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# Summary of responses to the consultation entitled 'Improving the energy performance of domestic wet products'

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# 1 Introduction

1. On 5 December 2007, following the publication of the Energy White Paper, the Government launched a domestic wet products consultation paper<sup>1</sup>. Interested parties were invited to provide comments by the end of February 2008. AEA Energy and Environment managed this consultation, as lead contractor of the Government's Market Transformation Programme (MTP).

2. The paper (chapter 3 of the consultation paper) set out the Government's current evidence, analysis, indicative targets and eco-design standards for domestic wet products that are sold and brought into use in the UK. The consultation paper was directly circulated to over 350 organisations and individuals. In addition, it was published on the MTP website and open to all interested parties for comment. This consultation is part of a wider annual review and policy development process, supporting delivery of the Government's objectives for energy and for sustainable consumption and production.

3. The responses have been reviewed and are reported in the following sections:

- Section 2 summarises the quantity and nature of responses received.
- Section 3 gives a summary of the responses by consultation question and the Government's response.
- Section 4 details the next steps in the process.

4. Appendix 1 lists the stakeholders who provided a response. None wished to remain anonymous.

## 2 Overview of responses

5. A total of five responses were received representing one government organisation, two universities, one domestic wet product manufacturer and one trade association. These were the Energy Saving Trust (EST), Loughborough University, the University of Bonn, Crosslee Plc and AMDEA.

6. One stakeholder's views centred around tumble dryers and viewed the proposed future scenarios as too simplistic and pointed out the omission of other comparable products in particular gas dryers and A vented dryers. They called for energy labelling to be replaced with carbon labelling.

7. Another stakeholder felt the scenarios were not as ambitious as they had expected and called for a revalorisation of existing labelling. They also take the view that linkages and synergises between energy efficiency and water efficiency policies

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<sup>1</sup> The original domestic wet products consultation document can be downloaded at [www.mtprog.com/cms/whitepaper/](http://www.mtprog.com/cms/whitepaper/).

should be considered (e.g. low water demand requires low heat input). Similar views on considering the whole life cycle impacts of products were raised by two other stakeholders.

8. One stakeholder felt there was less scope to improve the efficiency of these products compared to cold products and that this work must take into consideration work at European level.

### 3 Summary of topics raised and the Government's response

**Question 1: Are there any other market or technological trends or factors that should be taken into account in this market overview?**

#### Summary table for Question 1

Key topics raised	Number of comments
Consumer practices- washing at lower temperatures	1
No mention of gas powered or A rated vented dryers	2
Support for dynamic energy labelling system	1

9. This question relates to the information provided in the consultation document which sets out the current trends in the domestic wet product market (washing machines, washer dryers, tumble dryers and dishwashers) in terms of energy efficiency, innovation in these products and prices paid by consumers for these products.

Three stakeholders responded to this question.

10. One stakeholder raised the point that product standards need to take account of how consumers actually use the product. For a washing machine to have its index classified under the EU Energy Label classification requirements for washing machine state testing is carried out on a 60<sup>0</sup>C cotton cycle, which may not represent how people use washing machines. (This issue is acknowledged in the consultation paper). They suggested undertaking market research to better understand the apparent increase in consumers washing at lower temperatures and any reduction in use of tumble dryers. This could lead to specific marketing activity to increase any such trends. Such a campaign could also be linked into ESR to secure further savings. This would support their 2006 review of ESR endorsement criteria.

11. Two stakeholders pointed out that the consultation document makes no mention of gas powered dryers and/or A rated vented dryers.

12. One stakeholder stated that in several categories, including washing machines, products have already reached the top-classes under the energy labelling classification. New top classes should be added to the energy labelling scheme to give manufacturers the opportunity to show improvements to consumers. Without

this dynamic energy labelling scheme, manufacturers are discouraged from competing on the basis of energy efficiency improvements.

## Government response

13. The underlying models take account of the assumptions that MTP makes regarding the use of washing machines and the energy used by different programmes with realistic loads. See BNW05<sup>1</sup>. The product standards are given in the units (kWh/kg) used by the EU Energy Label to measure energy efficiency on the 60°C wash cycle. For the purposes of the proposed product standards it is not necessary to understand how consumers use their machines, as it is assumed that the more efficient classes in the EU Energy Label scheme are also more efficient on other programmes than the less efficient classes. It is acknowledged that the data used in the MTP models is quite old, however it would be expensive to gather reliable representative data to replace it. The EUP study for washing machines has undertaken a consumer survey, and its findings broadly support the assumptions already used by MTP. For both washing machines and tumble driers it might be possible to undertake a sensitivity analysis to see the effects on projected energy consumption of changing the various consumption parameters. Defra supports ESR initiatives to encourage consumers to use their existing appliances in the most energy efficient ways.

14. For modelling purposes we have assumed that gas dryers or A rated vented dryers have carbon emissions equivalent to A-rated heat pump dryers.

15. The EC is in the process of reviewing the EU energy label scheme alongside the EUP measures for washing machines, dishwashers and tumble dryers. MTP maintains BNXS37<sup>2</sup> to give information about the process of this review, and welcomes stakeholder input.

## Question 2: Do these graphs accurately illustrate how existing policy instruments could support delivery of more efficient new products?

### Summary table for Question 2

Key topics raised	Number of comments
EBP for tumble dryers too optimistic.	2
EBP for all products not optimistic enough.	1
Question reference scenario	1
Impact of energy prices on market	1

16. This question refers to the graphs showing three difference illustrations for possible future average energy consumption for washing machines, tumble dryers and dishwashers. Each illustration is based around different assumptions regarding potential impact of any policy instruments.

Four stakeholders responded to these issues.

<sup>1</sup> BNW05 Assumptions underlying the energy and water projections for washing machines <http://www.mtprog.com/cms/product-strategies/subsector/wet-appliances>

<sup>2</sup> BNXS37 Framework Directive for the energy labelling of household appliances

17. One stated that that the earliest best practice scenario for tumble dryers seems overly optimistic. Another felt that the scenario assumes that the market will move to heat pump tumble dryers and possibly gas tumble dryers. The traditional tumble dryer's efficiency cannot be improved without recourse to long-term drying cycles with minimal heat input. Due to the cost difference between the two products, this change will only occur if the cost difference narrows substantially and energy cost increases dramatically. Even a small increase in sales of gas tumble dryers might help achieve the P1 values shown.

18. Another stakeholder questioned why total energy consumption in the reference scenario is shown to increase. They recognise that a slight increase in market penetration is predicted but, in their view, this is outweighed by overall energy reduction resulting from the replacement of inefficient products with optimal products. Other calculations (e.g. ECCP) show a clear decline in the reference scenario.

19. Another stakeholder expected to see greater improvements in the Earliest Best Practice scenarios by 2020 for both tumble dryers and dishwashers. As a result, they expected to see more challenging P1 targets and called for government measures in this regard to be progressed. They also stated that the target for washing machines lacks ambition.

20. One stakeholder stated it was difficult to comment due to the limited available data behind the graphs. In their view, the rate of increase in energy price will, to some extent, determine the take up of most energy efficient appliances.

### **Government response**

21. The Earliest Best Practice scenario demonstrates what could be achieved if all consumers bought the most efficient products from now onwards. It therefore shows the potential size of the savings that could be made. For tumble dryers the current price difference between standard and more efficient models may be a barrier to increased sales of more efficient products. Increased uptake of gas dryers could contribute to the P1 values shown.

22. In the underlying models it is assumed that the ownership of dishwashers and tumble driers increases in two ways, the percentage of households owning them increases, as does the overall number of households in the UK. It is also assumed that these additional households use their appliances in the same way. The lifespans used to create the replacement cycle for these products may be shorter than those used in other countries because the UK has seen sales of wet appliances increase over the last 5 to 10 years. This may mean that the installed base of appliances may be younger than in other countries, so the effect of new products may be less than in other countries and the number of new households has a larger impact than in other models.

23. Figures 3.2 and 3.3 in this section of the consultation paper show Ref, P1 and EBP lines projected into the future. The EBP for tumble dryers assumes all units sold are EU Energy Label A rated from 2010 onwards. This would be a very large move for the UK market, as sales of EU Energy Label A rated dryers have so far only been less than 1%, and A and B together have accounted for slightly over 4% of sales.

The EBP for dishwashers assumes all units sold use 15% less energy than the current EU Energy Label A rated class. This level was identified from the results of the EuP study for dishwashers as an achievable level of improvement. As the UK market for dishwashers is already saturated with EU Energy Label A rated products, the impact on energy use is unlikely to be large. The target for washing machines is set to reflect short term sales development from approximately 30% of the UK market in 2007 to 50% of "A+" rated models in 2010, rising to 100% in 2020. In order to set longer term standards the Government will need to know the effect on washing machines of a revised test method and EU Energy Label scheme, as well as the introduction of EuP minimum standards. The targets will therefore be revised in future, and may become more ambitious as a result.

24. MTP data and assumptions are available on the MTP website. The assumptions do not quantify the contribution of particular policies or market conditions to energy saving or efficiency gains.

**Question 3: Do the performance values shown in the tables in the Appendix cover the right products and are they set at the right levels?**

**Summary table for Question 3**

Key topics raised	Number of comments
Too simplistic to combine individual product types	1

25. This question refers to the average energy consumption levels for washing machines, tumble dryers and dishwashers that are anticipated under the P1 projection for the years 2000 to 2020.

Two stakeholders responded to this question.

26. One stakeholder felt that it is overly simplistic to combine the performance levels for vented and condensing dryers.

27. Another stakeholder remarked that it is unhelpful to call these 'indicative performance standards' as the word 'standard' can imply a compliance level or satisfactory performance level as this could be misleading. They also referred to their response to Question 2.

**Government response**

28. Combining the performance allows for a 'basket of goods' approach. In future, standards could be set that separate out vented dryers, condenser dryers and gas dryers.

29. The term indicative standard is used in this consultation to describe the performance level of products within the scope of the proposed targets.

**Question 4: In the areas of market analysis, projections and targets, should consideration be given to any additional measures, risks or strengthening initiatives?**



#### Summary table for Question 4

Key topics raised	Number of comments
EuP Findings should be taken into consideration	1
Represent standards in terms of carbon efficiency, not kWh	1
Improvements in detergent could assist energy efficiency initiatives	1

30. The consultation chapter outlines the intention to monitor progress against the P1 target. It acknowledges that the market may develop in a different direction and the real life performance of products may not reflect the performance of products under test conditions.

Three stakeholders responded to this question.

31. One stakeholder called for the measures for tumble dryers to be represented in terms of carbon efficiency. This would allow gas and electric dryers to be compared on an equal basis.

32. Another stakeholder stated that it seems that the outcome of the EuP work has not been taken into account. In particular, the discrepancy between the way the energy is measured for testing purposes and real life. In their view, this results in a significant overestimation of the energy consumed for washing machines and underestimation for dishwashers. This could lead to a severe misalignment and wrong optimisation of the products and could result to even higher energy consumptions in real life (e.g. winter switch)

33. Another stakeholder felt that as there is considerably less scope for technological advancement within this product group, the opportunities for energy consumption reductions may lie with the use of improved detergents. These would allow the use of lower temperature washing programmes.

#### Government response

34. The targets for tumble dryers have been expressed in kgC/kWh/kg load in the revised tables at the end of this document. The carbon factors have been taken from MTP Briefing Note BNXS01c Carbon Factors for UK Energy Use<sup>1</sup>.

35. For the washing machine and washer drier models underlying the targets there is an estimate made of the effect of consumers using different wash cycles and the effect of different load sizes on consumption relative to the 60°C wash cycle used for the EU energy label. See BNW05 Assumptions underlying the energy and water projections for washing machines<sup>2</sup>. The dishwasher model assumes that consumers do not always use the most efficient cycle and makes an estimate of the consumption of the higher energy consumption as a result. See BNW07 Assumptions underlying the energy and water projections for dishwashers<sup>3</sup>

<sup>1</sup> MTP Briefing Note BNXS01c MTP Briefing Note BNXS01c Carbon Factors for UK Energy Use <http://www.mtprog.com/cms/product-strategies/subsector/cross-sector>

<sup>2</sup> MTP Briefing Note BNW05 Assumptions underlying the energy and water projections for washing machines <http://www.mtprog.com/cms/product-strategies/subsector/wet-appliances>

<sup>3</sup> MTP Briefing Note BNW07 Assumptions underlying the energy and water projections for dishwashers <http://www.mtprog.com/cms/product-strategies/subsector/wet-appliances>

36. Developments in detergents could encourage consumers to increase the use of lower temperature wash programmes. The lifecycle implications of this should be taken into account to ensure that production of new detergents to meet this need does not require more resources than at present.

**Question 5: In the area of engaging the supply chain, should consideration be given to any additional measures, risks or strengthening initiatives?**

**Summary table for Question 5**

Key topics raised	Number of comments
Raise views on Red-Green calculator	1
Issue of considering compact and larger dryers in same 'bundle'	1

37. The consultation chapter outlines the Government's intention to encourage competition between manufacturers and retailers to supply products in line with the P1 standards. Yet it acknowledges that no tools exist for product designers to assess products energy efficiency performance, although a 'Red-Green' tool has been produced for consumer electronic products which could be adapted for wet products.

Two stakeholders responded to this question.

38. One stakeholder called again for the inclusion of carbon-based measures in order to promote the most eco-friendly and lowest running cost tumble dryers – the gas heated types. They felt there is a risk that compact dryers will be marginalised because of their lower energy ratings compared to full size dryers if they continue to be bundled in with their larger counterparts. Compact dryers have an important role to play (e.g. smaller loads, small household size) and the risk is larger appliances will be used inefficiently with partial loads.

39. Another stakeholder believed the Red-Green calculator may be useful to enhance the volume effect i.e. actual energy use as opposed to energy index. They supported the Government's view that it should not be used to form the basis for a labelling scheme as it is not sufficiently robust and is more likely to confuse consumers. They mentioned the risk that a retailer with a 'good' portfolio could publicise that they are 'substantially ahead of Government standards'.

40. They also stated that it is not clear whether the impact of supply chain engagement has been included in energy consumption projections and asked whether assumptions could be included.

**Government response**

41. The targets for tumble dryers have been expressed in kgC/kWh/kg load in the revised tables at the end of this document. The carbon factors have been taken from MTP Briefing Note BNXS01c Carbon Factors for UK Energy Use<sup>1</sup>. The model that sets the targets takes account of all types of tumble dryer, both full size and

<sup>1</sup> MTP Briefing Note BNXS01c MTP Briefing Note BNXS01c Carbon Factors for UK Energy Use <http://www.mtprog.com/cms/product-strategies/subsector/cross-sector>

compact, therefore it can be used to set a 'basket of goods' approach that would include some smaller models with higher kWh/kg load values as well as larger ones with lower kWh/kg load values. Defra would welcome any data that compares energy consumption of full size tumble dryers with part loads and compact dryers with full loads.

42. It is proposed that the standards are reviewed on an annual basis, and the market will be monitored through sales data so that if the market moves rapidly towards the standards, the targets can be revised. Retailers must decide for themselves if they want to use references to the standards and their ability to meet or exceed them in their marketing materials.

43. For the forward projections assumptions have been made regarding the effect of various policies. It is not possible to assign a value to each individual policy because they are likely to affect each other. The supply chain has not yet been actively engaged for wet goods in the way that they have for electronic products, so the effect has not yet been included in the forward projections.

**Question 6: In the area of EU and international policy actions, programmes and initiatives, should consideration be given to any additional measures, risks or strengthening initiatives?**

**Summary table for Question 6**

Key topics raised	Number of comments
Support re-alignment of A to G banding /Additional labelling	2
Do not support re-alignment of A to G banding – but support labelling alternative	1
Existing international work is underway	1
Work on tolerances by European Industry	1

44. The consultation paper outlines the work of the ITFSP in the area of international collaboration, the ongoing work on the implementation of the EuP Directive and the International Energy Agency's 1-Watt initiative which seeks to establish a target for standby power of many products. The section outlines the review of the mandatory EU labelling regime and CECED voluntary initiative on washing machines and a new possible initiative for dishwashers. It also mentions the current status of test methods for domestic wet products. Question 6 refers to these measures and initiatives.

Four stakeholders responded to this question.

45. One mentioned again the concept of carbon-based measures, rather than energy efficiency. They did not support the realignment of the A to G banding levels (as suggested in the consultation paper) as consumers may think they are being misled. They suggest the use of a numerical scale which could be adapted in line with technological improvements.

46. On the other hand, another stakeholder supported the updating of EU labels as it has shown itself to be very effective in driving the market. They claimed this is more effective than minimum efficiency standards.

47. A third stakeholder took the view that as CECED is indicating no further commitment to voluntary agreements, the revalorisation of A-G for washing machines is required to acknowledge the unofficial A+ products. They advocated the requirement for sensor drying to be the default dryer programme. They also called for a mandatory requirement for clear publication of energy usage of *all* programmes, not just 60°C cotton wash for instance.

48. A fourth stakeholder raised the point that at international level work was underway to update the existing performance standard for washing machines including proposals for partial load and a 40°C programme.

49. They also mentioned tolerances and the fact this is being addressed by the European industry on the Standards front. They also suggested that there was a need to ensure that standards are not specifically mentioned in legislation – as standards may need to change ahead of legislative timetables.

### **Government response**

50. The EC is currently undertaking a review of the EU Energy Labelling scheme including the design of future EU Energy Labels. Stakeholders have been asked to contribute to the UK position on any revised product labels.

51. It is anticipated that the EC will complete a review of the EU Energy Label for washing machines at the same time as the implementation of EUP minimum standards. This should remove any confusion regarding the status of A+ and other similar claims regarding improved energy efficiency. The work of the standards committees to update the performance tests is an important element in the revision process.

52. The work of European industry and standards bodies is noted by Defra. The relationship between test standards, policy and legislation will continue to be monitored on a case by case basis

53. The EC has started a preparatory study for laundry driers. This will identify measures to encourage energy efficiency in use as well as technological developments. The implementing measures could include aspects such as the default setting of each machine to ensure users are offered the most efficient method each time they use it, and the information provided to consumers at point of sale or in handbooks.

**Question 7: In the area of UK policy actions, programmes and initiatives, should consideration be given to any additional measures, risks or strengthening initiatives?**

### **Summary table for Question 7**

Key topics raised	Number of comments
Research into new technologies	1
Equal weighting for gas and electric dryers	1

54. This questions follows a discussion of:

- the UK Government's and other public sector actions on procurement of energy efficient products;
- the EST's *Energy Saving Recommended (ESR)* scheme on product endorsement and labelling; and
- the *Energy Efficiency Commitment* scheme's obligations on energy suppliers to improve household energy efficiency.

Two stakeholders responded to this question.

55. One stakeholder was concerned that if the indicative standards in the Appendix are used for tumble dryer procurement, gas dryers will automatically be excluded as their efficiency cannot be compared on a like for like basis with electric dryers.

56. Another stated it would be helpful to stimulate research into improved technologies both physical and chemical (e.g. possible increase in water re-cycling from wet goods.)

### Government response

57. The targets for tumble dryers have been expressed in kgC/kWh/kg load in the revised tables at the end of this document. The carbon factors have been taken from MTP Briefing Note BNXS01c Carbon Factors for UK Energy Use<sup>1</sup>.

58. The Environment Agency currently considers that increasing water efficiency is more beneficial to the environment than encouraging water re-cycling<sup>2</sup>. Waste water from dishwashers and washing machines can be used and information is available on the methods that can be used. This position may change as domestic household water use becomes more efficient.

### Question 8: Are there any other policies likely to impact on domestic wet products which should be taken into account?

#### Summary table for Question 8

Key topics raised	Number of comments
Represent standards in terms of carbon efficiency, not kWh	1
Links/synergies between water and energy efficiencies	1
Support for financial incentives and tax rebates for consumers	1

59. This question follows a summary of other policies which impact on domestic wet appliances. These include the *Act on CO<sub>2</sub>* initiative, possible reduced VAT rate for energy efficiency products and smart metering.

<sup>1</sup> MTP Briefing Note BNXS01c MTP Briefing Note BNXS01c Carbon Factors for UK Energy Use <http://www.mtprog.com/cms/product-strategies/subsector/cross-sector>

<sup>2</sup> [http://www.environment-agency.gov.uk/subjects/waterres/286587/286911/548861/861599/?version=1&lang=\\_e](http://www.environment-agency.gov.uk/subjects/waterres/286587/286911/548861/861599/?version=1&lang=_e)

2 stakeholders provided comments in response to this question.

60. One stakeholder called again for the replacement of the current energy labelling scheme with a carbon labelling scheme to generate a level playing field for all domestic appliances, regardless of fuel source. They fear the 'agenda' is dominated by the electrical appliance industry, namely CECED. Innovation into alternative fuels for domestic appliances should be encouraged. They cited the inability to compare gas and electric hobs, gas and electric tumble dryers, gas and electric ovens etc.

61. A second stakeholder strongly supported the installation of smart metering requiring a clear statutory mandate from Government. They also called for linkages and synergies between energy efficiency and water efficiency policies to be considered (e.g. low water demand requires low heat input)

62. One stakeholder supported the idea of Government providing financial incentives directly to consumers such as tax rebates and cash-back schemes.

### **Government response**

63. The EC has asked stakeholders whether the EU Energy Label should convert electricity consumption into carbon dioxide emissions. Stakeholders have typically responded that this would not be feasible across the EU because of the different mixes of different methods used to generate electricity in the Member States. This may not therefore be the most appropriate method of giving consumers the information they need to assess the relative carbon emissions of gas and electricity fuelled products. Within the UK various schemes may be used to give consumers information regarding the relative emissions of products, these include ESR, Energy Efficiency Advice Centres and Environment Direct. Information can only be generated when there are appropriate test methods and for the list of products given, there are no agreed test methods for gas appliances.

64. Washing machines and dishwashers have significantly reduced the amount of water they use during their cycles, and have focussed on reductions to the water that has to be heated in order to reduce the energy consumption.

65. Government policy supports the delivery of more efficient washing machines appliances through the CERT scheme. This scheme may subsidise the cost to consumers of the more expensive appliances.

### **Question 9: What additional measures would you suggest developing to drive forward sustainability in domestic wet products?**

#### **Summary table for Question 9**

<b>Key topics raised</b>	<b>Number of comments</b>
Gas connection point for tumble dryers in new homes	1
No additional work outside existing EuP initiatives	1

66. This question followed the section discussing product innovation issues (e.g. waterless clothes washing systems, rainwater use, heat-pump tumble dryers) and inclusion of efficient wet appliances in the Code for Sustainable Homes. .

Two stakeholders provided a response.

67. One suggested including the provision of a gas connection point for a tumble dryer as a mandatory requirement for any new dwellings connected to the gas main.

68. A second stakeholder felt that given the wide-ranging work under the EuP Directive, there is little scope for additional work outside these ongoing initiatives.

**Question 10: Are there any other potential impacts resulting from these proposals that should be taken into account?**

**Summary table for Question 10**

Key topics raised	Number of comments
Heat pump dryers use more materials hence more waste	1
Multi-unit, multi-occupancy dwellings less space for natural drying	1
More efficient wash programmes take longer	1

69. This final question follows the partial analysis of the potential impacts of the proposals outlined in the document. These include:

- the issue that consumers are reluctant to spend more on the initial cost of most efficient appliances, despite the ability to recoup these costs over the product lifecycle;
- the fact that most washing machines and dishwashers are manufactured overseas but the UK is a net exporter of tumble dryers;
- possible impacts on the detergent industry as appliances use less water;
- the end of life issues; and
- the possible health impacts of low temperature washing for those with compromised immune systems.

70. Two stakeholders responded to this question.

71. One stakeholder argued that if all tumble dryer promotion is targeted on heat pump dryers, there will be a rise in the volume of waste material for the future when they reach the end of their working life as they use considerably more materials to manufacture than gas dryers or A-rated vented dryers. They claimed that washing machines take longer to wash as they become more efficient and householders may tend to use the “quick wash” functions instead. Consideration should be given to any potential health risks associated with this reflex reaction by consumers.

72. Another suggested that with the tendency towards the multi-unit, multi-occupancy building, the opportunities for natural drying may reduce and result in increased demand for tumble dryers.

## Government response

73. The EUP preparatory study on laundry driers will examine and compare the impacts of different types of appliance over the lifecycle of the product, including the waste phase. They will therefore be able to make suggestions for improvement, but are likely to focus on the in-use phase as being the phase with the highest level of impact.

74. It is acknowledged that the EU Energy Label has impacted on washing machine design, and that cycles have typically lengthened as a result. In response, many manufacturers have developed quicker washes to meet consumer needs. The EUP study for washing machines identified these trends and they, and other trends, including low temperature washing, will be considered when the washing machine energy label is revised.

75. Builders of multi-unit, multi-occupancy buildings should be encouraged to use the EcoHomes guidance and include secure drying areas for all dwellings.

## General Responses

### *Summary Table of General responses*

Key topics raised	Number of comments
Consideration of impacts of alternative products and methods/ life cycle approach	3
Legislation is more effective than voluntary agreements – support stronger standards	1
Need to take into consideration European developments	1
Financial incentives for consumers	1
Support for open-ended numeric labelling system	1

76. All five stakeholders provided some general comments in support of their response.

77. One raised the absence of any reference to gas models despite them being recommended by the EST. They also suggested there should be a greater mention of long-duration programme A rated dryers and some mention of A-rated vented dryers. In terms of innovation, they argued the statement on heat pump technologies is incorrect as it fails to recognise gas dryers and A-rated vented dryer which have had greater market penetration than heat pump technologies.

78. Another stakeholder pointed out that if penetration of dishwashers and tumble dryers is increasing, other processes used to wash dishes and dry laundry are decreasing. In their view, these alternative processes also take energy, in many cases more than the automatic processes and these needs to be taken into consideration.

79. A third stakeholder

- supported the intention to monitor progress against projected technology and market development, to consult on the evidence and to annually review and



update the published analysis and policy response, including indicative product performance levels for new products supplied to the UK market. A further stakeholder supported this process and asked that this should fit in with both established supply chain procurement cycles and with manufacturers' product development cycles.

- recognised the advantages of voluntary agreements but also provide some comments on the different risks associated with them.
- agreed that legislation is more effective than voluntary agreements and urge for such legislation to set challenging but achievable long-term targets. They believe the UK Government needs to continue to push for more far stronger EU standards under the EuP Directive and advocate that UK Government should aim to bring in new EU legislation as early as practicable to do so.

80. One stakeholder felt that waste water needs to be included within an efficiency rating. More energy efficient models may result in higher overall CO<sub>2</sub> produced from clean water production process if they consume more water. They also question the view that dishwashers are not more efficient than hand washing and full life cycle impacts of both approaches should be considered.

81. Another stakeholder referred to the ongoing work of CECED at European level and the need to ensure that this UK work needs to take into account these European developments. They acknowledged the three focus areas (raising the energy performance standards, promoting better energy management and working with consumers to reduce wasteful usage in homes) and take the view that they should all carry equal weighting.

82. In relation to the revision to the current mandatory EU energy labelling regime, they pointed out that the European white goods industry, through CECED, has expressed its views on the revision and favours an open-ended numeric scale to replace the current system

83. One stakeholder felt the goals need to be achievable and need to be accepted by the market (such as a willingness from consumers and retailers to accept higher costs). To get energy efficient product into UK homes requires a range of initiatives from manufacturers, retailers and consumers and Government. They believe financial incentives for consumers need to be seriously considered.

### **Government response**

84. It is beyond the scope of the current consultation to consider lifecycle impacts of domestic activities such as dishwashing and the various methods employed. The methods of heating water are discussed in the domestic heating and hot water paper. The aim of the consultations overall is to set standards for products.

85. The Government fully supports the aims of the EUP and Energy Labelling Directives and will ensure that they are implemented within the UK as necessary.

86. The EU Energy Label has encouraged a reduction in the water used by washing machines and dishwashers. The most energy efficient models are typically also the most water efficient on the programme tested for the EU Energy Label.

87. The three areas of raising performance standards, promotion of better energy management and changing consumer habits cut across several government departments. This consultation focuses on performance standards, but it is acknowledged that the other areas could contribute to reduced energy use.

88. Defra has already engaged with stakeholders for their input into proposals for the revision of the EU energy labelling scheme and will continue to do so as discussions evolve.

89. As noted above, the CERT scheme can support the delivery of more efficient products into consumers' homes.

## 4 Next steps

90. The Market Transformation Programme has carefully reviewed the existing evidence and taken into account these stakeholder responses and any new information or data. The original projections for the future performance of domestic wet products are being reviewed along with options for the ongoing improvement.

91. The outcome of this process is published in the separate document entitled 'Policy Brief for Domestic Wet Products' which provides an update of the baseline information provided in the original Consultation Document. While the formal consultation process has closed, engagement on the standards will continue as part of an annual reviewing and updating process.

## Appendix 1 - List of respondents

<b>Crosslee Plc</b>
<b>University of Bonn</b>
<b>Loughborough University</b>
<b>The Energy Saving Trust</b>
<b>AMDEA</b>