NRCS IMPLEMENTATION APPROACH ENERGY EFFICIENCY REGULATIONS

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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** | VC will indicate the different phases of implementation and prescribe the due date to comply fully with the latest VC. | Industry can apply for a sales permit to deplete old stock imported/manufacturer before the implementation of the new MEPS. Not a given that sales permit will be awarded to all applicants |
| **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)
THANK YOU