

Lord Callanan,
Department for Net Zero and Energy Security
55 Whitehall
London
SW1A 2HP

20 June 2024

Cc: Jeremy Pocklington CB, Permanent Secretary at the Department for Energy Security and Net Zero

Dear Lord Callanan,

A call for regulatory action to support energy efficiency improvements to tumble dryers and other domestic appliances

AMDEA was grateful for your kind acceptance initially to meet with us on 10 June to discuss the energy efficiency of domestic appliances and the open invitation to get in touch again when the Election period is over. We do of course fully understand the restrictions around General Elections. There is one policy area for which action will be particularly urgent for the members of AMDEA and the British Retail Consortium, and we hope you will support our joint initiative to raise this now so that it may receive early attention.

The policy relates to the ecodesign and energy labelling of energy related products, and the urgency is because for one product group – tumble dryers – the new rules will apply in Northern Ireland from March and July 2025, whereas the approach to GB markets has yet to be determined. We have sought to summarise the situation in our letter below and to explain the business and consumer impacts further in the Annex.

AMDEA has campaigned for several years to deliver crucial savings to consumers and to help the nation achieve Net Zero, through improvements in the energy performance of domestic appliances. A parallel concern has been the continued availability and affordability for consumers of the full range of our members' products as they continuously innovate to bring in state-of-the art technologies. The threat we are seeking to raise here is to all three of these priority concerns.

The BRC is the trade body for the UK retail sector. Our members want to sell safe and compliant goods, and will always adhere to their legal requirements. Given the large and complex nature of retail supply chains, it is imperative that retailers are given as long as possible to comply with upcoming regulations. Our members are concerned that where the UK has lost pace mirroring updates in our common framework with the EU, this directly drives poor consumer experience as well as negatively impacting the UK's own commitment to the Net Zero agenda.

In 2023, the UK's energy efficiency requirements for domestic appliances began a potentially steady drop below that of neighbouring markets, with the introduction of higher efficiency requirements for tumble dryers sold in pan-European markets. The impact on consumers will be most evident from March 2025 onwards with current UK regulations set to undermine the sale of the most efficient appliances in GB markets and contradictory UK and EU requirements applying in Northern Ireland. But manufacturers and retailers have struggled with the complexity of this situation since the autumn of last year. The uncertainty of the approach in GB has already increased the administrative and operational burden carried by our members (as elaborated in the annex to this letter).

Consumers buying tumble dryers, ovens, cookers and hoods are still presented with the “old” style energy efficiency rating (A+++ to D), rather than the new style (A to G) with no roadmap for them to be rescaled. But products including washing machines, dishwashers, fridges and freezers on offer in UK shops have changed to the new label. Since the purpose of labelling is to help customers make more informed decisions, this seems counter-intuitive.

The proposed short-term solution for manufacturers, retailers and consumers alike could, we believe, be relatively simple for the most urgent product groups: a specified list of appliances are scheduled for energy efficiency and labelling upgrades across Europe before 2026, under the ecodesign and energy labelling frameworks that are now assimilated UK law. These are distinct from the product groups for which work has begun under the new, upgraded European ecodesign framework, for which solutions will also be required in the medium term.

We are calling on government to match the improvements and timeframes that are being developed for this first category, so that these same upgraded appliances can be sold seamlessly across the UK:

- **An urgent tailored solution is required for the first product category – tumble dryers – for which the UK regulatory timetable has already failed to keep pace with manufacturing-retail supply lines. This includes clarity on the approach to CE marking and GB specific implementation timelines required to accommodate the resulting variations in individual lines that inevitably developed as a result of this delay.**
- **At the same time, it would be timely for government to engage now with industry on the fast-developing regulations for the follow-on product categories, including vacuum cleaners, cooking appliances, external power supplies, water heaters, comfort fans and local heaters.**

We believe prompt action on these products would support the ambitions behind the Government’s own Energy Related Products Policy Framework which recognises the IEA’s 2021 report on “Achievements of Energy Efficiency Appliance and Equipment Standards and Labelling Programme” that confirms the role played by several categories of domestic appliances in the lowest-cost options for reducing energy consumption and associated emissions.

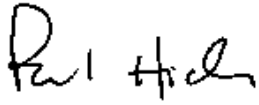
It will likely be influential in supporting consumers to make sustainable choices and encouraging manufacturers’ innovation and investment in efficient appliances, by avoiding the risk that GB markets offer a ‘bargain basement’ for cheaper, low performing products for global suppliers (and so unfairly affecting competition in UK markets).

Additionally, it would likely facilitate commitments in the Government’s January Command Paper on Safeguarding the Union, allowing a smooth flow of appliances between all UK markets, including Northern Ireland. Revisions of the energy label, under EU regulations, are for example tied to the entry of product information in the EU EPREL database (a one-stop information shop for all stakeholders, including consumers – see below). GB economic operators, without a physical presence in the EU, however have no access to the database. How great a trade barrier this creates between GB and Northern Irish markets is dependent on the compatibility of GB regulations.

Expanded in the annex to this letter are some of the challenges for business and consumers, that could be addressed through the Government’s intervention.

We thank you in advance for your consideration of our concerns and recommendations raised here

Yours sincerely,



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Annex to AMDEA and BRC call for regulatory action to support energy efficiency improvements to tumble dryers and other domestic appliances

I The need for urgent action on the ecodesign and energy labelling of tumble dryers

Section II below explains the timelines and market conditions that industry is constrained to work to. In this context, the deadline for a UK-wide response to the new EU tumble dryers ecodesign and energy labelling regulations has passed.

Manufacturers were obliged to make individual choices for their own supply chains. To support the AMDEA and BRC membership, a confirmation is urgently required that:

- GB will follow the agreed changes for the pan-European market, and
- GB transition arrangements will accommodate both suppliers to Ireland, Northern Ireland and GB that have needed to operate to EU timelines, and suppliers to UK but not EU markets that were required to continue operating under UK legal requirements and will therefore require the full implementation timeline to make the necessary transition.

The benefits to households as well as to the Government's net zero ambitions, of following the move in continental markets to integrated heat pump tumble dryers, are demonstrated in AMDEA's own energy savings calculator as well as in the impact assessment made for the European regulations.

AMDEA's energy saving calculator¹ – for use by UK households – estimates (at the time of writing) that over an average lifespan of 13 years, on the current average tariff etc, a popular 8 kilo machine would likely save households between £3,646 and £4,757 depending on the energy efficiency rating.

The European Commission estimates that the new ecodesign and energy labelling measures for tumble dryers will lead, by 2040, to cumulative energy and greenhouse gas emissions savings of 15TWh and 1.7 million tones of CO₂ equivalent, respectively. The potential savings to consumers is around €2.8 billion. A key factor in this is the move to integrated heat pumps that have been found to use only 50% of the energy used by conventional electric condensing tumble dryers. In comparison, the banned vented and condenser appliances are set to remain on sale in GB, whilst UK regulations undermine the sale of the new continental models (unless possibly recognised under the CE marking conformity rules).

Consumers will see the promotion of these more efficient appliances in neighbouring countries as from March 2025. Suppliers to the UK market, however, are now individually taking contingency measures to navigate the uncertainty over whether a parallel approach will be taken in GB markets and what approach will be taken in Northern Ireland. The impact of this immediate regulatory and logistical burden is hard to quantify given the individual choices faced by the respective company boards.

Last year, a survey of AMDEA members – who jointly make up around 95% of the UK market for large white goods – revealed several likely outcomes, should a decision be taken for the GB market not to follow the continent. With the starting point, that separate arrangements would (continue to) be required for production lines destined for GB:

- $\frac{3}{4}$ of tumble dryer manufacturers expected the additional costs to be passed to consumers
- Additional costs would be incurred ranging across: different control panels, energy labels and documentation, managing specifications for GB conformity and testing

¹ AMDEA Know Watt's What Savings Calculator [available here](#)

- Individual companies' mitigation measures could include the limitation of ranges available on the GB market

It is worth noting that an additional European intervention, already in preparation, is also expected to introduce a repair index on tumble dryer energy labels as from 1 January 2026.

II The vital importance of matching implementation periods to manufacturing timelines

UK ecodesign and energy labelling regulations have to date been timed to allow the smooth transition by businesses to state-of-the-art efficiency thresholds. An informed deadline for products to be "placed on the market" recognised the need for the coordination of contracts down through the supply chain to retail sales to consumers. The transition from old to new product labelling has been coordinated to educate consumers' sustainable purchasing decisions. In comparison, the timeline for tumble dryers (with a cut-off date of 1 July 2025) has been running down in neighbouring countries since 2023.

With the regulatory details for the follow-on product groups still unclear, the outlook for tumble dryers offers a case study for the transition generally required for all.

As regards the stages that an appliance passes through from manufacturing to retail sales: working backwards from warehousing (up to 9 months including factory to regional to local), shipping (up to 6 weeks including quality control and flexibility for operational considerations e.g. availability of containers) and manufacturing (up to 18 months, including research, design and development, product testing and certification under the respective applicable regulations, distribution of display stock to stores and updating websites), the timeline for members to comply with incoming legislation is roughly 28 months. In recognition of the challenges for industry, the implementation periods for these product groups across the pan-European market range from 18 months to two years.

Where regulatory changes need to be supported by the development of new test methods to underpin conformity assessment procedures, manufacturers' start timelines will be contingent on the completion of these methods.

In the current example (tumble dryers), a condenser unit production facility cannot be simply updated to a heat pump line. Actioning these changes includes increasing the capacity of new production lines while simultaneously adjusting old lines and their associated supply chains.

The economic climate for domestic appliance manufacturers has been challenging following the covid crisis, with the sales of "wet appliances" in 2023 still down around 16% against 2021 sales. However in early 2024 (the timeframe since the entry into force of new requirements on the continent), UK sales of tumble dryers have rallied in response to climate conditions and changes in energy prices. In comparison GB markets have needed to respond *in line with existing UK regulations*. The business operations of manufacturers and retailers (including the ramp up of production) are now set for the coming months. It is too late for supply line to adapt to sudden changes.

IV Confusion on the Northern Ireland market

The new EU tumble dryer regulations offer a case study for the challenges that will likely arise with all incoming product regulations, whereas early engagement would likely avoid many future complications for follow-on products.

Within Northern Ireland, new EU regulations supersede the UK regulations under the Windsor Protocol. As from 1 July 2025, EU tumble dryer display requirements are set to .

contradict UK regulations with respect to the display of an “eco programme” in place of a “standard cotton programme”.

Additionally, not only will the new tumble dryer design and labelling obligations apply under the established EU timelines, but more detailed product information sheet data must be available (including to consumers) on the accompanying EU EPREL² website from 1 March 2025 onwards. This requirement not only advances the timeline within which all suppliers and retailers to the Northern Irish (and EU) market(s) must be ready to comply with the new requirements, but it compounds the existing disadvantage to GB businesses that do not have direct access to EPREL with the need to enter parameters of the product information sheet in line with EU regulations.

V The need for early engagement with industry on follow-on product categories

In addition to compliance with the established new regulations for tumble dryers, our members are now engaged with the drafting of further energy and material efficiency improvements for follow-on product categories sold in pan-European markets. The estimated timelines for the imposition of these requirements for key AMDEA products are:

- Mid-2026: vacuum cleaners
- 2027: cooking appliances and external power supplies
- Subsequently: water heaters, comfort fans and local heaters

As noted above, manufacturing timelines work backwards from these deadlines by 18-24 months.

Our members are concerned to engage early with your Department, not only to enable the timely adaptation of GB supply lines, but also to: coordinate with parallel regulatory proposals initiated: for the UK market, to support the operation of the Northern Irish market, as well as to facilitate exports to Europe.

Although it is still too early in the process to elaborate detailed impacts for businesses and consumers, some indications can be drawn from two of the most advanced proposals under negotiation.

Vacuum cleaners:

Alongside the strengthening of energy efficiency values for mains-powered appliances, new requirements could be introduced for the first time for battery-operated vacuum cleaners and for robot vacuum cleaners in stand-by mode.

Where regulations introduce new test methods, manufacturing transition periods are measured in years. This will be the case here with proposed testing for measurable battery endurance as well as for changes in the efficiency values.

Negotiations on the possible reintroduction of an EU energy label include the potential display of new information such as sound, flooring suitability and a repair index. Vacuum cleaners are for example, one of the products reviewed by DEFRA when considering the future approach to consumer labelling³. There is potential value – including in line with the Government's own smarter regulation ambitions - in engaging with industry as it contributes to the parallel development of potentially overlapping measures impacting global supply chains.

² The EPREL public website is [available here](#)

³ WRAP report Assessing consumer receptivity to an ecolabel for product durability, recyclability and [reparability available here](#)

Cooking appliances:

More demanding energy and performance efficiency as well as emissions requirements are being developed for ovens and hobs. And once again, the scope of the legislation will potentially be expanded to new products, namely microwaves and small and portable ovens as well as cooking fume extractors.

Domestic cooking appliances were one of the product categories identified for early action within the Government's 2021 Energy Related Product Policy Framework. This is therefore another product category where there is considerable value in coordinating parallel initiatives to avoid potential detriment for UK consumers and businesses, on the other hand, to grow the economy through smarter regulation on the other.