Input on draft Tasks 1-4
Preparatory study on the review of the Household Dishwashers' regulations

July 2015

Following the Seville stakeholder meeting on 23rd June 2015, and to complement our answer to the JRC questionnaire in May, we would like to highlight a few points of particular importance to environmental NGOs regarding the review of the Energy label and Ecodesign measures of household dishwashers.

Priority issues

▪ The need to match the consumers' actual use

One of the two reasons given by the Omnibus study in March 2014 to justify the need for a preparatory study to review the current measures is the need to '*address issues for better alignment of the measurement and calculation method to real life use'.*

The label declaration and test procedure are based on the eco-programme, which is only used in 22% of dishwashing cycles, according to the initial results of the University of Bonn's study presented in Seville in June. The label and test procedure need to better reflect the consumers' actual use. We tend to consider that, as with washing machines, the label declaration and test procedures should be calculated based on more than one program, i.e. based on the programmes used most often, such as the automatic, short, and eco programmes. On one hand, this could make testing more costly, but on the other, it would also unleash the potential of Ecodesign measures and Energy labelling for dishwashers. Let's keep in mind that the main feature a consumer wants from a dishwasher, besides cleaning performance, is its low energy and water consumption and the bills associated with that, according to the above mentioned consumers' survey.

This could be complemented by a requirement foreseeing not more than one automatic, short and, eco program, to avoid the washing machine situation where manufacturers have duplicated the main programmes.

▪ Information on programme duration and consumption

Consumers have very little acceptance for long-running programmes. The first measure to take, in our opinion, is to better inform them before their purchasing decision. Displaying the programme time of the most used programme(s) on the label should be envisaged.

Capping the most used programmes to a limit of 2 hours could also be considered. In our opinion, the eco-programme could remain unrestricted.

Programme duration and energy consumption of all programmes need to be presented in an intelligible way to the consumer. For this purpose, we believe that the appliance manual needs to be rethought. ECOS was involved in the Atlete II project on washing machines which showed that there was a very low compliance rate for the information requirements in the booklet of instructions. One easy solution benefitting both consumers and manufacturers could be to introduce a template for information requirements. Another option is the use of QR codes.

Other aspects

- There are also a number of issues that were discussed in Seville for which we support Topten answers[1], especially:
  - the need to introduce an Ecodesign requirement for the delayed start function, should the low power modes be excluded from the EEI calculation;
  - the attention to be paid to battery-operated dishwashers and the possibility of including semi-professional dishwashers in the scope, at least for energy information requirements;
  - the interest of displaying the energy consumption per cycle instead of per year;
  - the little relevance of adapting the share of half load in the EEI formula;
  - the consideration to give to the possible consumption increase of demand response functions;
  - the added value of having a hot water supply icon on the label.

- We would also like to formally express our intention to be part of the subgroup on tolerances.

Expectations for next steps

We take the opportunity to insist here on topics that we expect to see covered in the remaining sections of the report:

- Life-cycle cost calculations using learning curves: learning curves are referred to in the MEErP, and dishwashers are a very relevant and well documented product group for the use of this approach;

- Examination of size evolution and need to maintain the standard energy consumption in a way that it does not create an incentive for larger models.

- Discussion of policy options for resource efficiency aspects: in the annex, you will find a joint ECOS-EEB-Coolproducts-RREUSE proposal that we would like you to consider for the next stages of the review. *Annex: Material efficiency and end-of-life aspects: Design and policy options proposals*

END

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[1] Input to the draft preparatory study on the revisions of the dishwasher energy Labelling and Ecodesign regulations, Tasks 1-4 - Anette Michel, Topten International Services, 20. July 2015