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**The Consumer Voice in Europe**

## CONSUMER ORGANISATIONS COMMENTS ON ECODESIGN AND ENERGY LABELLING FOR WASHING MACHINES AND WASHER DRYERS

European Commission's draft legislative  
proposal of November 2017

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## Why it matters to consumers

Thanks to EU rules, consumers can save on energy and water - hence money - when washing their clothes. The Energy label also informs them about their washing machine's noise and capacity for instance. As both market and consumer behaviour are evolving, the Ecodesign and Energy label measures need an update to ensure consumers benefit from greater energy savings and better information.

## Summary

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Washing machines and washer dryers are covered at EU level by both Ecodesign requirements and Energy labelling. We welcome that the European Commission is now reviewing these requirements<sup>1</sup> to reflect technological developments and current usage patterns. In this paper, ANEC and BEUC give recommendations pertaining to the draft legislative proposals put forward in November 2017.

In general, we do not agree that an unjustified advantage is provided to larger washing machines and we ask the Commission to modify the calculations accordingly. Overall, we believe that the ambition of the proposal must be enhanced, including the reduction of the energy consumption in the 60°C program. Rinsing performance should be addressed and low power modes must be covered, ideally at horizontal level.

We believe that the temperature must be reached for all programs in order not to mislead consumers. Furthermore, the program time should be limited. We also call on the Commission to reduce the noise level of these appliances and to ensure the pictogram stays on the label.

We strongly support the proposals on resource efficiency and we propose ways of improving them. For example, the maximum delivery time of spare parts should be reduced to 1 week. In addition, requirements on durability as well as on upgradability should be put forward.

Regarding the Energy label, we believe it must be based on more than one program. We welcome the proposal to replace the weighted annual energy consumption currently displayed on the label with a clearer unit for consumers. For washer-dryers, we disagree with the proposal to display two labels on the appliance as such approach is likely to lead to confusion among consumers. Finally, we call for the pictograms on the Energy label to be straightforward and tested upfront amongst consumers.

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<sup>1</sup> Including Energy Label regulation 1061/2010 and Ecodesign Regulation 1015/2010 on household washing machines.

# 1. GENERAL

## 1.1. Promotion of bigger machines should stop

The current proposal contains weighting loading factors depending on the rated capacity. The way the calculations are undertaken provide an unjustified advantage to large washing machines. However, consumers must be informed in a transparent way about the fact that larger appliances consume more.

*see ED Annex II, 1 A (c) / EL Annex III 1 A (c) Table 6*

- **The weighting factors must be changed – the current proposed weighting factors for large machines have to be taken for small machines, the factors for small machines have to be taken for the large machines.**
- **The rated capacity (kg) categories should be modified. Especially, the proposed value for the category ‘large appliances’ starts at too high capacities. We propose the following reclassification:**
  - **c < 6 kg for small appliances;**
  - **6 kg ≤ c ≤ 8 kg for medium sized appliances;**
  - **c > 8 kg for large appliances.**

**Taking both points into account, Table 6 should be changed into:**

c < 6 kg	0,229	0,428	0,343
6 kg ≤ c ≤ 8 kg	0,286	0,428	0,286
c > 8 kg	0,343	0,428	0,229

- **The weighting factors should also apply to the washing cycle of household washer-dryers. We propose to modify the table header as followed: “Weighting loading factors depending on the rated capacity of the washing machine or the washing cycle of the washer-dryer”.**

## 1.2. Better alignment of definitions between EL and ED regulations

The definitions of household washing machines and household washer-dryers in both the Ecodesign and the Energy label draft regulations should be the same. The former wording ‘textiles’ has been replaced by ‘household laundry’ despite the lack of definition for the latter. It is recommended to keep the wording ‘textiles’ as it is used within the performance standards.

- **Align ED and EL definitions (Article 2).**
- **The term textiles should be preferred as it is used in performance standards.**

### 1.3. Consumer behaviour to be further assessed in the future

The preparatory study for household washing machines revealed that beside technical innovations, user behaviour<sup>2</sup> influences the overall impact on the environment during the use phase. As consumer behaviour related to washing has been changing during the last decades and is likely to change further in the future due to different materials that textiles are made of, innovative detergents and machines etc., there is a need to further analyse consumer behaviour when Ecodesign and Energy Labelling rules are under review.

→ **Include consumer behaviour analysis in the revision clause of both the ED and EL regulations (Article 7).**

## 2. ECODESIGN

### 2.1. The overall ambition of the proposal must be enhanced

We fear the proposal is expected to fall behind the achievements of the current measure, as e.g. the 60°C program is not regulated and there is no obligation for manufacturers to include an energy saving program.

→ **Energy consumption in the 60°C program must be reduced.**

### 2.2. Rinsing performance must be addressed

Despite consumer organisations' warnings about bad rinsing performance of current washing machines, rinsing performance is not covered under the European Commission's proposal. ANEC and BEUC have during the last 10 years repeatedly raised the issue of rinsing performance<sup>3</sup>. Good cleaning and rinsing performance for a washing machine is not only crucial to ensure consumer satisfaction but also to protect more sensitive consumers from potential skin irritation related to traces of chemical substances used in detergents which may still be present in badly rinsed textiles. According to ICRT test results of washing machines last year, no models achieved good rinsing. We provide more information in Annex 1.

**A minimum rinsing efficiency requirement must be introduced based on the new LAS method<sup>4</sup> and ensure that a suitable measurement method for rinsing performance is developed in technical standard by European Standardisation organisations.**

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<sup>2</sup> Such as under loading of drums and minor use of the energy efficient standard programmes

<sup>3</sup> See our position paper from 2008: [http://www.beuc.eu/publications/beuc-x-2008-069\\_consumer\\_relevant\\_eco-design\\_labelling.pdf](http://www.beuc.eu/publications/beuc-x-2008-069_consumer_relevant_eco-design_labelling.pdf)

<sup>4</sup> A new measurement procedure is developed in Europe (CENELEC TC59X WG1) based on measuring the remaining surfactant (LAS - Linear Alkylbenzene Sulfonate) via UV spectroscopy on the unsoiled part of the test strip after the washing and rinsing process. This procedure has the advantages that it is a direct measure of one relevant detergent's ingredient (compared to the alkalinity which is influenced by many factors) and it is applicable also for washer-dryers. In the latter case the alkalinity method cannot be used in the continuous washing and drying cycle as no separate water extraction of the washed load can take place. Additionally, this new procedure may be used also for liquid detergents. This procedure is now under comparison with other procedures developed and used in other countries. The result of this investigation is expected to deliver sound data to answer the question how precise and how reproducible a rinsing process in a washing machine can be measured. Reference: <https://ec.europa.eu/jrc/en/publication/ecodesign-and-energy-label-household-washing-machines-and-washer-dryers>

- **Alternatively, the water consumption requirement could be relaxed. However, the European Commission must ensure that the increase in water use serve better rinsing purposes. For example, the formula for the maximum Water Consumption could be change into  $Wt \leq 6 \times c1/2 + 35$ .**

### 2.3. Low power modes requirements must be covered

The European Commission proposes to remove household washing machines from the scope of the current horizontal regulation on standby EU 1275/2008<sup>5</sup> (currently being revised) and to deal with the power consumption of the low power modes in this product specific Ecodesign regulation instead. However, such approach means that other requirements of 1275/2008 would not apply to household washing machines, such as general information requirements, or specific requirements like the mandatory possibility of deactivating wireless network connection(s). Moreover, as in the future more and more washing machines that are not connected to the home network today might be connected in the future so that 'smart' washing machines can participate in demand-side management schemes, this change is not appropriate.

- **As a general approach, we favour a horizontal approach, i.e. to deal with standby and lower power modes of machines within the standby regulation.**
- **Dealing with low power modes at vertical level should not mean reducing the level of ambition of the requirements. All relevant requirements of the horizontal regulation should be included there, such as information requirements or the mandatory possibility of deactivating wireless network connection(s). The proposed requirements should also be aligned to the revised regulation 1275/2008, e.g. lower limit values are foreseen for the off-mode in the revision.**

### 2.4. Temperature must be reached for all programs

According to the current proposal, manufacturers are allowed to reach lower temperature than the one displayed on the machine, e.g. the 60°C program should reach only 45°C. Not only is it misleading information for consumers and could constitute an unfair commercial practice<sup>6</sup>, but it is also especially problematic for the 60°C program which is used for hygienic needs by e.g. users prone to skin allergies.

- **All programs must reach the declared temperature<sup>7</sup> in order not to mislead consumers.**
- **In order to guarantee consumers health and safety, market surveillance authorities must undertake in particular efforts to check if the temperature of the 60 programme are always reached.**

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<sup>5</sup> Currently the requirements of regulation 1275/2008 with regard to power consumption of standby only apply to the off-mode of washing machines and washer-dryers, but not to the delayed start and left-on mode.

<sup>6</sup> Unfair commercial practices are prohibited by the EU Unfair commercial practices directive 2005/29.

<sup>7</sup> For a certain period of time to be determined.

## 2.5. Program time should be limited

We agree with the European Commission that too long-time program must be avoided as they are otherwise not used even though they may have benefits for the environment and bring cost savings for consumers. However, we ask for a time cap instead of displaying only the time duration on the label. According to a recent survey<sup>8</sup>, time is an important factor for consumers when purchasing an appliance. It is therefore not excluded that consumers would opt for an appliance with lower energy efficiency if the time indicated on that label is shorter compared to another appliance with better energy efficiency class. Additionally, comprehensibility of the time duration indicated on the Energy label was low. In Annex 2, we also share results from a survey undertaken in 2015 by our German member, Verbraucherzentrale Bundesverband (vzbv), assessing consumers' willingness to accept a given duration per wash program. For the 40°C programs, respondents clearly opted for program duration below 2 hours.

- **A time cap of 2:30 hours should be introduced.**
- **Alternatively, a maximum duration of approximately 30min/kg could be introduced<sup>9</sup>. This is, when the machine recognises the load quantity.**

## 2.6. Noise level must be reduced

The proposed benchmarks for airborne acoustical noise emissions do not reflect the lowest achievable values on the market. It means that the European Commission does not propose ambitious requirements to reduce the noise of washing machines in the future. However, this is a very important aspect for users, especially for those living in flats, where high noise level might cause discomfort for user themselves and their neighbours.

- **Update benchmarks and set stricter noise emission requirements. We propose to update the table as follows:**

Washing	Light	< 50
	<b>Medium</b>	<b>50 ≤ n &lt; 56</b>
	<b>Loud</b>	<b>n ≥ 56</b>
Spinning	<b>Light</b>	<b>n &lt; 72</b>
	<b>Medium</b>	<b>72 ≤ n &lt; 76</b>
	<b>Loud</b>	<b>n ≥ 76</b>

## 3. RESOURCE EFFICIENCY

Overall, **we strongly support that the European Commission proposed resource efficiency requirements**, namely 1) information requirements for refrigeration gases<sup>10</sup>, 2) design for dismantling for recycling, material recovery and depollution purposes, 3) declaration on spare parts availability, 4) access to repair and maintenance information for independent repairers with reasonable and proportionate fees.

<sup>8</sup> (Graulich et al. 2017) "Consumer survey on the use of washing programmes in the context of new policy options proposed in the EU Ecodesign and Energy label revisions for washing machines".

<sup>9</sup> Currently there are washing machines where the STD/ECO cotton 40°C program duration is more than 40 min/kg, which is too long). There are also already some machines that stay below 30min/kg.

<sup>10</sup> household washing machines and washer-dryers equipped with heat-pumps also use refrigerants.

We propose ways of improving these requirements and put forward new resource efficiency requirements:

### **3.1. Spare parts availability: shorter delivery time needed**

According to the proposal, manufacturers will have to declare how long spare parts are available - for a minimum of 7 years - and should deliver them within 3 weeks. We support this requirement but propose to strengthen it by lowering the maximum delivery time to 1 week. A delivery time of maximum 3 weeks does not mean that an appliance is repaired within 3 weeks. Many users such as e.g. those in large families cannot possibly wait as long before having their washing machines operational again. Moreover, the European Commission should specify which spare parts are covered under this requirement, ideally these should be the ones that tend to break most often, data about these may be collected from industry and repair networks. Lastly, consumers should be able to claim their rights and receive compensation in case of non-compliance, i.e. non delivery of spare parts.

- **Set the maximum delivery time of spare parts to 1 week.**
- **Specify which spare parts are covered by the requirement.**
- **Ensure consumers can claim their rights in case of non-compliance.**

### **3.2. Durability and guarantee should be investigated**

Ecodesign has a very strong role for ensuring the longer life time of products. We call for three elements that implementing acts for Ecodesign specific product groups should stipulate:

#### **Durability criteria**

Firstly, we advocate in favour of the establishment of product specific technical durability criteria as provided for by the Ecodesign framework Directive. Such criteria have already been successfully established for vacuum cleaners and lighting. Member States are obliged to carry out public law enforcement on the whole product group in case the Ecodesign requirements (including durability) standards are not met.

#### **Manufacturers' guarantee**

Secondly, we call for a manufacturers' guarantee for a specific minimum period of time to be set in the specific ecodesign implementing measure. Manufacturers shall guarantee to repair or replace faulty products within this period. In general, the set periods should correspond to good market practices, consumer expectations and the average consumer use on which any technical durability criteria should also be based. For white goods, such as refrigerating appliances, washing machines, or dishwashers there should be a guaranteed durability of at least five years.

#### **Consumer information about durability**

The guarantee duration should also be indicated on the packaging of the product. This guarantee should be communicated in a clear manner to consumers such as in a specific number of years. We fear that technical units such as those currently indicated for lighting products, i.e. nominal life time of the lamp in hours, is unclear for consumers. In addition such indications normally cannot be verified by consumers and are, therefore, of limited use.

- **Implementing acts for Ecodesign specific product groups should stipulate durability criteria, manufacturers' guarantee and consumer information about durability.**

### 3.3. Software updates must be covered

As washing machines are becoming increasingly connected, it is important that software updates of these appliances are easily available for consumers. In a survey from our German member, Verbraucherzentrale Bundesverband (vzbv), 30% of respondents said they replace their electronic devices because of software issues<sup>11</sup>. As consumers are confronted with the lack of availability of software updates when it becomes outdated, their products' life-expectancy decreases. Although most cases are currently observed with electronics such as mobile phones<sup>12</sup>, TVs and computers, we fear they could spread to other types of appliances such as washing machines and washer dryers.

In the case of computers and mobile phones, software updates which are made available are sometimes badly designed and lead to consumer dissatisfaction after they have been installed, as products may become slow or unreliable. This also needs to be kept in mind for washing machines that will come to the market as of now, as similar developments should be avoided.

- **Include a requirement on software updates availability. Washing machines and washer dryers shall come with a free function to allow the user to update the operating system. The manufacturer shall offer security updates for the operating system of the washing machine or washer dryer for at least 5 years from the time that the production ceases.**

## 4. ENERGY LABEL

### 4.1. The label must be based on more than one program

The European Commission proposes to base the calculation of the Energy label (Energy Efficiency Index) on the 40°C cotton program only. Although we acknowledge that the 40°C program was the most used program (Alborzi et al. 2015) selected by 15% of participants in a 2015 survey, the total use share of this program is rather limited.

- **The calculation of the EEI should not only be based on the 40°C program, but on a few ones, with different temperatures and different loads. Those programs should be the most often used ones.**

In the European Commission proposal, the name of the program shall be 'Cotton 40°C', and other programs for cotton 40°C shall not be allowed besides programme with better performance. The use of other names such as 'daily', 'standards', 'normal' for programs providing the same washing cycle is prohibited. We welcome this proposal and proposes that it is complemented by setting the program(s) on which the Energy label is based as first program to appear in the default settings.

- **Program names should be restricted to ensure the use of the Energy label program.**

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<sup>11</sup>VZBV survey from November 2016. More information can be provided upon request.

<sup>12</sup>Our Dutch member organisation Consumentenbond has observed a lack of updates on products with Android software for mobile phones.



- **The program(s) on which the Energy label is based should come first on the display default/be the first one(s) users can find when operating the turning knob.**

#### **4.2. Facilitating combined wash loads: information will not be sufficient**

The proposal foresees to provide information to consumers to explain that this program is also able to clean normally soiled laundry declared to be washable at 60°C (on the tag). We fear information requirement will not be enough in order to avoid confusion among users.

- **The European Commission and Member States need to participate in the promotion of the new Energy label through awareness raising campaigns.**

#### **4.3. The label comprehensibility must be tested upfront with consumers**

We welcome that the European Commission confirmed during the Ecodesign Consultation Forum meeting that stakeholders will 1) receive the terms of references of the consumer survey and 2) have the opportunity to comment on both the survey results and the modified label. ANEC and BEUC have already provided to the European Commission general recommendations on the design and the methodology of the consumer survey<sup>13</sup>. In addition:

- **The label's comprehensibility must be tested upfront with consumers.**
- **Stakeholders should have a say - at earliest stages - on the design of the label.**

#### **4.4. Display the consumption per cycle (kWh/cycle) or per kg**

We welcome the proposal to replace the weighted annual energy consumption by the consumption per cycle. This information, when displayed on the label, is easier to understand for users according to consumer surveys<sup>14</sup>. However, we encourage the European Commission to also investigate the comprehensibility of displaying the consumption per kg as it would ensure comparison between washing machines that have a different capacity.

- **Display of consumption per cycle or per kg - depending on the consumer survey results - to increase consumer comprehensibility.**

Furthermore, we believe this information should be given for all programs in the user manuals.

<sup>13</sup>[http://www.beuc.eu/publications/beuc-x-2017-112\\_mai\\_anec\\_beuc\\_position\\_electronic\\_displays\\_2017.pdf](http://www.beuc.eu/publications/beuc-x-2017-112_mai_anec_beuc_position_electronic_displays_2017.pdf)

<sup>14</sup>*Comprehensibility of the EU Energy label – Results of two focus groups and a representative consumer survey*, VZBV Rheinland-Pfalz e.V 2014 <https://www.verbraucherzentrale-rlp.de/media231718A.pdf>

#### 4.5. Information on noise emission must remain

The Energy label must include a pictogram informing consumers about the airborne acoustical noise emission. According to the 2015 EU consumer survey on washing behaviour, it is one of the most important attributes for consumers when buying a washing machine. However, as the current display with decibel is not well understood<sup>15</sup>, another design – which would be more straightforward and better understood by consumers – should be investigated. We propose to investigate the comprehensibility of a three-sound wave pictogram.

- **Keep the noise information pictogram.**
- **Test the comprehensibility of a three sound waves pictogram in the consumer survey.**
- **Once agreed up, the pictogram must be similar across all product groups.**

#### 4.6. Two labels for washer-dryers is confusing

For washer dryers, the European Commission proposes to display two labels on the appliance: one for the washing and the other for the drying efficiency. Such approach is likely to lead to confusion among consumers.

- **Design and display only one label for washer-dryers. The information should be directly comparable to the information on washing machines and dryers in order for consumers to decide whether they want to buy the combination or two separate appliances.**
- **One scale for the A-G rating should be favoured for consistency across product groups.**

#### 4.7. Multi-drum washing machines should wear a label

The European Commission's proposal does not foresee a label for multi-drum washing machines although this type of appliances can be found in the market<sup>16</sup>.

- **Include multi-drum washing machines in the Energy label scope.**

#### 4.8. Improve pictogram for distance selling and other types of advertisements

According to the new Energy label framework, consumers should – in the case of distance selling – be provided with at least 'the energy class of the product and the range of the efficiency classes available on the label.' Although the pictogram proposed by the European Commission, for distance selling and visual advertisement/promotional material does show the energy efficiency class of the appliance, it does not illustrate well enough the range of energy of classes. For the sake of increasing consumers transparency, we propose that all the classes are displayed, i.e. A,B,C,D,E,F,G, instead of A-G only.

- **Also for distance selling, the full scale should be displayed.**
- **The comprehensibility of the pictogram for online selling (and any others) should be tested upfront.**

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<sup>15</sup>Idem.

<sup>16</sup>Data to be added by our technical expert.

## **Annex 1. Evidence from our membership of bad rinsing performance**

ICRT tests results on the rinsing performance of washing machines a specific focus on the rinsing efficiency (scale 1-10; 10 being the best) and water consumption.

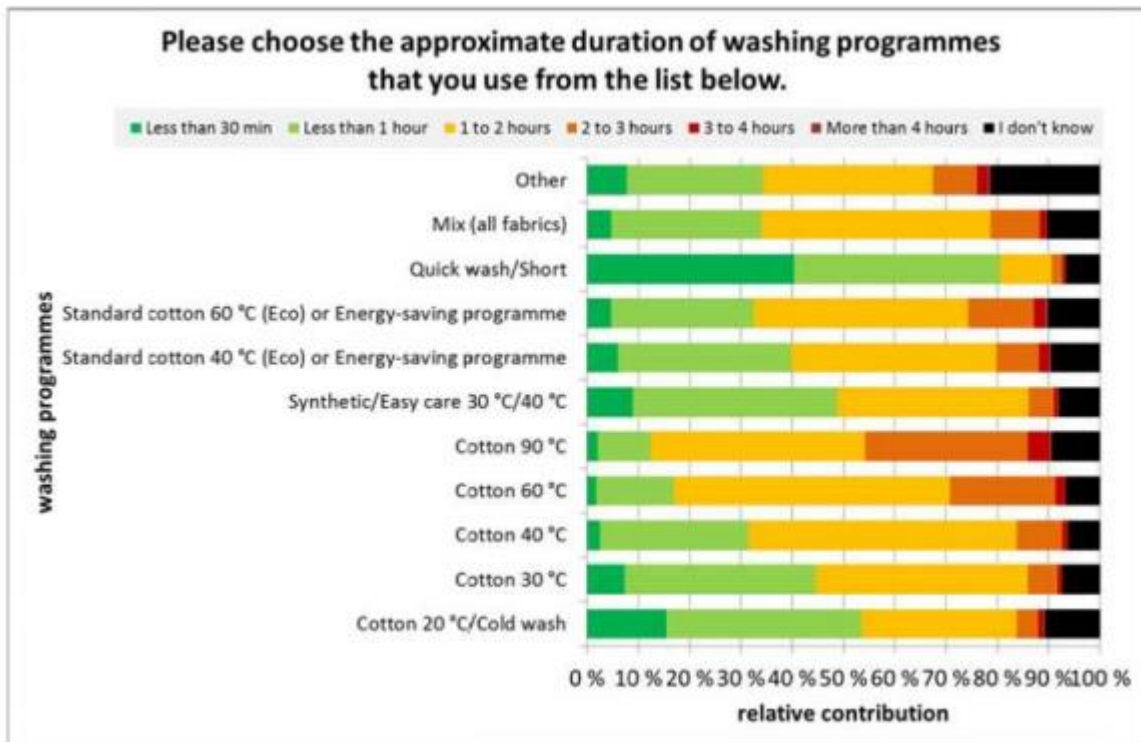
### **Results:**

According to the test results, the rinsing efficiency of washing machines ranged from moderate to poor. A good rinsing performance was not achieved in any models. Out of the 20 tested washing machines, two brands had washing machine models with slightly better rinsing efficiency. However, the rinsing efficiency of those models still obtained a rating of 5 in the scale of 1-10. Furthermore, 3 washing machines out of 20 tested machines had poor rinsing performance (grade 1 or 2 in the scale 1-10). Water consumption of the best performing washing machine models was acceptable, which shows that it is possible to combine both moderate rinsing performance and moderate water consumption.

### **Rinsing efficiency test:**

This test aims to show how well the washing machines remove detergent from clothes after washing. Immediately after the end of the cycle, the load is removed and then placed in 3 spin extractors and spun for 5 minutes. The spun water is analysed. Its alkalinity is compared to the source (tap) water. The greater the alkalinity of the spun water, the poorer the rinse efficiency is.

**Annex 2. Results from a 2015 survey that VZBV undertook – consumers’ willingness to accept a given duration per wash program**



Source: [https://www.verbraucherzentrale-rlp.de/sites/default/files/2017-12/VZ\\_RLP\\_Marktcheck\\_Waschmaschinen\\_11\\_2017.pdf](https://www.verbraucherzentrale-rlp.de/sites/default/files/2017-12/VZ_RLP_Marktcheck_Waschmaschinen_11_2017.pdf)