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**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 Vacuum Cleaners**

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

Contacts:

ECOS – European Environmental Citizens' Organisation for Standardisation
Edouard Toulouse, Ecodesign Officer
Tel: + 32 2 894 46 57 / E-mail: edouard.toulouse@ecostandard.org

EEB – European Environmental Bureau
Stéphane Arditi, Policy Officer on Waste and Products
Tel: + 32 2 289 10 97 / E-mail: stephane.arditi@eeb.org

WWF-European Policy Office
Arianna Vitali, Energy Conservation Officer
Tel: + 32 2 743 88 16 / E-mail: avitali@wwfepo.org

Friends of the Earth Europe / Germany
Christian Noll
Tel: + 49 30 275 86-436 / christian.noll@bund.net

INFORSE Europe – International Network for Sustainable Energy
Gunnar B. Olesen
Tel: + 45 86 22 70 00 / E-mail: ove@inforse.org

CAN Europe – Climate Action Network Europe
Erica Hope, Energy Efficiency Officer
Tel: + 32 2 894 46 71 / E-mail: erica@climnet.org



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

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

The Working Document circulated by the European Commission on 7 June 2010 is rather rudimentary and does not provide details on some of the options mentioned.

While we appreciate the open questions, **we expect the Commission to move forward quickly on vacuum cleaners and develop a more precise proposal for a vote in Regulatory Committee before the end of this year.**

We also regret the lack of figures on the estimation of the impact of the various options proposed, which does not make comparison easy.

Comments on the scope

- We question the **exemption of battery hand-held models**. Some products on the market still consume more than 4 W on 'hold' position, meaning important energy losses 24h a day. A 4 W charger consumption represents 35 kWh / year, which is as much as 30% of the consumption of a standard vacuum cleaner. Clarification as to whether this mode is covered by the Ecodesign implementing measure on standby would be welcome.
- We also question the **exemption of robot cleaners**. Even if their market share is limited today, they should not be left free of any requirement. We are of the opinion that the Ecodesign policy should guarantee that any new technology brought to the market does not add up more energy consumption to render a service.

Comments on the various options proposed

In general, we consider that Ecodesign requirements are a preferable choice than only labelling instruments (especially for 'secondary' labelling scales that are not displayed as the primary information on the energy label, and might therefore be neglected by consumers). Ecodesign measures are more reliable and swifter in achieving market transformation.

This is why **we support Ecodesign requirements for noise, filtration performance and energy.**

As the intention of the Ecodesign policy is to decrease energy use, the requirement on energy should be designed in a way to decrease the power of products put on the market.

- **A cap of 1000 W on the electric power could be set by 2013, then 750 W by 2015.**
- A minimum requirement could also be discussed on the **performance of the main nozzle** provided with the cleaner. This would ensure a minimum cleaning performance and decrease the energy need.

On top of that, an energy label could provide information on the overall cleaning performance, so that manufacturers are **encouraged to further compete on the cleaning performance under the overall power cap**. This energy label scale could be **based on a relative metrics** (e.g. energy consumption per dust removed). And we support not mentioning the input power on the label.

As regards the scope of the energy label, we consider it could also be applied to commercial vacuum cleaners.

Requirements on other environmental aspects

We strongly encourage the European Commission to develop minimum requirements and/or consumer information on other environmental aspects. For example, a progressive ban of brominated and chlorinated flame retardants could be implemented in two stages.