



# CONSUMER RELEVANT ECODESIGN AND ENERGY LABELLING REQUIREMENTS FOR HOUSEHOLD DISHWASHERS

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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 dishwashers.

Regarding the ecodesign requirements, we emphasise the need to introduce the generic requirements one year after the ecodesign regulation on dishwashers enters into force. We also call for introducing the second tier of specific ecodesign requirements three years after the regulation enters into force. A more ambitious timing than proposed by the Commission seems justified considering that the latest innovations in the household dishwasher market provide for significant energy efficiency gains.

Moreover, we ask to indicate in the benchmarks best available technology.

With regard to the Energy Label we do not support showing empty classes at the bottom of the scale. As due to the Ecodesign requirements classes B-G will not be available on the market in the future, these 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 dishwashers by introducing mandatory Ecodesign requirements. Moreover, the Commission proposed updating the existing Energy Label requirements for dishwashers.

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 dishwashers<sup>1</sup>. The paper adds-on to our input to the stakeholder Consultation Forum meeting of 3 December 2008<sup>2</sup>.

### 1. Generic ecodesign requirements should apply earlier

The setting of a standard cleaning cycle and certain information requirements in the booklet of instructions are foreseen to apply two years after the Ecodesign Regulation enters into force. However, we ask to make these generic ecodesign requirements mandatory one year after the Regulation enters into force as this may bring additional resource savings.

### 2. Second tier of specific ecodesign requirements should apply earlier

We ask to introduce the second stage of ecodesign requirements after three instead of four years. Considering that already in the year 2007 more than 92% of the sales were dishwashers of class "A"<sup>3</sup>, the second step should not be delayed.

Since the draft ecodesign requirements have been under discussion in the years 2008 and 2009, some innovations have been introduced that provide for additional efficiency gains. According to the information from EcoTopTen<sup>4</sup>, some manufacturers have already developed "A+" dishwashers with an electricity consumption of < 1 kWh/cycle. In addition, BoschSiemens developed a new energy efficient drying technology (Zeolith®-drying)<sup>5</sup> which delivers dishwashers of class "A++".

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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 dishwashers, <http://www.anec.eu/attachments/ANEC-PT-2008-EuP-047final.pdf>.

<sup>3</sup> Bertoldi, Paolo/ Atanasiu, Bogdan: Electricity Consumption and Efficiency Trends in European Union, Status Report 2009, Joint Research Centre, p. 24.

<sup>4</sup> [www.ecotopten.de](http://www.ecotopten.de)

<sup>5</sup> Zeolith is a silicate mineral that withdraws dampness during the drying process. The mineral is also able to store heat from the washing process and to release the heat during the drying process, see: <http://www.bosch-home.com/de/specials/ActiveWater-Langzeitest.html> and <http://www.test.de/themen/haus-garten/meldung/Zeolith-Geschirrspueler-1000-Mal-gut-gespueelt-1833520-2833520/>

### 3. Benchmarks should show best available technology

We ask to add benchmarks for household dishwashers with 15 place settings as follows:

*Energy consumption: 0.97 kWh/cycle, corresponding to an overall annual energy consumption of 284.5 kWh/year, of which 272 kWh/Year for 280 washing cycles and 12.5 kWh/year due to the low power modes*

*Water consumption 12 litres/cycle, corresponding to 3 360 litres/year for 280 cycles.*

We ask to add the following benchmarks for household dishwashers with 13 place settings as dishwashers of class "A++" are already available:

*Energy consumption: 0.83 kWh/cycle, corresponding to an overall annual energy consumption of 244.5 kWh/year, of which 232 kWh/Year for 280 washing cycles and 12.5 kWh/year due to the low power modes*

*Water consumption 10 litres/cycle*

We also ask updating the benchmarks for dishwashers with 12 place settings. Although the working document mentions dishwashers with an energy consumption of 0.950 kWh/cycle as best available technology, there are dishwashers available that consume only 0.930 kWh/cycle. This corresponds to an overall annual energy consumption of 272.5 kWh/year.

Moreover, the current benchmark for a dishwasher with 6 place settings relates to a class "B" dishwasher whereas models of all other sizes mention benchmarks of class "A" or better. In case best available technology progressed beyond class "B" in the meantime, we propose updating the benchmarks for dishwashers with 6 place settings.

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

The revised Commission working documents for an Energy Label for household dishwashers propose introducing classes named 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 dishwashers will be misleading for consumers as it foresees several classes at the bottom of the label that will be empty because of the ecodesign requirements.

### 5. 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. Moreover, retailers

are required to show the label 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 from our perspective 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 already outdated today. 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.

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

The Commission's working document foresees a transition period of 16 during which manufacturers and retailers will be allowed to show both, old and new labelling requirements to consumers. However, this period is far too long and will lead to consumer confusion about different label layouts being present in shops at the same time. Thus, we call on the Commission to limit the transition period to a maximum of 6 months.

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