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Eco-design and labelling requirements for TVs, refrigerators and freezers, and washing machines

Consumer organisations' comments on the draft Regulations

On 30 and 31 March 2009 Member States supported the European Commission proposals for future eco-design requirements for TVs, refrigerators and freezers, and washing machines. ANEC and BEUC welcome setting eco-design requirements for these product groups as they account for a considerable part of total household energy consumption.

Televisions

We welcome the decision to have requirements on standby and off-mode losses apply earlier than foreseen in the horizontal eco-design measure on standby and off-mode losses¹.

We support the provision requiring televisions to be equipped with an automatic power down function which will automatically set televisions into standby mode in cases where no user interaction has taken place for four hours.

However, we are disappointed to note that the draft Regulation does not call for a mandatory "0 watt mode"² for appliances, as we have been long calling for. The possibility to switch off a device should be an integral part of the product's functionality.

Refrigerators and freezers

We are pleased that the schedule to phase out inefficient appliances will be quicker than that originally proposed by the Commission. The new schedule means that from July 2010 onwards only current appliances labelled with an Energy Label of class "A" and above will be allowed on the market. Moreover, more stringent energy efficiency requirements will apply from July 2012, leaving only current Energy Label classes "A+" and above on the market. Considering that

¹Commission Regulation (EC) No 1275/2008 of 17 December 2008 with regard to ecodesign requirements for standby and off mode electric power consumption of electrical and electronic household and office equipment, http://eur-

lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:339:0045:01:EN:HTML

 $^{^{2}}$ A "0 watt mode" means any technical solution which would allow consumers to put the device into a mode in which it does not consume any energy – be it a hard-off switch or any other similar technological solution.

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even today most consumers buy refrigerators and freezers labelled "A" or above, we support this timeframe as a way to ensure that only the most energy efficient products are offered to consumers.

We regret however that no generic eco-design requirement has been included which requires refrigerators and freezers to give a warning signal in case the interior temperature of the appliance increases, e.g. because the door was left open.

Washing machines

We welcome the decision to require all washing machines to provide a 20° C programme as studies have shown that more and more consumers wash at lower temperatures.

We are, however, disappointed that manufacturers will not be required to better inform consumers in the booklet of instructions on the correct dosage of detergents for the different programmes. Consumer research has shown that consumers do not read the instructions on correct dosage each time before using the washing machine, but that they would be more likely to check the instructions for correct dosage when reading the instructions for a new washing machine. We had therefore called on the booklet to contain particular information on dosage and how detrimental environmental impacts could be reduced, e.g. by avoiding overdosage of detergents.

Moreover we would have been supportive of more ambitious requirements with regard to water consumption. The maximum value proposed by the Commission is still too high and will not allow phasing out the least efficient models in the first stage of the implementation of the ecodesign requirements.

Role of EU Energy Label

Although we appreciate that the three eco-design measures described above will lead to the least energy efficient appliances being phased out of the market, we believe these measures will be seriously undermined by the recent decision³ adopted by Member States to change the layout of the EU Energy Label as consumers will no longer be able to readily identify the most energy efficient products on the market. We therefore urge the European Parliament to reject this change to the label in the context of its ongoing scrutiny.

End.

³ Decision of the Member States in Eco-design and Energy Labelling Regulatory Committee, 30-31 March 2009.

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