

## **BEUC & ANEC comments following the Ecodesign Consultation Forum meeting on Vacuum Cleaners on 11 December 2023**

### **Summary**

- **We strongly agree that the scope of both the Ecodesign and Energy labelling Regulations for vacuum cleaners should be extended to cordless/battery-operated and robot vacuum cleaners.** As these product types are increasingly popular among consumers, it is very important that strict performance, energy and resource efficiency requirements are imposed on these products too. Consumers cannot be expected to have lower expectations in terms of lifetime, repairability, and energy use for battery powered vacuum cleaners than they have for mains-powered models.
- **We recommend aligning the proposed measures on resource efficiency with the more recent Ecodesign Regulations adopted for smartphones and tablets and tumble dryers.** Among other things, we urge the European Commission to introduce requirements on software updates availability for connected products and information requirements on the price of spare parts.
- **We recommend adopting stricter sound levels, dust-re-emission, and motion resistance requirements** to ensure consumers' health and comfort when using any type of vacuum cleaner.
- **We support the simplification of the energy label** and recommend maintaining it as simple as possible for consumers.
- **We urge the European Commission to reconsider the level of ambition of the proposed criteria of the repair score,** which is currently extremely low. It is crucial to integrate the cost of repair in the score, to make sure this tool is useful for consumers.

### **1. ECODESIGN**

#### **1.1 Scope**

We welcome the extended scope of the Ecodesign Regulation to cordless/battery-operated vacuum cleaners and to robot vacuum cleaners, as these products are increasingly popular among consumers. However, we urge the European Commission to also set minimum requirements on performance, reliability and repairability for these products, instead of only to regulating their (standby) energy use.

Consumers do not have lower expectations in terms of performance, lifetime, repairability, and energy use for battery powered vacuum cleaners than they have for mains-powered models. Minimum performance and material efficiency requirements should therefore be introduced also for battery-powered vacuum

cleaners. Similarly, consumers frequently complain about the disappointing cleaning performance of robot vacuum cleaners. According to recent tests from the UK consumer organisation Which?, some robot vacuum cleaners picked up just 4% of the dust from carpets.<sup>1</sup>

To face this problem, we suggest a two tiers approach in which material efficiency and durability requirements enter into force immediately, and performance requirements on a later date (e.g. after 2 years). This would acknowledge the time needed for standardisers to develop performance tests for robot vacuum cleaners that are suitable for use in Ecodesign requirements, without giving robot vacuum cleaners a free ride for many years to come.

## **1.2 Resource efficiency requirements**

We welcome the proposed measures on material efficiency, which align the Ecodesign Regulation for vacuum cleaners to those for other household appliances, like washing machines, dishwashers and tumble dryers. However, we believe critical elements are missing to ensure all type of vacuum cleaners are designed to be durable and repairable.

With the adoption of the political agreement on the Ecodesign for Sustainability Products Regulation (ESPR), EU policymakers have rightly recognised the importance of improving the circularity and sustainability of products to lower their environmental and climate impact. We therefore urge the European Commission to introduce strong resource efficiency requirements in this revision.

As noted in section 1.1, we urge the European Commission to extend the proposed measures on material efficiency to battery-operated vacuum cleaners and robot vacuum cleaners. As these are often connected products, it is essential to introduce requirements on operating system updates, as well as on availability of software and functionality updates, in line with the new measures adopted for smartphones and tablets and for tumble dryers.

Furthermore, for battery-operated vacuum cleaners, the battery should be easily removable by end-users.

Below, we list our broader recommendations on the proposed material efficiency requirements:

- **The list of spare parts** to be made available to consumers should also include wheels, power buttons.

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<sup>1</sup> <https://www.which.co.uk/reviews/robot-vacuum-cleaners/article/which-dont-buy-robot-vacuum-cleaners-amihM3h96wv0>

- **The maximum delivery time for spare parts** is set at 15 days, while for smartphones and tablets the timeline is much shorter (5 to 10 days). We ask the European Commission what the justifications for such longer timeline for vacuum cleaners is. A recent market check by the German consumer organisation vzbv on washing machines shows that, in most cases, the delivery of key spare parts takes considerably less time compared to the prescribed 15 working days.<sup>2</sup> We believe similar considerations should be made when setting the minimum delivery time of spare parts for vacuum cleaners.
- **Access to repair and maintenance information** requirements are currently limited to professional repairers and there is no obligation to provide information to end-users. We ask the European Commission to introduce a requirement addressing end-users, following the example of the measures recently adopted for smartphones and tablets (aka, instructions must be provided for free to end users for spare parts that they can replace).
- **Information on price of spare parts** is currently not addressed in the proposal. We ask the European Commission to take inspiration from the recently adopted Regulations for smartphones and tablets and for tumble dryers, which require manufacturers to indicate the indicative pre-tax prices of spare parts. The high cost of repair is the main barrier to repairing appliances for consumers.
- **Disassembly requirements** are currently missing from the proposal. Easy disassembly is essential to enable repair and ensure products continue to be used for longer instead of being discarded. We ask the European Commission to take inspiration from the recently adopted Regulations for smartphones and tablets and to align with the definitions used under the standard EN45554 when referring to disassembly tools. We also recommend measuring the disassembly time, and not just the common measure of number of steps, as easier disassembly and repair may also lower the overall cost of repair. This is also a recommendation from the PROMPT project, as a way to optimise design for durable products.<sup>3</sup>
- **Requirements on the replacement of serialised parts** are currently missing from the proposal. We ask the European Commission to take inspiration from the recently adopted Regulations for smartphones and tablets and require that manufacturers provide non-discriminatory access for professional repairers to any software tools, firmware or similar auxiliary means needed to ensure the full functionality of those spare parts and of the device in which such spare parts are installed during and after the replacement.

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<sup>2</sup><https://www.vzbv.de/pressemitteilungen/ersatzteile-gesucht-waschmaschinen-hersteller-machen-es-verbraucherinnen#:~:text=In%20einem%20aktuellen%20Marktcheck%20haben,halten%20sich%20an%20die%20Vorgaben.>

<sup>3</sup>[https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-031\\_Better\\_design\\_and\\_testing\\_for\\_more\\_durable\\_products.pdf](https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-031_Better_design_and_testing_for_more_durable_products.pdf)

- **Battery replacement:** Replacing the battery of a vacuum cleaner should be an easy task. According to a 2022 consumer survey by the Dutch consumer organisation Consumentenbond, inability to replace the battery is among the key inconveniences reported by vacuum cleaners' owners.

### **1.3 Functional requirements**

We recommend adopting stricter sound levels, dust-re-emission, and motion resistance requirements to ensure consumers' health and comfort when using any type of vacuum cleaner.

Noise is an extremely important factor for consumers. According to tests from ICRT (International Consumer Research and Testing), the average noise level for mains-powered vacuum cleaners is 66.5 dB, while for cordless vacuum cleaners is 70 dB. Yet, consumers complain about very loud products, even when the emissions stay below these limits. We therefore recommend setting limits at least at 80 dB for cordless vacuum cleaners and 75 dB for mains-powered vacuum cleaners.

We understand the proposed approach of setting high minimum cleaning performance requirements in Ecodesign and focus the energy label on energy efficiency. This would make the label more reliable and understandable and is in line with other revised energy labels. However, it is important that a good balance is stricken, to avoid that vacuum cleaners are designed to be very energy efficient to the detriment of high-performance levels.

We very much welcome that minimum durability requirements are proposed for the hose, the operational motor and the battery. For battery endurance, we understand the European Commission is considering alignment with the levels established in the Ecodesign Regulation for smartphones and tablets. We would support such alignment, which would set the minimum battery endurance to 800 cycles while maintaining 80% of its initial run time.

## **2. ENERGY LABELLING**

We support the European Commission's proposal to re-introduce an energy label for vacuum cleaners, as this is among the more recognised and trusted labels by consumers. It is important that the A-class of the label is initially left empty, to stimulate manufactures to become more efficient.

We agree with the proposed simplification of the label and the need to keep it as simple as possible, to ensure clarity to end-users. Besides the energy efficiency scale, we think essential elements of the label are:

- The noise level, in a scale format

- Information about the durability of the battery
- Electricity consumption per year
- A more ambitious repair score

We also understand the reason for introducing an icon on the maximum useful volume of the receptacle. While this information may not be as relevant for consumers, we agree it can be an important data for market surveillance authorities to assess compliance with Ecodesign requirements.

We do not think the icon representing “general purpose” would be easily understandable for consumers. Consumers generally expect a vacuum cleaner to be usable both on hard floors and on carpets.

We also support the idea of requiring the EPREL reference number to be indicated on the energy label, to facilitate research in the database. This would partially solve the issue of unreadable QR codes on new labels.

### **3. REPAIR SCORE**

The repair score for vacuum cleaners could be a useful information tool for consumers that currently lack any adequate means to compare the reparability of products.

However, we find the proposed calculations for a repair score extremely unambitious. For a repair score to be effective, it must be designed in a way that it only rewards manufacturers that go beyond minimum Ecodesign requirements. Otherwise, the risk is to mislead consumers and not to encourage manufacturers to improve the reparability of their products.

In the proposed measures for a repair score for vacuum cleaners, products would simply be required to meet mandatory requirements to receive a top class in the score. For example, maximum points would be allocated to products that require commercially available tools or tools that are supplied with spare parts for their replacement. This closely reflects the minimum Ecodesign requirement proposed for spare parts availability. If compared with the adopted criteria for a repair score for smartphones and tablets, the same criteria would translate into the lowest points possible in the score. Top scores would only be awarded to products that require no tools to replace key spare parts.

Similarly, according to the proposed measures, products would be awarded maximum points if repair and maintenance information for secondary spare parts are provided to end-users. This should simply be a minimum requirement under Ecodesign and therefore cannot be considered as the highest level of ambition to be awarded top classes in the repair score.

We therefore urge the European Commission to reconsider the level of ambition of the proposed repair score and align it at least with the repair score adopted for smartphones and tablets.

When identifying primary and secondary parts, the European Commission should make a distinction between priority parts and simple accessories, such as nozzles, that should always be easily changeable by end-users. Priority parts should also include, at least, wheels and electronic control boards.

We also recommend measuring the disassembly time, and not just the common measure of number of steps, as easier disassembly and repair may also lower the overall cost of repair.

Price of spare parts is a key criterion for an effective repair score, as cost of repair (including the cost of repair services, e.g. installation) is often the main driver influencing whether consumers choose to replace or repair a product.<sup>4</sup> According to a survey conducted by our German member vzbv, 88% of consumers expect that a repair score with a high rating would mean that the cost of repair of a product would be significantly lower when buying a new product.<sup>5</sup> It is therefore crucial to examine integrating the cost of repair in the score, or the tool risks losing relevance and effectiveness for consumers.

For consumers to properly compare products, they should have access to extended information behind the score criteria. A dedicated study by the French consumer organisation UFC-Que Choisir showed that in the case of the French repair score already on the market, it was often hard for consumers to find the information on the criteria behind the score.<sup>6</sup>

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<sup>4</sup> This is reflected in the findings gathered by consumer organisations, such as through the webtool [trop vite use'](#) where consumers can directly report this data. This is a bottom-up approach that provides valuable insights into consumers' frustrations when products break down as well as whether they attempted repair and how their experience went.

<sup>5</sup> <https://www.vzbv.de/meldungen/recht-auf-reparatur-umsetzen>

<sup>6</sup> <https://www.quechoisir.org/action-ufc-que-choisir-indice-de-reparabilite-le-consommateur-bien-mal-eclairer-n96968/>