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**Comments from ECOS (on behalf of Environmental NGOs)
on the draft Ecodesign and Energy Labelling measures for vacuum
cleaners (as circulated by the European Commission in July 2011)**

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The publication of these new draft documents is welcome, although we regret the long delays since the 1st Consultation Forum meeting on this product group organised already more than a year ago. **We call for a quick finalisation and adoption of the measures.**

Current proposal: too complex

The current European Commission's proposal is based on an attempt to model the annual consumption of a vacuum cleaner through a sophisticated formula.

This would make market surveillance activities and testing by consumer organisations very complex, as it would require to test 6 characteristics of a product (effective power, percentage of dust removal on carpet, percentage of dust removal on hard floor, maximum movement resistance of the head during the carpet test, maximum movement resistance of the head during the hard floor test, width of the cleaner head) and apply a complex formula before being able to check whether a product is compliant or not.

We believe it could be possible to achieve the political goals highlighted in the preparatory study and at the first Consultation Forum meeting through a simpler and clearer approach, especially for the Ecodesign requirements.

Ecodesign measure: a clear framework required

The issue at stake with vacuum cleaners is to limit the exaggerated and unjustified trend to higher and higher input power, while ensuring that the cleaning performance remains decent.

This can be achieved through two simple Ecodesign requirements:

- A cap on the input power.
- A minimum requirement on the cleaning performance.

This would set the clear framework into which vacuum cleaners are allowed to compete.

The power cap could for example be set as we suggested in our 2010 position paper, i.e. 1000 W by 2013 and 750 W by 2015.

The minimum cleaning performance could be set at the 2 double-stroke point. It would ensure that all vacuum cleaners on the market perform decently after 2 double-strokes (the most common way of using the product).

Such an approach would simplify testing and allow market surveillance authorities and consumer organisations to quickly spot non-compliant products.

Energy Labelling: a credible and understandable rating

The energy rating of vacuum cleaners should be primarily based on the power they use, while allowing premium cleaning performance to be rewarded (based on the assumption that a premium vacuum cleaner would allow quicker cleaning and be less used than the average).

This could be done by using the power as the main metrics of the ranking and providing a bonus (e.g. possibility to jump one energy class up) for products reaching a very high cleaning performance. Another option could be a simplified formula based on the Commission's or CECED's preliminary work. However, we don't believe that other parameters such as movement resistance of the head or time in idle are really necessary for this ranking.

Calculation of the annual energy consumption

The Commission's sophisticated formula for the annual energy consumption of a vacuum cleaner remains highly theoretical, as we have little evidence about the way consumers use their vacuum cleaner and how much the cleaning performance really influences the time it is used. Therefore, indicating an annual energy consumption value on the energy label remains a difficult exercise. However, this should not distract decision-makers from the simple fact that there is urgency to cap the power of vacuum cleaners on the market.

In addition, we again question the proposal to exempt hand-held and robotic cleaners from any requirement.