

French comments on the following products :

After the Consultation Forum on December, participants were invited by the Commission to submit their comments by the beginning of February. Our contribution arrives slightly later than the stated date, but we wish to submit a few of preliminary remarks before the exchanges that will take place in the following months on a final draft. We aim to underline some points important for us.

1 - Draft proposal of the Ecodesign and Energy Label regulation for washing machines and dishwashers

France supports the review of these regulations and can support the greater part of the proposals, for example the stand-by mode in the horizontal regulation.

We support a test with a fixed rated washing capacity to be able to compare the consumption between all the machines : with such a test, the consumer can see that the consumption of larger machines is higher and we avoid encouraging consumers to choose big machines.

Washer-dryers : the consumption of water seems too high, it would be appropriate to have more ambitious requirements.

Best available technology for dishwashers : In order to be in compliance with the framework regulation, we would like to see the best available technology (i.e. heat pump dishwasher) as the reference model for the definition of the energy classes. If this is not the case, Class A will not be empty when the new Label comes onto the market. This will further set a precedent for other products and negatively impacts the credibility of the label.

2 - Draft proposal of the Ecodesign and Energy Label regulation on household refrigerators :

We can support the contribution received from the Netherlands and Sweden :

As many other contributions, we wish that all wine storage appliances be included in the scope of the household refrigerators for both regulations (ecodesign and labelling) ;

It is important to include refrigerating appliances with a glass door to show their low efficiency to the consumers

We can accept correction factors for requirements for these products at least at the first stage but it is not appropriate to wait for commercial refrigeration regulation ;

3 - Draft proposal of the Ecodesign and Energy Label regulation on lighting :

France welcomes the proposal including all the previous regulations in one single text because it is really too complex for all the stakeholders (a lot of questions received about this sector) who had difficulties to manage them ; But we are not sure it will be really simpler with so many categories (17).

We support the inclusion of decorative lamps : they are not efficient and probably create a loophole in the regulation.

We regret that there is only one step for requirements (2020) because LED technologies are in rapid evolution and it is important to encourage the suppliers to improve their production by labelling and eco-design.

For connected light sources, the “reference control setting” for measuring the efficacy should be better defined, preventing from simply switching off lighting control parts or non lighting part.

It would be interesting to reduce the standby mode (a target between 0.1W and 0.3W seems possible), especially for connected lamps where annual power consumption due to standby mode can be higher than annual power consumption in active mode. To avoid loopholes, it should concern all products with a light source, even though lighting is not the main function of the product.

The criteria for avoiding flicker may be insufficient and only applicable until 70 Hz whereas 100 Hz modulation is responsible for stroboscopic effect among others.

Power factor is not limited anymore and photobiological issues are not treated whereas these are well known issues for LED luminaires. Displacement factor doesn't consider harmonics.

Annex 5 : We need some information about the reducing of the timecycles tests from 6000 hours (regulation 1194/2012) to 1000 hours in the proposal, compared to the life cycle of LED (50 000 hours) ;