



# Vacuum Cleaners

## Comments following consultation forum on 31/03/2022

We thank the European Commission for the updated Ecodesign and Energy Labelling proposal for vacuum cleaners focusing on a new formula, as well as for the opportunity to discuss it at the consultation forum on 31 March 2022. We support the overall rationale for the changes suggested, and would like to add some important considerations to make sure that the changes fully seize the energy savings potential of these products.

### General Comments

We support the following changes suggested by the Commission:

- Making annual energy consumption independent of cleaning performance. **However, this needs to be done very carefully in order not to forego much needed energy savings, as we explain below.**
- Expanding the scope to include cordless vacuum cleaners, robots and handheld vacuum cleaners within the scope of the regulation.
- Testing in partly-loaded conditions, based on manufacturers' declared maximum usable volume (MUV).
- Testing with three double strokes, provided that the round-robin tests currently being conducted by standardisation bodies provide positive results on this front.
- We support the new weighting of 75% for hard floor and 25% of carpet, as this is more representative of the actual distribution of floors in Europe.

We think the following points need be considered/clarified:

- While we support simplifying the annual energy consumption formula by getting rid of correction factors, the current Commission proposal means that annual energy consumption of most models is now lower than in regulation 666/2013. In some cases, this results in previously banned products being (re-)allowed into the market. The current Commission proposal would effectively be "backsliding" with respect to 666/2013. We think therefore that the Ecodesign threshold for annual energy consumption, and the energy label classes thresholds need to be tightened to reflect this. We provide more information on this point, and suggest some solutions in Annex 1.
- The formula proposed is only for passive nozzles. We understand that this is just for the sake of simplification in the document, and that the regulations that will be put forward will explicitly include the energy consumption of active nozzles:

$$SE = \frac{P + NP}{1800 \times B}$$

where:

*SE* is the average specific energy consumption in Wh/m<sup>2</sup> during test

*P* is the average power intake

*NP* is the average power equivalent of battery operated active nozzles

*B* is the nozzle width

- It is unclear whether power intake will be calculated while removing dust and/or debris, both for hard floor and carpet:
  - At one point, the document reads “The test for mains-operated VCs follows IEC 62885-2:2016”, which does not include debris pick-up.
  - In the “summary of parameters, standards and formulas for Ecodesign and Energy Label of vacuum cleaners” however, power P is calculated as a weighted average of debris pick-up and dust pick-up.

## Ecodesign

The Commission explains in its document that the October 2019 proposal “kept the energy efficiency limits of Regulation (EU) 666/2013, because there is no Least Life Cycle Cost (LLCC) gain in setting more ambitious limits”. Footnote 4 on page 1 of the paper says that “the review study concluded that the limit could not be pushed any further”. This is in our opinion a deeply biased interpretation of the review study. Page 284 of the preparatory study on vacuum cleaners reads: “While the energy saving potential is higher in PO1 and PO2 than in PO3, all three scenarios result in roughly the same monetary savings for the end-users compared to the BAU scenario.”. And figure 84 of that same study further makes the point. Because the Ecodesign regulations aim at “continuous improvement in the overall environmental impact of products, when this improvement does not entail excessive costs”, we think that the Commission should suggest the more ambitious requirements proposed by the consultant, that is 36 kWh/year (before the corrections suggested above, that is).

There are at least two other important arguments for raising the ambition:

- One is that time is slipping down. By the time this regulation comes into force, it will likely be 2023, or even 2024. Keeping the same Ecodesign limits as in 2017 would be assuming that manufacturers have not made any progress in seven years regarding the energy efficiency of their products, which is surely not true.
- The second one is that the cost analysis carried out by the consultants was made in a completely different scenario of energy prices. Operating costs have increased, and therefore the most efficient options become more appealing from an economic point of view.

We support the 750W power cap suggested by the consultants for policy options 1 and 3 of the preparatory study.

## Energy Label

- Once the right level of Ecodesign has been established, the energy label classes will need to be adjusted accordingly. We can provide further input on this once there is clarity on the formula issues raised above.
- We believe that the parameter “S” on the label does not add much for the consumer. If anything, it is confusing. As discussed during the 31 March meeting, a satisfactory solution would be to keep it in the energy label of commercial vacuum cleaners, and to take it out of the energy label for domestic vacuum cleaners.



## Circularity and resources efficiency

While not discussed specifically at the Consultation forum, we take the opportunity to stress the importance of circularity and resource efficiency in vacuum cleaners.

We suggest to consider a minimum recycled content for plastics and to prohibit the use of halogenated flame retardants and organo-phosphates based flame retardants that hamper recycling. This is really aligned with the goals of the EU Commission as mentioned in the CE action plan of 2020 and the announcement to consider a wide range of substances of concern for restrictions (see: <https://ec.europa.eu/docsroom/documents/49734/attachments/1/translations/en/renditions/native>). It should be noted that producing vacuum cleaner without those flame retardants is feasible, as a French EPR system already reward products not using plastics containing flame retardants.

We also would like a confirmation of non-destructive disassembly (for repair) and dismantling (for easing compliance with WEEE) requirements as set in other white goods measures.

On durability, we wonder whether sticking to the same durability requirements as in existing regulation represents a fair picture of the market evolution. We call for a better exploration of other parts that could be associated with durability requirements and if it should not be increased the minimum durability of motors and nose.

On repair, we insist again on making sure parts can be delivered unbundled to maximise the resource saving opportunities while increasing the financial accessibility to spares by professionals and consumers.

Finally, we also call for asking Carbon Footprinting information, not necessarily yet associated with a threshold quantitative value, but already echoing the proposal on new Ecodesign by the EU Commission, providing a transition period for industry and market surveillance to get used to such carbon footprint information and informing policy options for a future revision or the setting of horizontal requirements. Postponing such information requirements does not appear justifiable, notably if not related to a performance threshold for now.

