

August 27<sup>th</sup> 2010

## *Ecodesign Directive (2009/125/EC)*

### *Comments on the Working document on possible ecodesign requirements and labelling for household tumble driers*

Reference: Invitation to Consultation Forum on 25 June 2010 under Article 18 of the Ecodesign of Energy related Products Directive 2009/125/EC

#### **1. Introduction:**

Ambitious goals and a full realisation of efficiency potentials, e.g. through top runner approaches as demanded by the Council (Environment) on 28th of June 2007<sup>1</sup> are urgently necessary to reach the EU's common energy efficiency goal (20 percent improvement by 2020 across all sectors). To implement the top runner principle within the frame of the ecodesign directive the following elements are necessary:

- Ambitious requirements for which the best-performing products or techniques available on the market, including on international markets, should be taken as reference. The level of ecodesign requirements should be established on the basis of technical, economic and environmental analysis.
- Dynamic requirements by regular revision.
- Technology independent definition of requirements.
- Coupling of the implementing measures with energy efficiency labelling and parallel adoption of labelling regulation wherever this is adequate.

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<sup>1</sup> “The Council STRESSES that substantial progress has still to be made and that concrete outcomes need to be delivered, particularly in the areas of climate change, and in this context RECALLS the EU's firm commitments, as decided at the Spring 2007 European Council, to ambitious targets in the context of an integrated climate and energy policy; LOOKS FORWARD to Community measures and to agreeing on an internal burden-sharing and to the proposals for implementing the Energy package, in particular in relation to energy efficiency; (...) STRESSES that governments should act to provide the adequate framework and incentives to overcome barriers that prevent Europe from fully tapping the potential of eco-efficient technologies; EU and national Environment policy must provide industry with environmental legislation setting ambitious and realistic standards, which take into account small-scale industry, and that provide benchmarks and trigger innovation, while using a creative mix of push and pull instruments that support energy and resource efficient innovations on a broad basis; POINTS TO (...) environmental regulation with lead standards such as supported by "top runner approaches" that take into account that industries need reliable and appropriate framework conditions, inter alia through implementing the Directive on eco-design requirements for energy using products“ (Doc. 10796/07)

## 2. General Remarks

We welcome the revision of the labelling for household driers. We request the commission to implement also ecodesign requirements on household driers, because manufacturers have designed energy efficient household driers since the last IFA exhibition. Most of them have the labelling energy efficiency classes A or B.

Another reason for ecodesign requirements is that tumble driers are partly exempted from the regulation on fans. At that time this exemption was accepted in view of a soon coming separate regulation on tumble driers.

## 3. Specific ecodesign requirements

### Energy Efficiency Requirements

Household tumble driers have significant environmental impact. The electricity consumption in the use phase was estimated to be 17 TWh in 2005 and will increase to 23 TWh in 2020 because of increasing stock. Since the last two years there are more efficient tumble driers available on the market which are in energy efficiency class A or B. While at present class A can only be achieved by gas driven tumble driers or heat pump condensing driers, class B can be reached by conventional condensing driers and also by some vented tumble driers. To set no ecodesign minimum requirements, as proposed by the Commission, would send the wrong signal to the market.

Therefore we request the Commission to implement minimum requirements on energy efficiency to ban current class D to G as a first step to safeguard the current efficiency level for a growing number of products, especially in the case of low-cost vented tumble driers.

As far as we understand the comments in the consultation forum, this step is widely supported by member states and industry.

We also ask the Commission to consider a ban of the current class C in a second stage. It needs to be checked especially whether the LLCC argument for not setting ecodesign requirements is valid as at least some vented driers can reach class B, as shown in graph 2 of the working document.

Comments on Least Life Cycle Cost calculation:

While the preparatory study identified higher life cycle costs for heat pump condenser driers (€1211) compared to the base case condenser drier (€1106) and the lowest LCC for the base case air vented driers (€906), a different picture has been found for the conditions on the German Market. The examples of the EcoTopTen database<sup>2</sup> show that heat pump condenser driers can provide comparable life cycle costs to condenser driers and even to vented driers. This is mainly based on the fact, that the average electricity cost for the EU is lower than in Germany and that the EcoTopTen database works with real prices while the preparatory study had to make a static cost assumption. As the last years have seen a steady increase in electricity prices and as it can be assumed that especially heat pump driers will become available for lower prices, a ban of class C needs to be considered.

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<sup>2</sup>. [http://www.ecotopten.de/prod\\_trocknen\\_prod.php](http://www.ecotopten.de/prod_trocknen_prod.php)

### **Measurement of humidity**

Automatically controlled tumble driers are more energy efficient than time controlled tumble driers, as the drying is optimised according to the drying need. As discussed in the consultation forum it should be considered to require the function of humidity control/measurement.

### **Condensing Efficiency**

The condensing efficiency is an important property in order to avoid that too much humidity is released to the room. Therefore a minimum condensing efficiency of 60% should be required.

### **Refrigerants**

The global warming potential of refrigerants is also an important environmental impact. At present no tumble dryers are on the market which use refrigerants with a low global warming potential (e.g. hydrocarbons, carbon dioxide), however first attempts are undertaken by industry (BNAT). Therefore the issue of refrigerants in heat pump driers needs to be considered in the revision at the latest.

## **4. Labelling requirements**

Germany supports the suggested labelling requirements for household tumble driers and welcomes the defined classification.

### **Scope**

In principle we welcome to include gas fired household tumble driers into the labelling scheme. However, today there appears to be no harmonized measurement standard in view of the energy consumption of gas fired household tumble driers which is comparable to the measurement standard of electrical heated tumble driers. We thus ask the Commission, how this problem should be solved. We would also support the development of a common measurement standard and would kindly ask the Commission to issue a mandate for standardization of tumble drier efficiency measurements in order to include gas fired household tumble driers as soon as possible in the labelling scheme.

### **Calculation method for the energy efficiency index and energy efficiency classes**

Germany supports the revised calculation method. The new formula which is based on 160 drying cycles per year and which includes low power modes (left-on mode and off-mode) as well as a combination of full and partial load takes the right approach and integrates the entire use-phase of the device.

## **Energy Label and definition of the energy classes**

Germany supports the proposal of the European Commission to have one label per type of appliance (electric air-vented or electric condenser), but one common energy classification. The electric driers could better be indicated by a “plug” pictogram, rather than the “lightning/spark” now proposed which is commonly associated with danger.

We furthermore support the information that shall be included in the label (weighted energy consumption per cycle, information on the type of tumble drier, weighted programme time, rated capacity, noise emissions, condensation efficiency for condenser household tumble driers). As heat pump tumble driers contain refrigerants, we ask the Commission to ensure that by the time of revision the preparatory study will provide information on emissions from refrigerants (CO<sub>2</sub>-equivalents) and its global warming potential. Depending on these results and the market development of heat pump driers, a pictogram and the value containing these information could be provided on the label.

We ask the Commission, however, for clarification in view of the suggested bonus system for lower load tumble driers.

Generally, we support the suggested bonus, which will favour small loads appliances. However the current proposal appears to overshoot at one point, where the current proposal results in a shift of two energy efficiency classes in the case of 3,5 kg load machines. While such small machines are not marketed in high numbers, it is an indication for the disproportional bonus and might in this case also provide an unwanted stimulus towards marketing washing machines, which actually are too small for most households.

We thus kindly ask the Commission to review the calculation formula for this machine category of 3,5 kg load so to avoid a too big shift on the indication on the label.

The reference line and the limits for the new energy efficiency classes should be adjusted in such a way, that the intersection of the lines for old and new energy efficiency classes is at a rated capacity of 6 kg (at least for the mostly populated class ‘C’). Otherwise too much devices would be assigned to new energy efficiency classes, what should be avoided.

The EU COM working paper (page 7) shows that the best heat pump or gas household tumble driers currently on the market would reach A++ in the proposed classification. Some of them have only a small distance to A+++ class. We are concerned that a considerable amount of devices could populate the upper classes too quickly and the need of rescaling would then arise too soon. We would thus kindly ask the Commission to ensure that the present label still leaves space for innovation potential. Since the chart pictured on page 7 of the EU COM working paper is based on a calculation of the Energy Efficiency Index (EEI) which differs from the new calculation method (combination of full and partial load, inclusion of low power modes) described under 2.2 of the COM Working paper, we would like to ask the Commission for clarification on the market situation under the new calculation method of the EEI.

## 5. Washer-driers

As already stated in our comments on washing machines, washer-driers are not covered by lots 14 or 16. There is a need for a revision of the label and for ecodesign requirements comparable to washing machines and tumble driers. We welcome the announcement of the commission made at the consultation forum to propose ecodesign requirements and the revision of the label as soon as possible.

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