

# Position for the Consultation Forum on Household Tumble Dryers

## Summary

APPLiA welcomes the working documents presented by the European Commission for the discussion in the Consultation Forum for household tumble dryers. We would like to provide few recommendations with regard to these drafts hoping that these will be taken in consideration for the development of the regulations.

### 1. Horizontal remarks for Ecodesign and Energy Labelling

#### 1.1. Entry into force and application of requirements

APPLiA recommends ensuring a transitioning period between the entry into force of the regulations and the application of the requirements in line with what is stated in the Energy Labelling Framework (1369/2017) - 18 months.

As it is proposed in the working documents, manufacturers (authorities and authorized laboratories) will be obliged to use two different calculations for the EEI:

- one to determine the new energy efficiency class of the new energy label, and
- one to have the conformity assessment of the ecodesign value of the current ED requirement (EU 932/2012).

To avoid the situation above, APPLiA proposes the following timeline for the application of the requirements:

#### **Proposal:**

**1.** Application date for new ED and EL requirements shall respect the **timeframe of 18 months** given in the Framework Regulation (1369/2017).

The first tier for the current ED requirements (932/2012) should be based on the new EEI calculation applicable at the same date.

This would need to take into consideration the equivalent value of the current ED requirement calculated with the new EEI calculation method. Thus, the limit of the current ED should be in line with the new EEI calculation – including condensation efficiency requirements.

The weighted Condensation efficiency shall not be lower than 70% (as defined in 932/2012).

**2.** The second ecodesign requirement shall apply **3 years after the application date of the label**, in line with the timing proposed on the other regulations (Refrigerators, DW and WM-WD).

As editorial remark, we recommend specifying the date of application of the requirements also for the “functional requirements” (Annex II par. 3)

The weighted Condensation efficiency shall not be lower than 80%



## 1.2. Scope – Article 1 point 1

APPLiA would like to make an important remark on Article 1 point 1 related to the inclusion of the term “*non-household use*”.

We understand that the intention here was to target household dryers sold via Business-to-Business channels, and not professional appliances, but we are very concerned that mentioning the LVD or RED directive within the tumble-dryer definition is simply not enough to consider professional appliances out of scope.

While Low Voltage Directive (LVD) and the Machinery Directive are mutually exclusive, for the Radio Equipment Directive (RED) the same is not valid, as there are professional appliances on the market that have also wireless connectivity.

To address this issue, we request the introduction of a clear scope exclusion for “*tumble dryers in scope of Directive 2006/42/EC*”.

### **Proposal:**

Add new point 2. to Article 1 – Subject matter and scope

**2. This Regulation shall not apply to tumble dryers in scope of Directive 2006/42/EC**

## 1.3. Definitions

APPLiA recommends that the definitions in the Energy Labelling act are in line with the one in the Energy Labelling Framework Regulation (2017/1369). For instance, the definition of equivalent model is not the same as the one in the Framework Regulation.

In general, we recommend ensuring coherence in the common definitions among ecodesign and energy labelling regulations.

## 1.4. Weighted condensation efficiency – Annex III Point 2 (ED) and Annex IV Point 2 (EL)

APPLiA believes that the number of test runs should not be identified and included in the regulation, but rather it should be included in the test standard. Therefore, this information should be decided by the standardization body and not to by the Commission.

Furthermore, the Commission should also consider the test as it is described in the harmonized standard EN 61121:2013 without elimination of the first test run for the calculation of condensation efficiency.

The condensate is not necessarily collected in a container of the tumble dryer. The water may also be directly drained outside (e.g. external container or better sink) the tumble dryer.

The testing procedure for measuring the condensation efficiency is completely described in the current harmonised standard EN 61121:2013 (as well as the procedure for energy consumption and duration). Thus, it is not necessary to explain details on the method in the regulation.

In addition, the procedure given in the draft regulation is based on an old status of the standard and contradicts the current standard.

### **Proposal:**

For the measurement of the condensation efficiency we recommend referring to the harmonized standard as it is done for the measurement of the energy consumption and programme duration. The information given here (in Annexes III and IV point 2) causes confusion as it differs from the standard testing method.

We recommend moving the 2nd paragraph of clause 2. (calculation of the weighted condensation efficiency) as a new clause 1.6 and delete the 1<sup>st</sup> and 3rd paragraph of clause 2.



## 2. Energy Labelling draft

### 2.1. New formula and new proposal for classes – Annex II point 1

APPLiA believes that the new formula and its consequently proposed intervals are overestimated in the evaluation made by the Report and therefore, in the proposal included in the Working Documents.

APPLiA is working on a proposal for the division of the classes that will stimulate and ensure both energy efficiency and technological innovation. In the meantime, we would like to provide the following recommendations:

1. As a general remark, we recommend ensuring a clear differentiation among the classes which are now on the market.

In particular, a clear differentiation must exist for appliances in class A+++ and A++. As it states now in the working documents it will not be the case for future classes where A+++ and A++ would fall into the same class.

2. The intervals as proposed now are too broad. We recommend keeping the intervals less broad.

As it is proposed now, it would be way too difficult and challenging to reach class A. This will minimize the stimulation for manufacturers to invest in new and more efficient technology. In particular, we think that the new factors are too high for the EEI calculation, so that the heat pump technology for dryers cannot reach the highest-class A in the next 10 years or even never reach it. There must be a stimulation to reach the highest level in energy efficiency. This does not promote a technology leap.

### 2.2. The EEI calculation - Annex IV 1. 1.1

The EEI calculation refers to the term “*active mode*”.

- $E_{c}$  = weighted average energy consumption per cycle of the household tumble drier during active mode.
- $SE_{c}$  = standard energy consumption per cycle of the household tumble drier.

However, there is no definition for the active mode in the text.

If the text is meant to the power mode in which the dryer operates during programme execution, then it should be clearly stated. Otherwise, a definition for active mode should be introduced in the regulations.

### 2.3. Number of decimals for $E_{dry}$ and $E_{gdry}$ - Annex IV 1. 1.3

There is an inconsistency in the energy labelling draft on the number of decimals required for  $E_{dry}$  and  $E_{gdry}$ .

The definitions specify that they are to be determined at a precision of 2 decimals places, while the technical documentation requires them to be declared at a precision of 3 decimals places. The number of decimals must be aligned.

Please, review the PIS and Technical Documentation and align the number of decimals for these two factors. APPLiA recommends keeping it to **2 decimals places** as it is stated in the current regulation (EU 392/2012).

Furthermore, APPLiA recommends aligning the number of decimals for each required value in all documents to be provided: energy label, PIS, technical documentation and EPREL.

### 2.4. Product Information Sheet – Annex V

#### 2.4.1. EEI and Energy Efficiency Index

We strongly recommend **leaving out the EEI from the Product Information Sheet** as this is not a declared value.

Furthermore, there is no tolerance specified for the EEI in Annex IX, Table 7 (verification tolerances), because there is no need to verify the EEI itself, this is done through the energy consumption.



Moreover, as editorial mistake, there is no difference between EEI and Energy Efficiency Index. We invite to **remove both of them from the PIS**.

#### 2.4.2. Dimensions

We recommend **removing the dimensions** from the Product Information Sheet.

For built-in appliances and integrated appliances, the dimension might vary slightly. However, due to the definition in 2017/1369 of equivalent model, for the manufacturers is still possible to upload to EPREL such appliances as "equivalent model". However, if the dimensions are included in the PIS (as this is the case –no tolerance is given which means that 0% needs to be considered), this definition won't apply anymore, and it won't be possible to upload the same model as equivalent to EPREL.

Specifically, for tumble dryers, the height is usually adjustable, which value manufacturers should then provide?

We do recommend therefore, to **remove the dimensions** from the PIS or at least clarify that these can be either considered as *modifiable* or marked as *"indicative or approximate"*.

#### 2.4.3. Editorial mistakes in the PIS

- Wrong reference in "Additional information" at the bottom of the PIS table: Annex II point **2-9 6** of ED (it should be point **6** rather than point 2.9);
- EEI is – according Annex IV 1.1. – rounded to 1 decimal place. As general remark, we recommend – for all values – to consider the number of decimal places according to Annex IV;
- Replace the term "*the chemical name of the refrigerant gas used*" with what is mentioned in the ED (Annex II 5.(4)) "*the chemical name of the refrigerant gas used, or equivalent reference such as a commonly used and understood symbol, label or logo,*".

Some refrigerants used in tumble dryers are a blend of several different basic refrigerants. Requiring the chemical name would lead to extensive entries (e.g. "Difluoromethane/Pentafluoroethane/1,1,1,2-tetrafluoroethane (23/25/52)").

- For gas-fired dryers, the overall energy consumption of the gas dryers should be given in the PIS, not only the gas consumption (valid only for gas-dryers). Similar as, for gas-fired dryers the overall energy consumption should be given for full, half and weighted load.

#### 2.4.4. Missing information in the PIS

- For the main-electrical operated appliances only one value on energy consumption is requested. However, the PIS should contain the energy consumption for cycles with full load, half load and, weighted load.

A clarification is needed here.

- The condensation efficiency classes; the noise classes; weighted programme duration.
- It should be clarified that the condensation efficiency contained in the PIS needs to be considered as *weighted* condensation efficiency. The condensation efficiency for full and half load cycles should also be considered. On this last remark, please also see below point (2.6)
- For gas-fired dryers, the overall energy consumption should be given in the PIS, not only the gas consumption. Similar as for the other dryer types, the overall energy consumption should be given for full, half and weighted load.

#### 2.5. Measured values in the Technical Documentation – Table 5 and 6 Annex VI

We strongly recommend specifying that the values in table 5 and table 6 of Annex VI **must be considered as measured values** and not as declared values. According to 2017/1369, the value from the technical documentation that must be uploaded to the compliance part of EPREL needs to be considered measured value.



Indeed, declared values are for the public part (included in the label and the PIS Annex V) and measured values for the compliance part (technical documentation) of EPREL.

The technical documentation contains both the declared values (via the PIS of annex V) and the measured values (via the table on the technical documentation in Annex VI).

Point 2(a) of Annex IX which deals with the verification procedure should be modified to state that the values in the technical documentation are in fact measured values, not declared values. Otherwise the technical documentation does not make sense for the MSAs, they would just duplicate the product information sheet values and the MSAs would still have to ask the manufacturers for the test report data.

**Proposal:** Annex VI point 1 and 2 should be phrased as follow:

1. For electric mains operated household tumble driers, the technical documentation referred to in Article 3(d) shall include:

(a) information as set out in of Annex V;

(b) information as set out in Table 5; **the values in table 5 shall be considered as measured value.**

[...]

2. For gas-fired household tumble driers, the technical documentation referred to Article 3 (c) shall include:

(a) information as set out in of Annex V;

(b) information as set out in Table 6; **the values in table 6 shall be considered as measured value.**

To avoid any other misunderstanding and to fully clarify what “declared values” are, we recommend introducing a definition of “*declared value*”. In line with this, we recommend amending all the past regulations on energy labelling (such as WM-WD, DW, refrigerators regulations).

**Proposal:** add under **EL Article 2 Definition:**

(x) ‘**Declared value**’ is considered as data given in the Product Information Sheet (according Annex V), on the Energy Label (according Annex III) or in the public part of EPREL. Where values to identical characteristics differ between these documents the value being more favorable to the manufacturer shall be considered as declared value and thus shall be verified according to Annex IX;

## 2.6. Verification Procedure – Annex IX

Finally, we would like to seek for a clarification from the Commission regarding Annex IX point 3.

If the published information of a specific model contains a typing error, whereas the published information for all equivalent models is correct, will all equivalent models be considered as non-compliant?

As we recommend providing in the PIS condensation efficiency factors for full, half and weighted condensation efficiency (see above 2.4.5) we, therefore, ask to provide the related verification tolerances also for *full* and *half load*, not only for *weighted*.

**Proposal:** add the verification tolerance in **EL Annex IX – Table 7 verification tolerances**

Weighted condensation efficiency ( $C_t$ )	The determined value* shall not be less than the declared value of $C_t$ by more than 6 %.
$C_{dry}$ , $C_{dry1/2}$	<b>The determined value* shall not be less than the declared value of <math>C_{dry}</math>, <math>C_{dry1/2}</math> by more than 6 %.</b>



### 3. Ecodesign draft

#### 3.1. Programme requirements (Name) – Annex II point 1

APPLiA believes that the name '*standard cotton programme*' proposed for the name of the programme declared by the manufacturer, importer or authorised representative, is too long. This would have consequences when the name is translated in EU official languages, considering that some countries also have two official languages. Moreover, as the term '*standard*' is forbidden to be used for WM-WD and DW, it would not make sense to allow this term on tumble dryers.

Moreover, we believe that such a name is not fully understandable by consumers who will not consider "*standard*" as the most efficient programme nor the function of such a programme.

We recommend adopting a name, **or better a symbol**, that is in line with the one already used by other cleaning appliances (i.e. WM-WD and DW), that is fully understood by consumers and that can be easily translated and placed on the display panel. In particular, we would recommend introducing the name '**eco**' which is more an overall understood symbol which consumers, despite the different languages, can relate to.

**Proposal** for the name of the standard cotton programme to be displayed to the consumer: '**eco**'

However, flexibility should be given to manufacturers. Therefore, they should be allowed to additionally indicate the drying target and/or type of textile: e.g. "*cotton eco cupboard dry*" and/or "*cotton eco*" and/or "*eco cotton*".

There should be given the possibility to indicate the reference programme by a symbol only. The name should be aligned to the name of the reference programme for other product category which now (or with the upcoming revision) have "**eco**" as programme name (e.g. WM-WD and DW).

Moreover, on this same topic, manufacturers will need a **transitioning period** to introduce the name "**eco**" on the displays of the appliances. This change cannot happen over-night, but rather it will take some time.

We would like to ask to align the transitioning measures inserted in the WM-WD ED regulation under article 11 to the tumble dryers ecodesign act. With the transitional measures, manufacturers will be free to adopt the changes while ensuring the correctness and compliance to the requirements.

**Proposal:** Add new Article 11 – Transitional measures (as it was done for WM-WD)

*As from [OP – please insert the day of entry into force of this Regulation] until 31 May 2024, by way of derogation to the requirement in point 1 1.1 of Annex I to the Regulation (EU) No 932/2012 the indications of 'standard cotton programme' shall not need to be displayed on the programme selection device of household tumble dryers or on the household tumble dryers display, if the following conditions are complied with:*

- *The 'standard cotton programme' is clearly identifiable in the booklet of instructions and in the technical documentation with the meaning of point (2) of Article 4 of Regulation (EU) No 932/2012; and*
- *The 'eco' programme is clearly displayed on the programme selection device of household tumble dryers or on the household tumble dryers display, in accordance with point 1(3) of Annex II to this Regulation*



### 3.2. Energy Efficiency Index – Annex II 2. (1)

APPLiA understands the introduction of the requirement for EEI not higher than 96. However, we would like to raise the attention on the consequences and impacts that this limit will bring to the market.

As a matter of facts, the introduction of such an ecodesign requirement will consequently phase out a large number of condenser and vented dryers as from the application of the second tier. This means that on the market there would be no longer condenser and vented dryer appliances with electrical heating devices.

The economic impacts of this will consequently weigh on the consumers and on the demand side of the market.

Overall, we do understand the intention of the Commission, however, we would like to highlight the economic impacts of this requirement in particular on certain EU countries.

### 3.3. Standby requirements (Low Power Modes) – Annex II Point 4

APPLiA welcomes the requirements for standby as these are in line with the recent approved requirements for WM-WD and DW.

We indeed support removing tumble driers from the horizontal standby regulation and add specific standby requirements to the new tumble drier ecodesign regulation and setting proposed maximum consumption levels for low power modes. However, we have a remark regarding the procedure on how the amendment will be put into place (see below and point above 3.1).

### How will the Commission ensure that all the products will be exempted from the Regulation (EU) No 1275/2008?

### 3.4. Resource Efficiency requirements – Annex II Point 5

APPLiA recommends and highlights the importance that all ecodesign requirements should be measurable and verifiable by appropriate MSAs. It is highly important that market surveillance is ensured and that requirements can be checked for compliance and verified by MSAs to ensure a fair level playing field. A simple declaration cannot be verified and will not be supported by APPLiA.

We also recommend ensuring that critical spare parts (pumps, motors, fans, heating elements) are available for at least **7 years** after the production of a model ceases, and not after 10 years to avoid unnecessary waste and stock.

### 3.5. User manual – Annex II point 6(2)

We would like to highlight that the information set in Annex II 6(2)(a)(b)(c)(d) needs to be insert in the user manual only if available. As a matter of fact, not all tumble dryers have each of those specific programs set out in point (2)(d).

Therefore, we would recommend change to the sentence as such:

**Proposal:**

(2) values for the following parameters: (...) for each of the following programmes **if available** (at least):

APPLiA - Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of EUR 50 billion, investing over EUR 1.4 billion in R&D activities and creating nearly 1 million jobs.

