreditation, testing capacity and turnaround time for delivering results which will direct the regulator on the type of samples and sample frequency.**
- **Specialization of NRCS inspectors**
- **Enforcement of existing and new MEPS – surveillance inspections will be conducted at importers, manufactures, distribution centers and retail outlets. (VC9006 enforcement /VC 9008 enforcement)**
- **Samples will be taken to verify compliance with MEPS /if local testing facilities is not available, international laboratories will be utilized.**
- **Sanctions will be imposed on contravening companies**
- **Non-adherence to sanctioning conditions will result in prosecutions and possible naming and shaming**
- **Creating a level playing field – also dependable on industry to report know contraveners to NRCS**
- **Products under MEPS to be placed on P&R list – Customs to enforce stoppage through the risk engine at the POE.**
- **VC Amendment – Refer to label requirements as per DOE guide and not SANS 941 who is still referring to old label. (2021)**

**THE END**

**THANK YOU**