



Vacuum cleaners - Ecodesign and Energy Labelling

ECOS response to the public consultation

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Introduction

Ecodesign and Energy Labelling regulations are some of the most effective policies to address energy efficiency and circularity of products, but they need to be designed ambitiously and be up to date with technology development. The review of ecodesign requirements and energy labelling for vacuum cleaners is finally underway again after [lengthy delays](#), and a lawsuit that ended in [annulment of the energy label in 2019](#).

In the new proposal, popular robot and battery vacuum cleaners are included in the scope and ambition on material efficiency is raised. However, a new formula for the calculation of energy efficiency runs the risk of opening the market up to previously banned products. ECOS has recently submitted [detailed technical comments](#) to the Ecodesign and Energy Labelling Consultation Forum.

Now, the European Commission is running an open [consultation on the Ecodesign and Energy Labelling requirements for vacuum cleaners](#) in the form of a survey. In this document, we show how ECOS will answer and why. We encourage our members and other environmental-minded individuals and organisations to submit their own response with this as input.

Read the guide like this:

- a) *Questionnaire question?*
- ➔ Our answer

Our explanation

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Part 1 - On the revision of the Ecodesign act on vacuum cleaners

Question 1)

- a) *Should cordless/battery operated vacuum cleaners be in the scope of the Ecodesign act?*
→ Yes, including minimum energy efficiency requirements
- b) *Should robot vacuum cleaners be in the scope of the Ecodesign act?*
→ Yes, including minimum energy efficiency requirements

Battery operated and robot vacuum cleaners are steadily growing in popularity and are expected to represent 40% of the energy consumption from vacuum cleaners in 2030. Leaving such a great market share out of the scope of the regulation would be a significant missed opportunity for energy savings. Battery operated and robot vacuum cleaners are still evolving in their design. This is sometimes used by industry as an argument not to regulate these products. However, in our view it is rather an argument in favour of inclusion in the scope: Introducing ambitious requirements now will help guide this development in a more resource efficient direction.

Question 2)

As for resource efficiency:

- a) *How important are the following criteria? Rank them (with 1 being the most important)*

→ This is our ranking:

1. Availability of spare parts
2. Accessibility of components
3. Manual for reparability and maintenance with diagrams and list of spare parts
4. Delivery time for spare parts
5. Other

Because of vacuum cleaners' typical price point – they may often cost too little for consumers to consider paying for professional repair – the likely repair scenario for these products is self-repairs at home. It is therefore essential that spare parts are made available to consumers and that parts on the product can be easily accessed without professional knowledge or tools. Notably though, all of these aspects play a part in order to bring down the barriers to repair.

- b) *Which spare parts for vacuum cleaners would it be most important for you to be able to obtain easily (chose up to three answers): Hose, motor, wheels, battery, permanent filters, or other (please specify)?*

→ In the text box "Other": We do not want to limit the list to three. All these parts should be easily obtainable along with cord, cord wheel, and reel/spring as these are commonly failing parts.

We don't accept the premise of the question that we should only demand access to three of these parts. Consumers need easy access to all these parts, including the commonly failing parts of the cord wheel mechanism.

Question 3)

Which of the following testing conditions are the most reproducible and suitable to reflect real-life usage? Rank them (with 1 being the most important information)

→ Our ranking:

1. Partially filled receptacle
2. Three double strokes
3. Dust pick-up
4. Debris pick-up (distinguishing household and commercial debris)
5. Universal nozzle
6. Speed, measured as m² cleaned per minute of operation

In standards making, real-life representativeness and reproducibility are often subject to trade-off, which makes this question a little ambiguous. Nonetheless, it is our view that the partially filled receptacle, three double strokes, and dust and debris pick-up are the important factors for a real-life representative yet reproducible test. Dust and debris pick-up are of equal importance. The design of the nozzle may be an opportunity for innovation to improve the performance of the vacuum cleaner. Standardising this could stifle such product development, which is why we rank it lower. Speed is not relevant for household vacuum cleaners and is therefore ranked last. As a final remark, the most important factor in the development of the standards underpinning this regulation is that the conditions in the cleaning performance test are identical to those in the energy performance test.

Question 4)

To avoid the practice of discharging the battery in a very short time just for the cleaning performance test, it is considered to require the battery capacity QN should last at least 20 minutes at P_{max} ($0,33hP_{max}$) used for the cleaning performance tests. Do you agree with this approach?

→ Yes

This closes an opportunity for circumvention in the cleaning performance test.

Question 5)

Which of the following approaches do you agree with?

- To set high minimum cleaning performances in ecodesign as entry point on the EU market, in order to be coherent with other cleaning products such as washing machines and dishwashers.

This ensures all products on the EU market are not just energy efficient but are also fit for their purpose.



Part 2 – On the introduction of an EU energy label on vacuum cleaners

Question 6)

Should there be a EU energy label for vacuum cleaners?

→ Yes

Energy labelling is an effective measure to create a consumer demand for the most energy efficient products. It leads to energy cost savings for consumers and to carbon emission savings for the planet. Following a court case in 2019, the energy label for vacuum cleaners was annulled, which was very unfortunate from an environmental point of view. We want it reintroduced as soon as possible.

Question 7)

On top of the energy consumption, which of the following information would you find useful on the EU Energy Label?

→ Our ranking

1. Duration of the battery
2. Noise
3. Dust re-emission
4. Don't know or no opinion
5. Cleaning performance (speed as m² cleaned per minute)

The most important to note with this ranking is that cleaning speed is not relevant for household vacuum cleaners.

Question 8)

The information on the cleaning performance would be relevant for the commercial vacuum cleaning market and also in a household context. Should this information deserve more prominence than other information?

→ In the "Other" text box: Cleaning speed is not relevant for domestic VCs

Cleaning speed may be relevant for commercial vacuum cleaners, but in our view it is not relevant for household vacuum cleaners and it should therefore not at all be included in the label.

Question 9)

Which of the following approaches do you agree with?

→ To set high minimum cleaning performances in ecodesign as entry point on the EU market and focus the energy label on energy efficiency, in order to be coherent with other cleaning products such as washing machines and dishwashers

