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Austrian comments on working document for the eco-design and labeling of household tumble dryers

General comments regarding the implementation of eco-design requirements

The draft working document of the EC proposes that only labeling criteria but no eco-design requirements shall be implemented. Thus only a labeling regulation is proposed. It is argued that the use of eco-design requirements would currently not lead to substantial energy savings.

Nevertheless Austria as many other EU Member States recommends an implementation of eco-design requirements for the following reasons:

- Eco-design requirements allow to remove least efficient products from the market (D-class and below)
- Eco-design criteria furthermore allow the implementation of additional functional requirements and information requirements (see below).
- Labeling and mandatory eco-design requirements together are synergetic instruments which can significantly support the improvement of energy efficiency of tumble dryers in the mid to long term even if short term effects will be limited due to technological reasons.

Eco-design requirements

Energy consumption

There are examples outside the EU for stringent regulations removing products below A-class efficiency from the market after 2014 (e.g. Switzerland). While this approach for several reasons is too demanding for the EU market a phase-out criterion gradually eliminating D-class (and lower) in a first tier and part of C-class products in a second tier would seem appropriate. Partial phase out of current C-class products in any case should be based on additional market data.

As an additional eco-design criterion a functionality should be required which allows optimized timing of the drying cycle. This is normally not achieved by simple timer functions. An approach for example could be a mandatory criterion for moisture controlled programs respectively for technological solutions which provide a comparable level of efficiency. According to comments from industry a technology neutral criterion for optimizing of drying cycles would not impose significant barriers like high costs etc.

Standby energy consumption

We expect that tumble dryers are basically covered in the horizontal ERP regulation on standby. However in any case it should be assured that there are no loop holes due to specific additional/new standby functions which need to be covered in the vertical measure.

Noise level

A mandatory criterion for noise could be considered.

Labeling criteria

The current EC draft proposes, that the new efficiency classes A+ and A++ shall be populated right from the beginning of the implementation of the regulation. In general we strongly recommend to start new/revised labeling schemes with A-class as the most efficient and to extend to the A+/+++ classes later when required due to technical development. The reason for this is twofold:

- The A-G scale gives a more powerful signal to the consumer than the A+/A+++scale
- Enough room has to be reserved on the top end of the scale to be able to cover future technological development without revising the scheme again.

However in the specific case of tumble dryers the goal is to strongly promote the current A class since most products available to date are still in class C. Therefore in this specific case it would be less appropriate for the market to downgrade current A-class to A, B and C. Therefore as a compromise it is recommended to segment current A-class products into A+, A and B. The A++/A+++ levels in any case should be reserved for further technological innovation.

In the consultation forum meeting there has been much debate regarding the new reference lines for label classes. There seems to be a lack of testing data which would allow to analyze and optimize reference lines also in relation to product size. We propose to reconsider the current draft concept for the reference lines and to check if there is still a need for modification/optimization. Industry indicated that larger tumble dryers dry more efficiently than smaller ones (even if total energy consumption per kg is considered), however only few testing data is available supporting this information.

The time-related correction factor for vented driers compensating for the additional energy used to heat up replacement air should be revised. The relevant energy demand is very different for southern and northern countries and the suggested compromise in the working document seems to be too weak for mid/northern countries climate. If it is assumed that in southern countries driers are used mainly in the cold (heating) season, a stronger correction factor should be set.

The draft working document suggests displaying (full) rated capacity aside weighted energy consumption (and duration) per cycle. This is confusing and should be replaced by a consistent approach. The lightning arrow on the label should be replaced by a more appropriate symbol.

Information criteria

In the consultation forum meeting it has been discussed how the energy consumption should be declared on the label. We recommend to indicate consumption per drying cycle rather than per year since the energy demand per year highly varies depending on many factors (usage pattern etc.).

We see different options for extending product information requirements for example also regarding information on the most efficient use of dryers (full use of the capacity, spin-dry of the laundry before using the tumble drier, avoiding of over drying).

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