EUROPEAN COMMISSION
Impact Assessment Board

Brussels, 20 DEC. 2010
D(2010)

Opinion

Title **Impact Assessment accompanying the proposal for a Commission Regulation implementing Directive 2009/125/EC with regard to eco-design requirements for household tumble driers**

(draft version of 17 November 2010)

(A) Context

The proposed eco-design implementing regulation is based on the Directive 2009/125/EC of the European Parliament and of the Council establishing a framework for the Commission to set eco-design requirements for energy-related products.

The Directive establishes conditions for when a product/group of products should be covered by an implementing measure, such as sales volume and potential for improvement. It sets out a number of conditions that an implementing measure needs to take into account, such as product functionality or impact on business competitiveness.

(B) Overall assessment

The report needs additional work on the following issues. Firstly, it should better explain the rationale for setting minimum levels of condensation efficiency and revising the methodology for calculating energy efficiency of tumble driers. Secondly, it should demonstrate better – in line with the requirements of the eco-design directive – that the proposed energy efficiency requirements reflect the current minimum life cycle cost to end-users. Finally, the report should discuss the robustness of the assumptions used in assessing the impacts on purchase price, employment and turnover.

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(C) Main recommendations for improvements

(1) Explain better the rationale for setting minimum levels of condensation efficiency and revising the methodology for calculating energy efficiency of tumble driers. The report should explain more fully the rationale for setting a condensation efficiency level in addition to an energy efficiency limit, and should explain why this level should be set at 60% (stage 1) and 70% (stage 2). In this context, it should also discuss the order of magnitude of investments necessary to meet this requirement. In addition, the report should elaborate more on the shortcomings of the current methodology for calculating energy efficiency of tumble driers.

(2) Demonstrate better that the proposed energy efficiency requirements reflect the current minimum life-cycle cost. Given that the level of energy efficiency should be set with the aim of minimising the life-cycle cost to end-users, the report should demonstrate better that this minimum is currently in efficiency class B and no longer in class C as concluded in the preparatory study. This conclusion should be specifically related to the requirements of the eco-design directive and should be substantiated by further empirical evidence, such as current market data for additional member states. The report should also present more fully the position of Member States on the preferred option, and should discuss how the proposed measures would compare to those in the third countries with market conditions similar to those of the EU. The report should briefly explain why banning tumble driers in efficiency classes D and below would not achieve the desired objectives, even if combined with a revised labelling scheme (new efficiency classes on top of class A, improved method for calculating energy efficiency).

(3) Discuss the robustness of the assumptions used in assessing the impacts on purchase price, employment and turnover. The report should provide a clearer explanation of how the impact on the purchase price of vented and condenser driers was calculated. It should discuss the key uncertainties surrounding the projected price increase of 22-27% under options 1 and 2. The report should also discuss the robustness of the assumptions made that (i) an increase in the purchase price will not affect the volume of sales and so will lead to increases in turnover and (ii) higher turnover will necessarily result in higher employment. The report should also clarify whether the proposed measures could disproportionately affect certain groups of manufacturers or Member States.

Some more technical comments have been transmitted directly to the author DG and are expected to be incorporated in the final version of the impact assessment report.

(D) Procedure and presentation

The report should more systematically refer to specific pages of the preparatory study. Page numbering should be introduced. The report should make clear that the terms 'household tumble driers' and 'laundry driers' cover the same product.

(E) IAB scrutiny process	
Reference number	(Implementing measure)
External expertise used	No
Date of IAB meeting	Written procedure