



# Draft Ecodesign and Energy Labelling Regulations for 2021

A consultation on proposed regulations to:

- (a) update ecodesign requirements for electric motors, household washing machines/washer-dryers, household dishwashers, household refrigeration and electronic displays;
- (b) introduce ecodesign requirements for welding equipment and commercial refrigeration; and
- (c) introduce energy labelling requirements for commercial refrigeration.

Closing date: 11 November 2020



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# Introduction

Energy-related products are goods, such as washing machines, lighting equipment and televisions, which have an impact on energy consumption when in use or in standby mode. In total, they account for around 55% of the UK's total non-transport energy use and are currently regulated under two policies in the UK:

- Ecodesign
- Energy labelling

These policies aim to reduce carbon emissions; lower consumer energy bills; make products more energy and resource efficient; and drive product innovation.

Ecodesign aims to phase out the least efficient energy-related products from the market through minimum energy performance requirements, whilst energy labelling aims to drive the uptake of the most energy efficient products on the market by providing consumers with information on the energy performance of the products they are buying. Ecodesign requirements can also facilitate progress towards a more circular economy by setting requirements relating to aspects of a product's resource efficiency, at any point in the product lifecycle from production to end-of-life. These include material consumption, emissions, pollution and waste generation, as well as durability, repairability, recyclability and ease of material recovery. These policies represent one of the most cost-effective ways to reduce energy bills and carbon emissions and will help the UK in its transition to a low-carbon society.

When it was a Member State, the UK always took a leading role in pushing for both ambitious and realistic EU ecodesign and energy labelling requirements. In Winter 2018/19, we voted in favour of new requirements for certain energy-related products. Some of these requirements take effect before the end of the Transition Period and so will be saved in UK law from 1<sup>st</sup> January 2021, whereas those due to come into force in 2021 require us to introduce specific legislation to ensure that Great Britain realises the associated benefits.

This consultation sets out new ecodesign requirements for electric motors, household washing machines/washer-dryers, household dishwashers, electronic displays, household refrigeration, welding equipment and commercial refrigeration and energy labelling requirements for commercial refrigeration in Great Britain. EU ecodesign and energy labelling regulations will continue to apply in Northern Ireland in accordance with the Northern Ireland Protocol. The proposed draft regulations reflect what the UK voted for as a Member State; our support was affirmed at the time by our own cost-benefit analysis and engagement with UK interested parties.

Through the draft regulations proposed in this consultation, we expect **15.8 TWh of electricity savings by 2050** in the domestic sector, which is the equivalent of up to a **£3 billion reduction on household energy bills**. This will also result in around **1.3 MtCO<sub>2</sub> of Carbon Savings** for the same period.

From 1st January 2021, the UK will gain powers to enable it to set its own ecodesign and energy labelling requirements (subject to the terms of the Northern Ireland Protocol). Government published a Call for Evidence<sup>1</sup> in June 2020 seeking views on how the UK can

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<sup>1</sup> More information on the [Call for Evidence](#)

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use its new independence to improve its ecodesign and energy labelling regulations in order to maximise the benefits for UK businesses and consumers. The Call for Evidence explored the possibility of raising ecodesign requirements for certain product categories which we believe could yield greater energy, resource and carbon savings than are currently being achieved by EU regulations, as well as considering new product categories which have not yet been regulated by the EU. The document also looked at how to make energy labels more useful for UK consumers; how to improve UK market surveillance; and which other policy levers, for example fiscal incentives or awards schemes, could be used to maximise benefits for the UK.

Future ecodesign and energy labelling policies will play an important part in achieving the Government's Carbon Budget and Net Zero targets and will ensure that the Government delivers on its commitment in the Clean Growth Strategy. The information and data gathered by this Call for Evidence will be used to build up an evidence base to support better ecodesign and energy labelling regulations. Any proposed future interventions will consider the impact on business, consumer bills and carbon savings to ensure that the regulations deliver a net benefit to the UK and do not place unnecessary burdens on businesses.

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# General information

## Why we are consulting

We are consulting on the draft Ecodesign for Energy-Related Products and Energy Information Regulations 2021 to be made under the two separate powers:

- Ecodesign powers which will exist in the Ecodesign for Energy-Related Products Regulations 2010, as amended by the Ecodesign for Energy-Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019 at the end of the Transition Period;
- Energy Labelling powers which will exist in the retained Energy Labelling Framework Regulation (EU) 2017/1369 as amended by the Ecodesign for Energy-Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019 at the end of the Transition Period.

These Regulations require the Secretary of State to consult on new product-specific regulations and the associated Impact Assessment. This is what this consultation document does.

The draft regulations published as part of this consultation relate to 7 products. These are:

- Electric motors and variable speed drives (“electric motors”);
- Electrical mains-operated welding equipment (“welding equipment”);
- Household washing machines/washer-dryers;
- Household dishwashers;
- Refrigerating appliances (“household refrigeration”);
- Refrigerating appliances with a direct sales function (“commercial refrigeration”); and
- Electronic displays.

The draft regulations will apply in Great Britain and reflect what was agreed by the UK as a Member State at EU level in December 2018 and January 2019. In accordance with the Northern Ireland Protocol, EU Ecodesign and Energy Labelling Regulations will continue to apply in Northern Ireland Post-Transition Period. The associated Impact Assessments assess the impacts for the entire UK. The draft regulations are intended to:

- (a) update existing ecodesign requirements for electric motors, household washing machines/washer-dryers, household dishwashers, electronic displays, and household refrigeration;
- (b) introduce new ecodesign requirements for welding equipment and commercial refrigeration; and
- (d) introduce new energy labelling requirements for commercial refrigeration.

Respondents should note that the draft regulations published as part of this consultation are an advanced draft but are **not yet final**. There may be parts of the draft that are awaiting completion, but we do not believe that this will impede respondents' ability to review the proposed requirements.

This consultation sets out what the draft regulations are trying to achieve and asks whether stakeholders agree with the following:

- the ecodesign and energy labelling proposals themselves;
- our assessment of the costs and benefits of these regulations as well as our assessment of the impact of not regulating, as set out in the Impact Assessments published with this consultation; and
- the intended timetables for reviewing the draft regulations after they come into force - these are noted in each product-specific section.

It is anticipated that those wishing to respond to this consultation may include manufacturers, their authorised representatives, importers, trade bodies, consumer groups, environmental organisations and other civil society organisations interested in electric motors, welding equipment, household washing machines/washer-dryers, household dishwashers, household refrigeration, commercial refrigeration and electronic displays.

The consultation may also be of interest to those with an interest in energy efficiency, resource efficiency, circular economy and climate change. Since the draft Ecodesign for Energy-Related Products and Energy Information Regulations 2021 will extend to England, Wales and Scotland we welcome views from the whole of Great Britain.

Following this consultation, we will consider whether revisions are needed to the ecodesign and energy labelling requirements and will finalise the draft regulations, carrying out thorough scrutiny and quality assurance of the provisions. We will prepare a final Impact Assessment which will be published alongside the final regulations. It is our intention to lay the final regulations in Parliament in early 2021.

## Consultation details

**Issued:** 30 September 2020

**Respond by:** 11 November 2020

**Enquiries to:**

Energy-related Products Team

Department for Business, Energy and Industrial Strategy

2nd Floor, Orchard 3 Area

1 Victoria Street

London

SW1H 0ET

Email: [efficientproducts@beis.gov.uk](mailto:efficientproducts@beis.gov.uk)

**Consultation reference:** Ecodesign requirements for Industrial Goods, White Goods & Electronic Displays: Draft Regulations.

## How to respond

We encourage respondents to make use of the online e-consultation wherever possible when submitting responses as this is the Government's preferred method of receiving responses.

The e-consultation platform can be found at: [beisgovuk.citizenspace.com/energy-efficiency/ecodesign-energy-labelling-regulations-2021](https://beisgovuk.citizenspace.com/energy-efficiency/ecodesign-energy-labelling-regulations-2021)

However, responses sent via email to [efficientproducts@beis.gov.uk](mailto:efficientproducts@beis.gov.uk) will also be accepted.

For ease of reference, questions posed throughout the document are also listed together in a catalogue of questions at the end of this consultation.

Your response will be most useful if it is framed in direct response to the questions asked. To aid our analysis, please state 'yes' or 'no' to indicate whether you agree or disagree with each proposal. If you have information which supports your view, we invite you to provide details in support of your response.

## Confidentiality and data protection

Information you provide in response to this consultation, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018, and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential please tell us but be aware that we cannot guarantee confidentiality in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not be regarded by us as a confidentiality request.

We will process your personal data in accordance with all applicable UK and EU data protection laws. See our [privacy policy](#).

We will summarise all responses and publish this summary on [GOV.UK](https://www.gov.uk). The summary will include a list of names or organisations that responded, but not people's personal names, addresses or other contact details.

## Quality assurance

This consultation has been carried out in accordance with the government's [consultation principles](#).

If you have any complaints about the way this consultation has been conducted, please email: [beis.bru@beis.gov.uk](mailto:beis.bru@beis.gov.uk).

# Context and Background Information

## What is ecodesign?

Ecodesign requires manufacturers of energy-related products to improve the performance of their products by meeting minimum energy and resource efficiency requirements before they can place their products on the market. Ecodesign requirements can also relate to material consumption, emissions, pollution and waste generation, as well as durability, repairability, recyclability and ease of material recovery. This policy pushes industry to improve the energy efficiency and environmental performance of products and removes the least performing products from the market.

Ecodesign represents one of the most cost-effective ways to reduce energy bills and carbon emissions and will help countries to transition to a low carbon society whilst increasing economic growth. The UK Government's current estimates show that, taken together with related energy labelling requirements which allow consumers to choose the most energy efficient products, ecodesign requirements will save around £100 for the average dual-fuel household on their energy bills in 2020, and lead to greenhouse gas emissions savings of 8 million tonnes of CO<sub>2</sub>e in 2020.

## What is energy labelling?

Energy labels provide information on the energy consumption (and other parameters such as water consumption) of products and show how much energy an appliance uses compared with similar models. Energy labels help consumers make more informed decisions to choose more energy efficient products by presenting easily understood information on energy efficiency and product performance at the point of sale.

## UK ecodesign and energy labelling after the Transition Period

To date, ecodesign and energy labelling policy measures have been set at an EU level and have subsequently taken direct effect in all Member States. To provide clarity and ensure continuity after the end of the Transition Period, we have already introduced legislation<sup>2</sup> to ensure that all existing minimum performance and labelling requirements for energy-related products in households and the commercial sector remain enforceable in the UK from 1st January 2021. That legislation also allows us to introduce new or revised minimum performance and labelling requirements for energy-related products in the UK.

The UK left the EU on 31 January 2020 and following the end of the Transition Period on 31 December 2020, we will regain control over our economic and political independence. This means we will be able to set our own, better products policy regulations to maximise benefits for UK consumers and businesses. In June 2020, the Government published a Call for Evidence which explored how the UK can improve its ecodesign and energy labelling policies<sup>3</sup>. Any future measures will be set following public consultation and with due consideration to the

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<sup>2</sup> The [Ecodesign for Energy-Related Products and Energy Information \(Amendment\) \(EU Exit\) Regulations 2019](#)

<sup>3</sup> More information on the [Call for Evidence](#)

terms of the Northern Ireland Protocol. Future ecodesign and energy labelling regulations will seek to yield greater carbon energy and carbon savings in order to support the delivery of our Carbon Budget and Net Zero targets. At the same time, regulations will aim to deliver a net benefit to the UK and to avoid placing unnecessary burdens on businesses.

## Ecodesign and energy labelling regulations for 2021

Whilst we develop the UK's future ecodesign and energy labelling policy, it is important to continue to make progress towards our Carbon Budget and Net Zero targets. Between September 2018 and January 2019, the UK, as an EU Member State, voted in favour of a new package of EU ecodesign and energy labelling regulations, following a cost-benefit analysis and informal consultation with UK interested parties. The ecodesign regulations covered eleven product groups: servers and data storage products, external power supplies, electric motors, welding equipment, household washing machines/washer-dryers, household dishwashers, household refrigeration, commercial refrigeration, light sources and separate control gears, electronic displays, and power transformers. The whole package of regulations is estimated to save around 2.7 TWh of energy in 2030 and reduce net carbon emissions by 1.7 MtCO<sub>2</sub>e over Carbon Budget 5 (2028-2032).

The servers and data storage and external power supplies regulations will be saved in UK law from 1<sup>st</sup> January 2021 as they began to apply during the Transition Period.

The remaining product-specific requirements that the UK voted for begin to apply in the EU after the end of the Transition Period, so we will need to bring forward domestic secondary legislation in Great Britain to benefit from the associated energy, carbon and bill savings.

This consultation covers the proposed regulations for industrial goods, white goods and electronic displays (which includes welding equipment, electric motors, household washing machines/washer-dryers, household dishwashers, household refrigeration, commercial refrigeration and electronic displays).

Through the regulations in this consultation, in the domestic sector we expect **15.8 TWh of electricity savings by 2050** which is the equivalent of up to a **£3 billion reduction on household energy bills**. This will also result in around **1.34 MtCO<sub>2</sub> of Carbon Savings** for the same period.

It should be noted that while the energy labelling requirements for commercial refrigeration are included in this consultation, we are not consulting on the rescaled energy labelling requirements for household washing machines/washer-dryers, household dishwashers, household refrigeration and electronic displays. The energy labelling requirements for these products will begin to apply in two stages. The first stage requires manufacturers to supply the new rescaled labels with their products from 1 November 2020. This requirement will be saved into GB law Post-Transition Period. The second stage requires retailers to display the new rescaled labels at the point of purchase from 1 March 2021. As this requirement begins to apply after the end of the Transition Period, it will not be saved into GB law.

Our intention is to introduce the March 2021 requirements for these products into GB law through a separate piece of legislation which will be laid in Parliament later in 2020.

A further consultation, covering updated ecodesign and energy labelling regulations for light sources and separate control gears will follow later in 2020.

The intention is to introduce the draft regulations covered by this consultation in early 2021 with the intention that the GB requirements will commence at the same time as the EU requirements, and where this is not feasible, as soon as is practicable after the EU requirements come into force.

The proposed ecodesign and energy labelling regulations will be enforced in GB in the same way as existing ecodesign and energy labelling regulations are currently enforced. That is, the regulations will be subject to the compliance regime as set out in the Ecodesign for Energy-Related Products Regulations 2010 and the Energy Information Regulations 2011 and will be enforced by the Office for Product Safety and Standards (OPSS) in accordance with their enforcement policy.

## Consultation already undertaken at EU and UK levels

The EU carried out a consultation process between 2013 and 2018 on all the products covered by this consultation. This involved in-depth "preparatory studies" with the involvement of stakeholders that explored the technical, economic, environmental, and social aspects of these product groups. Assessments of the impacts on the environment, industry, and consumers were also undertaken.

The UK Government consulted UK stakeholders about the outcome of this process and the proposed draft regulations at the time.

## Next steps

The deadline for responding to this consultation is 11 November 2020. Responses to this consultation will be taken into account when taking the policies forward, and following the analysis of responses, the draft regulations may be revised.

# 1. Welding Equipment

## Background on welding equipment

Welding equipment are products that deliver energy in the form of electricity to join or cut two or more metals by heating (often  $>6,000^{\circ}\text{C}$ ), with or without the use of ancillary materials such as filler sticks, wire, or gases that shield the welding area from the surrounding air. Welding equipment use electricity to produce an 'arc' to melt, join, braze, solder, and cut materials.

Welding equipment products within the scope of the draft regulations are those which use one or more of the following welding and allied processes:

- (a) manual metal arc welding;
- (b) shielded metal arc welding;
- (c) self-shielded flux-cored welding;
- (d) flux cored arc welding;
- (e) metal active gas and metal inert gas welding;
- (f) tungsten inert gas welding; or
- (g) plasma arc cutting.

Excluded from the scope of the draft regulations are welding equipment which use one or more of the following welding and allied processes:

- (a) submerged arc welding;
- (b) limited-duty arc welding;
- (c) resistance welding; or
- (d) stud welding.

Around 15,000 welding equipment units are sold in the UK annually. Welding equipment collectively consume a significant amount of energy. It is estimated that welding equipment used 307 GWh in the UK in 2020/21<sup>4</sup>.

Welding equipment placed on the GB market are not currently subject to any ecodesign regulations.

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<sup>4</sup> Impact Assessment of Proposed Ecodesign Requirements for Electric Motors and Variable Speed Drives, and Electrical Mains-Operated Welding Equipment

## New ecodesign requirements for welding equipment

The draft Ecodesign for Energy-Related Products Regulations 2021 annexed to this consultation set out new ecodesign requirements for welding equipment in GB for 2021. The Government's intention, subject to consultation, is for these regulations to come into force as soon as practicable after 1<sup>st</sup> January 2021 when they begin to apply in the EU. These requirements reflect what the UK agreed as a Member State at EU level in January 2019.

The draft regulations set minimum energy efficiency requirements on the following aspects:

- minimum power source efficiency (i.e. the ratio of the output power at standardised welding conditions and standardised welding load voltages, to the highest power consumption of the power source); and
- maximum idle state power consumption (i.e. the power demand when the power is switched on and the welding circuit is not energised).

The draft regulations also set requirements for resource efficiency on the following aspects:

- availability of and access to spare parts and maintenance information to facilitate repairs;
- removal of certain materials and components with the use of commonly available tools; and
- indication of the use of welding wire or filler material where a display is provided.

Additionally, the draft regulations set requirements regarding information provided by manufacturers and importers. There are two target groups for the information:

- end users (to be informed by the manuals and free access websites); and
- market surveillance authorities conducting verification of products (to be informed by the technical documentation).

Adopting these requirements would lead to estimated carbon savings of around 17,000 tonnes of CO<sub>2</sub>e between 2021/22 and 2050/51 in the UK, and 200 GWh of energy saved.

There are currently no ecodesign measures for welding equipment. In the absence of regulation, there would be no market competition to place on the market energy and resource efficient products. This would result in missed opportunities in terms of carbon and energy bill savings in the GB. Further, non-GB manufacturers who fail to plan and adjust to the new EU regulation may have an excess supply of products that do not comply with the new EU regulation. These products may reach the GB market, impacting our carbon and energy bill savings negatively.

We are not proposing at this time to exceed the requirements the UK agreed at EU level.

Q.1 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for welding equipment in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

## Timing of the welding equipment draft regulations

The draft regulations propose to implement the ecodesign requirements for welding equipment as soon as practicable after 1 January 2021, which is when the enabling powers will become available. This is to ensure the ecodesign requirements for welding equipment are introduced in GB as soon as possible after the new EU regulations for welding equipment begin to apply in the EU from 1 January 2021. We will take all reasonable actions to minimise the gap between the EU regulations applying and the GB regulations coming into force. We intend to lay the regulations in Parliament in early 2021.

On the basis that the draft regulations reflect those agreed by the UK at EU level in January 2019, we think it is reasonable to expect manufacturers to be well prepared for an implementation date as soon as practicable after 1 January 2021. In any event, manufacturers selling to the EU market will need to be prepared for the 1 January 2021 implementation of the EU regulations.

The EU regulations were agreed after a lengthy consultative process, which UK stakeholders were involved in. This process involved a preparatory study, an initial ecodesign working draft regulation, a Consultation Forum, notification of the draft EU regulation to the World Trade Organization, publication of the draft EU regulation, and a Regulatory Committee. We therefore believe manufacturers will not be impacted significantly by the short lead time between the legislation being laid in Parliament and it taking effect. However, we would be keen to understand any possible issues, particularly for small and micro businesses that might be affected by this legislation.

Q.2 Do you agree with our intention to implement the proposed GB ecodesign requirements for welding equipment as soon as practicable after 1 January 2021, reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.3 Do you agree that an implementation date as soon as is practicable after 1 January 2021 is an achievable implementation date for introducing ecodesign requirements for welding equipment for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

## Review of the welding equipment draft regulations

As required by the Ecodesign for Energy-Related Products Regulations 2010, as amended by the Ecodesign for Energy- Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019, the draft regulations set a date for their evaluation and possible revision.

Our proposal is to review the draft regulations no later than 6 years from their application dates. This review period reflects the particular rate of technological progress for welding equipment (the review periods for other products in this consultation may vary). It will also allow sufficient time for all provisions to be implemented and for market penetration to be understood.

Q.4 Do you agree with our intention, as set out in the draft regulations in respect of welding equipment, to review the regulations 6 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

## Impact Assessment for the welding equipment draft regulations

An Impact Assessment for the draft regulations in respect of welding equipment has been annexed to this consultation. The Impact Assessment considers the impact in the UK of the draft regulations on individuals, groups, and businesses with the aim of understanding the overall impact on society.

We would welcome any comments on and additional evidence to support the analysis set out in this Impact Assessment, such as potential costs to UK businesses as well as any additional benefits and risks arising from the draft regulations.

Q.5 Do you agree with our assessment of the costs and benefits of introducing GB ecodesign requirements for welding equipment that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.6 Do you agree with our assessment of the impact of not introducing GB ecodesign requirements for welding equipment that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.7 Have the costs to UK businesses in general of introducing GB ecodesign regulations for welding equipment been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.8 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing GB ecodesign requirements for welding equipment in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.9 Do you agree with our estimate of an additionality of 50% for introducing GB ecodesign regulations for welding equipment (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.10 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for welding equipment?

## Future welding equipment regulations

The Government recently held a Call for Evidence to explore how ecodesign and energy labelling could be improved in GB in the future. This exercise invited views on whether certain products could yield greater carbon energy and carbon savings than what is currently being achieved. As noted in the Call for Evidence, where ecodesign measures already exist, the UK may start to re-evaluate these from 2021, with a view to implementing better regulations from 2024/2025 in order to meet environmental targets.

Welding equipment was not one of the products included in the Call for Evidence and, subject to this consultation, the Government intends to implement the new ecodesign requirements as agreed at EU level in January 2019. Nevertheless, we welcome views on how better ecodesign and energy labelling regulations for this product could be set in the future. Responses to this question will supplement the evidence gathered by the Call for Evidence.

Q.11 If you have any proposals for developing future eco-design standards or energy labelling requirements for welding equipment in a way that could balance saving more energy in GB with reducing unnecessary costs or burdens on business, please provide these below. Please also provide supporting evidence and/or data where possible.

## 2. Electric Motors

### Background on electric motors

Electric motors convert electrical energy into mechanical energy. Most electric motors operate through the interaction between the motor's magnetic field and electrical current in a wire winding, generating force in the form of rotation of a shaft. The draft regulations also cover Variable Speed Drives (VSDs), which are devices that can vary the speed of a motor. The electric motors in scope are globally traded goods, based on International Electrotechnical Commission (IEC) standards.

Around 6 million electric motors are sold in the UK annually. Small electric motors (0.12-0.75kW single phase motors) account for 75% of the market.

Electric motors placed on the UK market are currently subject to existing ecodesign regulation, Commission Regulation (EC) No. 640/2009, which will be retained after the end of the Transition Period. As noted above, in January 2019 the UK together with other Member States voted in favour of updating this regulation.

### New ecodesign requirements for electric motors

The draft Ecodesign for Energy-Related Products Regulations 2021 annexed to this consultation set out updated ecodesign requirements for electric motors which will apply from July 2021 in GB. These requirements reflect what the UK agreed as a Member State at EU level in January 2019.

The proposed ecodesign requirements for electric motors will replace the current ecodesign requirements currently in force in GB (The European Commission Ecodesign regulation No 640/2009 on electric motors). The proposed requirements extend the scope of the existing requirements to cover smaller motors between 120W and 750W, larger motors between 375kW and 1000kW and 60Hz motors, 8 pole motors and single-phase motors. The draft regulations will also introduce minimum efficiency requirements for VSDs.

The draft regulations set minimum energy efficiency requirements according to the following aspects:

- The rated output power and number of poles of the electric motors; and
- The power losses of VSDs operating with electric motors.

The draft regulations also set requirements regarding information provided by manufacturers and importers. There are two target groups for the information:

- end users (to be informed by the manuals and free access websites); and
- market surveillance authorities conducting verification of products (to be informed by the technical documentation).

Adopting these requirements would lead to estimated carbon savings of around 1.5 million tonnes of CO<sub>2</sub>e between 2021/22 and 2050/51 in the UK, with 21,725 GWh of energy saved.

In the absence of this new regulation, there is little market competition to place energy efficient products on the market. Not adopting the new requirements would result in missed opportunities for GB in terms of carbon and energy bill savings. Further, non-GB manufacturers who fail to plan and adjust to the new EU regulation may have an excess supply of products that do not comply with the new EU regulation. These products may reach the GB market, impacting our carbon and energy bill savings negatively.

We are not proposing at this time to exceed the requirements the UK agreed at EU level.

Q.12 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for electric motors in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

## Timing of the draft regulations in respect of electric motors

The draft regulations propose to implement the ecodesign requirements in two tiers. The first tier will apply from July 2021 and second from July 2023 reflecting what the UK agreed at EU level as a Member State in January 2019. This will provide certainty and clarity to businesses. This will also prevent less efficient and more polluting electric motors from being placed on the GB market and allow GB to realise the full potential of energy and carbon emission savings from these products. We intend to lay the regulations in Parliament in early 2021.

On the basis that the requirements in the draft regulations reflect those agreed by the UK at EU level in January 2019, we have confidence that manufacturers will be well prepared for the July 2021 implementation date.

The EU regulations were agreed after a lengthy consultative process, which UK stakeholders were involved in. This process involved a preparatory study, an initial ecodesign working draft regulation, a Consultation Forum, notification of the draft EU regulation to the World Trade Organization, publication of the draft EU regulations, and a Regulatory Committee. We therefore believe stakeholders will not be impacted significantly by the short lead time between the legislation being laid in Parliament and it taking effect. However, we would be keen to understand any possible issues, particularly for small and micro businesses which might be affected by this legislation.

Q.13 Do you agree with our intention to implement the proposed GB ecodesign requirements for electric motors in July 2021 reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.14 Do you agree that July 2021 is an achievable implementation date for new ecodesign requirements for electric motors for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

## Review of the electric motors draft regulations

As required by the Ecodesign for Energy-Related Products Regulations 2010, as amended by the Ecodesign for Energy- Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019, the draft regulations set a date for their evaluation and possible revision.

Our proposal is to review the draft regulations no later than 5 years from the application dates of the regulations. The review period reflects the particular rate of technological progress for electric motors (the review periods for other products in this consultation may vary). It will also allow sufficient time for all provisions to be implemented and for market penetration to be understood.

Q.15 Do you agree with our intention, as set out in the draft regulations in respect of electric motors, to review the regulations 5 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

## Impact Assessment for the electric motors draft regulations

An Impact Assessment for the draft regulations for electric motors has been annexed to this consultation. The Impact Assessment considers the impact in the UK of the draft regulations on individuals, groups, and businesses with the aim of understanding the overall impact on society.

We would welcome any comments on and additional evidence to support the analysis set out in this Impact Assessment, such as potential costs, to UK businesses as well as any additional benefits and risks arising from the draft regulations.

Q.16 Do you agree with our assessment of the costs and benefits of introducing new GB ecodesign requirements for electric motors that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.17 Do you agree with our assessment of the impact of not introducing new GB ecodesign requirements for electric motors that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.18 Have the costs to UK businesses in general of introducing new GB ecodesign regulations for electric motors been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.19 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for electric motors in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.20 Do you agree with our estimate of an additionality of 50% for introducing the new GB ecodesign regulations for electric motors (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion

of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.21 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for electric motors?

## Future electric motors regulations

Electric motors were one of the product categories included in the Government's recent Call for Evidence, which explored how future ecodesign standards could be improved for this product. Therefore, we have decided not to ask a further, similar question in this consultation.

## 3. Washing Machines and Washer-dryers

### Background on household washing machines and washer-dryers

Washing machines are automatic machines that clean and rinse laundry by using water, chemical, mechanical, and thermal means. A spin extraction function is also used in this cleaning process. Washer-dryers have the function of a household washing machine but also have a clothes-drying function. The draft regulations cover electric mains-operated household washing machines and household washer-dryers, including built-in household washing machines and household washer-dryers as well as electric mains-operated household washing machines and household washer-dryers that can also be powered by batteries.

Around 1.6 million washing machines are sold in the UK annually. UK energy consumption from washing machines has declined by around 500 GWh over the last ten years, despite the total number of household appliances remaining constant<sup>5</sup>. Information on the energy consumption of these products is limited but average annual consumption is estimated to be around 11 TWh in the UK with the stock continuing to increase.

Household washing machines/washer-dryers placed on the UK market are currently subject to existing ecodesign and energy labelling regulations, Commission Regulation (EC) No. 1015/2010 and Commission Regulation (EC) No.1061/2010 which will be retained after the end of the Transition Period. In January 2019, the UK together with other Member States, voted in favour of updating these Regulations.

### New ecodesign and requirements for household washing machines/washer-dryers

The draft Ecodesign for Energy-Related Products Regulations 2021 annexed to this consultation set out updated ecodesign requirements for washing machines/washer-dryers in GB that reflect those agreed by the UK as a Member State at EU level in January 2019.

The draft regulations set new minimum energy efficiency requirements related to the use of energy and water, and introduce requirements related to resource efficiency such as reparability and recyclability.

Adopting these requirements would lead to estimated carbon savings of around 7,500 GWh of electrical energy and 0.6 million tonnes of CO<sub>2</sub>e over the appraisal period (2021/22 to 2050/51).

We are not proposing at this time to exceed the requirements the UK agreed at EU level.

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<sup>5</sup> [Energy consumption data from ECUK \(2019\) Electrical Products Tables](#) – average used is the mean average.

Q.22 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for household washing machines/washer-dryers in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

## Timing of the washing machines/washer-dryers draft regulations

The draft regulations propose to implement the ecodesign requirements from March 2021 reflecting what the UK agreed at EU level as a Member State in January 2019. This will provide certainty and clarity to businesses. This will also prevent less efficient household washing machines/washer-dryers from being placed on the GB market and allow GB to realise the full potential of energy and carbon emissions savings from these products. We intend to lay the regulations in Parliament in early 2021.

On the basis that the requirements in the draft regulations reflect those agreed by the UK at EU level in January 2019, we have confidence that manufacturers will be well prepared for the March 2021 implementation date.

The EU regulations were agreed after a lengthy consultative process, in which UK stakeholders were involved. This process involved a preparatory study, an initial ecodesign working draft regulation, a Consultation Forum, notification of the draft EU regulation to the World Trade Organization, publication of the draft EU regulations and a Regulatory Committee. We therefore believe stakeholders will not be impacted significantly by the short lead time between the legislation being laid in Parliament and it taking effect. However, we would be keen to understand any possible issues, particularly for small and micro businesses which might be affected by this legislation.

Q.23 Do you agree with our intention to implement new GB ecodesign requirements for household washing machines/washer-dryers from March 2021, reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.24 Do you agree that March 2021 is an achievable implementation date for new ecodesign requirements for household washing machines/washer-dryers for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

## Review of the household washing machines/washer-dryers draft regulations

As required by the Ecodesign for Energy-Related Products Regulations 2010, as amended by the Ecodesign for Energy-Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019, the draft regulations set a date for their evaluation and possible revision.

Considering technological progress for household washing machines/washer dryers, our proposal is to review the draft regulations no later than 7 years from the application dates of the regulations. The review period reflects the particular rate of technological progress for

household washing machines/washer dryers (the review periods for other products in this consultation may vary). It will also allow sufficient time for all provisions to be implemented and for market penetration to be understood.

Q.25 Do you agree with our intention, as set out in the draft regulations in respect of household washing machines/washer-dryers, to review the regulations 7 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

## Impact Assessment for the household washing machines/washer-dryers draft regulations

An Impact Assessment for the draft regulations for household washing machines/washer-dryers has been annexed to this consultation. The Impact Assessment considers the impact in the UK of the draft regulations on individuals, groups, and businesses with the aim of understanding the overall impact on society.

We would welcome any comments on and additional evidence to support the analysis set out in this Impact Assessment, such as potential costs, to UK businesses as well as any additional benefits and risks arising from the draft regulations.

Q.26 Do you agree with our assessment of the costs and benefits of introducing new GB ecodesign requirements for household washing machines/washer-dryers that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.27 Do you agree with our assessment of the impact of not introducing new GB ecodesign requirements for household washing machines/washer-dryers that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.28 Have the costs to UK businesses in general of introducing new GB ecodesign regulations for household washing machines/washer-dryers been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.29 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for household washing machines/washer-dryers in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.30 Do you agree with our estimate of an additionality of 50% for introducing new GB ecodesign regulations for household washing machines/washer-dryers (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.31 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for household washing machines/washer-dryers?

## Future household washing machines/washer-dryers regulations

The Government recently held a Call for Evidence to explore how ecodesign and energy labelling could be improved in GB in the future. This exercise invited views on whether certain products could yield greater carbon energy and carbon savings than what is currently being achieved. As noted in the Call for Evidence, where ecodesign measures already exist, the UK may start to re-evaluate these from 2021, with a view to implementing better regulations from 2024/2025 in order to meet environmental targets.

Household washing machines/washer-dryers were not one of the products included in the Call for Evidence and, subject to this consultation, the Government intends to implement the updated ecodesign requirements as agreed at EU level in January 2019. Nevertheless, we welcome views on how better ecodesign and energy labelling regulations for this product could be set in the future. Responses to this question will supplement the evidence gathered by the Call for Evidence.

Q.32 If you have any proposals for developing future eco-design standards or energy labelling requirements for household washing machines/washer-dryers in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible

## 4. Household Dishwashers

### Background on household dishwashers

Household dishwashers are machines that clean, rinse and dry tableware. Household dishwashers exist in stand-alone and built-in versions. The scope of these regulations covers electric mains-operated household dishwashers, including built-in household dishwashers as well as electric mains-operated household dishwashers that can also be powered by batteries.

On average, 1 million dishwashers are sold in the UK annually. Energy consumption is predicted to steadily increase due to increasing popularity of household dishwashers. Therefore, whilst the energy efficiency of dishwashers will increase, increased sales over the appraisal period means that net energy consumption will increase as well.

Household Dishwashers supplies placed on the UK market are currently subject to existing ecodesign regulations, Commission Regulation (EC) No. 1016/2010 and Commission Regulation (EC) No. 1059/2010 which will be retained in UK law after the end of the Transition Period. As noted above, however, the UK, together with other Member States, voted in favour of updating these regulations in January 2019.

### New ecodesign requirements for household dishwashers

The draft Ecodesign for Energy-Related Products Regulations 2021 annexed to this consultation set out updated ecodesign requirements for household dishwashers in GB that reflect those agreed by the UK as a Member State at EU level in January 2019.

The draft regulations set new minimum energy efficiency requirements related to use of energy and water and introduces requirements related to resource efficiency such as reparability and recyclability.

Adopting these requirements for household dishwashers deliver an estimated saving of around 5,800 GWh of electrical energy and 0.4 million tonnes of CO<sub>2</sub>e over the appraisal period (2021/22 to 2050/51). Annual energy savings amount to around 200 GWh a year by the end of the appraisal period.

We are not proposing at this time to exceed the requirements the UK agreed at EU level.

Q.33 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for household dishwashers in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

### Timing of the household dishwashers draft regulations

The draft regulations propose to implement the ecodesign requirements from March 2021 reflecting what the UK agreed at EU level as a Member State in January 2019. This will

provide certainty and clarity to businesses. This will also prevent less energy efficient household dishwashers from being placed on the GB market and allow GB to realise the full potential of energy and carbon emission savings from these products. We intend to lay the regulations in Parliament early in 2021.

On the assumption that the requirements in the draft regulations reflect those agreed by the UK at EU level in January 2019, we are confident that manufacturers will be well prepared for the March 2021 implementation date.

The EU regulations were agreed after a lengthy consultative process, which UK stakeholders were involved in. This process involved a preparatory study, an initial ecodesign working draft regulation, a Consultation Forum, notification of the draft EU regulation to the World Trade Organization, publication of the draft EU regulations and a Regulatory Committee. We therefore believe stakeholders will not be impacted significantly by the short lead time between the legislation being laid in Parliament and it taking effect. However, we would be keen to understand any possible issues, particularly for small and micro businesses which might be affected by this legislation.

Q.34 Do you agree with our intention to implement the new GB ecodesign requirements for household dishwashers from March 2021 reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.35 Do you agree that March 2021 is an achievable implementation date for new ecodesign requirements for household dishwashers small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

## Review of the household dishwashers draft regulations

As required by the Ecodesign for Energy-Related Products Regulations 2010, as amended by the Ecodesign for Energy- Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019, the draft regulations set a date for their evaluation and possible revision.

Considering technological progress for household dishwashers, our proposal is to review the draft regulations no later than 7 years from the application dates of the regulations. The review period reflects the particular rate of technological progress for household dishwashers (the review periods for other products in this consultation may vary). It will also allow sufficient time for all provisions to be implemented and for market penetration to be understood.

Q.36 Do you agree with our intention, as set out in the draft regulations in respect of household dishwashers, to review the regulations 7 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

## Impact Assessment for the household dishwashers draft regulations

An Impact Assessment for the draft regulations for household dishwashers has been annexed to this consultation. The Impact Assessment considers the impact of the draft regulations in the

UK on individuals, groups, and businesses with the aim of understanding the overall impact on society.

We would welcome any comments on and additional evidence to support the analysis set out in this Impact Assessment, such as potential costs, to UK businesses as well as any benefits and risks arising from the draft regulations.

Q.37 Do you agree with our assessment of the costs and benefits of introducing new GB ecodesign requirements for household dishwashers that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.38 Do you agree with our assessment of the impact of not introducing new GB ecodesign requirements for household dishwashers that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.39 Have the costs to UK businesses in general of introducing the new GB ecodesign regulation for household dishwashers been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.40 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for household dishwashers in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.41 Do you agree with our estimate of an additionality of 50% for introducing the new GB ecodesign regulation for household dishwashers (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.42 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for household dishwashers?

## Future household dishwashers regulations

The Government recently held a Call for Evidence to explore how ecodesign and energy labelling could be improved in GB in the future. This exercise invited views on whether certain products could yield greater carbon energy and carbon savings than what is currently being achieved. As noted in the Call for Evidence, where ecodesign measures already exist, the UK may start to re-evaluate these from 2021, with a view to implementing better regulations from 2024/2025 in order to meet environmental targets.

Household dishwashers was not one of the products included in the Call for Evidence and, subject to this consultation, the Government intends to implement the updated ecodesign requirements as agreed at EU level in January 2019. Nevertheless, we welcome views on how

better ecodesign and energy labelling regulations for this product could be set in the future. Responses to this question will supplement the evidence gathered by the Call for Evidence.

Q.43 If you have any proposals for developing future eco-design standards or energy labelling requirements for household dishwashers in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible

## 5. Household Refrigeration

### Background on household refrigeration

A refrigeration system for household use is an insulated metal cabinet, which contains a cold chamber. It is used for storing and keeping perishable foodstuffs and beverages. The appliances covered by the draft regulations include electric mains-operated refrigerating appliances with a total volume of more than 10 litres and less than or equal to 1500 litres.

Household refrigeration placed on the UK market is currently subject to existing ecodesign regulation (Commission Regulation (EC) No 643/2009 and Commission Regulation (EC) No 1060/2010), which will be retained in UK law at the end of the Transition Period. As noted above, however, the UK, together with other Member States, voted in favour of updating this regulation in December 2018.

### New ecodesign requirements for household refrigeration

The draft Ecodesign for Energy-Related Products Regulations 2021 annexed to this consultation set out updated ecodesign requirements for household refrigeration in GB that reflect those agreed by the UK as a Member State at EU level in December 2018.

The draft regulations set new minimum energy efficiency requirements related to the use of energy and introduce requirements related to resource efficiency such as reparability and recyclability.

Adopting these requirements for household refrigeration would lead to estimated carbon savings of around 0.3 million tonnes of CO<sub>2</sub>e over the appraisal period (2021/22 to 2050/51). Annual energy savings amount to around 30 GWh per year by the end of the appraisal period.

In the absence of this new regulation, there is little market competition to place energy efficient products on the market. Not adopting the new requirements would result in missed opportunities for GB in terms of carbon and energy bill savings. Further, non-GB manufacturers who fail to plan and adjust to the new EU regulation may have an excess supply of products that do not comply with the new EU regulation. These products may reach the GB market, impacting carbon and energy bill savings negatively.

We are not proposing at this time to exceed the requirements the UK agreed at EU level.

Q.44 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for household refrigeration in GB to reflect what the UK agreed at EU level as a Member State in December 2018? If you do not agree, please provide reasons supported by evidence where possible.

## Timing of the household refrigeration draft regulations

The draft regulations propose to implement the ecodesign requirements from March 2021, reflecting what the UK agreed at EU level as a Member State in December 2018. This will provide certainty and clarity to businesses. This will also prevent less energy efficient household refrigeration from being placed on the GB market and allow GB to realise the full potential of energy and carbon emission savings from these products. We intend to lay the regulations in Parliament in early 2021.

On the assumption that the requirements in the draft regulations reflect those agreed by the UK at EU level in December 2018, we have confidence that manufacturers will be well prepared for the March 2021 implementation date.

The EU regulations were agreed after a lengthy consultative process, which UK stakeholders were involved in. This process involved a preparatory study, an initial ecodesign working draft regulation, a Consultation Forum, notification of the draft EU regulation to the World Trade Organization, publication of the draft EU regulations and a Regulatory Committee. We therefore believe stakeholders will not be impacted significantly by the short lead time between the legislation being laid in Parliament and it taking effect. However, we would be keen to understand any possible issues, particularly for small and micro businesses which might be affected by this legislation.

Q.45 Do you agree with our intention to implement the new GB ecodesign requirements for household refrigeration from March 2021 reflecting what the UK agreed at EU level as a Member State in December 2018?

Q.46 Do you agree that March 2021 is an achievable implementation date for new ecodesign requirements for household refrigeration for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

## Review of the household refrigeration draft regulations

As required by the Ecodesign for Energy-Related Products Regulations 2010, as amended by the Ecodesign for Energy-Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019, the draft regulations set a date for their evaluation and possible revision.

Considering technological progress for household refrigeration, our proposal is to review the draft regulations no later than 7 years from the application dates of the regulations. The review period reflects the particular rate of technological progress for household refrigeration (the review periods for other products in this consultation may vary). It will also allow sufficient time for all provisions to be implemented and for market penetration to be understood.

Q.47 Do you agree with our intention, as set out in the draft regulations in respect of household refrigeration, to review the regulations 7 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

## Impact Assessment for the household refrigeration draft regulations

An Impact Assessment for the draft regulations for household refrigeration has been annexed to this consultation. The Impact Assessment considers the impact in the UK of the draft regulations on individuals, groups, and businesses with the aim of understanding the overall impact on society.

We would welcome any comments on and additional evidence to support the analysis set out in this Impact Assessment, such as potential costs, to UK businesses as well as any additional benefits and risks arising from the draft regulations.

Q.48 Do you agree with our assessment of the costs and benefits of introducing new GB ecodesign requirements for household refrigeration that reflect what the UK agreed at EU level as a Member State in December 2018? Have any impacts of introducing these requirements been overlooked?

Q.49 Do you agree with our assessment of the impact of not introducing new GB ecodesign requirements for household refrigeration that reflect what the UK agreed at EU level as a Member State in December 2018? Have any impacts of not introducing these requirements been overlooked?

Q.50 Have the costs to UK businesses in general of introducing the new GB ecodesign regulation for household refrigeration been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.51 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for household refrigeration in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.52 Do you agree with our estimate of an additionality of 50% for introducing the new UK ecodesign regulation for household refrigeration (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.53 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for household refrigeration?

## Future household refrigeration regulations

The Government recently held a Call for Evidence to explore how ecodesign and energy labelling could be improved in GB in the future. This exercise invited views on whether certain products could yield greater carbon energy and carbon savings than what is currently being achieved. As noted in the Call for Evidence, where ecodesign measures already exist, the UK

may start to re-evaluate these from 2021, with a view to implementing better regulations from 2024/2025 in order to meet environmental targets.

Household refrigeration was not one of the products included in the Call for Evidence and, subject to this consultation, the Government intends to implement the new ecodesign requirements as agreed at EU level in December 2018. Nevertheless, we welcome views on how better ecodesign and energy labelling regulations for this product could be set in the future. Responses to this question will supplement the evidence gathered by the Call for Evidence.

Q.54 If you have any proposals for developing future eco-design standards or energy labelling requirements for household refrigeration in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible

## 6. Commercial Refrigeration

### Background on commercial refrigeration

Commercial refrigerating appliances are insulated cabinets that are controlled at specific temperatures, cooled by natural or forced convection through one or more energy consuming means. They are used in supermarkets and small shops for displaying and selling food, drink, and other items at specified temperatures.

Around 190,000 commercial refrigerating appliances are sold in the UK annually.

Commercial refrigerating appliances placed on the UK market are currently not subject to any ecodesign regulations. However, in January 2019 the UK as an EU Member State voted in favour of introducing new ecodesign and energy labelling regulations.

### New ecodesign and energy labelling requirements for commercial refrigeration

The draft Ecodesign for Energy-Related Products Regulations 2021 annexed to this consultation set out new ecodesign and energy labelling requirements for commercial refrigeration in GB that reflect those agreed by the UK as a Member State at EU level in January 2019.

The draft regulations set minimum energy efficiency requirements related to energy use, and introduce requirements related to resource efficiency such as reparability and recyclability.

Adopting these requirements for commercial refrigeration would lead to estimated carbon savings of around 0.4 million tonnes of CO<sub>2</sub>e and 3,975 GWh of electrical energy saved over the appraisal period (2021/22 to 2050/51) in the UK. Annual energy savings amount to around 100 GWh by the end of the appraisal period.

There are currently no ecodesign measures for commercial refrigeration. In the absence of this new regulation, there is little market competition to place energy efficient products on the market. Not adopting the regulations would result in missed opportunities for GB in terms of carbon and energy bill savings. Further, non-GB manufacturers who fail to plan and adjust to the new EU regulation may have an excess supply of products that do not comply with the new EU regulation. These products may reach the GB market, impacting carbon and energy bill savings negatively.

In addition, we are proposing to introduce energy labelling requirements for commercial refrigeration for the first time. The energy label will display an A-G scale.

We are not proposing at this time to exceed the requirements the UK agreed at EU level.

Q.55 Do you agree with our intention to introduce ecodesign requirements for commercial refrigeration in GB to reflect what the UK agreed at EU level as a Member State in

January 2019? If you do not agree, please provide reasons supported by evidence where possible.

Q.56 Do you agree with our intention to introduce energy labelling requirements for commercial refrigeration in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

## Timing of the commercial refrigeration draft regulations

The draft regulations propose to implement the ecodesign and energy labelling requirements from March 2021 reflecting what the UK agreed at EU level as a Member State in January 2019. This will provide certainty and clarity to businesses. This will also prevent less energy efficient commercial refrigeration from being placed on the GB market and allow GB to realise the full potential of energy and carbon emission savings from these products. We intend to lay the regulations in Parliament in early 2021.

On the basis that the requirements in the draft regulations reflect those agreed by the UK at EU level in January 2019, we have confidence that manufacturers will be well prepared for the March 2021 implementation date.

The EU regulations were agreed after a lengthy consultative process, which UK stakeholders were involved in. This process involved a preparatory study, an initial ecodesign working draft regulation, a Consultation Forum, notification of the draft EU regulation to the World Trade Organization, publication of the draft EU regulations and a Regulatory Committee. We therefore believe stakeholders will not be impacted significantly by the short lead time between the legislation being laid in Parliament and it taking effect. However, we would be keen to understand any possible issues, particularly for small and micro businesses which might be affected by this legislation.

Q.57 Do you agree with our intention to implement the GB ecodesign and energy labelling requirements for commercial refrigeration from March 2021 reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.58 Do you agree that March 2021 is an achievable implementation date for ecodesign and energy labelling requirements for commercial refrigeration for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

## Review of the commercial refrigeration draft regulations

As required by the Ecodesign for Energy-Related Products Regulations 2010, as amended by the Ecodesign for Energy-Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019, the draft regulations set a date for their evaluation and possible revision.

Considering technological progress for commercial refrigeration, our proposal is to review the draft regulations no later than 5 years from the application dates of the regulations. The review period reflects the particular rate of technological progress for commercial refrigeration (the

review periods for other products in this consultation may vary). It will also allow sufficient time for all provisions to be implemented and for market penetration to be understood.

Q.59 Do you agree with our intention, as set out in the draft regulations in respect of commercial refrigeration, to review the regulations 5 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

## Impact Assessment for the commercial refrigeration draft regulations

An Impact Assessment for the draft regulations for commercial refrigeration has been annexed to this consultation. The Impact Assessment considers the impact in the UK of the draft regulations on individuals, groups, and businesses with the aim of understanding the overall impact on society.

We would welcome any comments on and additional evidence to support the analysis set out in this Impact Assessment, such as potential costs, in particular to UK businesses as well as any additional benefits and risks arising from the draft regulations.

Q.60 Do you agree with our assessment of the costs and benefits of introducing GB ecodesign and energy labelling requirements for commercial refrigeration that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.61 Do you agree with our assessment of the impact of not introducing GB ecodesign and energy labelling requirements for commercial refrigeration that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.62 Have the costs to UK businesses in general of introducing GB ecodesign and energy labelling regulations for commercial refrigeration been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.63 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing GB ecodesign and energy labelling requirements for commercial refrigeration in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.64 Do you agree with our estimate of an additionality of 50% for introducing GB ecodesign and energy labelling regulations for commercial refrigeration (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.65 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for commercial refrigeration?

## Future commercial refrigeration regulations

The Government recently held a Call for Evidence to explore how ecodesign and energy labelling could be improved in GB in the future. This exercise invited views on whether certain products could yield greater carbon energy and carbon savings than what is currently being achieved. As noted in the Call for Evidence, where ecodesign measures already exist, the UK may start to re-evaluate these from 2021, with a view to implementing better regulations from 2024/2025 in order to meet environmental targets.

Commercial refrigeration was not one of the products included in the Call for Evidence and, subject to this consultation, the Government intends to implement the new ecodesign requirements as agreed at EU level in January 2019. Nevertheless, we welcome views on how better ecodesign and energy labelling regulations for this product could be set in the future. Responses to this question will supplement the evidence gathered by the Call for Evidence.

Q.66 If you have any proposals for developing future eco-design standards or energy labelling requirements for commercial refrigeration in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible.

## 7. Electronic Displays

### Background on electronic displays

An electronic display is the name given to display screen or associated electronics that, as its primary function, displays visual information from wired or wireless sources. Around 15 million electronic displays are sold in the UK annually. Electronic displays in scope of the draft regulations include televisions, computer monitors and digital signage displays.

Electronic displays placed on the UK market are currently subject to existing ecodesign regulation (Commission Regulation (EC) No. 642/2009) which will be retained after the end of the Transition Period. However, in December 2018 the UK together with other Member States voted in favour of updating this regulation.

### New ecodesign requirements for electronic displays

The draft Ecodesign for Energy-Related Products Regulations 2021 annexed to this consultation set out updated ecodesign requirements for electronic displays which will apply in GB from March 2021. These requirements reflect what the UK agreed as a Member State at EU level in December 2018.

The proposed ecodesign requirements for electronic displays will replace the current ecodesign requirements currently in force in GB (The European Commission Ecodesign regulation (EC) No 642/2009 on televisions). The proposed requirements update definitions for products in line with the development of technology. It also extends the scope of the existing requirements to cover televisions and other displays (computer monitors, digital signage displays) due to the overlap in functionality of the different display types.

The proposed ecodesign regulation for electronic displays sets minimum energy performance standards (MEPS) for on-mode power consumption as well as off-mode, standby and networked standby (including automatic power down). The proposed MEPS will be introduced in two separate tiers (2021 and 2023) for on-mode consumption, with the remaining modes being subject to MEPS in the first tier. Additionally, it includes requirements covering peak luminance ratio, forced menu and set-up requirements on initial activation, material efficiency and information requirements.

Adopting these requirements would lead to estimated carbon savings of around 100,000 tonnes of CO<sub>2</sub>e between 2021/22 and 2050/51 in the UK, with 1,010 GWh of energy saved.

In the absence of this updated regulation, there is little market competition to place energy efficient products on the market. Not adopting the new requirements would result in missed opportunities for GB in terms of carbon and energy bill savings. Further, non-GB manufacturers who fail to plan and adjust to the new EU regulation may have an excess supply of products that do not comply with the new EU regulation. These products may reach the GB market, impacting carbon and energy bill savings negatively.

We are not proposing at this time to exceed the requirements the UK agreed at EU level.

Q.67 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for electronic displays in GB to reflect what the UK agreed at EU level as a Member State in December 2018? If you do not agree, please provide reasons supported by evidence where possible.

## Timing of the electronic displays draft regulations

The draft regulations propose to implement the ecodesign requirements from March 2021 reflecting what the UK agreed at EU level as a Member State in December 2018. This will provide certainty and clarity to businesses. This will also prevent less efficient electronic displays from being placed on the GB market and allow GB to realise the full potential of energy and carbon emission savings from these products. We intend to lay the regulations in Parliament in early 2021.

On the basis that the requirements in the draft regulations reflect those agreed by the UK at EU level in December 2018, we have confidence that manufacturers will be well prepared for the March 2021 implementation date.

The EU regulations were agreed after a lengthy consultative process, which UK stakeholders were involved in. This process involved a preparatory study, an initial ecodesign working draft regulation, a Consultation Forum, notification of the draft EU regulation to the World Trade Organization, publication of the draft EU regulations, and a Regulatory Committee. We therefore believe stakeholders will not be impacted significantly by the short lead time between the legislation being laid in Parliament and it taking effect. However, we would be keen to understand any possible issues, particularly for small and micro businesses which might be affected by this legislation.

Q.68 Do you agree with our intention to implement the proposed GB ecodesign requirements for electronic displays from March 2021 reflecting what the UK agreed at EU level as a Member State in December 2018?

Q.69 Do you agree that March 2021 is an achievable implementation date for new ecodesign and energy labelling requirements for electronic displays for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

## Review of the electronic displays draft regulations

As required by the Ecodesign for Energy-Related Products Regulations 2010, as amended by the Ecodesign for Energy- Related Products and Energy Information (Amendment) (EU Exit) Regulations 2019, the draft regulations set a date for their evaluation and possible revision.

Our proposal is to review the draft regulations no later than 3 years from the application dates of the regulations. The review period reflects the particular rate of technological progress for electronic displays (the review periods for other products in this consultation may vary). It will also allow sufficient time for all provisions to be implemented and for market penetration to be understood.

Q.70 Do you agree with our intention, as set out in the draft regulations in respect of electronic displays, to review the regulations 3 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

## Impact Assessment for the electronic displays draft regulations

An Impact Assessment for the draft regulations for electronic displays has been annexed to this consultation. The Impact Assessment considers the impact in the UK of the draft regulations on individuals, groups, and businesses with the aim of understanding the overall impact on society.

We would welcome any comments on and additional evidence to support the analysis set out in this Impact Assessment, such as potential costs, to UK businesses as well as any additional benefits and risks arising from the draft regulations.

Q.71 Do you agree with our assessment of the costs and benefits of introducing the new GB ecodesign requirements for electronic displays that reflect what the UK agreed at EU level as a Member State in December 2018? Have any impacts of introducing these requirements been overlooked?

Q.72 Do you agree with our assessment of the impact of not introducing the new GB ecodesign requirements for electronic displays that reflect what the UK agreed at EU level as a Member State in December 2018? Have any impacts of not introducing these requirements been overlooked?

Q.73 Have the costs to UK businesses in general of introducing the new GB ecodesign regulation for electronic displays been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.74 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for electronic displays in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.75 Do you agree with our estimate of an additionality of 25% for introducing the new GB ecodesign regulation for electronic displays (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.76 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for electronic displays?

## Future electronic displays regulations

The Government recently held a Call for Evidence to explore how ecodesign and energy labelling could be improved in GB in the future. This exercise invited views on whether certain products could yield greater carbon energy and carbon savings than what is currently being achieved. As noted in the Call for Evidence, where ecodesign measures already exist, the UK may start to re-evaluate these from 2021, with a view to implementing better regulations from 2024/2025 in order to meet environmental targets.

Electronic displays were not one of the products included in the Call for Evidence and, subject to this consultation, the Government intends to implement the new ecodesign requirements as agreed at EU level in December 2018. Nevertheless, we welcome views on how better ecodesign and energy labelling regulations for this product could be set in the future. Responses to this question will supplement the evidence gathered by the Call for Evidence.

Q.77 If you have any proposals for developing future eco-design standards or energy labelling requirements for electronic displays in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible.

## Next steps

Responses to this consultation will be taken into account when taking the policy forward, and following the analysis of responses in Winter 2020, the draft Ecodesign for Energy-Related Products and Energy Information Regulations 2021 may be revised. We intend to lay the regulations in Parliament in early 2021.

## Catalogue of questions

Q.1 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for welding equipment in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

Q.2 Do you agree with our intention to implement the proposed GB ecodesign requirements for welding equipment as soon as practicable after 1 January 2021, reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.3 Do you agree that an implementation date as soon as is practicable after 1 January 2021 is an achievable implementation date for introducing ecodesign requirements for welding equipment for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

Q.4 Do you agree with our intention, as set out in the draft regulations in respect of welding equipment, to review the regulations 6 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

Q.5 Do you agree with our assessment of the costs and benefits of introducing GB ecodesign requirements for welding equipment that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.6 Do you agree with our assessment of the impact of not introducing GB ecodesign requirements for welding equipment that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.7 Have the costs to UK businesses in general of introducing GB ecodesign regulations for welding equipment been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.8 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing GB ecodesign requirements for welding equipment in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.9 Do you agree with our estimate of an additionality of 50% for introducing GB ecodesign regulations for welding equipment (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.10 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for welding equipment?

Q.11 If you have any proposals for developing future eco-design standards or energy labelling requirements for welding equipment in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible.

Q.12 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for electric motors in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

Q.13 Do you agree with our intention to implement the proposed GB ecodesign requirements for electric motors in July 2021 reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.14 Do you agree that July 2021 is an achievable implementation date for new ecodesign requirements for electric motors for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

Q.15 Do you agree with our intention, as set out in the draft regulations in respect of electric motors, to review the regulations 5 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

Q.16 Do you agree with our assessment of the costs and benefits of introducing new GB ecodesign requirements for electric motors that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.17 Do you agree with our assessment of the impact of not introducing new GB ecodesign requirements for electric motors that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.18 Have the costs to UK businesses in general of introducing new GB ecodesign regulations for electric motors been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.19 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for electric motors in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.20 Do you agree with our estimate of an additionality of 50% for introducing the new GB ecodesign regulations for electric motors (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.21 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for electric motors?

Q.22 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for household washing machines/washer-dryers in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

Q.23 Do you agree with our intention to implement new GB ecodesign requirements for household washing machines/washer-dryers from March 2021 reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.24 Do you agree that March 2021 is an achievable implementation date for new ecodesign requirements for household washing machines/washer-dryers for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

Q.25 Do you agree with our intention, as set out in the draft regulations in respect of household washing machines/washer-dryers, to review the regulations 7 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

Q.26 Do you agree with our assessment of the costs and benefits of introducing new GB ecodesign requirements for household washing machines/washer-dryers that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.27 Do you agree with our assessment of the impact of not introducing new GB ecodesign requirements for household washing machines/washer-dryers that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.28 Have the costs to UK businesses in general of introducing new GB ecodesign regulations for household washing machines/washer-dryers been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.29 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for household washing machines/washer-dryers in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.30 Do you agree with our estimate of an additionality of 50% for introducing new GB ecodesign regulations for household washing machines/washer-dryers (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.31 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for household washing machines/washer-dryers?

Q.32 If you have any proposals for developing future eco-design standards or energy labelling requirements for household washing machines/washer-dryers in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible.

Q.33 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for household dishwashers in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

Q.34 Do you agree with our intention to implement the new GB ecodesign requirements for household dishwashers from March 2021 reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.35 Do you agree that March 2021 is an achievable implementation date for new ecodesign requirements for household dishwashers small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

Q.36 Do you agree with our intention, as set out in the draft regulations in respect of household dishwashers, to review the regulations 7 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

Q.37 Do you agree with our assessment of the costs and benefits of introducing new GB ecodesign requirements for household dishwashers that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.38 Do you agree with our assessment of the impact of not introducing new GB ecodesign requirements for household dishwashers that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.39 Have the costs to UK businesses in general of introducing the new GB ecodesign regulation for household dishwashers been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.40 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for household dishwashers in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.41 Do you agree with our estimate of an additionality of 50% for introducing the new GB ecodesign regulation for household dishwashers (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.42 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for household dishwashers?

Q.43 If you have any proposals for developing future eco-design standards or energy labelling requirements for household dishwashers in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible.

Q.44 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for household refrigeration in GB to reflect what the UK agreed at EU level as a Member State in December 2018? If you do not agree, please provide reasons supported by evidence where possible.

Q.45 Do you agree with our intention to implement the new GB ecodesign requirements for household refrigeration from March 2021 reflecting what the UK agreed at EU level as a Member State in December 2018?

Q.46 Do you agree that March 2021 is an achievable implementation date for new ecodesign requirements for household refrigeration for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

Q.47 Do you agree with our intention, as set out in the draft regulations in respect of household refrigeration, to review the regulations 7 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

Q.48 Do you agree with our assessment of the costs and benefits of introducing new GB ecodesign requirements for household refrigeration that reflect what the UK agreed at EU level as a Member State in December 2018? Have any impacts of introducing these requirements been overlooked?

Q.49 Do you agree with our assessment of the impact of not introducing new GB ecodesign requirements for household refrigeration that reflect what the UK agreed at EU level as a Member State in December 2018? Have any impacts of not introducing these requirements been overlooked?

Q.50 Have the costs to UK businesses in general of introducing the new GB ecodesign regulation for household refrigeration been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.51 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for household refrigeration in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.52 Do you agree with our estimate of an additionality of 50% for introducing the new UK ecodesign regulation for household refrigeration (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with

the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.53 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for household refrigeration?

Q.54 If you have any proposals for developing future eco-design standards or energy labelling requirements for household refrigeration in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible.

Q.55 Do you agree with our intention to introduce ecodesign requirements for commercial refrigeration in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

Q.56 Do you agree with our intention to introduce energy labelling requirements for commercial refrigeration in GB to reflect what the UK agreed at EU level as a Member State in January 2019? If you do not agree, please provide reasons supported by evidence where possible.

Q.57 Do you agree with our intention to implement the GB ecodesign and energy labelling requirements for commercial refrigeration from March 2021 reflecting what the UK agreed at EU level as a Member State in January 2019?

Q.58 Do you agree that March 2021 is an achievable implementation date for ecodesign and energy labelling requirements for commercial refrigeration for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

Q.59 Do you agree with our intention, as set out in the draft regulations in respect of commercial refrigeration, to review the regulations 5 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

Q.60 Do you agree with our assessment of the costs and benefits of introducing GB ecodesign and energy labelling requirements for commercial refrigeration that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of introducing these requirements been overlooked?

Q.61 Do you agree with our assessment of the impact of not introducing GB ecodesign and energy labelling requirements for commercial refrigeration that reflect what the UK agreed at EU level as a Member State in January 2019? Have any impacts of not introducing these requirements been overlooked?

Q.62 Have the costs to UK businesses in general of introducing GB ecodesign and energy labelling regulations for commercial refrigeration been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.63 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing GB ecodesign and energy labelling requirements for commercial refrigeration in the Impact Assessment, in particular in relation to the

number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.64 Do you agree with our estimate of an additionality of 50% for introducing GB ecodesign and energy labelling regulations for commercial refrigeration (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.65 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for commercial refrigeration?

Q.66 If you have any proposals for developing future eco-design standards or energy labelling requirements for commercial refrigeration in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible.

Q.67 Do you agree with our intention to introduce, in the draft regulations, new ecodesign requirements for electronic displays in GB to reflect what the UK agreed at EU level as a Member State in December 2018? If you do not agree, please provide reasons supported by evidence where possible.

Q.68 Do you agree with our intention to implement the proposed GB ecodesign requirements for electronic displays from March 2021 reflecting what the UK agreed at EU level as a Member State in December 2018?

Q.69 Do you agree that March 2021 is an achievable implementation date for new ecodesign and energy labelling requirements for electronic displays for small and micro businesses? If you do not agree, what support or allowances could be given to small and micro businesses to help them meet this implementation date?

Q.70 Do you agree with our intention, as set out in the draft regulations in respect of electronic displays, to review the regulations 3 years from their date of application? If you do not agree, please provide reasons supported by evidence where possible.

Q.71 Do you agree with our assessment of the costs and benefits of introducing the new GB ecodesign requirements for electronic displays that reflect what the UK agreed at EU level as a Member State in December 2018? Have any impacts of introducing these requirements been overlooked?

Q.72 Do you agree with our assessment of the impact of not introducing the new GB ecodesign requirements for electronic displays that reflect what the UK agreed at EU level as a Member State in December 2018? Have any impacts of not introducing these requirements been overlooked?

Q.73 Have the costs to UK businesses in general of introducing the new GB ecodesign regulation for electronic displays been assessed adequately? Can you provide any evidence in relation to the size of the manufacturing base for these products in the UK?

Q.74 Can you provide any evidence to support the Small and Micro Business Assessment (SaMBA) for introducing new GB ecodesign requirements for electronic

displays in the Impact Assessment, in particular in relation to the number of UK-based small and micro manufacturers and whether any small and micro businesses may be forced to exit the market due to potentially high barriers to operating?

Q.75 Do you agree with our estimate of an additionality of 25% for introducing the new GB ecodesign regulation for electronic displays (which reflects the adjustment we have made to the overall costs and benefits of the policy intervention to reflect that a proportion of these would occur without intervention due to businesses complying with the EU regulations regardless)? Has this additionality been assessed adequately? Can you provide any evidence for a more accurate figure?

Q.76 What impact would maintaining consistency with the EU's 2021 requirements have on innovation and can you provide any quantitative evidence on the rate of innovation within GB and worldwide markets for electronic displays?

Q.77 If you have any proposals for developing future eco-design standards or energy labelling requirements for electronic displays in a way that could balance saving more energy in Great Britain with reducing unnecessary costs or burdens on business, please provide these below. Please also provide further evidence and/or data where possible.

This consultation is available from: [www.gov.uk/government/consultations/draft-ecodesign-and-energy-labelling-regulations-2021](https://www.gov.uk/government/consultations/draft-ecodesign-and-energy-labelling-regulations-2021)

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