



Raising standards for consumers



The Consumer Voice in Europe

ANEC/BEUC comments on the updated Ecodesign and Energy Labelling proposal for vacuum cleaners

Updated European Commission drafts of December 2012

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Summary

The European Commission put forward its first draft proposal for ecodesign and energy labelling requirements for vacuum cleaners in 2010. Since then the texts have been subject to consultations and have undergone alterations. In August 2012, the European Commission services submitted to inter-service consultation two respective drafts on Ecodesign and energy labelling on which ANEC and BEUC provided extensive comments in our paper of October 2012. In December 2012, the European Commission notified to the World Trade Organization (WTO) two updated versions of the August 2012 drafts. Although, the updated texts contain some significant improvements, we express reservations on whether they correspond to the most feasible technological solutions that are available. With this paper, we provide comments on some key points we consider that can be further improved before finally adopting the mandatory ecodesign and labelling requirements for vacuum cleaners.

We notably comment on the following selection of points:

- The test standard proposed to measure the cleaning performance does not correspond to a realistic use of their vacuum cleaner by consumers;
- The rated input power must be assessed in combination with quality criteria such as dust pick-up;
- The level of ambition regarding noise is low;
- The number of different Energy Labels proposed for vacuum cleaners (9 different labels from the beginning) is not justified in the case of such a moderately complex product;
- The intention to tackle the abuse of tolerances is a great step forward.

Ecodesign requirements

- **Timeline**

We welcome the decision of the Commission to shorten the introduction of Tier 2 requirements from 5 to 4 years. This is justified considering that the negotiations about possible Ecodesign requirements are pending for several years and technology evolved in the meantime.

- **Rated input power should be combined with quality criteria such as dust pick-up**

ANEC/BEUC welcome the intention of the European Commission to propose more ambitious power caps. Consumers are led by marketing to believe that higher input power means better cleaning performance. As extensively stated in our previous position paper¹ test results confirm on the contrary that the *rated input power* does not give a good indication of the cleaning performance.

However, at the same time, we believe that it is crucial to assess the suitability of the power caps in combination with quality criteria such as dust uptake. ANEC/BEUC are concerned about the proposal of a 900W cap in Tier 2 especially due to the fact that dust pick-up on carpets in the current proposal is set at only 65% for both Tiers. ANEC/BEUC are of the opinion that the lower power cap proposed in combination with the non ambitious quality criteria will result to products that will not correspond to consumer needs.

In addition, we remind that according to the current measurement standards, measurements are performed with an empty bag and as our members' tests have shown, used vacuum cleaners will perform significantly worse than new models tested for compliance without containing any dust in the bag. On top of that we must bear in mind that it is not realistic to assume that consumers empty their dust receptacle every time they use their vacuum cleaner as this is not practical and the paper bags for some models are quite costly.

DG ENER proposes that dust pick-up on hard floor reaches at least 95% by Tier 1 and does not propose that the threshold be gradually raised. Considering that most vacuum cleaners can already easily achieve the 95% threshold, we suggest raising the bar by Tier 2. It is important to note that the pick-up can reach values beyond 100% as the head of the vacuum cleaner picks up dust laterally as well.

¹ [Consumer organisations comments on draft Ecodesign and Labelling rules for Vacuum Cleaners- European Commission working documents of 27/08/2012](#)

Concluding, ANEC/BEUC are convinced that power caps should be assessed together with quality criteria and compliance test should be performed under realistic conditions and suggest the following improvements:

	DG ENER	ANEC/BEUC
Dust pick-up on carpets	Tier 1: 65% Tier 2: 65%	Tier 1: 70% Tier 2: 75%
Dust pick-up on hard floors	Tier 1: 95% Tier 2: 95%	Tier 1: 95% Tier 2: 97%

- **Noise levels**

According to the European Commission quoting the European Environment Agency, “noise above a volume threshold of 60dBA affects not just the wellbeing but also the physical health of citizens²”. In our previous paper³ we have presented data supporting that noise reduction does not come as a trade-off with other aspects important to consumers such as weight. Noise depends on the measurement standard that has been used. In the data presented in our previous paper we refer to noise measurements based on *sound pressure* as this method provides a more realistic overview of the level of disturbance to humans. However, in order to allow comparability with the European Commission’s proposal we propose the limits described in the table below as measured on carpet:

	DG ENER	ANEC/BEUC
Noise level (sound power)	Tier 1: <i>N/A</i> Tier 2: $\leq 80\text{dBA}$	Tier 1: $\leq 82\text{dBA}$ Tier 2: $\leq 78\text{dBA}$

Energy label

ANEC/BEUC regrets that DG ENER proposes that nine Energy Labels for vacuum cleaners coexist at the same time on the market. We consider that this will not help consumers to make a well informed choice and **we support a single label with a scale from A to G**. However, we are pleased to see the proposal to express dust filtration in an A-G scale rather than in the form of percentages.

² http://europa.eu/legislation_summaries/environment/noise_pollution/index_en.htm

³ [Consumer organisations comments on draft Ecodesign and Labelling rules for Vacuum Cleaners- European Commission working documents of 27/08/2012](#)

Verification and market surveillance

ANEC/BEUC welcome the intention of the European Commission to **tackle the abuse of tolerances** by market players as mentioned in Annex III of the Ecodesign proposal and as particularly stated in Annex VII of the Energy Labelling proposal saying that:

“The verification tolerances defined in this Annex relate only to the verification of the measured parameters by Member State authorities and shall not be used by the supplier as an allowed tolerance on the values in the technical documentation to achieve a better energy efficiency, cleaning performance or dust re-emission class. The declared values shall not be more favorable for the supplier than the values reported in the technical documentation.”