



# CONSUMER RELEVANT ECODESIGN AND ENERGY LABELLING REQUIREMENTS FOR HOUSEHOLD WASHING MACHINES

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## Summary

In this position paper, we comment on the updated Commission working documents on ecodesign and energy labelling requirements for household washing machines.

Regarding the ecodesign requirements, we emphasise the need to introduce the second tier requirements two years after the ecodesign regulation on household washing machines enters into force as this would allow keeping the originally envisaged timescale.

With regard to the Energy Label we do not support showing empty classes at the bottom of the scale. As due to the mandatory ecodesign requirements, classes B-G will not be available on the market in the future, these empty classes should not appear on the label.

We also call on the Commission to make the introduction of the new Energy Label requirements mandatory earlier than what is suggested in the Commission's working documents.

To prevent confusion about the performance of different appliances in a transition period between the old and new labelling requirements, we call on the Commission to keep the transition period as short as possible. The transition period, where consumers see old and new labels in shops should not exceed six months.

## Introduction

In 2008, the European Commission proposed to improve the energy efficiency of household washing machines by introducing mandatory ecodesign requirements. Moreover, the Commission proposed updating the existing Energy Label requirements for washing machines.

In this position paper, ANEC and BEUC comment on the working documents from the European Commission with regard to ecodesign and energy labelling of household washing machines<sup>1</sup>. The paper adds-on to the stakeholder Consultation Forum meeting of 3 December 2008<sup>2</sup>.

### 1. Generic ecodesign requirements should apply earlier

We suggest setting the standard programme for 40° C and 60° C as default one year after the measure enters into force as this may bring additional resource savings.

We also suggest introducing the information requirements one year after the measure enters into force as manufacturers should not need two years to update the booklet of instructions.

We ask introducing the 20° C programme at the same time when the second tier of ecodesign requirements enters into force as this will provide for consistency with the timing of the specific ecodesign requirements.

### 2. Specific ecodesign requirements should apply earlier

Considering that the first tier of ecodesign requirements will phase out less than 2-3% of the market, the second tier of ecodesign requirements should apply two years after the regulation enters into force. This would allow keeping the schedule that has been envisaged by the Commission in March 2009.

### 3. Label layout will be confusing for consumers

The revised Commission working documents for an Energy Label for washing machines proposes introducing classes from A+++ to D from the beginning.

The need to open already now a third class on top of "A" shows clearly that the reform of the Energy Label Framework Directive will not bring about a long lasting reform.

We are concerned that the label for washing machines will be misleading for consumers as it foresees several classes at the bottom of the label that will be empty because of ecodesign requirements. As due to the mandatory ecodesign requirements, classes B-G will not be available on the market in the future, these empty classes should not appear on the label.

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<sup>1</sup> Our comments relate to the working drafts as distributed to stakeholders on 5 March 2010.

<sup>2</sup> See ANEC/BEUC position paper "Consumer relevant eco-design and labelling requirements for household washing machines", <http://www.anec.eu/attachments/ANEC-PT-2008-EuP-046final.pdf>.

#### **4. Labelling requirements should be introduced earlier**

The draft working document requires manufacturers to comply with the labelling requirements 12 months after the legislation enters into force and for retailers to show the label to consumers in shops 16 months after the legislation enters into force.

While we understand that manufacturers need some time to adapt their production to new ecodesign requirements, it should be possible to introduce new labelling requirements within less time.

At the Consultation Forum it had been argued that retailers need additional four months as catalogues are only updated once a year. This argument is not convincing for several reasons. First, retailers are usually able to exchange information in shops overnight, e.g. information related to promotions or special activities. Second, manufacturers need to know which product they want to advertise before printing a catalogue. Thus, all the technical features of a particular product including its energy consumption and Energy Label classification have to be known in advance.

The timeframe of 16 months is far too long considering that the Energy label requirements for this product group are outdated. We therefore call on the Commission to limit the time for all economic operators to comply with the new labelling requirements to a maximum of 8 months.

#### **5. Transition periods for new labels need to be as short as possible**

The Commission's working document foresees a transition period of 16 month in which both labelling requirements would be acceptable. However, this period is far too long and will lead to consumer confusion about different label layouts. Thus, we call on the Commission to limit the transition period to a maximum of 6 months.

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