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**Position of ECOS (on behalf of Environmental NGOs)
on the new draft Ecodesign and Energy Labelling measures
for washing machines and dishwashers
(documents of March 2010)**

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Environmental NGOs are concerned that the Ecodesign and Energy Labelling measures for washing machines and dishwashers are still not adopted and so many administrative delays occurred. European Institutions are encouraged to speed up the process of finalising and adopting Ecodesign and Energy Labelling measures, in order to make sure these measures reflect up-to-date and accurate market data. The measures for washing machines and dishwashers are based on now really old preparatory studies (using market data from 5 years ago).

We have received indication that since then, new efficient technologies have been developed and introduced, meaning that the level of ambition and timing of the Ecodesign requirements could be strengthened.

We understand that the main modification between the documents circulated these days and the ones from 2009 (apart from legal wording) is **a proposed delay in the entry into force of several of the Ecodesign and Energy Labelling requirements.**

The Commission has not provided any new technical or impact assessment evidence justifying these delays, so we assume they are of purely administrative and practical nature (to take into account the delayed vote and adoption of the measures).

We strongly oppose these delays, as they jeopardise the relevance of the Ecodesign measure and do not reflect the consensus achieved last year on the appropriate timing and level of ambition. Therefore, we call the Commission to either maintain the timing of requirements agreed last year, or if it is not possible for practical reasons to strengthen the delayed requirements accordingly.

This translates for example into:

- ⇒ Maintaining the entry into force of the generic requirements for washing machines in **July 2011** and **July 2013** respectively.
- ⇒ Changing the first stage specific requirement for washing machines into **EEI<65** (to take into account the delay of one year).
- ⇒ Maintaining the entry into force of the generic requirements for dishwashers in **July 2011**.
- ⇒ Changing the first stage specific requirement for dishwashers into **EEI<68** (to take into account the delay of one year).
- ⇒ Maintaining the entry into force of the second stage specific requirement for dishwashers in **July 2013**.

As far as the new Energy Labelling is concerned, after 3 years only the A+, A++ and A+++ classes will serve a purpose as the rest of the A-G scale will be empty of products. **As we already claimed before, we consider this a corrupted evolution of the principle of the EU Energy Label. We encourage the Commission to rescale the label before it enters into force.**

Additional comments:

- The Ecodesign measures include requirements on the washing efficiency index I_w for washing machines and cleaning efficiency index I_c for dishwashers. Therefore, these indexes should be declared by the manufacturers somewhere in the technical documentation with the products. However, we could not find such obligation (neither in the booklet of instructions nor on the energy labelling fiche). It should be added somewhere.
- In article 7 of the Energy Labelling measures, it should be mentioned that the label should be reviewed also according to its impact on the market and understanding by consumers (not only to technological progress).
- In the document for the energy labelling of dishwashers, class C is mentioned as the bottom class in the table page 7. However, the label design on page 15 then includes an inconsistent D class below C.

We also suggest an assessment of the impact of the new energy efficiency index calculation on the energy labelling of washing machines with respect to their size. We are concerned that big machines would be overly promoted by this label, since it is possible that not many small machines would reach the highest efficiency classes. This would be counter productive in terms of signal to consumers and resource efficiency.

END