

Tolerances and uncertainties

[FAQ n°3.1 - Are the values declared under the Energy labelling Directive, and threshold value to be respected, subjected to a tolerance?](#)

[FAQ n°3.2 - Should any verification tolerance quoted in the implementing measures under directive 2009/125/EC be higher than the measurement uncertainty?](#)

FAQ n°3.1 - Are the values declared under the Energy labelling Directive, and threshold value to be respected, subjected to a tolerance?

Yes.

The declared and threshold values benefit from a verification tolerance applied by the market surveillance authorities when they check the compliance of the product with applicable requirements. However, it should be noted that verification tolerances should not be regarded by manufacturers as an additional allowance when making the declaration of a product or when comparing against threshold values.

Due to uncertainties in measurements and to variations in the manufacturing of products of the same model, each product put on the market will likely have a performance different from the declared value (Energy labeling directive) or value stated in the technical documentation (Ecodesign directive). Therefore values to be declared (and threshold values to be respected) are nominal values for a model of products. The verification tolerance is applied by market surveillance on these nominal values, taking into account measurement uncertainties and manufacturing variations, is based on the state of the art and, when available, on the harmonized standards. Consistency of production is under the control of the manufacturer and therefore it is up to the manufacturer to account for this kind of variation when making claims in relation to eco-design or energy labeling regulations.

Furthermore, Ecodesign Regulations take into account this tolerance in the annexes named "Verification procedure for market surveillance purposes" which shall be used, by Member States authorities, for the purposes of checking conformity of products.

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FAQ n°3.2 - Should any verification tolerance quoted in the implementing measures under directive 2009/125/EC be higher than the measurement uncertainty?

No.

Measurement uncertainty is unavoidable and related to the measurement procedure, but setting the verification tolerance is a political decision. However, setting the verification tolerance close to the expanded uncertainty is a fair compromise.

More information is given in the [attached document](#).

Note: TF 2 is working on that item. A detailed guidance is under drafting.

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