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CECED Position on EuP limits for Dishwashers

The draft EuP measure foresees that small dishwashers (capacity between 7 and 10 place settings) have to reach an Energy Efficiency Index (EEI) of 63 to be allowed on the market after July 2014. CECED¹ believes this is extremely difficult for several reasons.

Availability of more efficient components

Dishwashers with 10 place settings (ps) or less are sold in Europe in a relatively small number (approximately 10% of the market). Due to the low number of small Dishwashers, manufacturers employ for these appliances components used also in bigger Dishwashers. This applies to components employed for both cleaning and drying process, such as circulation and draining pumps, dosing systems, drying systems and blowers, anti-hardening systems, etc. These components are optimized for larger Dishwashers. Therefore they do not provide the same results in energy efficiency when used in smaller Dishwashers, because the energy consumption allocated per place setting increases. Production of ad hoc components for smaller Dishwashers, missing the economy of scale of mass production, would make such components more expensive, which would lead to a product cost going beyond the Least Life Cycle Cost (LLCC) point.

To sum up, using the same component of a bigger dishwasher would not improve energy efficiency enough, while using ad-hoc custom built components would make the dishwasher more expensive, going beyond the LLCC point.

¹ Direct Members are Arçelik, ATG, BSH Bosch und Siemens Hausgeräte GmbH, Candy Group, De'Longhi, Electrolux Holdings, Fagor, Gorenje, Liebherr, Indesit Company, Miele, Philips, SEB and Whirlpool Europe. CECED's member associations cover the following countries: Austria, Belgium, Czech Republic, Denmark, Estonia, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Sweden, Switzerland, Turkey and the United Kingdom.

Availability of newest technologies

Furthermore, it is not possible to improve the energy efficiency of such Dishwashers from today class "A" to future class "A+" through other solutions such as reducing temperatures. This solution has been already applied for the most efficient small Dishwashers today on the market, which still do not reach the EEI limit of 63. Other technological options for improving the efficiency of Dishwashers, such as the introduction heat exchangers, phase change materials or zeolites, would need more space that is not available in Dishwashers with 10 ps or less (normally 45 cm width).

Therefore, if the proposed minimum EEI 63 threshold is requested also for Dishwashers with 10 ps or less (phasing out appliances roughly corresponding to today's "A" class), we expect that four years after the adoption of the measure (likely 2014) appliances with more than 7 ps and 10 ps or less will no longer be available on the market.

Consequently, we suggest for appliances with capacity higher than 7 ps and equal or lower than 10 ps (and a width equal to or less than 45 cm), the EEI shall be less than 71 and not less than 63.
