



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

July 2015

Following the Seville stakeholder meeting on 24th 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

▪ Stop the trend towards larger appliances

The average washing machine's capacity has increased by 20.4% between 2005 and 2012¹. Topten's market monitoring report from June 2015 showed that large machines are still gaining market share, and at a high pace. It also showed that washing machines in better efficiency classes are clearly larger. Due to the size increase, energy savings by efficient washing machines for the standard programs/loads are minimal. Stopping and changing this trend should be a priority of this review.

Different solutions exist and their impacts should be fully assessed in the coming tasks:

- The use of **curved and asymptotic formulas**, instead of linear ones, to define permitted energy levels in relation to capacity. Today, the EEI formula follows a strictly linear efficiency approach: an A+++ washing machine with an 8kg capacity can use 30% more energy than a model with 6kg. In other words, instead of efficiency improvements that lower the machine's energy consumption, currently, good efficiency classes can be reached more easily by increasing the capacity.
- The **use of sensors and technologies** that detect the load and/or the level of programme completion could be encouraged, by setting provisions for the largest capacity machines or awarding bonuses for truly energy-saving sensors.
- **Capacity-independent levels** - products would have to meet certain absolute levels to qualify, irrespective of their load or size.

We also invite the study team to consider the introduction of a 'small' load (e.g. 2 kg) or an 'average' load (3 – 3.5 kg) into the standard and EEI calculation. This could offer an incentive to optimise machines also for small loads from an energy perspective, thereby better reflecting the actual usage of consumers. Currently, the tests are based on half load, which, for very big appliances, is still far above the known 'average' load figure (3.5kg).

¹ Coolproducts - White Goods in a Dangerous Spin – Spiralling capacities, impacts and practical solutions ([link](#)) – based on VHK Omnibus review study (2014)

- Information to consumers

As shown by the initial results of the University of Bonn's study, presented in Seville in June, 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(s) of the most used programme(s) on the label should be envisaged. Capping the most used programmes to a time limit could also be considered. Given the impact that shorter programmes could have on washing performance, the interest of reintroducing the washing performance on the label should be discussed. Transparency on both programme time and washing performance would allow consumers to choose a machine according to their preferences and needs, minimising the risk of poor performance on one of these factors.

Moreover, maximum capacity, programme duration, and water 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 instruction manual. 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.

- Cold wash

Cold wash holds a tremendous energy saving potential. Tooten tests² demonstrated that washing at 20°C gives good results when using good detergent, and machines with a good washing performance. The Ecodesign regulation foresaw that washing machines must have a 20°C-programme since the end of 2013. However, in order to unleash the savings potential related to low temperatures wash, we would like requirements on the washing performance of these 20°C cotton programmes to be introduced.

Other aspects

- There are also a number of issues that were discussed in Seville for which we would like to refer to Tooten answers³, especially:
 - The preference for integrating small or average load in the EEI formula instead of adapting the share of half load (see above);
 - the possible misuse related to the capacity declaration;
 - the need to maintain the 60° programme in the EEI formula;
 - the added value of displaying the actual temperature in the instruction manual;
 - the need to solve the duplication of programmes issue;
 - the proposal to introduce requirements on spin drying efficiency and rinsing efficiency;
 - the need to introduce an Ecodesign requirement for the delayed start function, should the low power modes be excluded from the EEI calculation;
 - the added value of having a hot water supply icon on the label.

² Cold Wash – Do Prejudices Impede High Energy Savings, Tooten International Services TIS, Mibelle Group, Federation of Migros Cooperatives ([link](#))

³ Input to the draft preparatory study on the revisions of the dishwasher energy Labelling and Ecodesign regulations, Tasks 1-4 - Anette Michel, Tooten International Services, 20. July 2015

- The review of the Washing Machines regulations offers the right opportunity to also revise the out-dated label for combined **washer-driers**. Washer-driers offer the same functions as washing machines and tumble driers. In 2011, a survey by the University of Bonn found that consumers were using their washer dryers 4.3 times a week for a washing cycle, and 1.1 time a week for a "wash+dry" cycle. It would therefore be justified for consumers to be able to compare these two types of appliances, on the basis of their energy efficiency, consumption, spin-drying efficiency, etc. We therefore invite the study team to propose scenarios that would ensure this transparency.

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 washing machines are a very relevant and well-documented product group for the use of this market anticipation approach;
- 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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