



Position on the review of the specific requirements on the durability of the hose and the operational motor lifetime according to Regulation 666/2013 on vacuum cleaners

May 2017

▪ **Durability of the hose**

With reference to the three options described in the report, we support option 3 which foresees the development of a test method to assess the durability of secondary hoses of upright vacuum cleaners, since their characteristics are very different from the ones used in cylinder vacuum cleaners. This is also identified as the slowest option to be implemented, and we urge the European Commission to issue a standardisation request without further delay. Furthermore, we would like to underline that a strong definition of upright vacuum cleaners is needed so that no loophole is created.

▪ **Operational motor lifetime**

With the Ecodesign Regulation on Vacuum Cleaners published as long ago as July 2013, we express our disappointment with the situation we find ourselves in: four years after the regulation was adopted, the test method to determine the operational motor life with a half-loaded dust receptacle as defined by the regulation is questioned by stakeholders performing the tests, and some of them are now pushing to find a legislative arrangement that would allow for an empty receptacle testing.

ECOS has always advocated for the development and use of test methods that as much as possible represent real-life conditions of product operation and consumer behaviour. Every test methodology is associated with some cost and some uncertainty and consumer behaviour at home cannot be fully replicated under laboratory conditions. That is why the aspects of representativeness, cost and uncertainty should all be considered so as to arrive at a balanced decision. We consider that this has not been the case on this occasion: the study report does not sufficiently assess the impact of moving from half-loaded to empty receptacle testing, and the industry arguments outlined in the report do not seem to be substantiated with robust evidence or technical justification. Some stakeholders have suggested a belated arrangement instead of using the clear regulatory requirement already in place. This will create confusion on the market and does not encourage future improvements in test methodologies. Apart from more accurate test results, we also need more certainty that the financial, environmental and consumer benefits sought by Ecodesign and Energy Labelling measures will actually materialise.

Should it now be decided that the empty receptacle testing is an alternative to the above described situation, we urge the Commission to exert its power so that standardisation bodies continue developing the half-loaded receptacle test methods within a clear, stringent timeframe so that such a test is ready for the regulation's upcoming revision.

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