CONSUMER RELEVANT ECODESIGN AND ENERGY LABELLING REQUIREMENTS FOR HOUSEHOLD TUMBLE DRIERS

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Summary

In this position paper, we comment on the Commission working documents on ecodesign and energy labelling requirements of household tumble driers.

We call on the Commission to implement both, Ecodesign and Labelling requirements to address both ends of the market by phasing out the least efficient appliances and by informing consumers better on the energy efficiency of tumble driers.

We welcome including gas fired household tumble driers into the labeling scheme as consumers should be informed about the energy efficiency of all available appliances independent from the technology that is used to dry textiles.

As consumers should not be encouraged to purchase big laundry driers that they rarely use at full load, we welcome the approach to make it more difficult for big appliances and easier for small appliances to get high Energy Labeling classifications. However, we propose setting the reference line at a rated capacity of 6 kg appliances as larger appliances are not really relevant for average households.

We support the calculation model for the Energy Efficiency Index as it takes into account real life consumer behavior such as using a drier at partial load.

With regard to additional information on the label, we ask for all pictograms to be clear.

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.

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Mandatory Ecodesign requirements should phase out the least efficient tumble driers

The Commission working document on the ecodesign and labelling of household tumble driers states that these appliances are placed on the EU market in large quantities, that tumble driers have a significant impact on the environment and that they show a wide disparity in their environmental performance. Despite the findings of the preparatory study on tumble driers, the Commission is proposing to update only the Energy Label criteria and to abstain from setting mandatory Ecodesign requirements at the current stage.

ANEC and BEUC call on the Commission to address both ends of the market by combining Ecodesign and Energy Label requirements. Although we recognise that phasing out the current classes D to G would have a limited impact as the market share of the least efficient appliances is below five percent, we propose to ban these classes by setting Ecodesign requirements. In order to give the right signal to manufacturers and to start with Ecodesign of tumble dryers, the least efficient models of class D to G should be banned one year after the Regulation enters into force. This seems to be justified as in the case of other household appliances such as washing machines and dishwashers a similar approach has been chosen.

In addition, we ask to set a second tier of Ecodesign requirements applying from five years after the Regulation enters into force. In this second step also the current class C driers should be banned. A period of five years gives manufacturers sufficient time to improve air-vented driers up to class “B”. Moreover, we expect the purchase price of condenser driers with heat pump technology to decrease by the year of 2016.

However, as phasing out current driers of class “C” would phase out almost all air vented driers, the situation on the market should be re-evaluated e.g. in the year 2013 before the second step of Ecodesign measures will apply, to ensure that there will not be a negative impact for consumers.

As Ecodesign and Labelling requirements should be based on the same calculation formula for the Energy Efficiency Index and should use the same testing methods, we consider setting Ecodesign requirements not as a disproportionate burden for industry and market surveillance authorities.

Finally, letting current classes D to G stay on the market would be in contradiction with the proposal for a new labelling scale showing classes from A+++ to D. The new Framework Directive specifies that the scale should show seven classes unless more classes are still populated.

In addition to addressing the energy efficiency of tumble driers, we ask for Ecodesign requirements addressing other aspects that are relevant for the environment such as using lesser hazardous chemicals, easy dismantling and recycling.

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One labelling scale will be beneficial for consumers

As consumers should have the possibility to compare the energy efficiency of different appliances, e.g. of extraction and condensing driers, we support introducing one common labelling scale for all different types of appliances (electric air-vented, gas air-vented and electric condenser). We welcome including gas fired tumble driers into the scope as their superior environmental performance has so far not being transparent to consumers as they had been excluded from the current labelling scheme.

Energy Efficiency Index reflects consumer behaviour

The proposed new calculation method for the energy efficiency index in based on 160 drying cycles per year, of which 3/7 (approximately 69 cycles) are 'cotton dry' cycles fully loaded and 4/7 (approximately 91 cycles) are 'cotton dry' cycles partially loaded. It also includes energy consumption of low power modes (left-on mode and off-mode).

We support the proposed calculation formula for the Energy Efficiency Index (EEI) as the new method reflects real life consumer behaviour appropriately. We welcome in particular that drying cycles with partial load have been considered in the formula. As consumers today wash frequently at partial load, this needs to be taken into account when calculating the EEI for laundry dryers.

Distribution of labelling classes needs to be adjusted

In the working document it has been proposed to make it more difficult for large driers to achieve high energy efficiency classes and to make it easier for small driers to achieve high ratings. This will be done by requiring large driers to consume less energy per kilogram of textiles dried than small driers[1].

We support the overall idea as consumers should not be encouraged to install overcapacities. However, we ask adjusting the proposed reference lines.

Considering that appliances of a rated capacity of 7 kg and above are not really relevant for average households, we propose setting the reference line in a way that the intersection of the lines for old and new energy efficiency classes is set at a rated capacity of 6 kg. This threshold will be more suitable to prevent incentives to consumers to install overcapacities.

With regard to small appliances, we consider the bonus as being exaggerated. Based on the proposed formula it seems to be possible that small laundry driers of a rated capacity of 3-4 kg could jump one or two labelling classes without that any improvements in their energy efficiency had taken place. It would be highly misleading to consumers to see the same model of a laundry drier with an old and a new Energy Label and the rating would differ by one or two classes although the energy consumption is the same.

[1] For the distribution of classes and the reference lines, see the Commission working document of 31 May 2010 on laundry driers at page 7 and 8.

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Therefore this bonus effect should be slightly lower for small appliances. By setting the reference line at 6 kg as proposed above, small driers would still be privileged but to a lesser extend than proposed in the working document.

It should be avoided that the least efficient appliances would be upgraded to a higher class only for calculation reasons but without real requirements to improve the energy efficiency.

Best available technology should be in class "A"

As the calculation methods for the Energy Efficiency Index will be completely revised compared to the existing label, we ask to distribute the appliances into a seven class label from A-G.

Based on the working document it seems that today's most efficient "A" appliances would be labelled as "A++" without that any technical improvement had taken place. Such an automatic transformation to higher labelling classes without real efficiency gains, the future Energy Label will be misleading for consumers. In addition, it will not give sufficient incentives for future innovation.

Therefore we ask setting the best heat pump or gas household tumble driers at class "A". In order to allow for further differentiation, the appliances that are at the lower end of current class "A" should be distributed into lower labelling classes such as "B" and "C".

Additional information on the label needs to be clear

We welcome indicating the programme time on the label as this is an important information to consumers regarding the convenience of the drier. However, the pictogram on the programme time is not self explanatory. We suggest showing simply a clock and the duration of the cotton dry programme at full load as consumers should be informed about the duration of the programme that will take longest.

We also support including information about the condensation efficiency of condensing driers as it shows how much of the water evaporated from the laundry is collected and how much of the water leaks into the surrounding air. As atmospheric humidity may lead to formation of mildew consumers need to be informed about the performance of the different appliances. In this context we welcome using the well-known A-G rating to express condensation efficiency. However, the pictogram showing the box with the amount of the collected water is not easy to understand for consumers. The relevant information, which is the amount of water that leaks into the air, is not shown explicitly on the label.

We are supportive of informing consumers about the airborne acoustical noise on the energy label. The pictogram seems to be clear without further information.

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The pictogram showing whether an appliance functions with electricity or gas is not clear to consumers. We oppose using the flash to indicate that the appliance runs with electricity. The flash is commonly used as a warning symbol for high voltage. Any use of this icon that is not linked to a warning concerning high voltage, should be avoided as inflationary use of this symbol could decrease consumers' attention in situations where they need to take care. We propose showing a plug/ and or socket instead to symbolise that the appliance runs with electricity. In order to ensure that the labels look as similar as possible, it may be an option to show both, a plug and a gas flame on both labels and to tick the appropriate box.

Indication of the absolute energy consumption per cycle seems favourable

The working document foresees indicating the energy consumption per cycle instead of indicating the average annual energy consumption. For tumble driers it seems to be difficult to indicate the annual average power consumption as the use patterns differ widely across Europe depending on the climatic conditions. Therefore indicating the consumption based on a weighted average per cycle seems to be adequate.

However, we are not convinced that it will be beneficial to indicate on the Label only the virtual energy consumption in kWh per cycle for gas fired appliances. Although ensuring comparability with the absolute power consumption of a drier that uses electricity is very important, consumers also would like to know how much gas will be consumed during the use phase of a gas fired appliance. Therefore the real gas consumption should be given and it should be explained that this corresponds to certain electricity consumption.

Definitions

The term "household tumble drier" should include a clear definition for "household use" and "non-household use". Such as specification seems to be needed as the subject matter and scope refers to household tumble driers including those for "non-household use".

Shorter transition periods are needed to prevent consumer confusion

The working document foresees a transition period of twelve months in which both labelling requirements would be valid. As it can be assumed that manufacturers will apply the label that allows for a better rating, two driers with the same consumption could be in different energy efficiency classes. As this will be misleading for consumers, it should not be left to manufacturers to choose in a transition period of one year if they would like to apply the old or the new label.

In addition, it should not take sixteen months after the entry into force of the Regulation until manufacturers and retailers are obliged to show the new labels in shops to consumers.

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Additional information in the product fiche

As tumble driers can be either humidity controlled or time controlled, we suggest including the operation mode of the tumble drier into the product fiche and to the technical documentation.

Rating of condensation efficiency classes is supported

We support the proposed condensation efficiency classes, i.e. class "A" for a condensation efficiency of above 90%.

END.

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