

The Magazine of the Consumers' Association of Ireland

Consumer Choice



www.thecai.ie

SEPTEMBER 2014

Uncalled For: The Cost of Ringing Directory Enquiries

€ MONEY

- NEWS
- WHO OWNS MY DEBT?
- CONTRACT RENEWAL

☀ LIFESTYLE

- DIRECTORY ENQUIRIES
- PRICE RIGHTS
- TRANSATLANTIC TRADE

📺 PRODUCT TESTS

- FRIDGE FREEZERS

September 2014

The Consumers' Association of Ireland

The Council is the policy-making body of CAI. Members are elected from within the CAI's membership at the Annual General Meeting.

Council Members

Chairperson

Raymond O'Rourke

Vice-Chairperson

Michael Kilcoyne

Hon Secretary

James Wims

Hon Treasurer

Richard Donohue

Council Members

Elaine Bolger

Frank Dawe

Timothy Murphy

Steen Bruun-Nielsen

Dear Member,

Consumers in Ireland lost two of their most concerned, determined, active and effective advocates in the month just ended. Ronald (Ronnie) Rumball was a founding member of the Consumers' Association of Ireland. He was one of that group of concerned citizens who met in the Shelbourne Hotel in 1966 and set about forming this Association so that Ireland could have a truly independent non-government organisation to fight for the rights of consumers. Ronnie maintained a constant contact with the CAI and was frequently a front row occupant at the Annual General Meetings.

So too was John Bolger, who with wife Elaine, was an equally committed advocate and lobbyist. Known far and wide across the consumer community and notably respected for his exceptional dedication to improving the lot of the people of Kilkenny, this retired teacher represented the Association on the ANEC Traffic Working Group for many years. ANEC is the

consumer voice on standardisation based in Brussels and to which the CAI has been a long contributing member.

The contribution of Ronnie and John will not immediately be appreciated or understood by Irish consumers but it was they who led the demands for rights, entitlements and legislation to protect consumers who purchase products and services every day. We would not have had the Sale of Goods & Supply of Services, the Consumer Information or the Package Holiday and Travel Trade Acts and all the life-changing benefits they have brought to millions of Irish consumers without the determination of these volunteers and others like them.

Ar dheas Dé go raibh a anam.



Dermott Jewell



Our Reports

Reports in Consumer Choice are based on market research, laboratory tests or user surveys, all of which are independently and scientifically conducted. Free goods are never accepted for testing – all samples are purchased. Occasionally items may be borrowed for review purposes only.

The reports are produced in the main by our own Editorial staff. Some material is occasionally drawn from other foreign independent consumer magazines.

Because Consumer Choice carries no commercial advertising it is not swayed by bias or influence and can point out advantages and flaws in goods and services that other magazines may not be able to do.

Reports on any article relate only to the articles or goods mentioned, and not to any other article of the same or similar description. We do not necessarily price or report on all brands or models within the class, and the exclusion of any brand or model should not be taken as a reflection on it.

Consumer Choice

Consumer Choice is published by the Consumers' Association of Ireland (CAI) Limited, a wholly independent, non-government, non-profit making body. CAI was founded in 1966 to protect and promote the interests of the consumers of goods and services, and to enhance the quality of life for consumers. CAI is registered with charitable status: CHY 8559.

Advertising is not accepted for publication. Consumer Choice is available on a subscription basis only. To facilitate banking requirements all cancellations must be advised, by letter or email only, a full 30 days in advance. Where a bank applies a €24 chargeback fee for a Member/customer advised cancellation we will deduct same from any refund requests. To subscribe please write to:

Consumer Choice,
26 Upper Pembroke Street,
Dublin 2.

Tel (01) 637 3961

Email cai@thecai.ie
www.thecai.ie

Published Material

No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form without obtaining prior permission from the Council by contacting the Consumer Choice office. It may not be used for any form of advertising, sales promotion or publicity.

© Consumers' Association of Ireland 2013
ISSN 0790-486X

Staff

Policy and Council Advisor

Dermott Jewell

Administration & Marketing

Caroline Lafferty

Design/Typeset

Denzil Lacey (Zava Media)

Researchers

Clodagh O'Donoghue

Roisin Moloney

May Celliff

Alex Tierney

Contents

 www.twitter.com/The_CAI

 www.facebook.com/ConsumersAssociationIreland



MONEY

6 Money News

The latest news and advice on money matters, including getting a better deal on your health insurance and controlling heating costs.

18 Who Owns My Debt?

With banks selling off loan books, Consumer Choice asks: What protection does the consumer have?

20 Automatic Contract Renewal

Automatic insurance renewal has both advantages and pitfalls. Here is what consumers should consider before signing up.

LIFESTYLE

12 Uncalled For: The Cost of Ringing Directory Enquiries

What consumers should know before calling directory enquiry services.

14 The Transatlantic Trade and Investment Partnership: Friend or Foe?

With opinion divided on the potential trade agreement, Consumer Choice examines the issues behind TTIP.

PRODUCT TESTS

22 Fridge freezers

With 22 fridge freezer models on test, Consumer Choice brings you the coolest of the bunch.

REMINDING YOU OF YOUR RIGHTS

10 This month we look at pricing - your rights and retailers' responsibilities.

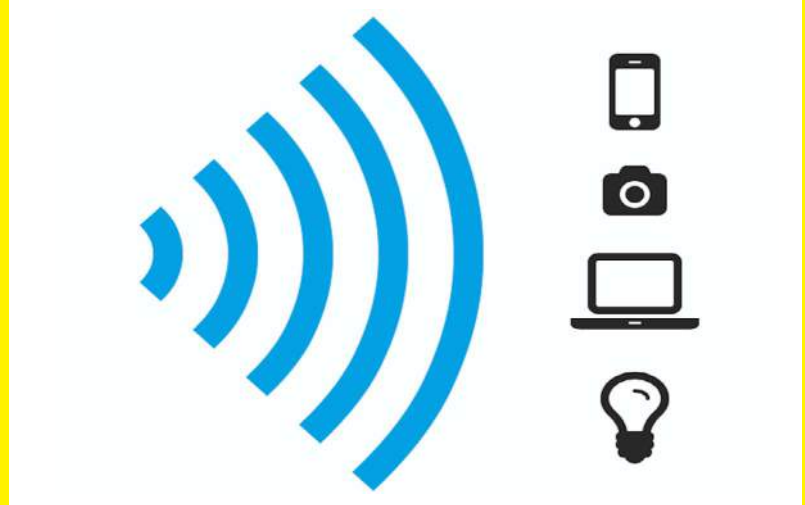


News Briefs

The latest information
on the world of the
consumer

EFSA Considers Potential Armaeggon

Complement of our colleagues at BEUC, the consumer voice in Europe and of which the CAI is a long-standing member, I learn how minds at EFSA (European Food Safety Authority) considered the consequences of extending the sell-by data and best-before dates for eggs eaten on their own or as ingredients in foods. Its conclusion is that this would increase Salmonella food poisoning risks. Our egg packages show both sell-by and best-before dates. The first one is straightforward for Irish consumers while the second is the period in which the eggs maintain their best quality, e.g. their texture and flavour. The EFSA states that extending the sell-by dates from 21 to 28 days would increase risk of infections by 40% for uncooked and 50% for slightly cooked eggs, respectively. Extending the sell-by date from 21 to 42 days would increase the risk threefold. EFSA considered that if Salmonella multiply more rapidly as the temperature and storage time rise then thoroughly cooking eggs reduces the risk of infection. If refrigeration helps reduce the risk of infections due to extended storage EFSA said that extending sell-by dates and best-before dates for more than three weeks would increase the risk of infection, even with refrigeration in shops. Salmonella cases in humans declined over recent years after Salmonella control programmes were implemented at EU level. Eggs remain the most important source of human infections in the EU.



Wi-Fi style-charging takes one step closer to reality

Unseen Beam Dream Machine

The New York Times recently carried news of the founder of a new US company uBeam and her exceptional talent as an astrobiologist. Meredith Perry has just amassed US\$750,000 in seed funding from some serious mainstream players, including Yahoo!, to make a wireless device that will produce ultrasound waves and facilitate the charging of your mobile and other devices. As I outlined here in previous months, up to now any wireless charging devices on the market require you placing your smartphone on a surface and using inductive coil technology to charge the device.

Meredith Perry, who, as a student, became inspired to create the technology when she grew frustrated by constantly running out of power on her laptop, has created a technology that can take electricity, convert it into sound and send airborne audio to the device you want to charge, which a receiver attached to the device will convert back into electricity. The prototype she built has already been turned into a fully functional device that is ready for mass production for consumers.

MEOWLD WI-FI'S NOT PURRFECT

A new hi-tech cat collar designed to sniff out unsecured Wi-Fi connections, known as the 'War Kitteh', has been showcased at one of the world's largest hacking conventions in Las Vegas. Known as Def Con, the convention brings some of the world's brightest and best hackers together resulting in the showcasing of some quite unique and impressive security tools. Despite the boring name it should be noted that, on just one of its test runs, the War Kitteh-wearing cat picked up 23 vulnerable premises, four of which had no password protection on them. The collar, while appearing entirely harmless, actually contains a Spark Core Wi-Fi development board which uses the operating system to detect any Wi-Fi broadcasting devices in homes and premises that might be unsecured. The cat's location is monitored using GPS. However, the collar's creators have emphasised how, in their view, the hacking community has spent far too long abusing its position and knowledge, rather than sharing it with the wider public. It is therefore their intention here only to raise awareness amongst providers of the vulnerabilities that exist in their systems.

THANK YOU MARY POPPINS

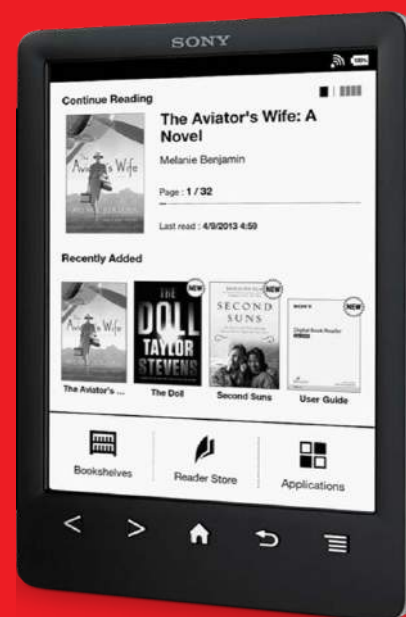
FAT	GDA 70g	0.75g per serving
SATURATES	GDA 20g	0.3g per serving
SALT	GDA 6g	0.3g per serving
SUGAR	GDA 40g	11.7g per serving
■ HIGH ■ MEDIUM ■ LOW		

While we continue to debate the benefits of traffic light labelling on food packaging in the EU, the US lobby group Centre for Science in the Public Interest (CSPI) is seeking the provision of information about added sugars there to improve consumers' information. The CSPI is lobbying the US Food and Drug Administration (FDA) to set a daily value for added sugars and to express it in teaspoons, a measure understood by all consumers and which will immediately advise how much of a day's worth a food contains. CSPI said the American Heart Association recommends that women consume no more than six teaspoons per day and men no more than nine. They also want to see front of packaging labelling provide better information per package. Eventually CSPI urged the FDA to require ingredients lists to be legible, including by using bullet points to separate ingredients from one another, which is already the case in Canada.

Caveat Emptor as Sony Say Sayonara

It has long been reported how Sony would be bringing an end to its e-reader business. They have now confirmed that their PRS-T3 e-reader will in fact be its last and that, once all of its European supplies and stocks have been sold, there will be no more. This last batch of the e-readers was manufactured in May and coincides with Sony's decision to stop selling e-books also in North America and Australia by this year-end. However, Japanese consumers will still be able to access the brand's Reader Store. Amazon dominates a large portion of the dedicated e-reader market with its Kindle range. However, experts believe

the global e-reader market peaked in 2011 when in excess of 22 million devices were sold worldwide and are now forecasting this will drop to below 10 million by 2017. This is predominantly fuelled by the growing use of smartphones, tablets and phablets that have made e-readers largely unnecessary for many users globally. For consumers, the growing losses at Sony means it is rapidly moving to close out on loss-making products and service, e.g. its Vaio PC business. Again, follow-up servicing and part availability will likely be problematic in terms of availability and, of course, price.



LEGALLY LIMITING CONSUMER CHOICE

Quite a significant number of consumers were surprised at the speed with which the September 1st ban was put in place by the European Commission on the sale of vacuum cleaners with a power rating in excess of 1600 watts. The background to this is the necessity for there to be energy saving reductions of 30% across the entire EU by 2030. Therefore, energy efficiency and the means through which consumers can cut down on their consumption and benefit climate change is being seriously examined in every detail.

There is now a study prepared which suggests a further potential 30 appliances where reductions could be achieved including hairdryers, kettles, lawn mowers, wi-fi routers and so on. These will be reviewed in January 2015 by the Commission with the intention of reducing the list to that of 20 appliances with significant potential for reduction. This is a serious issue for consumers which the CAI will follow closely. Efficiency through reduction of power seems at odds with reality and a cause for concern

regarding household costs. It will be important to monitor for these and other areas of focus for change over the coming years.



Food & Health

 by Clodagh O'Donoghue



“Five a day” is OK after all

Earlier this year, scientists from University College London (UCL) published a study indicating that, for optimum health gains, we should be consuming a rather challenging seven or more portions of fruit and vegetables a day. Encouragingly for those who are less than enthusiastic about eating their greens, a recent – and much larger – study indicates that going back to the more achievable and much touted “five a day” may be sufficient. Both studies offer evidence that suggests that eating more fruit and vegetables reduces the risk of dying from heart disease and cancer but they disagree in terms of the amounts needed to produce the maximum beneficial health effects. The UCL study, the findings of which were published in the *Journal of*

Epidemiology and Community Health in April, analysed data on the eating habits of over 65,000 people. It found that vegetables have a greater protective effect than fruit and that eating at least seven servings of fresh fruit and vegetables a day reduces the risk of death by cancer and heart disease by 25% and 31%, respectively. In the more recent study, published in the *British Medical Journal* in late July, researchers from Chinese and US universities analysed the results of 16 studies to give a total sample of 833,234 participants, of whom 56,423 had died. Findings indicate that the risk of death specifically from heart disease or stroke was reduced by 4% for each additional daily portion of fruit and vegetables consumed and that the average risk of death from

all causes was decreased by 5% for each additional daily serving, so that eating five servings a day lowered the risk by 25%. However, eating more than five portions a day was not found to reduce the risk any further. Although this latest research suggests that the protective effects of fruit and vegetables level off once you hit the five-servings-a-day mark, there is no evidence of any harm associated with eating a high-plant diet and other benefits may be conferred. It remains the case that most of us do not eat enough fruit and vegetables, so we do need to keep striving to increase our intake. Safefood offers some tips for how to achieve the five-a day target, which you can find at <http://www.safefood.eu/Easy-ways-to-eat-5-a-day.aspx>.

FSAI survey finds lamb kebabs containing little or no lamb

A survey carried out by the Food Safety Authority of Ireland (FSAI) in collaboration with the Health Service Executive has raised concerns about undeclared meat, such as chicken and beef, in lamb kebabs and lamb dishes sold in takeaway restaurants. The survey sampled ten lamb kebabs and ten lamb dishes from a number of independent takeaways in Dublin City and of the 20 items sampled, seven were found to contain meats other than lamb. Six of these were described on menus/menu boards as lamb kebabs and either contained no lamb at all or only contained lamb in tiny quantities. Instead, the six lamb kebabs were made up of over 60% chicken and between 5% and 30% beef. In addition, one lamb dish – minced meat for lamb skewers – contained

twice as much beef (over 60%) as lamb (around 30%). Although Professor Alan Reilly, FSAI's chief executive, stresses that this is not a food safety issue, he very rightly points out that consumers who order a lamb kebab expect to get a lamb kebab and not a chicken or beef kebab. As Professor Reilly notes, “incorrectly listing meat products on a menu or menu board, whether inadvertently or by design, is an unacceptable infringement of the labelling legislation” and the FSAI will ensure that appropriate action is taken on food businesses that are found to be intentionally misleading consumers.

On a more positive note, an FSAI survey undertaken as part of a wider EU initiative on food fraud has found no traces of horse DNA in 52

beef products analysed, including burgers, meat balls and pasta dishes, demonstrating compliance with regulations following the horsemeat scandal that surfaced in 2013. Indeed, results from across Europe are encouraging and show that measures to fight food fraud are working, with just 0.61% of 2,622 beef products sampled testing positive for horsemeat DNA – a significant improvement over the 4.6% of positive samples found in the first round of testing conducted last year. According to the European Commission, the 16 cases in which traces of horsemeat DNA were found are being followed up in the relevant member states with appropriate enforcement action, such as withdrawal and relabelling, being taken.

Health care cash plans

A new initiative from GloHealth could provide an affordable option for those who have given up on health insurance.

A new initiative from GloHealth could provide an affordable option for those who have given up on health insurance. Cash plans work by lowering the level of cover but give you the option of upgrading your policy should you require greater cover. Ideally suited to planned operations, you can call GloHealth and upgrade your policy to cover a hospital stay. If, however, you are involved in an emergency and need to be admitted to hospital, you can also invoke greater cover by unilaterally upgrading your policy. You can then call GloHealth within two weeks and retrospectively activate your increased cover. If you choose to convert your policy, you must commit to do so for 12 months. If you are part of a family plan you can have your own policy individually upgraded without converting the rest of the family members. These cash plans may be attractive to young people who are open to increased risk for lower premiums. Other insurance companies are unlikely to recognise time spent on cash plans with GloHealth where other traditional plans would be recognised.

Other more affordable options on the market are high excess policies. High excess policies are becoming increasingly popular with all health insurance companies as they offer again a more affordable option for those willing to take on a higher level of risk. With such a policy, your annual premium can be as low as €500 or €600, but the excess if you are admitted to a private hospital can be as much as €500. It is important with high excess policies, as it is with all policies, to read the detail carefully.

With great offers currently available on the market, now is a good time to compare your policy with potential alternatives. At the moment, VHI are offering half price cover for children and students on all their plans. Laya Health Care provides a similar offer



under Essential Connect Family, while Aviva are offering this on three of their corporate plans. GloHealth offers under three-year-olds free cover on most of their plans. The first step is to be aware of your renewal date so that as soon as the renewal notice comes through the door you will be prepared to act and not get stuck in another 12-month contract without first shopping around.

When shopping around, keep in mind that you have many options, including splitting your cover, taking on an excess, perhaps claiming student rates, and cancelling costly extras such as private room cover - and you can always look for a corporate plan equivalent to your current plan. Finding the right policy for you can certainly be a daunting task and the best strategy is to contact your provider and their competitors and ask what they have to offer. Ask the agent what is the nearest equivalent to your current policy that is offered across all their plans, including the company's corporate plans and nurses' and teachers' plans. It is important to know that it doesn't matter what the name of the plan is, we can all buy any plan but we must specifically ask for corporate plans or they are unlikely to be offered to us. Once you have identified some of the most suitable plans for you, you can then discuss increasing risk and decreasing or increasing cover until you find a premium that is suitable for your budget. Do not be afraid to ask exactly what you will be losing and gaining and ask the agent to

double check they have reviewed all their available plans for their suitability. Of course, you may feel that you are being fobbed off, the agent may offer to send you a pile of paperwork for you to read and choose your own policy, but do persevere with the call. Remember that the agent is in a far better position, being familiar with all the plans available. Health insurance does not come cheap so spending 30 minutes or more on the phone seeking out the most suitable plan can be a very valuable call. Do not expect to understand immediately what the agent is talking about and do not be afraid to ask for explanations as many times as necessary until you do understand what you are buying into. Be patient as the savings can be great as well as the level of cover achieved but you must be willing to switch.

In relation to waiting times, remember that if you have satisfied your waiting period with another provider, you do not have to serve another waiting period and you will be insured immediately if you switch - however this may not be the case with the newest cash plans available from GloHealth. Another important point to bear in mind is that going public is not free. For example you must pay €75 per night for the first 10 nights in hospital amounting to €750, while you can take out health insurance for as little as €500 per annum for an adult and €130 for a child - it can become a matter of risk that needs to be considered as opposed to cost alone.

Controlling heating costs this winter

Now that we are facing into the autumn and winter, the burden of heating costs comes to mind. Unnecessarily wasting energy on heating can be a matter of inefficient products, lack of home insulation and a series of bad habits. Lowering your heating costs can begin with looking at your daily habits and making some simple changes. Turning the radiator down in any room that is rarely used is a start - however, check for signs of damp or condensation regularly. Opening curtains lets natural light and warmth heat your house in the daytime and closing them at night keep draughts at bay. Hanging curtains behind front and back doors can make a significant difference. Take some time to ensure you are using your central heating controls effectively including the timer, zoning your heating, servicing your boiler and ensuring you have the correct temperature. Remember to reach for a jumper when you feel that nip in the air.

A major low-cost measure you can take to prevent heat loss through windows and doors, which can waste a third of the energy used to heat buildings, is insulation.

Insulating methods can include the following:

- Add a self-adhesive foam or rubber seal around door cavities and add a threshold strip to the bottom of the door with a brush to cover any gaps.
- Draught-proof your letterbox with a seal around or under the flap, put a brush inside and protect keyholes with a cover.
- Seal draughty gaps between skirting boards and the floor - this can be done with

wood molding or flexible silicon sealant.

- Insulate the loft hatch with a strip of foam or rubber seal.
- Unlagged cylinders lose heat from their surface - put a cylinder jacket over an uninsulated cylinder to prevent this heat loss.
- A heat-reflective foil can be fitted behind radiators on outside walls with the shiny side facing into the room. This reflects heat from the surface of the radiator into the room and away from the wall.

Those wishing to invest a little more in energy efficiency may consider insulating on a bigger scale. Insulating can cut your

energy bill significantly and now is the time to carry out these works with grants available. The Sustainable Energy Authority of Ireland (SEAI) under the Better Energy Home Scheme is offering home owners grants to upgrade their homes with energy efficient measures to reduce energy use, costs and greenhouse emissions. Grants are provided for roof insulation, wall insulation, boiler and heating control upgrades and solar panels. Grants are, however, only eligible for homes built before 2006 and approval must be in place before works commence. The work must be completed to SEAI standards by a registered contractor. For more information and further terms and conditions see http://www.seai.ie/Grants/Better_energy_homes.

SEAI Grants

Energy efficient works	Incentive Grant value
Attic Insulation	€200
Wall Insulation Cavity	€250
Wall Insulation Internal Dry Lining	
Apartment (any) OR Mid- terrace House	€900
Semi-detached or End of Terrace	€1,350
Detached House	€1,800
Wall Insulation - External	
Apartment (any) OR Mid- terrace House	€1,800
Semi-detached or End of Terrace	€2,700
Detached House	€3,600

Cash grants are a set value based on 30% of the average cost of the works - if expenditure is below this set value then only actual expenditure will be reimbursed.

The minimum grant application amount is €400.

Credit union ads non-compliant

A review of advertising standards in the financial sector has found that 66% of credit union advertisements surveyed fall down on the advertising requirements of the European Communities (Consumer Credit Agreements) Regulations 2012 (CCR). The Central Bank has examined print, radio, TV and online advertisements in circulation for a 12-month period in a sample of 23 financially regulated firms. The results show that 30% of the 291 advertisements did not contain all the relevant information or display the information in a clear, concise and prominent way.

Only one third of credit union advertisements met the CCR requirements. This is compared to 99% and 88% compliance rates for the sample of banks and money lenders, respectively. The Central Bank regularly reviews regulated firms' compliance with the advertising requirements of the Consumer Protection Code 2012. It is proving effective in its work as a 2013 investigation of 182 general advertising issues resulted in 154 advertisements either being withdrawn or amended. As highlighted by the Central Bank's Director of Consumer Protection Bernard Sheridan, consumers must be confident that financial products and services, including loans, are advertised and marketed in a way that is clear, fair and not misleading. If you feel that any regulated firm's advertisements or promotion - which can include TV, radio, print, online, flyers, etc - is unclear, inaccurate or misleading, you can report the advertisement to the Advertising Unit in the Central Bank at advertising@centralbank.ie.



Product/Tech News

Smart clothes shopping

Shopping for clothes online can be a very convenient way of updating your wardrobe but, of course, the downside is that you cannot try the items on before you buy. As a result, there is often the disappointment of realising that the clothes delivered to your door either do not fit at all or do not suit your body shape - which then means you have to tackle the less convenient process of organising to return the outfits to the online retailer. Now, two French entrepreneurs are seeking to revolutionise online clothes shopping with a virtual fitting room service called Fitle that allows you to see what your potential purchases will look like on a 3D avatar of yourself.

To use Fitle, you enter your height and four photos of yourself taken from different angles. In just 30 seconds, Fitle produces a customised 3D representation that, according to the company's founders, is 99% accurate. Fitle uses the same recognition and reconstruction algorithms that it uses to create the 3D avatars to digitise clothing from its partner brands. As well as numerous French brands, the company has also signed up such familiar names as Levi's, H&M and Ralph Lauren and says it has already digitised the catalogues of over 250 brand partners to date.

Fitle can help users to judge how various clothing items will fit and suit them before they make a purchase. It also remembers previous purchases, so if you buy a pair of jeans and a couple of months later are looking for a top to match, you can see what the two items will look like together on you. The company recently passed its crowdfunding goal on Kickstarter and plans to go live with its new service early in the new year, initially in the US and France.

F I T L E

FIT & STYLE.



Running on rotten food

UK supermarket chain Sainsbury's has developed a way to power one of its stores entirely by its own food waste. Vast amounts of food waste are generated annually, both domestically and commercially, with one significant source being the tons of food thrown out daily by supermarkets because it has gone off before it could be purchased. Sainsbury's already has an effective programme in place for putting unsold food to good use and it is now seeking to utilize the potential of rotten food collected from its stores to supply the energy needs of one of its supermarkets. The retailer has partnered with waste management company Biffa to generate electricity from food waste through the process of anaerobic digestion and this energy will be used to power the Sainsbury's store in Cannock in Staffordshire.

The Sainsbury's food recycling process works as follows: At the end of each day, unsold food that is a little past its prime but still edible can be collected by the store's charity partners to be redistributed and food that is not ok for human consumption is donated to zoos or used in the production of animal feed. Food that is not suitable for any of that is collected from the chain's supermarkets across the UK by the same trucks that deliver fresh food - meaning that no special trips are made, thereby generating carbon savings. The rotten food is then brought to the central Sainsbury's depot where it is picked up by Biffa's trucks and transported to the waste management company's plant in Cannock to be fed into an anaerobic digester. The food waste is broken down to produce bio-methane gas, which is used to generate electricity. A new 1.5-km cable now runs directly from the plant to the Sainsbury's Cannock store and the plan is that this will be used to supply all of the store's day-to-day electricity needs. If too much electricity is generated, this will go back into the UK's National Grid.

Since June 2013, Sainsbury's has achieved its goal of putting all its food waste to positive use and diverting it from landfill, with the vast majority of it going to Biffa's anaerobic digestion plant and generating enough electricity to power the equivalent of 2,500 homes a year. These sustainability efforts are certainly laudable but there is an argument that the greater challenge is to avoid generating these massive levels of food waste in the first place.

The products featured on these pages have not been tested by the Consumers' Association of Ireland and their inclusion here is not, in any way, an endorsement of them.



Product News by *Clodagh O'Donoghue*

Can you hear me at the back?

If your abiding memory of this summer was shouting at the kids in the backseat as you drove around the countryside, you might appreciate a new parent-friendly feature that Toyota will be introducing in its 2015 Sienna minivan. Driver Easy Speak is an optional microphone system that drivers can use to amplify their voice via loud speakers positioned in the back of the car. Instead of shouting themselves hoarse, parents at the wheel can effectively relay the familiar “If-you-don’t-stop-messing-in-the-back-I-am-turning-this-car-around” message to misbehaving youngsters behind them without raising their voice. This is particularly useful in this spacious vehicle, which seats eight passengers (and up to ten in certain configurations) - so being heard in the third row could be a challenge without the help of the built-in microphone, which is accessed using a seven-inch touchscreen panel positioned to the right of the wheel. Drivers can also keep an eye on what is happening in the back with a pull-down conversation mirror that lets them glance at their rear-seat passengers without having to turn around to look at them or adjusting the main rearview mirror. And if stern words or a fierce glare doesn’t work, parents can always use the dual view Blu-ray entertainment system to quieten down restless kids on lengthy family trips.



Multitasking hair clip

For €6, you can buy a Leatherdos hair clip that does a lot more than simply keep your fringe out of your eyes. Made from stainless steel, it may not be the most glitzy of hair accessories but it is akin to a Swiss army knife in terms of its range of uses. Not initially aimed at women, this product was originally designed as a means of fastening Jewish men's yarmulkes to their heads and it doubles up as a handy toolbox for emergency DIY situations. For example, if you are wearing the Leatherdos multitool clip in your hair and the need suddenly arises to tighten the screws on your sunglasses, you have the perfect tool ready and waiting - simply remove the clip, shake your hair loose and get to work. In fact, there are three different-sized screwdrivers on the clip as well as an 8-mm wrench. The serrated edge can be used for small cutting tasks and you can use the ruler along the opposite edge to do a spot of measuring up. And the manufacturer says the end can be used as a substitute for a trolley coin when you are out grocery shopping. In all, a must-have for the girl scout or anyone keen to be always prepared.

Don't just sit there

Sitting is the new smoking, according to many health experts, who point to the detrimental effects of our sedentary lifestyle, as we move from one seated position to another throughout the course of the day - from car to desk to car to sofa. Apparently, even those of us who adhere to World Health Organisation guidelines for 30 minutes of moderate exercise five days a week are undoing all our good work if we then sit at a desk for eight hours a day. Such prolonged periods of inactivity have been linked to increased risk of a range of conditions including obesity, heart disease, diabetes, colon cancer, and depression, and there is evidence that people with sitting jobs have twice the rate of cardiovascular disease as people with standing jobs. In response

to such findings, a variety of products has been developed in recent years, including the standing desk - so that you don't have to sit down as you tap away at your computer and can offset the ill effects of remaining seated for long periods. And for those who don't relish the thought of standing throughout the workday, one option is the height-adjustable Varidesk, priced from €375, which allows you to switch between sitting and standing using the handles at the side of the desk to raise and lower it as needed. Instead of getting you out of your chair, a number of active desk solutions let you wobble, wiggle, bounce and otherwise engage your muscles as you sit - including the appropriately named Wigli, priced at €339, that moves the pelvis in all

directions as you try to remain seated. One of the latest offerings aimed at enabling people with desk jobs to burn some calories as they check their emails is the Cubii elliptical trainer - a compact device that fits under your desk and lets you pedal away as you work without distracting you from the task in hand. It is designed so that your knees won't bump off the desk as you pedal and its quiet operation means you won't disturb your colleagues as you burn an average of 120 calories an hour. You can adjust the resistance of the pedals depending on how hard you want to exercise and useful features include a built-in carry handle and an accompanying app to monitor distance travelled and so on. The Cubii costs from \$319 and is due to start shipping in December 2014.

Reminding you of your rights....Pricing

In a new series, Consumer Choice offers a refresher course on consumer rights, looking at a different area in each issue.

This month, we focus on pricing – the rules for retailers and what consumers need to know. When it comes to buying products and services, the most basic information consumers need is the price. At the CAI, we frequently are asked questions in relation to pricing, so here is a rundown of the current consumer legislation.

Are retailers allowed to charge whatever price they want?

Sometimes, consumers may feel that retailers are charging too high a price for an item but, in general, legislation does not control pricing and retailers are free to set whatever prices they choose. Some retailers may opt to charge a significantly higher price for the same or similar product than their competitors and they are within their rights to do so. In a free and competitive market, it is then up to the consumer to decide if they wish to pay that price. The CAI always urges consumers to shop around and seek out the best available value.



Do retailers have to display their prices?

In order to allow consumers compare prices and make informed decisions about their purchases, the legislation requires retailers to display the price of all goods on offer. The price shown must be the complete price, including VAT or any other charges or extras. Prices should be displayed either on the product or near it - for example, on the edge of the shelf on which the product is placed. If the product is sold by weight or volume, the retailer must show both the actual price of the product and the unit price - for example, the price per kilo or litre. This enables the consumer to make a more accurate price comparison and assess value for money. Again, the unit price must be displayed on or near the product on the shelf. When it comes to service providers, the requirements vary but, in general, hairdressers, barbers, petrol stations, pubs, cafes and restaurants must display price lists in such a way that consumers can check them without having to enter the premises - for example, in the window or on a board placed outside. Hotels must display maximum and minimum prices in hotel bedrooms or in an information folder.

Do prices have to be displayed in euro?

Under EU legislation, the price of products on sale in Ireland must be displayed clearly in euro. The product may also be marked with the price in other currencies - for example, sterling - and there is no requirement that the euro price be larger or more obvious than the price in other currencies. It can be frustrating to see a sterling price alongside a euro price that is not its equivalent conversion under the current exchange rate but retailers can set prices at whatever level they want and are not obliged to charge comparable prices in the UK and Ireland. Often, retailers will argue that the higher euro price is due to higher operational costs in Ireland.

Does the retailer have to sell a product at the price displayed?

Retailers cannot deliberately mislead consumers when displaying prices, but they are allowed to make a genuine mistake and they are permitted to correct this mistake right up to the point of sale. Thus, if the price is displayed on an item is lower than the retailer intended to sell it at and a consumer brings the item to the till, the retailer is entitled to refuse to sell the item at the lower displayed price and the consumer can decide not to buy the product at the new stated price. Once the mistake is uncovered, the incorrectly marked price should be adjusted as soon as possible.

Can retailers raise or lower their prices as they like?

There is no legislation to prevent retailers from increasing their prices to take advantage of a special occasion or time of year. Equally, retailers may decide to reduce prices, but if they do so they must not give misleading or false information about the previous price charged. Businesses cannot claim that goods have been sold at a higher price and are now on sale for a lower price unless the goods were actually on sale at the higher price for a "reasonable period," which is generally understood to be 28 days in the three months before the price reduction.

How are the rules on pricing enforced?

The government-funded National Consumer Agency (NCA) has statutory powers of enforcement and can take action against businesses for breaches of consumer law, including misleading pricing and failure to display pricing. If consumers notice any breaches or examples of unfair or misleading practices by businesses, they can report the issue to the NCA.



...know your rights

Become familiar with your rights by visiting the "Your Rights" section of our website at www.thecai.ie or download our brand new app from the App Store.

Uncalled For: The Cost of Ringing Directory Enquiries

No doubt you know the numbers 11811, 11890 and 11850. But do you know what they charge?



REPORT by Alex Tierney

At a glance

- Set-up fees
- Call transfer costs
- Cheap options
- Any justification?

In 2009 we took a look at the main directory enquiry providers in Ireland in order to show you exactly how much a call to each one of them costs. At that time a Comreg survey had revealed that over 40% of respondents had no idea what they were paying when they dialled 11811, 11850 or 11890. The question is: do they now? Our latest research shows that while consumer awareness may or may not have grown, the directory enquiry charges most certainly have, in some cases leaping upwards by over 200%. For example, the most expensive one minute call from an Eircom landline in 2009 was to 11850 at €1.24; now it is to 11850 at €5.58.

The latest 11850 increase occurred as we were finalising this article, and we have included 11850's previous price (valid until end of August 2014) in the tables in order to show you how dramatically their charges can jump.

We have laid out for you the current prices (opposite). You may want to read them before making your next call.

Set-up charges

When you ring a directory enquiry number you are automatically charged a set-up or connection fee the moment an operator answers your call. This means that no matter how quick the call is, and how efficient the service, the price will already be high. Eircom 11811's set-up fee is €2.10; 11890's is €3.40; and 11850's is €2.79. In cases where the number is ex-directory and the operator cannot find it, these basic costs still apply.

In addition, some of the providers have a minimum fee. 11811 charges by the

second from the beginning so after you incur the set-up fee the remainder of the price will be dependent on the length of the call. (For example, a 30 second call will cost you €2.76.) 11890's set-up includes the first minute of the call, so you will pay €3.40 until you go above 60 seconds. 11850, on the other hand, charges a minimum fee of one minute (€2.79) alongside the €2.79 connection fee, so each call will cost you at the very least €5.58. Again, this is prior to requesting or receiving service.

As part of our research, we called all three providers; not one of them informed us of the connection or minimum fees when they took our call. This lack of early information leaves you at an obvious disadvantage, because unless you have looked up the price of the service before calling, or noted it down from an ad, or read this article, you won't know how much you have been charged until you see your phone bill.

1 minute call to a national directory enquiry provider

	Eircom Land-line	Vodafone Pre Pay	Vodafone Bill Pay	Meteor Pre Pay	Meteor Bill Pay	O2 Pre Pay	O2 Bill Pay	3 Pre Pay	3 Bill Pay
11811	€3.42	€2.98	€1.70	€1.98	€2.02	€2.36	€2.98	€4.26	€3.26
11890	€3.40	€2.98	€1.70	€1.98	€2.02	€2.00	€2.98	€4.26	€3.26
11850	€5.58 €4.38	€2.98	€1.70	€3.18	€3.18	€2.00	€2.98	€4.26	€3.26
11888	€0.60	€2.98	€1.70	€1.98	€2.02	€1.00	€2.98	€4.26	€3.26

1 second call (i.e. connection plus minimum fee) to a national directory enquiry provider

	Eircom Land-line	Vodafone Pre Pay	Vodafone Bill Pay	Meteor Pre Pay	Meteor Bill Pay	O2 Pre Pay	O2 Bill Pay	3 Pre Pay	3 Bill Pay
11811	€2.12	€1.49	€0.85	€1.98	€1.01	€1.18	€1.49	€4.26	€3.26
11890	€3.40	€1.49	€0.85	€1.98	€1.01	€1.00	€1.49	€4.26	€3.26
11850	€5.58 €4.38	€1.49	€0.85	€3.18	€1.59	€1.00	€1.49	€4.26	€3.26
11888	€0.60	€1.49	€0.85	€1.98	€1.01	€0.50	€1.49	€4.26	€3.26

Call completion/transfer

Call completion is a service offered by all three providers wherein the operator, after finding the number you want, asks you if you would like to be transferred to it. If you say yes, a short automated message will play prior to the transfer, warning you that you will be charged at the quoted price for the remainder of the call. It is crucial that you pay attention to this message. Some people presume that once they have been transferred, they are back to paying normal Eircom landline charges. This couldn't be further from the case. If you select call completion with 11811 you will continue to pay roughly 2.2 cents per second, or €1.32 per minute; with 11890, 99 cents per minute (with per second billing); and with 11850, €2.79 per minute (with per second billing). Our table showing the price of a 10 minute call using call completion gives you a good idea of how the costs can quickly add up if you stay on the phone for any considerable length of time. By way of comparison, a normal, 10 minute daytime national call on an Eircom landline would cost you 97 cents.

In addition to the costs involved, you should remember that call completion doesn't guarantee that your call will be completed. For example, the person you are calling might not answer the phone in time. If, for whatever reason, you don't get through, and you have not written down the number, then you might have to start the whole process from the beginning.

The Cheap Option

As you may have gathered, cheap is not an easy word to find a place for in this article. Of the three main numbers, 11890 is the cheapest once the call hits the minute mark, yet €3.40 is still a high charge, and 99 cents per minute can still make an ugly mark on your phone bill.

On the other hand, 11888 - 11850's low call number - offers a more reasonable price: with a 10 cents set-up fee and a charge of 50 cents per minute, you will most likely be able to get your number for a relatively low 60 cents. 11888 does not offer call completion but you are probably better off without it. There is little or no advertising surrounding the 11888 number, meaning it is likely that you will never have heard of it, unless you've gone onto 11850's website, or complained to their

10 minute call using a national directory enquiry provider

	Eircom Landline	Vodafone Pre Pay	Vodafone Bill Pay	Meteor Pre Pay	Meteor Bill Pay	O2 Pre Pay	O2 Bill Pay	3 Pre Pay	3 Bill Pay
11811	€15.31	€16.39	€9.35	€10.89	€11.11	€12.98	€16.39	€23.52	€22.52
11890	€12.31	€16.39	€9.35	€10.89	€11.11	€11	€16.39	€23.52	€22.52
11850	€30.69 €24.09	€16.39	€9.35	€17.49	€17.49	€11	€16.39	€23.52	€22.52

customer care team about the high cost of 11850, or read this article. Both 11890 and 11850 provide a texting service: a text to 11890 costs your standard network rate, and the reply is €2.00. A text to 11850 costs your standard network rate, and the reply is €2.50. If the number you are looking for cannot be found, you will only pay the standard network rate. The cheapest option of all, if you have Internet connection, is to use the services' free online search engines. You can find them at 11850.ie, 11890.ie or eircomphonebook.ie.

Is there any justification for such high costs?

We wrote to the three providers and asked if they would like to comment on the prices they charge. An 11850 spokesperson said only that 11850 provides its customers with the highest levels of speed and accuracy, but those customers can use the free Internet service if they aren't time-constrained. 11811's spokesperson attributed the high prices to a continuous decline in consumer demand, as did the spokesperson for 11890, who pointed also to the undiminished cost of maintaining

the National Database, staff, advertising campaigns, and the technical infrastructure for the phone and computer system. Both 11811's and 11890's spokespeople stated that while they set the prices for Eircom landlines, they have no control over what other networks charge for the services.

The decline in demand is inevitable: with smartphones and widespread broadband access, there simply isn't as much need now for the directory enquiry phone services as there used to be. But is it reasonable to combat this decline by levying such high prices on the consumer? And would the methodology of sharply increasing prices be an effective one if consumers were fully aware of what they were paying? And what about the people who don't have smartphones or Internet access? If you do not have the means or the technology to employ the free options that the services provide, you should, at the very least, know exactly what you are going to be charged before making your next call.

1 minute call to an international directory enquiry provider

Each service provides a number for international enquiries. Coupled with 11811 there is 11818; with 11890 there is 11891; and with 11850 there is 11860. See the table for a quick indication of the prices they charge.

	Eircom Landline	Vodafone Pre Pay	Vodafone Bill Pay	Meteor Pre Pay	Meteor Bill Pay	O2 Pre Pay	O2 Bill Pay	3 Pre Pay	3 Bill Pay
11818	€2.54	€4.00	€1.30	€2.98	€3.02	€2.28	€4.00	€2.54	€2.54
11891	€2.28	NA	NA	NA	NA	NA	NA	NA	NA
11860	€5.98 €4.98	€4.00	€1.37	€3.18	€3.18	€2.45	€4.00	€2.54	€2.54

-All prices are correct as of 2nd September 2014

-All prices quoted in the body of the article are for an Eircom landline

-All mobile prices are taken from the price plans of the respective operators

-O2 Bill Pay prices are for Open Plan customers

-Vodafone Bill Pay prices do not include Vodafone Red customers

-With 11891, mobile costs are not applicable (NA) as the service is only open to landline customers.



The Transatlantic Trade and Investment Partnership: Friend or Foe?

The potential trade agreement is lauded by some, denounced by others. What exactly are the issues behind TTIP?



REPORT by *Alex Tierney*

At a glance

- Proposed benefits
- Potential drawbacks
- Need for transparency

TTIP, or the Transatlantic Trade and Investment Partnership, is a prospective free trade agreement between the European Union and the United States. Following an assessment made by the High Level Working Group on Jobs and Growth, the world's two largest economies entered negotiations in June 2013, with the European Commission (EC) on one side of the table and the Office of the United States Trade Representative (USTR) on the other. They have completed six rounds to date, but the finish line, by all accounts, is still a long way off. The EU Commissioner for Trade Karel de Gucht is eager to see it wrapped up by the end of 2015, but some analysts are less optimistic, stating it is unlikely that an agreement will be reached before 2017.

The main objective of the agreement is to potentiate trade and investment between the two parties by eliminating tariffs; tackling costly non-tariff barriers (NTBs),

such as unnecessary red-tape measures; harmonising regulatory procedures; and providing greater protection for foreign investors by setting up an Investor-State Dispute Settlement (ISDS) mechanism, an independent tribunal that handles cases taken by foreign investors against the country they have their industries in. Critics of the agreement, from non-governmental organisations (NGOs) to consumer rights watchdogs such as BEUC to concerned citizens, have argued that meddling with current regulations in the name of a smoother flow of trade could have a negative impact on health and safety measures and environmental protection safeguards. In particular, the ISDS has come under fierce attack, on the grounds that it is anti-democratic, anti-transparent, accountable to nobody, and enables an industry to sue the government of a sovereign country anytime it feels its profits

threatened by government regulations. A final concern is the lack of transparency in the TTIP negotiation process itself.

Proposed benefits

The EC, relying mainly on a report it commissioned from the Centre for Economic Policy Research London (CEPR), predicts an addition of €119 billion a year to the EU's economy (a 0.5% GDP increase) if a successful agreement is reached. It says that hundreds of thousands of new jobs stand to be created; that the consumer will experience a greater range in choice of goods and benefit from more competitive prices; and that overall an average EU family of four will enjoy an extra €545 in annual income. If this forecast is accurate, the Irish economy could stand to benefit significantly (seeing that in 2013 the US was Ireland's single largest exporter market for goods) and the agreement has been

lauded by the Minister for Jobs, Enterprise and Innovation Richard Bruton, who says that we need to grab all job creation opportunities with both hands. The allure of optimism aside, however, it is important to note that the above figures comprise the CEPR's "ambitious estimate"; something the EC press releases do not always highlight. According to the "less ambitious", the estimated gain for Europe is significantly reduced to €68 billion. Furthermore, the figures are applicable to 2027, not next year or the year after- another point that the EC doesn't always bring up.

Non-tariff barriers to trade

At present, the average EU-US tariffs are between 3% and 5%, meaning that their elimination, while desirable, will not make an enormous difference. Rather, it is in the area of NTBs that true returns will be sought, with the CEPR report estimating that 80% of the total gains would be achieved by tackling them. With regard to goods exported from the US, high levels of NTBs have been reported for food and beverages, chemicals, cosmetics and biotechnology. One NTB that has been highlighted is the need for many products that are produced in Europe and shipped to the US to undergo duplicated regulatory inspections. It is argued that these two separate inspections should converge under a harmonised body that would afford goods a quicker, less costly transition. Both parties would share information and techniques in an attempt to achieve a unified best practice standard.

For opponents of the scheme, this implies a race to the bottom rather than the top, comprising lighter regulation that will weaken the standards of one party in order to strengthen the industry of the other. A leaked TTIP document states that the exporting party should have sole responsibility for implementing control protocols and inspections, meaning the importing party would have to take it on faith that the goods coming into its territory had been adequately vetted in line with its own standards. As a safeguard, the importing party would be able to carry out inspections and audits on the exporting party's safety measures, but it is unclear how often it would be able to do so, even in practical terms. Inevitably, such a system would require a huge amount of trust, and while the EU and the US like to pay homage to the strength of their relationship, the public are a lot more sceptical.

While President Obama, the USTR, the EC and de Gucht have all repeatedly vowed that safety regulations will be vigorously respected and upheld

on both sides, there are certain issues that merit scrutiny. In particular, many Europeans are extremely concerned that regulatory convergence within the food and agriculture trade will open EU markets to products and practices previously deemed unacceptable. The EU's general approach to food safety is characterised by the Precautionary Principle, which states that when a product is suspected of posing a risk to public health or the environment, yet the suspicion is not supported by copper-bottomed scientific data, the regulatory bodies may nevertheless take action to remove it from the market. Of course, this has led to disputes over products and practices that the US considers to be perfectly safe but are heavily regulated within the EU.

Genetically modified organisms

In the US, Genetically Modified Organisms (GMOs) are accepted as standard, while in the EU all GMO foods are investigated by the European Food Safety Authority (EFSA) on a case-by-case basis. Those that are approved for the market must carry GMO labels and there is a ten-year time limit put on each authorisation. The EC has categorically stated that the basic EU law regarding GMOs is not part of the negotiations and thus the general policy will not change, but there is little doubt that US agricultural stakeholders would love to see the heavy regulations tempered, and it should be taken for granted that pressure is being put, one way or another, on the EC negotiators over this issue. Certainly, it has been a contentious issue for a long time and the EU has been accused in the past of employing these restrictions for the sake of protectionism rather than out of genuine safety concerns. In June of this year, a new EU law was passed allowing individual member states to decide on a domestic level whether they want GMOs or not. Both GMO producers, such as Monsanto, and anti-GMO activists are furious - the first saying that the new law turns what should be a scientific debate into a political/nationalist one; the second that the basic EU law notwithstanding, individual countries will now come under pressure from GMO industries to open a "back door" into the European market. The battle over GMOs is constantly being waged and any complacency or increased tolerance fostered by new regulatory procedures would be eagerly exploited.

Chemical carcass treatments

Another point on which the EU and the US differ is the use of chemical carcass treatments. In the US, the application



of chemicals to animal carcasses during the slaughtering process is an authorized and common practice. This entails the carcasses being washed with substances such as chlorine dioxide in order to decontaminate them. In the EU, there are no authorised chemical treatments, though some are being tentatively considered for possible supplementary use alongside the standard hygiene procedures, with the EFSA conducting an investigation into four chemical substances (chlorine dioxide, acidified sodium chlorite, trisodium phosphate, and peroxyacids) to ascertain whether their application poses any health threats or might cultivate bacterial tolerance to the treatments. At present, the EFSA acknowledges that there are still a number of uncertainties surrounding the use of the above chemicals. Furthermore, the very idea of them is unpopular with the public, as shown by a *Which?* survey where the majority of respondents were against chemical treatments even if they guaranteed greater hygienic efficacy. The approach in the EU, valued by many, is one of farm to fork, where the amount of artificial tampering with foodstuffs is kept to a minimum.

Beef hormones

The use of artificial beef hormones is also a contentious issue, one that the two parties have fought over since the 1990s at the World Trade Organisation in what is referred to as the Beef Hormone Dispute. Both the US and Canada maintain that there is now enough scientific data on the subject to prove beef hormones are completely safe for livestock and consumers, but the EU, guided by the Precautionary Principle, banned the import of hormone-treated meat following the mad cow disease crisis and has since refused to rescind that prohibition.

Again, in spite of de Gucht's and the Commission's assurances that these safety regulations are not up for discussion, it is a certainty that the US is interested in gaining an acceptance of beef hormones and a lifting of the ban. The US ambassador to the EU Anthony Gardner was recently quoted in an article in the *Wall Street Journal* as saying, "We should be talking about why Europe ignores the scientific advice from its own agencies," which appears to suggest that Mr. Gardner considers Europe's objections to hormones and chemical carcass treatments to be unwarranted. For opponents of TTIP it does not matter whether or not the Americans agree with the European model of regulations; it only matters that they agree to abide by them.

Investor-state dispute settlement

The Investor-State Dispute Settlement mechanism is possibly the most contentious proposal on the TTIP negotiating table. ISDS bodies are international tribunals that deal with legal claims made by foreign investors/industries against the country that is hosting their business, and generally whenever a trade agreement is being drawn up an ISDS provision will be included. The EU is currently involved in thousands of bilateral treaties, many of which provide industries with a recourse to ISDS mechanisms.

The EC's position is that all investors need to have a staunch form of legal protection when establishing their business in a foreign country. In cases where a government expropriates their assets or issues regulations that are specifically targeted to damage their business interests and afford their competitors an unfair advantage, it might not be feasible for the investor to seek redress from a domestic court system run by that same government. Hence the need for an international arbitration body outside of the jurisdiction of the offending state and not swayed by any bias or subjective interest. Opponents of the ISDS argue that on the contrary, the nature of the mechanism provides for a huge amount of bias, but in favour of the industry rather than the government. The clauses are incredibly vague and industries are given a considerable amount of leeway when it comes to making a claim. For example, they can file under a violation of their guaranteed minimum standard of treatment clause, which industry advocates have taken in the past to mean any government measure that has had a negative impact on the claimant's assets

or expected profits. In a similar vein, they can claim that indirect expropriation took place instead of direct, the former being elastic enough to fit around any regulations leading to loss of profits.

NGOs and consumer rights watchdogs maintain that the structure of the tribunal is inherently flawed. Each case is heard by a rotating panel of three attorneys, and it is claimed that many of the attorneys also act as advocates for industries on separate occasions, creating a conflict of interest. Furthermore, the standard fee for an advocate is \$3,000 a day, providing them with little incentive to throw out frivolous cases. The tribunals are answerable to no oversight body and a significant number of the cases are conducted in an atmosphere of secrecy, with the documents being withheld from the public domain.

In many of his speeches, Karel de Gucht has dismissed the above concerns as myths and dystopian caricatures, but escalating public pressure led him to open an online consultation process where anyone could send in their own views on ISDS. The response was enormous, with 149,399 submissions received by the Commission. While the consultation process was a welcome move towards greater transparency and inclusion of the public, the information it provided makes it clear that most of the concerns with the ISDS are very far from being "myths". In the consultation document the EC acknowledges that clauses such as indirect expropriation and guaranteed minimum standard of treatment have been open to abuse in the past, and industries have used them to sue governments over any change in the general regulatory or legal regime that impacts on their expectations (i.e. their predicted profits). To combat this, the EC intends to tighten the rules regarding all aspects of the ISDS mechanism, ensuring that companies won't be able to take out frivolous cases or legally punish a sovereign government for its entitlement to pass new laws and regulations that are in the interest of its citizens, environment etc. Whereas previously many states (i.e. the taxpayers) had to at least partially cover exorbitant legal costs even when the cases were dismissed, the EC's new rules will ensure that the loser foots the entire bill. The EC also intends to address the ISDS mechanism's general lack of transparency by making it mandatory for all hearings to be open to the public and all documents available, excepting parts wherein confidential information and business secrets are contained. These intentions are certainly noble ones, but a look at past or

ongoing ISDS cases shows that there is still a cause for worry.

One example that is brought up time and again is the Philip Morris tobacco company, which is currently suing both Australia and Uruguay over laws the governments have passed concerning the packaging of cigarettes. Cigarette packets in Uruguay now have to carry health warnings that cover at least 80% of the visible space, while in Australia a plain-packaging law was introduced in 2011, eliminating all logos and trademarks, and reducing all brand-names to a small and uniform typeface. This second case, which has been called indirect expropriation by the tobacco company, is particularly relevant to Ireland, where the Public Health (Standardised Packaging of Tobacco) Bill was approved for publication on the 10th June 2014 and is now awaiting final ratification by the Dáil.

The complaints filed by Philip Morris against both countries show a general disregard for the countries' right to pass laws concerning the health and welfare of their populations. The company has argued that there is no hard data proving the efficacy of plain-packaging measures, but considering that smoking is the number one cause of preventable deaths in the world, governments should enjoy a reasonable amount of room for employing new measures motivated by a genuine and responsible desire to tackle the effects of such a dangerous product. Regarding transparency, there are a limited number of documents available to the public, including the notice of claim and, fittingly, a procedural order on confidentiality. The latter shows the various tactics a company can employ to try to ensure the proceedings are as opaque as possible. Among other things, Philip Morris has argued that public awareness will lead to a "trial by media", potentially intimidating witnesses or experts and preventing them from giving proper information; and that the cost and effort involved in redacting documents prior to releasing them to the public following the conclusion of the trial are simply not warranted by the "minimal gains for the public interest."

As it stands, the ISDS provision is currently on hold, pending the results of the consultation process. Opponents are convinced that there is no need for it and that it should be left out of the negotiations altogether. They argue that there are well-established court systems on both sides of the Atlantic that deal on a daily basis with industry and trade law, and that if a government has faith in its own judicial system, which one would presume

it does, then it should not allow this system to be bypassed by anyone, domestic or foreign investor alike. The effort to clarify and refine the legal powers of a TTIP ISDS mechanism is salutary but it might not be enough to prevent influential industries and trade-law advocates from finding loopholes or seeking to undermine rules on transparency. Furthermore, if the ISDS closet is filled with complaints taken against governments over regulations and safety measures, and if the EC is well aware of this as is shown by its questionnaire, then why is it so determined to push ahead with such a potentially hazardous mechanism? De Gucht's assertion that half of the world's ISDS cases are brought by European investors is by no means a guarantee of fairness or responsibility; if the system is inherently flawed, its employment by anybody, European or otherwise, should not be considered a justification of its existence. Whether or not public pressure will lead to its being written out of the agreement is hard to predict; the US is a firm believer in the mechanism, and its view is unlikely to be changed by the views of the European public. This could leave the EC caught between a rock and a hard place, and how it will handle a comprehensive public rejection of the ISDS remains to be seen.

Transparency

Because the TTIP is in the midst of negotiations, and because the negotiating texts are being kept confidential, it is difficult to ascertain how serious the threats are to Europe's current regulations, or how copper-bottomed the EC's promises that regulatory standards will go up if they go anywhere. In this sense, the public debate would benefit from a greater access to all documents pertaining to the negotiations, including the negotiating texts. The EC argues that it is customary for such documentation to be kept under wraps while negotiations are ongoing for several reasons:

1. In order for both sides to trust each other, there must be a climate of confidentiality.
2. The broadcasting of all information would be tantamount to showing the other side your cards.
3. All proposals are merely proposals until they are finalised, and the early release of information that could easily be altered or discarded further along in the negotiations might lead businesses to make nervy or ill-advised arrangements.

Furthermore, the EC maintains that it has ensured the democratic nature of the negotiations by publishing a significant amount of information, including the aims and positions of the parties; by holding a consultation forum for NGOs and stakeholders; and by setting up a stakeholder advisory group that provides the negotiators with expert advice and the views/opinions of the stakeholders.

Critics claim that there is a wilful secrecy surrounding the talks; that in reality very little attention is given to the concerns of NGOs; and that the quoted reasons for confidentiality are just a cover for what is essentially an attempt to dodge democratic bindings. The release of five key negotiating positions in May has done little to appease suspicions, and even the motivation behind the online consultation process is being questioned, with some asserting that it was only set up to temper public furore after the leaking of key documents by the German Green Party. (The leak occurred on the 7th March 2014 and the consultation process was opened on the 27th of the same month.) However, as far back as January de Gucht had announced his intention to provide an online forum for public comment on the ISDS, and while the leak may have precipitated the consultation, there is no proof that it caused it. Most recently, the EU Ombudsman Emily O'Reilly wrote to both the Commission and the Council outlining her concerns over the lack of transparency. While she stops short of calling for the publication of all documents, she states that the European bodies should be doing more to ensure the public are kept informed and suggests that, among other measures, they publish their negotiating directives and a list of stakeholders they regularly consult with. The Council has until the end of September to reply; the Commission until the end of October.

It does seem that there is a sound argument for more transparency; opacity serves to muddle the debate, and if the suspicions of the critics are unfounded, allowing them comprehensive access to the negotiating process could only aid the implementation of TTIP. An important point to remember is that a huge swell of negative pressure from the public could upset the EC's cart, as it has done in the past. In the 1990s, members of the OECD negotiated a trade agreement called the Multilateral Agreement on Investment (MAI), which came under intense scrutiny following the leak of a draft. The

prospective agreement was perceived to favour investors over sovereign countries, and subsequent heavy protests led to the host nation France removing its support in 1998, effectively scuppering the MAI. In more recent memory, the Anti-Counterfeiting Trade Agreement came under public fire on the grounds that it would cultivate internet censorship and the prevention of free speech, and in 2012 the European Parliament rejected it.

All of the above is good; the EU is a democratic structure and each citizen should be encouraged at every step to take an interest in these issues and have his or her say. The Commission argues that this is precisely what will happen once the negotiations are complete: the final draft will be made public and people will be able to see for themselves what changes etcetera it proposes. The process for ratification requires that the proposal be then put before the European Council and the European Parliament, at which time the elected representatives of the member states will have the final say. They will be able to approve or reject the agreement, but not to alter it.

As a general rule, free trade agreements are important in a global economy: they can boost trade, promote jobs, and furnish consumers with better choice of goods and lower prices. Once it has been written in stone that EU regulations won't be weakened or bypassed, and that unaccountable ISDS bodies are either rendered completely transparent and subject to strict parameters or struck off the agreement altogether, TTIP will most likely be a welcome addition to the trade-relationship between the EU and the US. Yet as long as there remains even the thinnest veil between the public and that 100% proof, questions and suspicions will continue to be raised.





Who owns my debt?

Consumer Choice
investigates the selling
of loan books by banks.
What protection does the
consumer have?

At a glance

- Loan Book Sales
- Consumer Protections
- Government Response



REPORT by *Roisin Moloney*

The restructuring of Irish banks involves the sale of loan books. These loan books, like a lot at an auction, can be made up of a combination of residential mortgages and commercial loans, as well as including both loans in distress and performing loans. Entities that are sometimes referred to as vulture funds are taking their opportunity to buy these loan books. Deutsche Bank, Lone Star, CarVal Investors and Goldman Sachs purchased most of the real estate loans that originated with Anglo Irish Bank, while Irish Nationwide's loan book went to Lone Star and Oaktree Capital. More recently, Permanent TSB also announced it was seeking purchasers for its €2.1-billion commercial real estate along with its €465-million springboard mortgage subprime portfolio. Bank of Ireland has recently secured the sale of a €250-million mortgage book to Dilosk Ltd. Dilosk, like so many vulture funds, is an entity not regulated by Ireland's Central Bank.

Concerns relating to the unregulated status of such purchasers have been raised by many commentators including Patrick Honohan, Governor of the Central Bank, and David Hall of the

Irish Mortgage Holders Organisation. Being regulated by the Central Bank brings with it protections for consumers through the existing regulatory regime, which requires financial institutions providing specified financial services - including mortgages - to adhere to certain standards. It empowers the Central Bank to impose sanctions on these regulated financial institutions for certain breaches of the Central Bank codes. Unregulated financial institutions are not bound by any of the Central Bank codes, therefore when a loan book is sold by a regulated financial institution to an unregulated institution the borrowers are not entitled to the protection of these codes. This is despite the fact that they originally contracted with a regulated institution and would have entered into the contract with the protection of these codes.

The relevant codes that will no longer be afforded to certain consumers include the Code of Conduct on Mortgage Arrears, which ensures consumers are dealt with in accordance with the Mortgage Arrears Resolution Process (MARF). MARF sets out a series of steps to be followed in relation to communication, gathering

information, assessing the circumstances of the borrowers and proposing a resolution, as well as a complaints and appeals procedure. Another code, the Consumer Protection Code, puts a limit on the communications, personal visits and other contacts from lenders. This code also prescribes a complaints resolution process, error handling and compliance of outsourced activity, and post-sale information provisions, including warnings on switching from a tracker mortgage to a variable interest rate mortgage. Consumers caught without the protection of the Central Bank do not have access to the Financial Services Ombudsman. The Financial Services Ombudsman investigates, mediates and adjudicates complaints about the conduct of regulated financial service providers.

Some commentators including corporate law firms have been quick to highlight that many of these vulture funds have agreed to voluntarily abide by the Central Bank's Code of Conduct on Mortgage Arrears and it is claimed that this should provide sufficient cover for consumers affected. While voluntary adherence to the code seems positive

for consumers it is by no means the same as consumers having the right to the protection of the codes. There can be no guarantee that the owners of the loan books will correctly and properly apply the codes without the supervision of the Central Bank. The Central Bank must have the consumers at the heart of its work and the independence of the Central Bank ensures that financial institutions can be forced to comply with the appropriate codes. One way it does this is through the range of sanctions it has available to it, ranging from site visits and cautions or reprimands to the imposition of significant financial penalties. However, the Central Bank does not have the power to impose such penalties on institutions that are not regulated by it, even where these institutions indicate that they are voluntarily complying with the codes and will continue to do so. In addition, the free service provided by the Financial Services Ombudsman in the event of a dispute cannot apply in the case of voluntary compliance.

In response to this situation, the Department of Finance has published a Consultation on Consumer Protection on the Sale of Loan Books. The purpose of the consultation is to receive recommendations on how to ensure that borrowers whose loans are sold by a regulated entity to a currently unregulated entity maintain the same regulatory protection as they had prior to the sale. The Government states it is considering its options on how best to achieve this including the enactment of legislation. As vulture funds do not need to be regulated to buy existing loans, only to offer new ones, the proposed Consumer Protection on the Sale of Loan Books Bill 2014 proposes, amongst other things, to redefine 'retail credit firms' under the Central Bank Act 1997 so as to include currently unregulated entities that purchase loan books. As a result, unregulated firms will need to seek authorisation from the Central Bank. While the Government committed in March 2014 to bring forward measures to protect mortgage holders whose mortgage had been sold to an unregulated entity, to date it has not yet actually implemented any changes. On July 14th, the Department of Finance published the proposed bill for the consultation process, which ran until August 22nd for responses. The difficulty here is the delay. This legislation when finally enacted will not be retrospective,

resulting in a significant period of time when consumers are exposed. This process has also acted as a loud warning for vulture funds to do their purchasing of loan books now by indicating that this gap in legislation exists for a significant length of time, with the proposed bill due to be enacted in 2015 at the earliest. With the sale of IBRC loan books having achieved a price above what was expected, there is currently an appetite for banks to sell their loan books and it appears that banks are anxious to sell these books quickly. This is fuelled by the lack of regulation by the Central Bank required by purchasers acting as a further incentive to make the purchase before the proposed measures finally come into effect. Some commentators predict we will see a major increase in the sale of these loan books before any legislation to protect consumers is implemented. Speculation around National Irish Bank and ACC offering loan books for sale is building as these banks wish to exit the market. Start Mortgages, which has a particularly high level of customers in arrears as a result of lending to people refused by mainstream lenders during the boom years, is now attempting to sell up. With such a high proportion of consumers in arrears, it is exactly these customers that need the protection of the Central Bank and the sale of these loan books to an unregulated vulture fund would be particularly devastating as mortgage holders in arrears would not have the protection of the Mortgage Arrears Resolution Process and they would not have access to the Financial Services Ombudsman should they run into a dispute with the potentially unregulated new owners.

A concern relating to this Government response is that the proposed legislation, if implemented, may make it more difficult to sell loan books. Of course, complying with a new regulatory regime will increase the costs borne by the

mortgage owner as both the Central Bank and the Financial Services Ombudsman impose levies on regulated financial service providers to fund their activities. Vulture funds that purchase these loan books will have to ensure that their business complies with the provisions of the Central Bank codes, which will take time and money. Despite the fact that these measures will actually make good commercial sense, these measures will more importantly and above all other considerations offer some protections to consumers. These protections are absolutely vital for vulnerable consumers who find themselves in the unfortunate position of being unable to make their mortgage repayments, many of whom were granted mortgages that they were very unlikely to be able to afford in the long run or with the least amount of stress.

Any process that provides additional protection to the consumer may potentially restrict the freedom of action of the financial service provider and increase the costs that they face. However, there are good public policy reasons why these consumer protections should be applied, not least of which being that the amendment proposed is restoring protections lost. All the protections applied when the consumer took the credit from the regulated credit provider but were lost on subsequent sale to an unregulated entity. These protections are simply being restored, but the question is when? Time is of the essence for many vulnerable consumers and the Government response needs to be prompt or, more specifically, the proposed legislation needs to be retrospective.





Automatic Contract Renewal

Many consumers have contracts automatically renewed each year but how exactly does this work? **Consumer Choice** investigates car insurance renewals and identifies pitfalls for consumers.



REPORT by *Roisin Moloney*

At a glance

- The advantages of auto-renewals
- Our survey
- Pitfalls of auto-renewals

Motor insurance protects you as a motorist against liability in the event of an accident that you may cause. Motorists are legally obliged to have motor insurance under the Road Traffic Act, 1961. We can agree that insurance is vital and an unavoidable expense. It is on this basis that we may become complacent when it comes to shopping around at renewal time. It is also the basis on which the insurance industry argues that automatic renewal is a positive for consumers. Automatic renewal is encouraged by most insurance companies and, by signing up to automatically renew your policy every year, you make sure you never miss your renewal date and that you always have adequate cover. Of course, this is advantageous to consumers but it is not without some hitches.

Research carried out in the UK by *Which?* identifies some of the problems with automatic renewal, including consumers having their premiums hiked year on year without fully appreciating what they have been paying. Others have ended up paying for cover twice as they were unaware their old policy was still active. Some consumers felt that this practice was 'sneaky'.

Renewing your motor insurance

To find out how automatic renewals are used in Ireland, we asked some of Ireland's

most popular car insurance companies how their policies worked. All companies surveyed operate a standard auto-renewal policy and customers must actively opt out if they do not want to automatically renew. Customers who pay their premiums monthly are always automatically renewed by default for the next 12 months of their policy unless they opt out. If you pay your insurance premium in full in one payment, automatic renewal may require action on your part. Most companies offer a renewal facility on their websites where payment can be made in a few short steps but your debit or credit card details will not be kept by the company.

Under Non-Life Insurance (Provision of Information) (Renewal of Policy of Insurance) Regulations 2007 (SI No. 74/2007), your motor insurance company must issue your insurance renewal notice not less than 15 working days before the date of expiry of your insurance policy. It is also required to include with the notice your no-claims discount certificate. You will need this certificate if you want to renew your motor insurance with a different insurance company. All the insurance companies surveyed write to their customers to notify them about their renewal. They differ, however, in their efforts to contact and inform customers. As outlined in table 1 below, all companies write to customers

at least once, both Liberty Insurance and AXA write twice. Other companies also try to contact customers by phone, with Liberty Insurance making the greatest efforts with three calls to customers at renewal time to inform customers that their contracts are being automatically renewed. If a company is not successful in contacting a customer, the renewal will go ahead and it will be presumed that the customer's circumstances are the same as the previous year and direct debit payment will be taken as it was the previous year.

Difficulties with auto-renewals

Although renewal notices sent to customers are required to have any increases in the premium, customers in many cases are only sent one notice. This may discourage customers from shopping around and it is important that customers realise they can opt out of this contract. Customers are entitled to a cooling-off period, which applies when purchasing any financial product. This period lasts for 30 days after a purchase and entitles customers to exit the contract and to receive a refund if applicable. Another area of difficulty includes insurance companies mistakenly failing to cancel a policy at the policy holder's request and customers being charged for a policy they do not want. A more common and

Table 1. Insurance company survey of automatic renewal process

Insurance Company	Letter	Email	Phone call	Date of 1st notification	Notifications sent	Auto renewal offered - direct debit only	Auto renewal by default opt-out option
Liberty	Yes	No	3	30 days before	2	Yes	Yes
Aviva	Yes	No	0	21 days before	1	Yes	Yes
AA Ireland	Yes	No	0	15 days before	1	Yes	Yes
AXA	Yes	No	0	30 days before	2	Yes	Yes
FBD	Yes	No	0	21-28 days before	1	Yes	Yes
Allianz	Yes	No	1	30 days before	1	Yes	Yes
One Direct	Yes	No	1	27 days before	1	Yes	Yes

potentially more damaging circumstance is when a company fails to automatically renew a policy, customers may mistakenly believe they are covered and in the event of an accident or theft find themselves in significant difficulties.

Customers need to consider whether there has been a change in their circumstances that would impact on their policy. Insurance companies will presume that your details remain the same as the previous year. If a change in your circumstances has not been communicated to the company and reflected in your policy, it could result in your policy being deemed invalid.

Automatic renewals do have their advantages - they were designed to provide security and convenience but they can go seriously wrong in the process. It seems that clear communication is lacking. In carrying out this research, it quickly became obvious that information on automatic renewals of policies is not adequately highlighted to customers on insurance companies' websites. Customers both current and potential need to know what they are signing up to and where they stand.

The automatic renewal process can result in consumers not having enough communication with their insurance providers, be it concerning a change in the customer's circumstances or the level of cover a customer has. Auto-renewal also discourages consumers from shopping around for better value. There can be great savings to be made by shopping around but remember you can bargain with your current provider who may lower the price of the premium

rather than lose your business. Customers must try to get as many quotes as possible from other providers but make sure to compare the cover offered also and always check the terms and conditions before committing.

Don't forget to check if any excess applies and if so how much is it. When you get a quote from a company it is usually only valid for a certain amount of time so ask the insurer. Also be clear on how much extra you will have to pay if you decide to pay in instalments by direct debit.

Complaints

If you have a complaint you can contact one or both of the following: The Insurance Information Service (IIS) or the Financial Services Ombudsman. The Insurance Information Service (IIS) is an information and complaints telephone service operated by the Irish Insurance Federation, which many insurance companies in Ireland belong to. Its purpose is to answer policyholders' questions and help them resolve problems. It has no binding powers and complaints that cannot be resolved are generally referred to the Financial Services Ombudsman. (See useful contacts). The Financial Services Ombudsman deals with complaints and disputes between policyholders and their insurance companies when the company's complaints procedure fails to resolve the problem. The Financial Services Ombudsman's decision is binding - if, however, you are unsatisfied with the decision you are entitled take your case to the High Court.



Useful contacts

Financial Services Ombudsman's Bureau

3rd Floor
Lincoln House
Lincoln Place
Dublin 2
Ireland

Tel: (01) 662 0899
Local: 1890 882 090
Fax: (01) 662 0890
Homepage: www.financialombudsman.ie
Email: enquiries@financialombudsman.ie

Irish Insurance Federation Insurance Information Service Insurance House 39 Molesworth Street Dublin 2 Ireland

Tel: (01) 676 1914 or (01) 676 1820
Fax: (01) 676 1943
Homepage: www.iif.ie
Email: iis@iif.ie



Fridge Freezers

Consumer Choice has tested 22 fridge freezer models to bring you the coolest of the bunch.

REPORT by Clodagh O'Donoghue

At a glance

- **Choosing a fridge freezer**
- **The lengths we go to...**
- **Nine Choice Buys**

To make the most of the space available in their kitchen, many opt for a dual-function fridge freezer. Beyond providing swift and reliable cooling and freezing, this always-on appliance should be energy efficient and should match the household's needs and lifestyle. Our tests examine which models are the hardest working, the most economical to run, the easiest to use and the quietest. The prices of the models in our current batch range from €330 to €1,600, so it is important to consider what exactly you are looking for, what features you really need and what you can live without.

Fridge freezer basics

Many of those in the market for a fridge freezer are focused on style and storage space. This appliance can make a big impact on the look of a kitchen. A stainless steel finish remains popular, though such models tend to be pricey and are hard to keep free of fingerprint marks.

For several of the white models on test, there are also silver or coloured versions but these will generally be more expensive than the white option. An integrated or built-in appliance will create a unified and streamlined look in your kitchen but these models tend to cost more than equivalent freestanding models and there is less choice available.

Beyond style, a fridge freezer needs to be spacious enough to accommodate the household's needs – and this is why our table provides information on the usable storage space in litres of both the fridge and freezer compartments in the models on test. Our measurements of usable space are generally less – and sometimes significantly so – than the storage space claimed by the manufacturer. And because a fridge freezer is a hardworking appliance that runs non-stop around the clock, energy efficiency is an important factor. Look at our energy-use scores to find the appliances that use the least electricity for their capacity.

The most basic criteria of all is that your fridge freezer will fit the space available in your kitchen. Don't forget to factor in the door swing in relation to adjacent walls, doors, presses and other appliances. On our table below, we provide the height, width and depth of each model rounded upwards to the nearest centimetre. You may also need to leave an extra few centimetres of space around these appliances for the air to circulate – the manufacturer's manual will

have recommendations on the amount of space to allow – so this should be taken into account in any measurements. Some models have reversible doors to give you more positioning options, and if your appliance has to be located next to a wall, make sure that all shelves are removable with the door at a 90° angle, as this is important for access and cleaning.

Appliance configuration

Another aspect to consider when purchasing a new fridge freezer is what configuration you are looking for – whether the freezer compartment will be located at the top or on the bottom of the appliance. Appliances with a top-mounted freezer tend to have lower price tags and to be more economical and energy efficient to run. This is due to the nature of convection or the way the air circulates in response to differences in temperature. Warmer air rises and cooler air falls – so with a top-mount freezer the natural flow of the cold air created takes it down into the fresh food compartment and requires less work by the circulation system. A top-mounted freezer is also positioned a long way from the appliance's compressor, which produces heat, so the freezer is easier to keep cold compared with a bottom-mounted freezer that requires more energy to maintain its low temperature due to its proximity to the heat-producing compressor.

However, the fridge compartment where

fresh produce is kept is used a lot more than the freezer compartment, so it is much more convenient to have the fridge section at eye level where it is easily accessible and where there is no bending involved. For this reason, bottom-mounted freezers have grown greatly in popularity despite their higher purchase and running costs. Other drawbacks to bottom-mounted freezers are that the freezer may take longer to chill and that, as the salad crisper is located at the bottom of the fridge, this places it very close to the freezer compartment - and so the crisper may be too cold and your vegetables will run the risk of ice-burn.

Whether you need a 70/30, 60/40 or 50/50 fridge freezer combination depends on the type and amount of food you buy and how much freezing you do. Those who like to do a big weekly shop or to bulk-buy groceries will need a large-capacity appliance and should look for features that will maximise their storage options.

Making life easy

Fridge freezers typically get plenty of use in an average day and those in the market for a new appliance should consider some elements and features that will make using it as easy and versatile as possible. Door handles should be positioned at a convenient height and should allow for easy opening and closing – it is worth remembering that doors will require more force to open when the appliance is operating, as opposed to a display model on a shop floor that is not plugged in.

Choosing an appliance with glass shelves rather than wire shelves prevents food and meat juices from dripping onto other items below, and there should be a sufficient range of shelves and shelf positions that you won't need to stack your food items on top of each other. Shelves that are height adjustable allow you to organise the interior of your fridge to make the most of the available space and let you rearrange the configuration if you need to accommodate bulkier items like the occasional large birthday cake or a turkey at Christmas. Similarly, half-width or split shelves and height-adjustable door racks to allow you to stow away taller items and give you plenty of options that can be tweaked as different storage needs arise. All shelves and door racks should be simple to remove for cleaning purposes.

Opting for transparent freezer doors, rather than opaque ones, lets you see instantly what you have in your freezer and deep drawers are useful for storing large, awkward-shaped items like a chicken or a joint of meat. A more advanced feature that could be worth investing in is frost-free technology, which is aimed at preventing the build-up of ice in the freezer compartment

and eliminates the time-consuming job of having to defrost it. On some appliances, the fridge compartment is also frost free to prevent condensation from freezing and to stop the formation of ice. Other advanced features include high-temperature and door-open alarms that sound if the temperature in the appliance rises too high or if you have accidentally not shut the door properly – however, such features will push up the cost.

The lengths we go to....

In our independent labs, each fridge freezer model undergoes rigorous testing to assess its performance. Three experts rate the appliance's ease of use, looking at such aspects as how easy it is to access the contents in both the fridge and freezer compartments, to set and adjust the controls, to remove shelves and door racks and to change their positions, to clean both the interior and exterior and to defrost both compartments.

A series of tests and measurements are carried out to determine the appliance's cooling and freezing power and how well it maintains the temperature inside even when temperatures fluctuate in the surrounding room.

Gel packs are placed inside the fridge and freezer compartments to simulate the food

that would typically be stored in these appliances and the room temperature is set at 25°. A light load of gel packs, approximately equivalent to a small fresh-food shop, is placed in both the fridge and freezer compartments and testers measure how long it takes for the packs to reach, respectively, 5° and -18° - the temperatures at which food will be safely stored. The ambient temperature is increased to 32° and lowered to 10° to check if the gel packs remain at the required safe temperatures inside the appliance. Measurements are also taken of the temperature of the gel packs on the top, middle and bottom shelves in the fridge to check for evenness of temperature throughout.

Manufacturers tend to calculate an appliance's capacity with all of the shelves and door racks removed, whereas our tests measure the amount of usable space with the various storage features left inside the fridge freezer to give an indication of how much food the appliance will actually hold. To gauge how well insulated the freezer is, our testers fill the freezer with gel packs, turn off the power to simulate a power cut, and measure how long it takes for the temperature to rise from -18° to -9° - the point at which food would need to be discarded.



1. Grundig GKN1680W €720 (freestanding)

The **Choice Buy** Grundig GKN1680W is a frost-free fridge freezer that will keep your food well cooled with excellent temperature stability in both compartments, even when temperatures fluctuate in the surrounding room. A touch control display is located on the front of the fridge door and with accurate thermostats for both the fridge and freezer compartments, you won't need a separate thermometer to check that the required temperatures have been reached on this appliance. The quick-chill and fast-freeze features are useful when, for example, adding a large shop of fresh food to the fridge or a batch of home-cooked meals to the freezer and these switch off automatically after a set period. A holiday mode sets the fridge compartment to 15° while maintaining the normal freezer temperature and other advanced features include a warning light when the freezer temperature gets too high and an alarm that sounds if the door of either compartment is left open. There are 184 litres of usable storage space in the fridge and 71 in the freezer, which, although a good deal less than that claimed by the manufacturer, is still very decent.



2. Samsung RL58GPEIH €900 (freestanding)

The **Choice Buy** Samsung RL58GPEIH is great at chilling and freezing fresh food quickly and the temperature inside this fridge freezer will remain stable throughout, no matter what changes in temperature occur in the surrounding room. This is a large appliance with plenty of usable storage capacity - 199 litres in the fridge and 87 litres in the freezer - so if you have the space in your kitchen and you like to do big weekly shops, this model could suit you. A water dispenser tank is located at the bottom of the fridge but this does limit the available space for taller items, and a chiller cabinet is useful for keeping products like meat and fish extra cool. With frost-free technology, you will not have to spend time defrosting this appliance and the digital thermostats located on the front of the fridge door do a good job of accurately setting the temperature inside both the fridge and freezer compartments. The controls on this stylish stainless steel appliance are easy to use and it is also quite energy efficient so running costs are reasonable.

3. Miele KDN12823S-1 €1050 (freestanding)

The **Choice Buy** Miele KDN12823S-1 excels at swift cooling and speedy freezing, getting your food to a safe temperature fast. Temperatures are also maintained throughout the appliance regardless of fluctuating temperatures outside. This Miele model offers top-notch freezer insulation so, in the event of a power cut, the food in the freezer should remain safely frozen for more than 24 hours. There will be no need to spend time defrosting the freezer as it is frost free and the three transparent drawers make it easy to see what items you have stored. There is one set of easy-to-use touch controls that allow you to regulate the fridge temperature and the freezer temperature will be dictated by how cold the fridge is. Warning alarms will sound if a door is left open or if the temperature rises too high in the freezer. The Miele KDN12823S-1 scored well in our energy-use tests so running costs should be fairly low for a fridge freezer of this size and this appliance offers generous usable storage space, with a usable fridge volume of 196 litres and 72 litres in the freezer.



4. Miele KFN12924 SD-1 €1,600 (freestanding)

By far the most expensive of our current batch of fridge freezers on test, the **Choice Buy** Miele KFN12924 SD-1 delivers super-speedy cooling and freezing so fresh food will reach a safe temperature without delay. In addition, maintaining a stable temperature within both the fridge and freezer compartments is no problem for this appliance regardless of how temperatures rise and fall in the surrounding room. A fan will help to keep temperatures even in the fridge compartment and there are separate temperature controls for both the fridge and freezer to allow for more precise settings. As well as a generous 196 litres of usable space in the fridge, which offers plenty of handy storage features, you can stow 98 litres of food in the four drawers of the freezer. In the event of a power cut, the freezer will keep all your food safely frozen for an impressive 30 hours. For a fridge freezer of its size, this Miele garnered a good energy-use score and will be relatively inexpensive to run.

5. Samsung RB29FWRNDBC €590 (freestanding)

The **Choice Buy** Samsung RB29FWRNDBC does a great job of cooling fresh food very quickly and freezing it fast to preserve as many nutrients as possible. The temperature is even throughout the appliance with no warm spots and will remain stable even if your kitchen heats up or cools down significantly. This fridge compartment has some useful storage features, including a shelf that slides out for easy access, but it is not as roomy as some other Choice Buys and the large water dispenser in the fridge door takes up a good deal of door storage. The water dispenser can be filled from the tap, so the appliance does not need to be plumbed into the mains water supply, and it holds a generous 4.5 litres. Freezer insulation on this model did not impress, as our testers found that food would thaw in less than 24 hours in the event of a power cut. However, the Samsung RB29FWRNDBC is quite energy efficient for its size, keeping down running costs.



6. Hotpoint Ultima FFUL1913P €900 (freestanding))

For those with a large household and significant food storage needs, the **Choice Buy** Hotpoint Ultima FFUL1913P could be a great option. With a usable storage capacity of a massive 260 litres in the fridge compartment and a range of handy storage features like a chiller cabinet and a salad crisper drawer with humidity switch, you have ample room for stowing fresh food safely and conveniently and the freezer is similarly of a very generous size, with a usable volume of 127 litres. With bigger dimensions than average in terms of width and depth, you will need to check that your kitchen will be able to accommodate this large appliance. When it comes to all-important cooling power, the fridge compartment is very speedy at getting your groceries down to a safe 5°. In addition, the temperature is even throughout and, in our tests, remained stable even when the room temperature was raised and lowered. This appliance does not freeze food quite as quickly as our other Choice Buys but the freezer is well insulated with food staying safely frozen for over 24 hours if the power is cut off.

7. Zanussi ZRB38213WA €605 (freestanding)

The **Choice Buy** Zanussi ZRB38213WA has a larger-than-average fridge compartment and a smaller freezer compartment, so it will suit households that need to store lots of fresh food, with frozen food less of a priority, or that also have a separate freezer in their garage. There is a substantial 200 litres of usable space in the fridge that offers such handy storage features as a half-width bottle rack and two salad crisper drawers so you can separate more delicate fruits and lettuce leaves from heavier vegetables. The cooling power on this appliance is impressive, with fresh food chilled extremely quickly, and its freezing times are also very good. Temperatures inside this fridge freezer are immune to fluctuating conditions in the surrounding room and the freezer offers very good insulation so food will not thaw too quickly in a power cut. The energy-use score for this appliance is not overly impressive but, considering its large size, it won't be too expensive to run - though it is not as economical as most of our other **Choice Buys**.



8. Zanussi ZRB34315WA €450 (freestanding)

For a relatively modest price, the **Choice Buy** Zanussi ZRB34315WA performs excellently in terms of cooling fresh food extremely quickly and freezing it fast, getting food to a safe temperature without delay and preserving nutrients. Temperatures are kept quite even with the help of a fridge fan and they will remain stable throughout the appliance regardless of how your kitchen heats up or cools down. The fridge compartment holds a little less than those of our other Choice Buys but it offers a good range of storage options, including a chiller cabinet and two salad crisper drawers, to help you make the most of the room available. The freezer, which holds 68 litres of food, has a fast-freeze feature to provide an extra boost when needed and it is frost free, eliminating the often messy and time-consuming task of defrosting. This is a very quiet appliance so you won't be bothered with any background humming or other noises and it garnered a good energy-use score in our tests so it shouldn't push up electricity bills too much.

9. Bosch KIV38X22GB €750 (integrated)

The only built-in model on test in our current batch, the **Choice Buy** Bosch KIV38X22GB is a great option for those looking for an appliance to integrate into their fitted kitchen. This Bosch model does an excellent job of cooling food very speedily and is equally good at freezing food fast. It is also great at maintaining a stable temperature within the appliance, keeping food safe no matter how the outside temperature fluctuates. The fridge compartment offers 178 litres of usable storage with five shelves - four of which are height adjustable - a salad crisper door and five door racks that are fixed in position. The freezer compartment is on the small end, with just 46 litres of storage space, so this appliance is best suited to households with a second freezer or that do not store much frozen food. The freezer struggled in our insulation tests, only keeping food safely frozen for 16 hours after a loss of power, and as it is not frost free, you will need to defrost this appliance from time to time.

MODEL		SPECIFICATION						TEST PERFORMANCE									SCORE
		Price	Size (cm) (hxxwxd)	Energy label	Frost-free freezer	Usable fridge volume (litres)	Usable freezer volume (litres)	Energy use (20%)	Cooling power (20%)	Freezing power (10%)	Temperature stability (room temperature of 25°) (10%)	Temperature stabiity (changing room temperatures) (10%)	Ease of use (10%)	Recommend- ed thermostat setting (10%)	Noise (5%)	Freezer insulation (5%)	%
1	Grundig GKN16820W	€720	184x60x71	A++	✓	184	71	★★★★	★★★★★	★★★★★	★★★★★	★★★★★	★★★★	★★★★★	★★★	★★★★	84
2	Samsung RL58GPEIH	€900	193x60x72	A++	✓	199	87	★★★★	★★★★★	★★★★	★★★★★	★★★★★	★★★★	★★★★	★★★★	★★★	83
3	Miele KDN12823S-1	€1050	182x60x67	A+	✓	196	72	★★★★	★★★★★	★★★★★	★★★★★	★★★★★	★★★★	★★★★	★★★★	★★★★★	83
4	Miele KFN 12924 SD-1	€1600	201x60x67	A+	✓	196	98	★★★★	★★★★★	★★★★★	★★★★★	★★★★★	★★★★	★★★★	★★★★	★★★★★	82
5	Samsung RB29FWRNDBC	€590	179x60x67	A+	✓	174	78	★★★★	★★★★★	★★★★★	★★★★★	★★★★★	★★★★	★★★★	★★★★	★★★	82
6	Hotpoint FFUL1913P	€900	195x71x77	A+	✓	260	127	★★★★	★★★★★	★★★	★★★★★	★★★★	★★★★	★★★★★	★★★★	★★★★	81
7	Zanussi ZRB38213WA	€605	201x60x65	A+	✓	200	63	★★★	★★★★★	★★★★	★★★★★	★★★★★	★★★★	★★★★★	★★★	★★★★	79
8	Zanussi ZRB34315WA	€450	185x60x65	A++	✓	168	63	★★★★	★★★★★	★★★★	★★★★★	★★★★★	★★★★	★★★★★	★★★★★	★★★	78
9	Bosch KIV38X22GB	€750	178x55x54	A+		178	46	★★★	★★★★★	★★★★★	★★★★★	★★★★★	★★★	★★★★★	★★★★★	★★	78
10	Bosch KGV33NW20	€400	177x60x69	A+		159	72	★★★★	★★★★★	★	★★★★★	★★★★★	★★★★	★★★★★	★★★	★★★★★	76
11	Bosch KGN34XL30G	€1150	187x60x73	A++	✓	157	81	★★★★	★★★★	★★★	★★★★★	★★★★	★★★★	★★★★★	★★★★	★★★	75
12	Liebherr CUN3033	€550	181x56x66	A+	✓	166	72	★★★★	★★★★	★★★★★	★★★★★	★★★★★	★★★★	★★★	★★★	★★★	75
13	Zanussi ZRB35212XA	€500	185x60x65	A+	✓	163	72	★★★	★★★★★	★★★	★★★★★	★★★★★	★★★★	★★★★	★★★★	★★★★	74
14	Whirlpool WBE3325 NFTS	€500	188x60x67	A+	✓	182	76	★★★	★★★★	★★★★★	★★★★★	★★★★	★★★	★★★★★	★★★	★★	71
15	Siemens KG34NVW30G	€725	186x60x74	A++	✓	166	81	★★★★★	★★★	★★	★★★★★	★★★★	★★★★	★★★★	★★★	★★★	66
16	Zanussi ZRB23200WA	€340	169x56x61	A+	✓	141	47	★★★★	★★★	★★	★★★★★	★★★★★	★★★	★★★★★	★★★★	★★★	66
17	Hotpoint FUFL1810P	€550	188x61x69	A+	✓	153	96	★★★★	★	★★★★★	★★★★★	★★★★★	★★★	★★★★★	★★★	★★★	65
18	Zanussi ZRT23102WA	€330	141x55x62	A+		144	39	★★★★	★★★	★★	★★★★★	★★★★★	★★★	★★★	★★★★	★★★★★	64
19	Bosch KGN34VL30G	€1015	187x60x69	A++	✓	165	81	★★★★	★★★	★★	★★★★★	★★★★★	★★★★	★★	★★★★	★★★	64
20	Liebherr CUPsi2721	€530	161x56x67	A+		164	42	★★★	★★★★★	★★	★★★★★	★★★	★★★★	★★	★★★★	★★★★★	64
21	Beko CXFD5104W	€550	183x55x66	A+	✓	117	80	★★★	★★★★	★★	★★★★★	★★★★★	★★★★	★★	★★★	★★★	59
22	Beko CXFD6113W	€485	185x61x67	A+	✓	167	60	★★★★	★	★★	★★★	★★	★★★★	★★★	★★★	★★★	43

USING THE TABLE

Star ratings are out of five.

Specifications

Price: Typical retailer's price if you shop around.
Size: Dimensions rounded upwards to the nearest centimetre.
Usable fridge/freezer volume: As measured with all the storage features in place.

Test Performance

Energy use: Ratings for the energy consumption of the appliance over 24 hours with the ambient room temperature at 10°, 25° and 32°.
Cooling power: The time taken to cool down a light load in the fridge to a maximum temperature of 7°C and 5°C.
Freezing power: The time taken to cool down a light load in the freezer to an average temperature of -18°C.
Temperature stability (room temperature of 25°C): The evenness and stability of the temperature in the fridge and freezer compartments at a room temperature of 25°.
Temperature stability changing room temperatures: The evenness and stability of the temperature in the fridge and freezer compartments at room temperatures of 10° and 32°.
Ease of use: Includes ratings for the ease of opening the door and accessing the contents, adjusting the controls, cleaning the exterior and interior of the fridge and freezer and for the quality and handling of the storage features.
Recommended thermostat setting: A rating for the accuracy of the thermostat settings on the appliance.
Noise: The level of noise and vibration emitted by the appliance when switched on, while running and when switched off.
Freezer insulation: How long the freezer will be able to keep food at a safe temperature in the event of a power cut.

Useful contacts

Bosch
tel (01) 4502655
www.bosch-home.co.uk

Grundig
tel 0044 845 603 1234
www.grundig.co.uk

Hotpoint
tel 0818 365008
www.hotpoint.ie

Miele Ireland
tel (01) 461 0710
www.miele.ie

Zanussi
Electrolux Group
tel 0044 8445 612612
www.zanussi.co.uk

Samsung
tel 0818 717100
www.samsung.com/ie



*Visit our website
www.thecai.ie*

Follow us on Facebook & Twitter



www.facebook.com/ConsumersAssociationIreland



www.twitter.com/The_CAI