



Brussels, 22 June 2010

**Position of ECOS, EEB, Friends of the Earth Europe,
WWF EPO, CAN Europe and INFORSE Europe
on the EC Working Document on the Ecodesign and Energy Labelling
of Household Tumble Driers**

In the context of Directive 2009/125/EC establishing a framework for the setting of ecodesign requirements for energy related products

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coolproducts
for a cool planet

Our Coolproducts for a Cool Planet campaign website: www.coolproducts.eu

Our expert website on Ecodesign: www.expert.coolproducts.eu

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An Ecodesign measure is required

The European Commission suggests not to set any Ecodesign requirement on household tumble driers. **We do not share this view.**

An Ecodesign implementing measure is required and justified, in order to reduce the environmental impact of tumble driers and ensure a more dynamic market transformation. More generally, we do not think the European Union can afford leaving some key energy-using products free of Ecodesign regulation in a context of urgently needed additional measures to reach the EU 2020 environmental goals.

It is critical to note that the overall environmental impact of tumble driers is expected to increase despite measures such as the energy label. An increase in electricity use of 6 TWh / year by 2020 is forecasted - which represents a 35% increase -, and the deployment of heat pump driers also raises the issue of limiting the impact of refrigerant fluids.

It is true that Annex II of the Ecodesign directive specifies that requirements on the energy consumption must be set aiming at the minimum life cycle cost. However, the same annex also stipulates that if a product group meets the criteria to be potentially covered by Ecodesign (which is the case here), "*concrete measures must be taken with a view to minimising the product's environmental impact*". This suggests that an Ecodesign measure is to be adopted, but of course designed in such a way that it avoids excessive short-term costs to users and manufacturers.

In our interpretation, not setting any Ecodesign requirement would therefore not be in line with the European Union's objectives on energy savings and climate as well as with several of the Ecodesign directive articles. **It would also fail to challenge manufacturers and send an appropriate signal to the market.** Below is a proposal for such an Ecodesign measure:

A first tier one year after entry into force of the regulation:

- **removing from the market the least energy efficient models** from classes D to G.
- imposing on all driers a **functionality that stops the program when the appropriate level of drying has been achieved** (this functionality can be ensured for example through a humidity sensor and will avoid unnecessary energy consumption).
- setting a minimum requirement of **60% for the condensation efficiency**.
- setting **information requirements** in the user manual on the most efficient way to dry clothes.
- setting design requirements on heat pump driers to further facilitate **use of low-GWP refrigerants and recovery of the fluids**.

A second tentative tier with a safeguard clause:

Inspired by the current policy development in Switzerland (i.e. ban of models below class A by 2013), this tier would **ban driers below class A in a reasonable middle-term timeframe**.

A **safeguard clause** would enable revision of this objective or its timing if the market share of products in the current energy class A does not reach a certain minimum level and/or average prices of such appliances do not decrease down to a certain threshold within the next 3 years.

Comments on the proposed revised energy label

As regards Energy Labelling of driers, we consider that the proposed new calculation methodology is substantially different from the current one, thus **allowing for a complete revision of the label, including the positioning of the scale.**

The proposed addition of classes A+ and A++ on top of A would mostly benefit manufacturers. Adding these classes would enable some current models on the market to become as good as A++ without any improvement. It would also reduce the room and incentive for further innovation.

Therefore, we strongly advise **redefining a scale for this new label which avoids classes A+ and A++ right now. The most logical way is to move the current scale by 2 classes up:** this would mean that the least efficient models on the market today would be rated from E to G, and the best from A to C. This would leave room for future improvement.

Additional comments on the label:

- We also believe that any condensation efficiency below 60% should be clearly prohibited or discouraged; therefore, the bottom class for condensation efficiency should include everything below 60%, preferably with letter G.
- The proposal to mention on the label the rated full load capacity together with a weighted energy consumption might be misleading, if consumers do not know that the latter is an average of various load conditions. We suggest either that the energy consumption figure be complemented by the weighted load on which it is based, or that it is clearly indicated that the energy consumption figure is based on a 'real life' calculation.
- The pictogram to differentiate drier technologies (condensing, vented, gas) could possibly be improved. We especially doubt that the lightning arrow symbol would be well understood (it could be replaced by a plug for instance).

Comments on the calculation method (annex VII)

We understand that the proposed calculation method is inspired by the calculation methods of the Ecodesign measures for washing machines and dishwashers (recently voted by the Regulatory Committee). While we appreciate this effort of consistency, there are several unclear (or insufficiently clarified) aspects in this calculation. We would welcome additional details on the rationale behind several of the parameters. In particular:

- The proposed new reference line would indeed discriminate by rated capacity, but it would allow current small models to jump by one or two energy classes without any improvement. This is completely unacceptable as the A-G label is not rescaled as we propose.
- The setting of the specific factor ' $-(30 \cdot T_i / 60)$ ' for vented driers in the calculation of SAE_c would need to be explained.
- It is not specified whether the calculation and values (in the graphs p.7/8) are based on a 60% starting moisture and on the measurement standard EN 61121:2005.
- The methodology does not take sufficiently into account the overall energy consumption due to the use of driers. When vented driers expel air from the inside of a building to the outside during cold season, this triggers additional need for space heating in the building. In some situation, this may have much more influence on energy consumption than other aspects such as low-power modes. This aspect should be considered in the overall discussion on the relevance of Ecodesign measures for tumble driers.

Comments on the verification procedure

We generally welcome tighter tolerances for declared values. However, the proposed 10% tolerance is still high and we believe it could be technically decreased to 7%.

A 10% tolerance is more than a half of an energy class, thus allowing too much deviation in our opinion.

END.