

PEECA **Save Up** Label Compliance and Enforcement Policy

October 2023

1 Purpose

The PEECA **Save Up** label has been developed to enable governments, consumers and others to easily identify the most energy efficient products in the Pakistan market. This has the potential to achieve substantial savings in electricity bills, greenhouse gas emissions and peak energy demand.

To be effective, PEECA recognises the importance of protecting the brand identity of the **Save Up** label. As a result, PEECA has developed rules which aim to ensure the continued credibility of the **Save Up** label.

These rules include (a) **Save Up Supplier Agreements**, which apply to Suppliers registered with PEECA under the **Save Up** programme and (b) **Save Up General Rules**, which apply to all other parties, especially but not limited to Suppliers not registered with PEECA under the **Save Up** programme (see end of document).

These rules apply to all Suppliers of products within the scope of the PEECA **Save Up** programme. Initially covered products include Ceiling Fans, Residential Air Conditioners and Motors.

2 Compliance Framework

PEECA will monitor and enforce compliance with the **Save Up Supplier Agreements** and **Save Up General Rules** through a compliance framework that focuses on:

2.1 Engagement and Education

PEECA will provide information, education, and support to assist responsible parties (manufacturers/importers/retailers) to comply with the rules through a sustained communication campaign. This will aim to:

- publicise the rules;
- engage responsible parties and help them understand the rules;
- attend and present at industry and consumer fora on compliance related issues;
- publicise offences, contraventions, and adverse decisions.

2.2 Monitoring Compliance

Compliance monitoring activities will be targeted to assist PEECA to determine compliance issues at an early stage. PEECA will monitor compliance through the following:

- Registration
- Market surveillance
- Market intelligence
- Verification testing

2.2.1 Registration

For those within the programme, the two-part registration process enables PEECA to check the validity of Suppliers and individual models. The provision of contact details within Pakistan ensures that any problems or transgressions can be quickly resolved. The registration of technical details of each model allows PEECA to check that these are consistent with the relevant **Save Up Supplier Agreements**.

2.2.2 Market Surveillance

Periodic inspections of products where they are sold to customers in physical or online stores is a proven means to check whether products are being correctly labelled. There are a range of potential transgressions that can will be identified through market surveillance, including the use of labels on non-registered products, the use of fake labels, etc.

2.2.3 Market Intelligence

PEECA will encourage and act on substantiated information provided by Suppliers and consumers regarding the unauthorised use the **Save Up** label.

2.2.4 Check Testing

Verification testing refers to the activities undertaken to ensure that products using the Energy Label meet the energy labelling specifications.

Samples of products will be selected for testing using a risk approach (i.e. focused on areas considered most likely to be non-compliant); with the products sourced directly from the market and generally purchased anonymously on behalf of PEECA. The samples will be tested by a high-quality independent laboratory chosen by PEECA.

In general, a single sample will be tested initially. If this satisfied the requirements, then no further action will be taken. If the first sample fails to meet performance requirements, then a further two samples will be tested. If two or more of the three samples do not to comply, PEECA will then consider taking appropriate enforcement action (see below).

2.3 Investigating Non-compliance

PEECA assesses each instance of suspected non-compliance and, where appropriate, conducts an investigation to determine:

- Whether it is an instance of non-compliance with the PEECA rules;
- The circumstances relating to the non-compliance; and,
- The responses that should be considered to address the non-compliance.

2.4 Responding to Non-Compliance

PEECA can apply a range of response options available to them including informal educative approaches, administrative and public notification. These may include:

- Oral warning
- Written warning/notice from PEECA
- Suspending a registration (only for Suppliers registered with PEECA under the **Save Up** programme)

- Cancelling a registration (only for Suppliers registered with PEECA under the Energy Label programme)
- Public identification

2.5 Response Criteria

All Regulator responses will consider a responsible party's history, behaviour, motivation, and intention, and be proportionate to the risk posed by the non-compliance. In general, transgressions made by Suppliers registered with PEECA under the **Save Up** programme will be treated more leniently than cases involving Suppliers and other parties not registered with PEECA.

If the non-compliance is relatively minor, such as the incorrect use of the **Save Up** label by Suppliers registered with PEECA under the **Save Up** programme, then an oral warning will usually be given to the supplier so that they have the opportunity to take corrective action.

If the non-compliance concerns the non-authorized use of the label, such as labelling a product without first registering the Supplier and Model or the use of fake labels, then PEECA will consider this as a severe transgression.

In these cases, to protect the integrity of the **Save Up** and to ensure that Pakistan businesses and consumers are not misled, PEECA will publicly identify the nature of the offence, the name of the Responsible Party and details of the model in question. This information will be displayed on the PEECA website, passed the other suppliers and retailers and publicised through the national press.

PEECA Energy Label *General Rules*

The PEECA **Save Up** label may only be used by authorised Suppliers, which have signed a **Save Up Supplier Agreement** and on models that have an approved registration ID provided by PEECA.

The PEECA **Save Up** label may not be issued or used by any other party.

Only PEECA **Save Up** labels supplied by PEECA are valid. It may not be copied under any circumstances.

The PEECA Save Up label is a registered trademark under the Trade Marks Ordinance 2001 of Pakistan. Any unauthorised use of the Save Up label risks imprisonment or fines under the provisions within this Ordinance.