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**The Consumer Voice in Europe**

## CONSUMER ORGANISATIONS COMMENTS ON ECODESIGN AND ENERGY LABELLING FOR HOUSEHOLD TUMBLE DRIERS

European Commission's draft legislative proposal of July 2019

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## Why it matters for consumers

Thanks to EU rules, consumers' tumble driers are now relying on less energy without compromising performance. Switching to one of the most efficient tumble driers can reduce energy costs up to 50%.<sup>1</sup> The Energy label also informs consumers about their tumble drier'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

Household tumble dryers are covered at EU level by both Ecodesign requirements and Energy labelling since 2013<sup>2</sup> and 2012<sup>3</sup> respectively. We welcome that the European Commission is now reviewing these requirements to reflect technological developments and current usage patterns. In this paper, European consumer organisations ANEC and BEUC give recommendations on the draft legislative proposals put forward by the European Commission in July 2019.

In summary, we encourage the European Commission to:

- Set stricter Ecodesign energy efficiency requirements in two tiers;
- Strengthen the condensation efficiency requirement by 15%;
- Enable consumers - and not only repairers - to have access to spare parts;
- Restrict the use of refrigerants to natural ones only;
- Rescale the Energy label to enable better differentiation within heat pump driers;
- Use the same reference cycle calculation as for washing machines;
- Test consumers' understanding of the Energy label.

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<sup>1</sup> [https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/energy-efficient-products/tumble-driers\\_en](https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/energy-efficient-products/tumble-driers_en)

<sup>2</sup> Staged application, 2013, 2014, 2015. Commission Regulation (EU) No 932/2012.

<sup>3</sup> Commission Regulation (EU) No 392/2012.

## 1. SCOPE AND SMALLER CAPACITY DRIERS

According to the European Commission's proposal to ban the least performing appliances from the EU market, smaller capacity (2-4 kg) tumble driers could be banned from the market. The question therefore arises whether there should be an exemption for these products to ensure we do not restrict consumer choice.

As consumer organisations testing appliances, we note that it is nowadays very hard to find any tumble driers with a capacity of 6 kg or below. The (representative) models ICRT tested in 2018 and 2019 (190 and 191 models respectively) varied from 7 to 11 kg in capacity. Therefore, the discussion should in our view not solely lie on the 2-4kg capacity, which are quite niche, but also on the 5-6 kg capacity tumble driers. These driers would be relevant for consumers, as they would constitute a basic, cheaper heat pump model, that has big enough capacity for most users<sup>4</sup>.

In addition, we think that small capacity driers tend to be used by households with low KW connections, such as in small city apartments, studios, mobile homes, etc. Therefore, we would advise the European Commission to run an impact assessment on the effect of having a longer cycle on a heat pump appliance versus the lower power usage during the cycle.

- **We are concerned that not only the 2-4 kg, but also the 5-6kg appliances are no longer part of manufacturers website, and this should be reflected at EU level.**
- **The 5-6 kg appliances should get an incentive to remain/return on the market. This could probably be done via lowering the exponent in the SEC value; from  $0.44 \times c^{0.75}$ , lowering the 0.75.**

## 2. ECODESIGN

### 2.1. ENERGY EFFICIENCY LEVEL

#### **Ecodesign requirements should phase out the least efficient tumble driers**

The overall ambition of the Ecodesign energy efficiency proposal must be enhanced by:

- A) regulating not only the 'standard cotton programme' but several programmes;
- B) strengthening the Ecodesign energy efficiency requirement as such.

According to the European Commission's draft proposal, the energy efficiency index (EEI) shall not be higher than 96 as of June 2024. It will not send a clear signal that heat pump tumble driers are the way forward, in terms of both environmental impact and financial savings. Our Belgium member Test Achats/Test Aankoop calculated that heat pumps driers are cheaper in the long run than regular driers because they are cheaper to run, which

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<sup>4</sup> As nowadays, families also tend to be smaller.

compensates for the higher purchase price. With heat pump driers, a return in investment can occur as early as 4 years after purchase.<sup>5</sup>

We consider that the proposal (EEI=96) is unambitious for the following reasons:

- **Much more ambition is technologically possible.** In 2012, Switzerland introduced a ban on non-heat pump driers. The EU should take inspiration from this example.
- **Heat-pump driers are getting cheaper.** Over the years, consumer organisations have noticed that the price difference between heat-pump and condenser tumble driers has decreased markedly. Many brands now propose a range of lower-priced heat pump models.
- **Stricter requirement would enable larger differentiation on the Energy label.** When combined with the Energy label, such an unambitious requirement of EEI <96 would mean that we still allow products that consume 3 times as much as the most efficient options on the market. It would enable a different spread for smaller energy efficiency classes (see 3.1).

→ **The Ecodesign energy efficiency requirement for tumble driers should be more ambitious. We propose a two tiers approach with:**

- **EEI=96 in 2022**
- **EEI=60 in 2024**

→ **Starting in 2022 would enable to align with the Energy label updates.**

## 2.2. FUNCTIONAL REQUIREMENT

### Keep exposure to moisture to a minimum

We support the proposal to strengthen the requirement on the weighted condensation efficiency for condenser household tumble driers.<sup>6</sup> We however suggest setting a 15% increase, instead of 10%. As tumble driers release some warm air into the room, called moisture emission, it is important that consumers – especially those who have a small and/or poorly ventilated laundry room – have a drier that releases very low moisture emissions. In other words, the condensation efficiency must be high and improved overall. We believe that strengthening the value by 15% is technically feasible, certainly by 2024.

<sup>5</sup> It was calculated based on Belgian electricity price, assuming 3 cycles per week and a 12-year lifespan. The conclusions were similar when assuming 2 cycle per week. Test Achats/Test Aankoop, has calculated based on their testing that a heat pump tumble drier would cost annually between €30 and €60 approximately in electricity consumption compared to around 100€ for its condenser equivalent.

<sup>6</sup> Condenser tumble drier means 'a tumble drier which includes a device (either using condensation or any other means) for removing moisture from the air used for the drying process'.

- **The weighted condensation efficiency should be regulated in two tiers, and should not be lower than:**
- **80% in 2022**
  - **85% in 2024**

### 2.3. RESOURCE EFFICIENCY

#### Make spare parts available for consumers

We welcome that the European Commission proposes to make spare parts<sup>7</sup> mandatorily available as of 2022 for a period of 10 years. This follows the example of other household products such as dishwashers, washing machines and refrigerating appliances which will fall under the same regime as of 2021 already.

However, we believe this requirement should go further and not be limited to professional repairers only. **Certain spare parts – for which safe repair is ensured – should be made available for consumers** to empower those who have the technical skills and prefer to self-repair. This list of spare parts available for consumers should include – but not be limited to – door, pump, motor, filter, control panel.

According to a survey by our members Euroconsumers<sup>8</sup> and UFC-Que Choisir, consumers report problems with the following features of their tumble driers: 1) drying function, 2) belt,<sup>9</sup> 3) filter, 4) door, 5) buttons (control panel). Those aspects should therefore be covered when developing resource efficiency requirements.

**The European Commission's requirement on the mandatory availability of spare parts should go further:**

- **Spare parts should be made available to consumers too, including door, pump, motor, filter, control panel.**
- **Requirements on 1) the belt, 2) the filter, 3) the door, 4) the buttons (control panel) should be foreseen.**

### 2.4. NOISE LEVEL

#### Keep the noise level down

No requirement for noise limit is currently proposed. 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. In addition, consumers who live in smaller apartments should be able to run their appliance at night when the electricity tends to be cheaper, without being disturbed. For this reason, we propose to set a 65dB(A) limit.

- **A noise emission requirement should be set at 65db(A)**

<sup>7</sup> Pumps, motors, fans, heating elements.

<sup>8</sup> Euroconsumers represent our Belgian, Italian, Spanish and Portuguese members, respectively Test-Achats/Test-Aankoop, Altroconsumo, OCU and DECO.

<sup>9</sup> Note: not all driers necessarily have a belt.

### 3. ENERGY LABELLING

The 2017 Energy labelling framework requires the deletion of the confusing ‘plus’ classes (A+, A++, A+++). The energy label will therefore go back to the well-known A to G scale as of 2022.

#### 3.1. ENERGY EFFICIENCY CLASSES

##### Rescale more ambitiously

In line with our proposal to put forward a more ambitious Ecodesign energy efficiency requirement of  $EEI=60$ , we propose to adjust the Energy label classes as followed:

Energy efficiency class	Energy Efficiency Index	
	European Commission’s proposal	ANEC and BEUC’s proposal
A (most efficient)	$EEI \leq 33$	$EEI \leq 33$
B	$33 < EEI \leq 46$	$33 < EEI \leq 40$
C	$46 < EEI \leq 60$	$40 < EEI \leq 49$
D	$60 < EEI \leq 78$	$49 < EEI \leq 60$
E	$78 < EEI \leq 96$	$60 < EEI \leq 78$
F	$96 < EEI \leq 148$	$78 < EEI \leq 96$
G (least efficient)	$EEI > 148$	$EEI > 96$

→ **The European Commission should put forward a more ambitious rescaling for the Energy label.**

#### 3.2. ALIGNMENT WITH THE LABEL FOR WASHING MACHINE AND WASHER DRIERS

##### Provide consumers with transparent and coherent information

The European Commission should explain the rationale behind proposing different reference cycle calculation and different load distributions for tumble driers and for washing machines and washer-driers (dealt with in separate measures). In our view, the approach taken for washing machines (legislative proposal already final) should be followed for tumble driers as well. It would be more transparent and relevant for consumers. It does not seem logical to have a higher load for tumble driers than for washing machine as the load in a tumble drier is generally smaller (as after the wash, the user will not necessarily transfer all clothes in the drier).

In addition, the EEI calculation is also different for the wash-and-dry cycle of the combi washer-dryers<sup>10</sup>. It means that comparing the energy efficiency of a washing machine and a tumble dryer, versus a combi-appliance, will be very confusing for consumers.

- **The European Commission should ensure the Energy label for tumble driers and washer driers are designed in a coherent way, hence working with the same reference cycle calculation.**
- **Comparison of the energy efficiency between a washing machine and a tumble drier, versus a combi appliance should be considered.**

### 3.3. CYCLE DURATION

#### Need for shorter time programme

The European Commission proposes to display the duration of the programme on the label with a view to stimulate manufacturers to design appliances with shorter time programme. We agree that long-time programmes must be avoided as they are otherwise not used even though they may have benefits for the environment and bring cost savings for consumers. In addition, it would also enable to be in line with the Energy label for washing machines as such information will be displayed in the future.

However, we believe that:

- A time cap would be more effective and/or could help achieve our goal, i.e. ensuring consumers do use the most energy-efficient programme.
- Displaying the duration at full load is more transparent as it would correspond to the worst performance and consumers therefore won't be frustrated with higher values.
- consumers might not understand that the time duration indicated on the label corresponds to only one programme, and not all of them.

**The European Commission should stimulate manufacturers to design appliances with shorter time programmes by:**

- **setting a cap limiting the cycle duration in minutes per kg or with total time limit (under Ecodesign);**
- **displaying the cycle duration at full load on the label.**

<sup>10</sup> for the combi's, 3/5ths full load, 2/5ths half load are counted.

### 3.4. TEST THE LABEL UPFRONT WITH CONSUMERS

#### **Display understandable icons on the label**

Some icons proposed to be displayed on the label do not seem clear at first glance. Although information such as the noise emissions come across as easily understandable, we wonder whether consumers will grasp the meaning of the icon representing e.g. 'information on the type of household tumble drier'. Furthermore, regulators should test the icon representing the weighted condensation efficiency to make sure it is well understood. More generally, we advise the European Commission to test the understanding of all icons as well as of the label overall.

- **We agree that consistency with other Energy labels, such as the one on washing machines and washer driers, should be ensured as much as possible.**
- **The European Commission should however test the comprehensibility of the icons and label via a consumer survey, especially on those which had not yet been tested:**
  - >*whether consumers understand the icons representing 'information on the type of household tumble drier' (especially the difference between the condenser and air-vented tumble driers).*
  - >*whether consumers understand the meaning of the icon representing the condensation efficiency class.*
- **We ask the Commission to take into account our [general comments](#) regarding the design and methodology of consumer surveys for the developments of upcoming new Energy labels.**

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