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COMMISSION STAFF WORKING DOCUMENT
EXECUTIVE SUMMARY OF THE IMPACT ASSESSMENT

Accompanying the document

COMMISSION REGULATION (EU) .../... laying down ecodesign requirements for household washing machines and household washer-dryers pursuant to Directive 2009/125/EC of the European Parliament and of the Council, amending Commission Regulation (EC) No 1275/2008

and repealing Commission Regulation (EU) No 1015/2010

and

COMMISSION DELEGATED REGULATION (EU) .../... supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of household washing machines and household washer-dryers

and repealing Commission Delegated Regulation (EU) No 1061/2010 and Commission Directive 96/60/EC

{C(2019) 1804 final} - {C(2019) 2124 final} - {SEC(2019) 337 final} -
{SWD(2019) 349 final}

Executive Summary Sheet

Impact assessment for the Regulation laying down ecodesign requirements for household washing machines and repealing Regulation (EU) No 1015/2010, and the Regulation laying down energy labelling of household washing machines and washer-dryers and repealing Regulation (EU) No 1060/2010 and Directive 96/60/EC.

A. Need for action

Why? What is the problem being addressed?

Washing machines are significant electricity consumers in households and are subject to minimum energy efficiency requirements and energy labelling. Washer-dryers are subject to mandatory energy labelling. As a consequence of those requirements and technological progress, most washing machines currently on the market fall within the three highest categories of energy labelling while most washer-dryers fall within the top two highest categories (A+ or higher). While this is a positive development, it also means that consumers are not in a position to differentiate sufficiently between the performances of appliances on the market. As a consequence, they might end up purchasing an A+ class washing machines or washer-dryer without realising that far from being a top performing washing machine these are in fact the lowest performing appliances currently on the market.

In addition, the programmes used for testing the washing process don't reflect real-life conditions and are often not used by consumers because of their long duration. As a result, the level of energy consumption shown on the label may not be achieved by consumers. Updating the ecodesign and energy labelling requirements will allow an increased capture of cost-effective energy savings.

The current ecodesign and energy labelling Regulations lack requirements that contribute to Circular Economy objectives, such as for durability, reparability, and recyclability as they focus on energy efficiency. However, washing machines and washer-dryers, like many other products, can be significantly improved in terms of circular economy aspects, such as the availability and cost of spare parts and their delivery, access to repair and maintenance information and more complete information on the end-of-life of appliances: measures that could be progressively achieved through ecodesign measures. Therefore, introducing requirements on reparability and recyclability will help reverse the decline in the average lifetime of washing machines and will contribute to circular economy objectives.

What is this initiative expected to achieve?

The revision of the existing ecodesign requirements will result in lower consumer expenditures on energy, water and replacement appliances, as well as higher income for manufacturers, retailers and repair services. Also applying the requirements to washer-dryers will add further benefits in these fields.

The revision of the energy labels for washing machines and washer-dryers is expected to empower consumers to choose more efficient machines, leading to reduced consumer expenditure on energy and water during the use of the appliances.

What is the value added of action at the EU level?

There is clear added value in requiring minimum energy efficiency levels and an energy label at EU-level.

Without harmonised requirements at EU level, there is a chance that Member States would put back in place national product-specific minimum energy efficiency requirements in the framework of their energy and environmental policies. Consequently, this would undermine the free movement of goods and increase EU companies compliance costs.

B. Solutions

What legislative and non-legislative policy options have been considered? Is there a preferred choice or not? Why?

For washing machines and the washing cycle of washer dryers, the following options were considered:

- POWM1: baseline, business as usual: no further action, the regulations currently in place remain unchanged;
- POWM2: Combination of ecodesign requirements and energy labelling setting a minimum temperature of 35 degrees;
- POWM3: Combination of ecodesign requirements and energy labelling setting a maximum duration of the test programme for half or quarter loads to 3 hours while providing information on the full load on the energy label;
- POWM4: Combination of ecodesign requirements and energy labelling setting a maximum duration of the test programme proportional to the machine capacity;
- POWM5: Combination of ecodesign requirements on material efficiency related to the end-of-life and reparability aspects including availability of spare parts.

For the combined washing and drying cycle of washer dryers, the following options were considered:

- POWD1: baseline, business as usual: no further action, the directive currently in place remain unchanged;
- POWD2: Combination of new low ambition ecodesign requirements and updated energy labelling;
- POWD3: Combination of new moderately ambitious ecodesign requirements and updated energy labelling;
- POWD4: Combination of ecodesign requirements on material efficiency identical to POWM5.

In all except the business as usual scenarios, the A-G energy label is based on the new test and rescaled.

The preferred option for washing machines and the washing cycle of washer-dryers is POWM 4 with two tiers on energy efficiency, in combination with the material efficiency requirements of POWM5. For the combined “wash & dry” function of washer-dryers the preferred option is POWD3 with two tiers on energy efficiency, in combination with POWD4. Both options provide the highest overall savings on energy and resources, while ensuring a substantial but realistic contribution to circular economy objectives.

Who supports which option?

While stakeholders did not comment on all the detailed combinations of measures in the different scenarios, they did express preferences for options. Industry stakeholders were not in favour of a time cap on the testing programme, while some of them preferred a minimum temperature requirement. Member States were generally in favour of a time cap, while consumer associations and environmental NGOs supported both requirements. There were some concerns among industry and some Member States over enforceability of the material efficiency requirements, but also support for their inclusion and the prudent approach followed should facilitate implementation.

C. Impacts of the preferred option

What are the benefits of the preferred option (if any, otherwise main ones)?

By 2030, the preferred options for washing machines and washer dryers together are expected to lead to:

- Electricity savings of 2,48 TWh/year and water savings of 711 million m³/year;
- Greenhouse gas emission abatement of 0,84 MtCO₂eq/year;
- 7,15 billion euros in annual savings for consumers;
- Extra business revenue of 1,1 billion euros per year, leading to 3 110 additional jobs in the EU manufacturing sector and 27 940 in the retail sector;
- Maintaining EU industry's competitiveness and leading role as high-quality manufacturers;
- Promoting innovation for more efficient washing machines and washer dryers;
- Higher revenues and profits for independent companies (such as SMEs) working in the field of reparation and refurbishment of products.

What are the costs of the preferred option (if any, otherwise main ones)?

For suppliers, there is a cost of EUR 2,7 million for providing two sets of energy labels (one according to the current regulations and one according to the new measures) over an "overlap" period of 6 months. For dealers, a one-off cost of EUR 0,45 million is assumed for the necessary re-labelling of products on display. Additionally, the cost of the database is estimated at EUR 0,49 million per year for suppliers and for the EU budget, a one-off cost of EUR 0,49 million and annual cost of EUR 49 420 for the database maintenance.

How will businesses, SMEs and micro-enterprises be affected?

See the costs and benefits mentioned above. In addition, many independent repair organisations are SMEs or micro-enterprises, which stand to gain in particular from the requirements on reparability.

Will there be significant impacts on national budgets and administrations?

No, the cost for Market Surveillance Authorities are expected to remain approximately the same. The costs of enforcing the Regulations are difficult to estimate, but it is expected that through the product registration database the administrative burden will diminish.

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| Will there be other significant impacts? |
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| Yes, the preferred option is expected to have a positive impact on competitiveness and innovation in the EU, while enabling the development of an independent repair market leading to savings of resources. |
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| D. Follow up |
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| When will the policy be reviewed? |
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| A review will take place no later than five years after entry into force. |
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