



# Draft Ecodesign and Energy Labelling Regulations 2021: Government Response

A response to 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



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# Executive Summary

The Government published a consultation in September 2020 on proposed Regulations to implement new ecodesign and energy labelling requirements for welding equipment, electric motors, household washing machines/washer-dryers, dishwashers, household refrigeration, commercial refrigeration, and electronic displays. The requirements in these Regulations reflect what the UK agreed at EU-level in 2018/19. The consultation sought views on the proposed Regulations, the associated impact assessments, and the timetable for implementing the Regulations in domestic legislation.

The evidence gathered by this consultation was supportive of the Government's proposal to implement these new ecodesign requirements for the products listed above in Great Britain. Therefore, in 2021 we will lay Regulations to do so, with the aim of bringing the new measures into force this Summer. Two of these products - welding equipment and commercial refrigeration - will be regulated under ecodesign legislation for the first time. The new ecodesign requirements include measures to improve minimum energy performance standards and material efficiency (including right to repair measures). The Regulations will also set energy labelling requirements for commercial refrigeration for the first time. After feedback from stakeholders, we plan to incorporate the amendments made by the European Commission's 'Omnibus' amendment procedure to their equivalent regulations into our domestic legislation when we implement these new ecodesign requirements. These amendments 'fix' a range of technical issues to ensure the measures can be implemented effectively.

This amendment procedure also affects a number of retained EU regulations.<sup>1</sup> In order to ensure the retained EU regulations remain consistent with their counterparts in the EU, we plan to lay secondary legislation in 2021 to make equivalent amendments, following consultation with affected stakeholders.

In implementing these Regulations, we will ensure that GB maintains product standards which benefit the environment and contribute to greater energy, carbon and bill savings. These benefits will help us on our way towards the UK's Carbon Budget and Net Zero targets. As a result of these Regulations, we expect around **21.5 TWh of energy savings by 2050** across all sectors; this will result in around **1.7 MtCO<sub>2</sub> of Carbon Savings** for the same period.

The document is structured as follows:

- An overview of the consultation, the policy context and responses received
- A combined government response for all products included in the consultation
- Summaries of the responses received to each product section
- A summary of responses in relation to future ecodesign and energy labelling policies
- A catalogue of the questions asked in the consultation

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<sup>1</sup> The retained EU regulations affected are Commission Regulation 2019/424 (ecodesign for servers and data storage products) and Commission Delegated Regulations 2019/2013, 2019/2014, 2019/2016 and 2019/2017 (energy labelling regulations for electronic displays, washing machines and washer-dryers, household refrigeration and household dishwashers).

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# Introduction

## Policy Context

Ecodesign aims to phase out the least efficient energy-related products from the market through minimum energy performance standards. Ecodesign requirements can also facilitate progress towards a more circular economy through setting requirements with regards to resource efficiency. This includes material consumption, emissions, pollution and waste generation, durability, repairability, recyclability and ease of material recovery.

Energy labelling aims to drive the uptake of the most energy efficient products by providing consumers with information on the energy performance of products they are interested in buying at the point of sale.

As an EU Member State, in Winter 2018/19, the UK voted in favour of new ecodesign and energy labelling requirements for a package of energy-related products. Our support for these requirements was informed at the time by our own cost-benefit analysis and engagement with UK interested parties. Some of these requirements took effect before the end of the Transition Period, so were retained on 1st January 2021.

In September 2020, we issued a consultation on our proposal to implement the requirements for seven product categories, which are due to come into force in the EU in 2021. As noted in the consultation document, domestic legislation is needed in order to give these requirements effect in Great Britain. The consultation proposals reflected the product-specific requirements that the UK voted for at EU-level in 2018/19 and were supported by a consultation-stage Impact Assessment for each product group which affirmed the benefits that these Regulations would achieve in Great Britain.

The consultation proposed Regulations to:

- Update ecodesign requirements for electric motors, household washing machines/washer-dryers, household dishwashers, household refrigeration and electronic displays;
- Introduce ecodesign requirements for welding equipment and commercial refrigeration;
- Introduce energy labelling requirements for commercial refrigeration.

The ecodesign requirements include higher minimum energy performance standards as well as new material efficiency and information requirements. They include, among other things, measures regarding the availability of spare parts and maintenance information to facilitate repairs.

Respondents were asked whether they agree with the following:

- The proposed ecodesign and energy labelling Regulations;
- The timetables for reviewing the draft Regulations;

- The assessment of the costs and benefits of the Regulations and the assessment of the impact of 'doing nothing'; and
- Views on future energy-related products policy.

## Outline of Respondents

We received 22 responses to this consultation. Of these, 13 were submitted through Citizen Space and 9 via email. Among the respondents to the consultation were trade associations (9), manufacturers (5), environmental NGOs (3), waste management organisations (2), a consumer body, retailer and local government authority. In addition to this, we conducted three stakeholder meetings, one per product group (Industrial Goods, White Goods and Commercial Refrigeration, and Electronic Displays). The attendees of these meetings were product manufacturers, trade associations representing manufacturers and other groups representing UK industry.

We promoted the consultation across our stakeholder base, covering industry stakeholders, and environmental and consumer groups, to encourage the widest range of responses. We focussed the stakeholder meetings specifically on industry stakeholders to gather sufficient evidence in relation to the costs of implementing our proposals. This group incur the vast majority of costs of ecodesign and energy labelling policies and are also the 'end-users' of the legislation so were able to offer particularly useful insights to support our implementation of the requirements in Great Britain. A full list of respondents can be found in Annex A.

# Government Response

The consultation proposed Regulations to implement new ecodesign and energy labelling requirements for welding equipment, electric motors, household washing machines/washer-dryers, dishwashers, household refrigeration, commercial refrigeration, and electronic displays. It sought views on the proposed Regulations, the associated impact assessments and the timetable for implementing the Regulations in domestic legislation.

The evidence gathered by this consultation showed strong support for the proposals across all of the energy-related products in question and, as a result, the Government will lay Regulations this Spring with the aim to implement the new ecodesign requirements for all these products in Summer 2021. These ecodesign requirements include improved minimum energy performance and material efficiency standards as well as ‘right to repair’ requirements regarding the availability of and access to spare parts and maintenance information to facilitate repairs. These measures will apply in GB only and will be compatible with the technical specifications set out in the equivalent EU requirements. We will also introduce energy labelling for commercial refrigeration in GB for the first time.

We aim to lay Regulations to bring the requirements into force as soon as practicable in Spring 2021, but we acknowledge that there will be a short delay between the equivalent requirements applying in the EU (from 1 March 2021 for household dishwashers, household washing machines/washer-dryers, household refrigeration, commercial refrigeration and electronic displays and July 2021 for electric motors) and when they begin to apply in GB.

For welding equipment, the EU’s regulation came into force on the 1<sup>st</sup> January 2021, so there will be a gap before the same requirements come into force in GB. The feedback received from stakeholders suggests that the impact of a gap of less than 6 months will be minimal, given product supply chains are already prepared to meet these requirements in the EU. The Government will aim to bring these requirements into force in GB as soon as is practicable.

The Government is aware that the equivalent EU regulations are undergoing an amendment procedure to clarify and correct a range of technical issues. It is our intention to implement equivalent amendments in the GB Regulations, except in instances where these are not relevant to the GB context. Our intention is to incorporate these amendments into the draft Regulations before laying them in Parliament in 2021.

The EU’s amendment procedure also impacts on a number of EU regulations which were retained in domestic legislation at the end of the transition period – specifically, the ecodesign requirements for servers and data storage products, and the updated energy labelling requirements for electronic displays, washing machines/washer-dryers, domestic refrigeration, and dishwashers. We are preparing a Statutory Instrument (SI) to make amendments to these retained EU regulations in order to incorporate the amendments, and will consult stakeholders on the draft SI in due course.

Efforts were made to find small and micro businesses to participate in the consultation, although they make up a small proportion of the market. While not directly from small businesses, we did receive helpful feedback from stakeholders in relation to the impact of the proposals on small and micro businesses. Along with evidence from other sources, this feedback will inform the assumptions underpinning our final-stage Impact Assessments for the Regulations. Based on this, we have decided that no transitional period is required specifically for small businesses to help them comply with the new requirements. Nevertheless, we are required to provide a transitional period for all businesses before all products placed on the market must comply with the new requirements; we will be discussing the appropriate length of this with stakeholders in due course.

From the date they apply, the Regulations for the products listed below will be reviewed no later than the period indicated in Table 1:

Table 1

Product	Period
Welding equipment	6 years
Electric motors	5 years
Household dishwashers	7 years
Household washing machines/washer dryers	7 years
Household refrigeration	7 years
Commercial refrigeration	5 years
Electronic displays	3 years

The Government is not prevented from reviewing the Regulations earlier than this if there is evidence to suggest it would be beneficial. We believe this is the best approach as it will allow the Government to consider the outcome of the EU's slightly earlier review of their equivalent Regulations. These review dates take into consideration the particular rate of technological progress for the relevant products, this also explains why these dates differ product to product. This approach also allows for provisions to be implemented and market penetration to be well-understood by the time of the reviews.

Across all product categories, stakeholders raised a concern about additional costs being incurred by companies as a result of having to study both the GB and EU Regulations in order to familiarise themselves with the requirements - despite the technical requirements being the

same – particularly if the drafting style is different. We acknowledge that businesses will incur a transitional cost when we implement the GB Regulations. It is important the GB Regulations are adapted to the style of the UK Statute Book and seek to simplify the complexity of the requirements as far as is reasonable. Our aim is to ensure the legislation is as clear as possible to minimise these costs for businesses and to ensure the requirements are well understood to support compliance. The analysis of costs in the Impact Assessment has taken these specific transition costs into account.

‘Additionality’ is the extent to which something happens as a result of an intervention that would not have occurred in the absence of the intervention. In response to feedback which suggested that the majority of manufacturers would comply with the requirements in the absence of any GB Regulations, we have reduced our ‘additionality assumption’ from our previously assumed 50% to 25% in the final stage Impact Assessments for welding equipment, electric motors, household dishwashers, household washing machines/washer dryers, household refrigeration and commercial refrigeration. There has been no change to our electronic displays initial assumption of 25% additionality in the final Impact Assessment. This means that a smaller proportion of the benefits will be realised as a direct result of implementing GB-specific Regulations. This is because the majority of products in this legislation package when supplied to the GB market will comply with the EU’s requirements, even in the absence of GB regulation. Nevertheless, the UK Government is committed to maintaining high product standards and wants to prevent inefficient products being placed on the GB market. Even with this change, regulation remains the best option for these energy using products in GB as this will facilitate them becoming more energy and resource-efficient.

We also used the consultation to seek views on future Ecodesign and Energy Labelling policy (collectively ‘products policy’) measures. In particular, we sought proposals for ways in which ecodesign and energy labelling policies could balance saving even more energy and carbon in future with reducing unnecessary costs or burdens on business. The feedback provided by stakeholders in this consultation will supplement the evidence gathered by our recent Call for Evidence and, alongside the UK Energy-related Products Policy Study<sup>2</sup> will shape our future policy framework. Our aim is to develop and publish our world class products policy framework in Spring 2021. This was recently announced as part of the Prime Minister’s ten point plan for a green industrial revolution.

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<sup>2</sup> <https://erpproductspolicystudy.uk/>

# Welding Equipment

*Questions 1 to 10 asked respondents for their views on new ecodesign requirements in the draft Regulations and the Impact Assessment relating to welding equipment. There are currently no ecodesign measures for welding equipment so, in the absence of regulation, there would be no market competition to place energy and resource efficient products on the market which would result in missed carbon and energy savings in GB. The new Regulations set energy efficiency requirements on minimum power source efficiency and maximum idle state power consumption. They also set requirements for resource efficiency and require manufacturers and importers to provide certain information. The exact questions asked are listed in the catalogue at Annex B.*

## Summary of responses to questions 1-3 on the proposed timing and implementation

The Government's proposal was to implement the new ecodesign requirements for welding equipment which were agreed at EU level in January 2019 and to do so as soon as practical after 1<sup>st</sup> January 2021, noting that the regulation-making powers would not be available until this date.

Question one asked whether stakeholders agreed with this policy intention and question two asked for views on our proposed timing for implementation. If respondents did not agree, we asked them to support their answer with reasons and, where possible, with evidence.

We received two responses to question one, both of which were from environmental NGOs. Both agreed with the policy intention to implement the new ecodesign requirements for welding equipment. One stakeholder stated the UK should adopt all ecodesign requirements for products agreed at EU level – there would be a risk to British manufacturers and consumers if we did not reflect these EU ecodesign requirements in GB.

We received two responses to question two which were both from environmental NGOs. Both respondents agreed with the proposal to implement the requirements as soon as practicable after 1 January 2021. One respondent suggested that, if there is to be a significant delay in implementing the requirements (6 months or more), this would create a risk that cheaper, lower quality products could be dumped on the GB market and consumers could be exposed to inefficient products.

Similarly, feedback from stakeholders at the consultation meeting was supportive of our intention to implement the new requirements for welding equipment and to do so as soon as practicable after 1 January 2021.

Question three asked whether the proposed timing for implementation was achievable for small and micro businesses and, if not, we asked what support or allowances could be given to these businesses to help them meet this. We received one response from an environmental

NGO. Their view was that the timing of implementation is achievable for small and micro businesses.

We did not receive any feedback during the stakeholder meeting on these questions.

## Summary of responses to question 4 on the review date

The Government's proposal was to review the ecodesign Regulations for welding equipment no later than six years from their application. This takes into consideration the rate of technological progress for welding equipment. Question four asked whether stakeholders agreed with this review date.

We received one response which was from an environmental NGO. They agreed with the proposed review date. No objections were raised to this by stakeholders at the consultation meeting.

## Summary of responses to questions 5-10 on the Impact Assessment for the draft Regulations

The Government's Impact Assessment on the draft Regulations for welding equipment considered the impact in the UK on individuals, groups and businesses with the aim of understanding the overall impact on society. Question five asked whether stakeholders agreed with the assessment of the costs and benefits. Question six asked whether stakeholders agreed with the assessment of the impact of not introducing the requirements for welding equipment. Question seven asked if the cost to UK businesses had been assessed adequately. Question eight asked for evidence to support the Small and Micro Business Assessment. Question nine asked if stakeholders agreed with the additionality estimate of 50% ('additionality' is the extent to which something happens as a result of an intervention that would not have occurred in the absence of the intervention).

We received no responses for questions 5-9 through Citizen Space, however the consultation meeting with stakeholders provided some helpful evidence to support the final Impact Assessment for these Regulations.

There was broad agreement to our assessment of the costs and benefits of introducing the requirements among stakeholders. Manufacturers emphasised that there would be an additional cost of producing two different products for two different markets if GB were not to implement these requirements. There is also the risk that GB could become a dumping ground for less efficient products if we did not implement these requirements, both of these points should be factored into the Government's final policy decision. Stakeholders also highlighted that one of the key drivers of costs in relation to the GB-specific Regulations is the impact that the different drafting style of UK legislation (compared with the EU's) will have on the time taken to familiarise with the new requirements.

Discussion with stakeholders also suggested that divergence from the EU on these new requirements for welding equipment would have a disproportionate impact on small and micro businesses (although it was not possible to confirm this comment with a small or micro business or representative).

When asked whether the proposed timing for implementation was achievable for small and micro businesses, no concerns were raised. However, it is important to note that respondents were not representing small or micro businesses.

Most significantly, insights from stakeholders on the extent to which stakeholders would expect to follow EU regulations without the introduction of GB legislation revealed that our initial assumption was too high. Representations made by stakeholders suggested that the majority of welding products are designed for an EU or global market and so manufacturers would most likely follow EU rules when supplying these products to the GB market, even in the absence of GB Regulations. They said that the EU's rules are seen as a benchmark to follow.

Lastly in this section, question ten asked what the impact on maintaining consistency with the EU would have on innovation. We received one response from an environmental NGO. They highlighted that ecodesign requirements incentivise innovation by removing the worst products from the market and give those who lead a 'first mover advantage', boosting competitiveness. Furthermore, UK businesses could be at a disadvantage if they do not at least maintain consistency with EU requirements because their products will be less efficient and international businesses will aim to meet the highest standards, particularly if supplying to large markets like the EU.

# Electric Motors

*Questions 12 to 21 asked respondents for their views on new ecodesign requirements in the draft Regulations and the Impact Assessment relating to electric motors. The proposed requirements extend the scope of the existing requirements to cover a wider range of electric motors, including 8 pole motors and single-phase motors. They will also introduce minimum energy efficiency requirements for Variable Speed Drives (VSDs) and requirements regarding information provided by manufacturers and importers. The exact questions asked are listed in the catalogue at Annex B.*

## Summary of responses to questions 12-14 on the proposed timing and implementation

The Government's proposal was to implement the new ecodesign requirements for electric motors and VSDs which were agreed at EU level in January 2019. We proposed the new requirements would be implemented in July 2021. Questions 12 and 13 asked whether stakeholders agreed with these proposals. Where respondents did not agree, we asked them to support their answer with reasons and, where possible, with evidence.

We received nine responses to question 12 from a range of stakeholders including trade associations, environmental NGOs and manufacturers. All agreed with the intention to implement these requirements for electric motors and VSDs in GB. Several stakeholders (manufacturer and trade associations) pointed out the EU's regulations on electric motors and VSDs are subject to further amendments and gave the view that these are essential to take into consideration when preparing the final GB Regulations. This was reiterated in discussions held with industry-based stakeholders.

We received eight responses to question 13 from a range of stakeholders including trade associations, manufacturers and environmental NGOs. All agreed with the proposal to implement the new requirements in July 2021. One representation made by a trade association was that, without these requirements in force in GB, a barrier to trade could be created.

Question 14 asked whether implementing the requirements in July 2021 was achievable for small and micro businesses and if not, we asked what support or allowances could be given to these businesses to help them meet this implementation date.

We received eight responses to this question from a similar range of stakeholders to question 13. Of these, seven agreed the proposed implementation date is achievable for small and micro businesses. One trade association highlighted that any electric motor or VSD supplied by a UK manufacturer to the EU market will need to comply by July 2021, therefore UK businesses should be ready to meet the same implementation date for electric motors and VSDs placed on the GB market.

We did not receive any additional feedback surrounding this in our stakeholder meeting for industrial goods.

## Summary of responses to question 15 on the review date

The Government's proposal was to review the Regulations for electric motors and VSDs no later than five years from their application. Question 15 asked whether stakeholders agreed with this review date.

We received eight responses to question 15 from a range of stakeholders including trade associations, manufacturers and environmental NGOs. Of these, six agreed with the proposed review period of five years.

One respondent disagreed and suggested that the GB review date should reflect the EU's review date for electric motors as this would be more conducive to maintaining consistency with the EU going forwards. One other representation was that the review date should be more flexible to allow regulation to keep up with the leading edge of technological development.

## Summary of responses to questions 16-21 on the Impact Assessment for the draft Regulations

The Government's Impact Assessment for electric motors and VSDs considered the impact in the UK of the draft Regulations on individuals, groups and businesses with the aim of understanding the overall impact on society. Questions 16 asked whether stakeholders agreed with the assessment of the costs and benefits.

We received six responses to question 16 from a range of stakeholders including trade associations and manufacturers. All agreed with the assessments of the costs and benefits of implementing the draft Regulations for electric motors and VSDs in GB. Stakeholders highlighted the concern that if GB Regulations are written in a different way to the EU's, companies would incur costs from having to study both sets of Regulations to work out whether they differ. Further, they highlighted that the scale of the difference in drafting style would affect the size of these costs.

Question 17 asked if respondents agreed with the assessment of the impact of not introducing new ecodesign requirements. We received six responses from a range of stakeholders including trade associations and manufacturers. All agreed with the assessment of not introducing new requirements. In our stakeholder meeting, it was emphasised that additional costs would be incurred if Great Britain were to differentiate its requirements for electric motors from the EU; including if GB were to not implement these requirements. One trade association felt that, as well as maintaining consistent ecodesign requirements, it is also important that the UK considers that divergence in the underpinning designated standards could increase businesses' costs.

Question 18 asked if the cost to UK businesses had been assessed adequately. We received six responses from a range of stakeholders including trade associations and manufacturers. Of these, four agreed, one disagreed and the other was unclear. Two stakeholders who agreed said manufacturers cater to European or global markets so they are already prepared. This means the cost to manufacturers will be marginal since only minimal, if any, changes need to be made to production lines in response to the GB Regulations.

Question 19 asked for evidence to support the Small and Micro Business Assessment. We received four responses from a range of stakeholders including trade associations and a manufacturer. Representations from a trade association and from manufacturers were that deviation in regulation would create two sets of rules in two different locations, for example in Northern Ireland and Great Britain. This would increase business costs for all suppliers to both markets, but the greatest impact would be on small and micro-businesses.

Question 20 asked if stakeholders agreed with the additionality estimate of 50% (additionality is the extent to which something happens as a result of an intervention that would not have occurred in the absence of the intervention). We received six responses from a range of stakeholders including trade associations and manufacturers. All six agreed with the additionality estimate.

Question 21 asked what the impact on maintaining consistency with the EU would have on innovation. We received seven responses from a range of stakeholders including trade associations, manufacturers and an environmental NGO. Three stakeholders (trade association and manufacturer) said that implementing GB Regulations in order to maintain consistency with the EU would have no impact on innovation. The reasons given centred on the fact that electric motor and VSD manufacturers cater to the EU and global markets, therefore are largely driven by regulation changes in those markets.

# Washing Machines and Washer-Dryers

*Questions 22 to 31 asked respondents for their views on new ecodesign requirements, in the draft Regulations and the Impact Assessment relating to washing machines and washer-dryers. The Regulations set new minimum efficiency requirements related to the use of energy and water and introduce requirements related to repairability and recyclability in order to improve resource efficiency. The exact questions asked are listed in the catalogue at Annex B.*

## Summary of responses to questions 22-24 on the proposed policy and timing of implementation

The Government's proposal was to implement the new ecodesign requirements for washing machines/washer-dryers which were agreed at EU level in January 2019 and that these new requirements were implemented from March 2021.

Question 22 asked whether stakeholders agreed with the intention to implement these new requirements and question 23 asked for views on our proposed timing for implementation. If respondents did not agree, we asked them to support their answer with reasons and, where possible, with evidence.

We received eight responses to question 22 from a range of stakeholders including environmental NGOs, a Local Authority, waste management organisation, a manufacturer, a consumer body and a trade association. Of these, all agreed with the intention to introduce the new ecodesign requirements in GB. Two stakeholders (a manufacturer and an environmental NGO) said the GB Regulations should also take account of amendments currently being made to the equivalent EU regulations.

We received six responses in relation to the proposal to implement these requirements from March 2021; these came from a range of stakeholders including environmental NGOs, a Local Authority, waste management organisation, a manufacturer and a trade association. Of these, five agreed with the implementation date. The other (a manufacturer) expressed the need for the GB regulations to reflect the EU implementation dates and any prolonged delay implementing these measures should be avoided. This respondent gave the view that there should be a 6-month delay in enforcement as businesses transition to the new requirements.

Feedback from stakeholders at the consultation meeting was supportive of our intention to implement the new requirements for washing machines/washer dryers from March 2021.

Question 24 asked whether the proposed implementation date was achievable for small and micro businesses and if not, we asked what support or allowances could be given to these businesses to help them meet this implementation date.

We received five responses from a range of stakeholders including environmental NGOs, a Local Authority, waste management organisation and a trade association. All agreed that the implementation date is achievable for small and micro businesses. One stakeholder agreed the implementation date is achievable since product lines will already meet requirements due to manufacturers supplying to both GB and the EU.

## Summary of responses to question 25 on the proposed review date

The Government's proposal was to review the Regulations for washing machines/washer-dryers no later than seven years from their application. Question 25 asked whether stakeholders agreed with this review date.

We received four responses from a range of stakeholders including an environmental NGO a Local Authority, waste management organisation, a consumer body and a trade association. Of these, two agreed and two disagreed.

One of the stakeholders who agreed said the proposed review date should be caveated with 'at the latest' as this would allow the review to take place sooner if needed. One stakeholder who disagreed (manufacturer) said the review period was too long and instead recommended 3-4 years. The stakeholder who disagreed (trade association) recommended reflecting the review date set by the EU as their members manufacture for the European market making it undesirable to have two separate approaches. The other stakeholder who agreed provided no further comments.

## Summary of responses to questions 26-31 on the Impact Assessment

The Government's Impact Assessment considered the impact of the draft Regulations for washing machines/washer-dryers on individuals, groups and businesses in the UK with the aim of understanding the overall impact on society.

Question 26 asked whether stakeholders agreed with the assessment of the costs and benefits in the Impact Assessment. We received two responses - from an environmental NGO and a trade association – both agreed. One stakeholder said that if GB had different requirements to the EU, manufacturers would need to produce a specific line of products for the GB market which could impact consumer choice and prices. The other stakeholder provided no further comments.

Question 27 asked whether stakeholders agreed with the assessment of the impact of not introducing the new requirements. We received two responses which were from an environmental NGO and a trade association. Both agreed with the assessment of not introducing new requirements but did not expand on their answer. Other stakeholders sought

to highlight that diverging from the EU could create barriers to trade which would increase costs for businesses.

In the stakeholder meeting, manufacturers said they would follow EU regulations when supplying washing machines/washer-dryers to the GB market, even in the absence of GB Regulations. It was said that more non-EU countries are choosing to comply with the EU's minimum standards as these are widely acknowledged as being the 'gold standard'. Further, they warned that GB could become a 'dumping ground' for inefficient products if no Regulations are in place.

Question 28 asked if the costs to UK businesses had been assessed adequately. We received one response from a trade association who said that costs of complying with the new Regulations should not be impacted by the fact that the UK is no longer a member of the EU. However, this was caveated by the fact that none of their members manufacture washing machines or washer-dryers in the UK.

Question 29 asked for evidence to support the Small and Micro Business Assessment. We did not receive any evidence through Citizen Space, however we did receive some helpful feedback at the stakeholder meeting. A stakeholder representing a trade association flagged that smaller manufacturers may incur additional costs in relation to ecodesign (and energy labelling) requirements after the end of the transition period for leaving the EU. They highlighted that small businesses find it harder and more costly to respond to changes, and that Government communication is key to ameliorating this.

Question 30 asked if stakeholders agreed with the additionality estimate of 50% (additionality is the extent to which something happens as a result of an intervention that would not have occurred in the absence of the intervention). We received two responses which were from an environmental NGO and a trade association, of whom one agreed. The stakeholder who agreed did not expand on their answer whilst the respondent who disagreed with this suggested that the analysis should not be impacted by the fact that the UK is no longer a member of the EU (however, there may have been a misunderstanding of the question).

Question 31 asked what the impact on maintaining consistency with the EU would have on innovation. We received three responses from stakeholders including environmental NGOs and a trade association. One environmental NGO said that the proposed GB Regulations will ensure consistent rates of innovation since manufacturers produce an almost identical range of products for the EU and GB. It will also ensure a similar rate of innovation and range of products available in GB and Northern Ireland and the EU. Another environmental NGO said ecodesign requirements incentivise innovation by removing the worst products from the market and give those who lead a first mover advantage, boosting competitiveness.

# Household Dishwashers

*Questions 33 to 43 asked respondents for their views on new ecodesign requirements in the draft Regulations and supporting Impact Assessment relating to household dishwashers. The Regulations set new minimum efficiency requirements related to the use of energy and water and introduce requirements related to repairability and recyclability in order to improve resource efficiency. The exact questions asked are listed in the catalogue at Annex B.*

## Summary of responses to questions 33-35 on the proposed policy and timing of implementation

The Government's proposal was to implement the new ecodesign requirements for household dishwashers which were agreed at EU level in January 2019 and to do so from March 2021.

Questions 33 and 34 asked whether stakeholders agreed with these proposals and the intention to implement them from March 2021. Where respondents did not agree, we asked them to support their answer with reasons and, where possible, with evidence.

We received seven responses to question 33 from a range of stakeholders including environmental NGOs, a Local Authority, a waste management organisation, a manufacturer, a consumer body and a trade association. Of these, all agreed with the intention to introduce new requirements. Two stakeholders felt the final GB Regulations should incorporate the amendments that the EU is currently making to their equivalent regulations (Commission Regulation (EU) 2019/2022).

Two stakeholders (a trade association and a manufacturer) said that not implementing these requirements in GB would mean diverging from the EU, which could create barriers to trade and increase costs to businesses, as well as other impacts. In the stakeholder meeting, representatives also echoed the need for the GB Regulations to reflect the measures in the EU.

We received six responses in relation to implementing the new requirements from March 2021 from a range of stakeholders including environmental NGOs, a waste management organisation, a manufacturer and a trade association. Of these, five agreed with the implementation date but did not expand on their answer. The sixth stakeholder, a manufacturer, neither agreed nor disagreed - instead they urged for the GB Regulations reflect the EU measures and asked for any delay in implementing these measures to be avoided. This respondent gave the view that there should be a 6-month delay in enforcement as businesses transition to the new requirements.

Question 35 asked whether the proposed implementation date of March 2021 was achievable for small and micro businesses and if not, we asked what support or allowances could be given to these businesses to help them meet this implementation date. We received five responses

to this question from a range of stakeholders including environmental NGOs, a waste management organisation and a trade association. All agreed that the implementation date is achievable. One stakeholder qualified this response by highlighting that most product lines will already meet requirements due to manufacturers supplying to both GB and the EU.

## Summary of responses to question 36 on the proposed review date

The Government's proposal was to review the Regulations for household dishwashers no later than seven years from their application. Question 36 asked whether stakeholders agreed with this review date.

We received four responses to this question from a range of stakeholders including an environmental NGO, a waste management organisation, a consumer body and a trade association. Of these, two agreed and two disagreed.

One of the stakeholders who agreed said the proposed review date should be caveated with 'at the latest' as this would allow the review to take place sooner if needed. One stakeholder who disagreed (manufacturer) said the review period was too long and instead recommended 3-4 years. The stakeholder who disagreed (trade association) recommended reflecting the review date set by the EU as their members manufacture for the European market making it undesirable to have two separate approaches. The other stakeholder who agreed provided no further comments.

## Summary of responses to questions 37-42 on the Impact Assessment

The Government's Impact Assessment for the draft Regulations for household dishwashers considered the impact in the UK on individuals, groups and businesses with the aim of understanding the overall impact on society.

Questions 37 asked whether stakeholders agreed with the assessment of the costs and benefits. We received two responses - from an environmental NGO and a trade association - both of whom agreed without expanding on their answer.

Question 38 asked whether stakeholders agreed with the assessment of the impact of not introducing requirements. We received two responses which were from an environmental NGO and a trade association. Both agreed with the assessment of not introducing new requirements. One stakeholder stressed that if GB did not introduce these requirements for dishwashers, and therefore had different requirements to the EU, manufacturers would need to produce a specific line for GB products which could impact consumer choice and cost.

Question 39 asked if the cost to UK businesses had been assessed adequately. We received one response from a trade association but they were unable to provide an evidence-based

response since they were not aware of any UK-based manufacturers of household dishwashers.

Question 40 asked for evidence to support the Small and Micro Business Assessment. We received no responses to this question via Citizen Space. However, in the stakeholder meeting a representative of a trade association flagged that smaller manufacturers may incur additional costs in relation to ecodesign (and energy labelling) requirements after the end of the transition period for leaving the EU.

Question 41 asked if stakeholders agreed with the additionality estimate of 50% (additionality is the extent to which something happens as a result of an intervention that would not have occurred in the absence of the intervention). We received two responses which were from an environmental NGO and a trade association, of whom one agreed without expanding on their answer. The other stakeholder said that results of the analysis should not vary between the EU and GB (however, there may have been a misunderstanding of the question). In the stakeholder meeting, manufacturers said they would follow EU regulations in absence of GB Regulations.

Question 42 asked what the impact on maintaining consistency with the EU would have on innovation. We received three responses from a range of stakeholders including environmental NGOs and a trade association. One environmental NGO said that implementing the ecodesign requirements for dishwashers in GB will ensure consistent rates of innovation since manufacturers produce an almost identical range of products for the EU and GB. It will also ensure a similar rate of innovation and products available between GB and Northern Ireland and the EU. The trade association said maintaining consistency will support innovation since manufacturers will be incentivised by economies of scale to develop more sustainable products in line with EU and GB circular economy objectives.

# Household Refrigeration

*Questions 44 to 54 asked respondents for their views on new ecodesign requirements for household refrigeration in the draft Regulations and supporting Impact Assessment relating to household refrigeration. The Regulations set new minimum efficiency requirements related to the use of energy and introduce requirements related to repairability and recyclability in order to improve resource efficiency. The exact questions asked are listed in the catalogue at Annex B.*

## Summary of responses to questions 44-46 on the proposed policy and timing of implementation

The Government's proposal was to implement the new ecodesign requirements for household refrigeration which were agreed at EU level in December 2018 and to do so from March 2021. Questions 44 and 45 asked whether stakeholders agreed with these proposals and the timing of implementation. Where respondents did not agree, we asked them to support their answer with reasons and, where possible, with evidence.

We received seven responses to question 44 from a range of stakeholders including environmental NGOs, a Local Authority, a waste management organisation, a manufacturer, a consumer body and a trade association. All seven respondents agreed with the intention to introduce the new ecodesign requirements for household refrigeration. Feedback from stakeholders at the consultation meeting also supported the proposal.

Two respondents called for the GB Regulations to reflect the amendments being made by the EU to their equivalent regulations on household refrigeration (Commission Regulation (EU) 2019/2019) which seek to improve the clarity and accuracy of the provisions; this was strongly supported by stakeholders at the consultation meeting.

Two respondents said diverging from the EU could create barriers to trade which would increase costs for businesses. One of these also said it would raise costs to consumers among other impacts. In the stakeholder meeting there were further calls for GB Regulations to reflect the EU measures.

On the proposal to implement the requirements from March 2021, we received six responses from a range of stakeholders including environmental NGOs, a waste management organisation, a manufacturer and a trade association. Of these, five agreed with the implementation date. The sixth stakeholder, a manufacturer, neither agreed nor disagreed – instead, they urged for the GB Regulations to reflect the EU measures and asked for any delay in implementing these measures to be avoided. This respondent gave the view that there should be a 6-month delay in enforcement as businesses transition to the new requirements.

Question 46 asked whether the proposed implementation date was achievable for small and micro businesses and if not, we asked what support or allowances could be given to these

businesses to help them meet this implementation date. We received five responses to this question from a range of stakeholders including environmental NGOs, a waste management organisation and a trade association. Of these, all agreed the implementation date is achievable for small and micro businesses.

## Summary of responses to question 47 on the proposed review date

The Government's proposal was to review the Regulations for household refrigeration no later than seven years from their application. Question 47 asked whether stakeholders agreed with this review date.

We received four responses from a range of stakeholders including an environmental NGO, a waste management organisation, a consumer body and a trade association. Of these, two agreed, two disagreed.

One of the stakeholders who agreed said the proposed review date should be caveated with 'at the latest' as this would allow the review to take place sooner if needed. One stakeholder who disagreed (manufacturer) said the review period was too long and instead recommended 3-4 years. Another stakeholder who disagreed (trade association) recommended reflecting the review dates set by the EU as their members manufacture for the European market making it undesirable to have two separate approaches. The other stakeholder who agreed provided no further comments.

## Summary of responses to questions 48-53 on the Impact Assessment

The Government's Impact Assessment of the draft Regulations for household refrigeration considered the impact in the UK on individuals, groups and businesses with the aim of understanding the overall impact on society.

Questions 48 asked whether stakeholders agreed with the assessment of the costs and benefits. We received two responses to this question - from an environmental NGO and a trade association - one of whom agreed.

Question 49 asked whether stakeholders agreed with the assessment of the impact of not introducing requirements. We received two responses to this question which were from an environmental NGO and a trade association. Both agreed with the assessment of not introducing new requirements but did not expand on their answer.

Question 50 asked if the cost to UK businesses had been assessed adequately. We received one response to question 50 which was from a trade association but they were unable to provide an evidence-based response since they were not aware of any UK-based manufacturers of household refrigeration.

Question 51 asked for evidence to support the Small and Micro Business Assessment. We received no responses to this question.

Question 52 asked if stakeholders agreed with the additionality estimate of 50% (additionality is the extent to which something happens as a result of an intervention that would not have occurred in the absence of the intervention). We received two responses to this question from an environmental NGO and a trade association, one of whom agreed but without expanding on their answer.

Question 53 asked what the impact on maintaining consistency with the EU would have on innovation. We received three responses to this question from environmental NGOs and a trade association. One environmental NGO said it will ensure consistent rates of innovation since manufacturers produce an almost identical range of products for the EU and GB. It will also ensure a similar rate of innovation and products available between GB and Northern Ireland and the EU.

# Commercial Refrigeration

*Questions 55 to 66 asked respondents for their views on new ecodesign and energy labelling requirements in the draft Regulations and supporting Impact Assessment relating to refrigeration with a direct sales function (“commercial refrigeration”). The new requirements set minimum efficiency requirements related to energy use and facilitate repairability and recyclability in order to improve resource efficiency; and introduce an A-G scaled energy label for the first time. The exact questions asked are listed in the catalogue at Annex B.*

## Summary of responses to questions 55-58 on the proposed policy and timing of implementation

The Government’s proposal was to implement, for the first time, new ecodesign and energy labelling requirements for commercial refrigeration which were agreed at EU level in January 2019 and to do so from March 2021. Questions 55, 56 and 57 asked whether stakeholders agreed with these proposals and the date of implementation. Where respondents did not agree, we asked them to support their answer with reasons and, where possible, with evidence.

We received twelve responses in total to questions 55 and 56 about whether the new ecodesign and energy labelling requirements should be implemented in GB. These responses came from a range of stakeholders including trade associations, a retailer, and environmental NGOs. All agreed with implementing the new ecodesign and energy labelling requirements for commercial refrigeration in Great Britain. Two trade associations specifically mentioned they wanted to maintain consistency with the EU’s ecodesign and energy labelling requirements across the piece; this was echoed in the stakeholder meeting.

We received six responses to question 57 about implementing the requirements from March 2021. These responses came from a range of stakeholder including trade associations, environmental NGOs and a retailer. Five agreed with the proposed timing of implementation whilst one disagreed. The stakeholder that disagreed cited that the test standard underpinning the new energy labelling requirements for chilled vending machines is in the process of being updated, which could impact on readiness for March 2021.

Question 58 asked whether the proposed implementation date was achievable for small and micro businesses and if not, we asked what support or allowances could be given to these businesses to help them meet this implementation date. We received six responses to this question from a range of stakeholder including trade associations, environmental NGOs and a retailer. Of these, four agreed that the implementation date is achievable for small and micro businesses without further comment. The remaining responses (trade associations) neither agreed or disagreed with this implementation date without further relevant comments.

## Summary of responses to question 59 on the proposed review date

The Government's proposal was to review the Regulations for commercial refrigeration no later than five years from their application. Question 59 asked whether stakeholders agreed with this review date.

We received four responses to this question from trade associations and a retailer. Of these, three agreed with this review date and one disagreed.

Of the stakeholders who agreed, one noted a concern about their ability to comply with ecodesign and energy labelling Regulations in the future if the review led to the introduction of more stringent standards. The stakeholder who disagreed recommended that GB review dates should reflect the EU's review dates for their equivalent regulations.

## Summary of responses to questions 60-65 on the Impact Assessment

The Government's Impact Assessment considered the impact of the draft Regulations for commercial refrigeration on individuals, groups and businesses with the aim of understanding the overall impact on society.

Question 60 asked whether stakeholders agreed with the assessment of the costs and benefits. We received four responses to this question from trade associations and a retailer. Of these, two stakeholders agreed with our assessment of the costs and benefits of the Regulations; one disagreed with our assessment; and the other did not give a view.

One trade association highlighted the need to factor in the additional administration that separate, GB specific Regulations will create for manufacturers. The stakeholder who disagreed with our assessment highlighted that the benefits of the Regulations vary across different types of commercial refrigeration. However, they did note that the new energy label will allow them to demonstrate the energy efficiency of their machines, which is a key benefit.

Question 61 asked whether stakeholders agreed with the assessment of the impact of not introducing requirements. We received four responses to this question from trade associations and a retailer. Of these, two stakeholders agreed with our assessment of not introducing these Regulations but did not expand on their answer. One stakeholder disagreed with our assessment and the other neither agreed nor disagreed with our assessment.

The trade association who neither agreed nor disagreed with our assessment was keen to stress that the impacts of not implementing these Regulations include a risk that the GB market becomes less competitive and that less efficient products are placed on the GB market. They also suggested that barriers to trade could be created if these Regulations were not implemented and that this could increase costs for businesses.

Question 62 asked if the cost to UK businesses had been assessed adequately. We received two responses from a range of stakeholder including trade associations, manufacturers, charities, and waste management organisations. Of these, two stakeholders agreed with our assessment but provided no further comments.

Question 63 asked for evidence to support the Small and Micro Business Assessment. We received four responses to this question from trade associations and a retailer. No respondents provided evidence relating to small and micro businesses.

Question 64 asked if stakeholders agreed with the additionality estimate of 50% (additionality is the extent to which something happens as a result of an intervention that would not have occurred in the absence of the intervention). We received two responses to this question from a trade association and a retailer, both stakeholders agreed with our assessment with no further comments.

Question 65 asked what the impact on maintaining consistency with the EU would have on innovation. We received four responses to this question from a range of stakeholder including trade associations, an environmental NGO and a retailer.

One stakeholder said they do not anticipate a negative impact on innovation if GB maintains consistency with the equivalent EU requirements. Two stakeholders shared the view that innovation in this sector is driven by policy and see ecodesign and energy labelling requirements as a driver for technological innovation. One environmental NGO argued that ecodesign requirements incentivise innovation by removing the worst products from the market and give those who lead a first mover advantage, boosting competitiveness. Furthermore, they said that UK businesses could be at a disadvantage if they do not at least maintain consistency with EU requirements since international businesses will aim to meet the highest standards, particularly if supplying to markets like the EU. However, this view was contested by one respondent who felt the industry is driven by the market not policy measures.

# Electronic Displays

*Questions 67 to 76 asked respondents for their views on new ecodesign requirements in the draft Regulations and supporting Impact Assessment relating to electronic displays. The requirements update definitions for products in line with the development of technology and extends the scope of the existing requirements to cover televisions and other displays. They set minimum energy performance standards for on-mode power consumption, and maximum energy consumption during standby and networked standby. The requirements also include measures to improve repairability and recyclability. The exact questions asked are listed in the catalogue at Annex B.*

## Summary of responses to questions 67-69 on the proposed timing and implementation

The Government's proposal was to implement the new ecodesign requirements for electronic displays which were agreed at EU level in December 2018 and to do so from March 2021. Questions 67 and 68 asked whether stakeholders agreed with this proposal. Where respondents did not agree, we asked them to support their answer with reasons and, where possible, with evidence.

We received 12 responses to question 67 from a range of stakeholders including trade associations, manufacturers, environmental NGOs, a waste management organisation and a consumer body. All agreed with the proposal to implement the new ecodesign requirements in GB. Three stakeholders noted that the GB Regulations should take account of the amendments that the EU is currently making to their equivalent Regulations (Commission Regulation (EU) 2019/2021). Some stakeholders said the UK should maintain consistency with the EU; ensuring identical scope, exclusions and requirements and roughly the same implementation dates.

We received nine responses to question 68 about the intention to adopt these requirements from March 2021. These came from a range of stakeholders including trade associations, environmental NGOs, a manufacturer, and a waste management organisation. Of these, seven agreed with the implementation date, one disagreed and the other neither agreed nor disagreed. Of those in support, one respondent acknowledged that a delay in implementation may be necessary in order to ensure the final GB Regulations reflect the amendments to the equivalent EU regulations, and that this would be tolerable. This was echoed by industry-based stakeholders at the consultation meeting. A manufacturer flagged that there may be challenges to meeting the implementation date due to the late availability of an officially recognised test method at EU-level.

The stakeholder who disagreed was a trade association and did not explain their reasoning. One manufacturer said efforts to delay the implementation should be resisted and called for the GB implementation date to reflect EU implementation date. However, feedback did not

suggest that a delay would create significant issues especially given the late changes being made to the equivalent EU regulations.

Question 69 asked whether the proposed implementation date was achievable for small and micro businesses and if not, we asked what support or allowances could be given to these businesses to help them meet this implementation date. We received eight responses from a range of stakeholders including trade associations, environmental NGOs, a waste management organisation and a manufacturer. Of these, six agreed the implementation date is achievable for small and micro businesses with one stakeholder suggesting that manufacturers' product lines already meet the new requirements. The other five who agreed gave no further details.

Two respondents neither agreed nor disagreed. Whilst not specific to small and micro businesses, it was said by stakeholders that their comments in relation to question 68 were likely to apply more acutely to smaller businesses.

## Summary of responses to question 70 on the review date of Regulations

The Government's proposal was to review the Regulations for electronic displays no later than three years from their application. Question 70 asked respondents whether stakeholders agreed with this review date.

We received eight responses from a range of stakeholders including trade associations, environmental NGOs, a manufacturer and waste management. Of these, four agreed with the review date and four disagreed.

The respondents who did not agree argued that the review date should reflect the EU review process (i.e., a review date of December 2022); these responses came from trade associations and a manufacturer. Reasons given for GB review process reflecting the EU review process were to ensure a more efficient, a realistic and achievable approach is taken to updating energy requirements. One trade association suggested that, since members manufacture for the European market, it would be undesirable to have two separate approaches.

## Summary of responses to questions 71-76 on the Impact Assessment for draft Regulations

The Government's Impact Assessment for electronic displays considered the impact in the UK of the draft Regulations on individuals, groups and businesses with the aim of understanding the overall impact on society.

Questions 71 asked whether stakeholders agreed with the assessment of the costs and benefits. We received four responses from trade associations and an environmental NGO. Of these, three agreed with the assessment of the costs and benefits. The fourth respondent

represented a trade association and was keen to point out that there would be a cost resulting from diverging from EU requirements.

Question 72 asked whether stakeholders agreed with the assessment of the impact of not introducing requirements. We received four responses from a range of stakeholders including trade associations and an environmental NGO. Of these, three agreed and one said there would not be a significant impact. Those who agreed gave no further comments. The other stakeholder was a trade association and explained there would be no significant impact since manufacturers would place the same product in the UK as the EU. However, they said there would be enforcement implications due to the changing test methods. Further, in their response to question 71, one respondent stressed that if GB did not introduce these requirements for electronic displays and had different requirements to the EU, manufacturers would need to produce a specific line for GB products which could impact consumer choice and cost. This was echoed by some stakeholders at the consultation meeting.

Question 73 asked if the cost to UK businesses had been assessed adequately. We received two responses, both from trade associations. Of these, one agreed the costs had been adequately assessed without expanding on their answer; the other did not expressly disagree although highlighted the impact assessment does not account for impacts to downstream industries, for example UK broadcasters who invest in display innovation.

Question 74 asked for evidence to support the Small and Micro Business Assessment. We received two responses to this question, both from trade associations. No evidence was provided but additional comments were given. One stakeholder repeated their view from question 73 about the impacts to downstream industries, which could include small and micro businesses. The other said failure to exclude industrial displays - as per the amendment being made by the EU to their equivalent regulations - may impact small and micro businesses who manufacture industrial displays in small quantities and do not operate in the consumer market.

Question 75 asked if stakeholders agreed with the additionality estimate of 25% (additionality is the extent to which something happens as a result of an intervention that would not have occurred in the absence of the intervention). We received three responses from trade associations and an environmental NGO. Of these, two agreed with the additionality estimate. The third respondent did not explicitly agree but said the current supply chains and distribution practices mean display manufacturers would place the same product on the market in the UK as those in the EU, which supports our assumption.

Question 76 asked what the impact on maintaining consistency with the EU would have on innovation. We received five responses to this question from trade associations and environmental NGOs. One environmental NGO said maintaining consistency would ensure consistent rates of innovation since manufacturers produce almost identical ranges of products for the EU and GB. It would also ensure similar innovation rates and products available across GB and Northern Ireland and the EU.

Several trade associations shared the view that maintaining consistency with the EU will minimise the cost burden on manufacturers and users and will support innovation as

economies of scale will incentivise manufacturers to develop more sustainable products in line with GB and EU circular economy objectives.

# Summary of responses in relation to future Products Policy

*In relation to all products in this consultation (with the exception of electric motors, which was covered in the recent energy-related products Call for Evidence), we asked respondents for their views on future ecodesign standards or energy labelling requirements. We sought proposals for ways in which ecodesign and energy labelling policies could balance saving even more energy and carbon in future with reducing unnecessary costs or burdens on business. The exact questions asked are listed in the catalogue at Annex B.*

Across all products, the main themes identified from responses to this question were associated with energy labelling; resource efficiency/circular economy; and professional repairer registers.

## Energy Labelling

Stakeholders across white goods and electronic displays suggested lifetime costs or average annual costs should be made clearer on energy labels. In relation to commercial refrigeration specifically, an environmental NGO said aspects of material efficiency should be included on energy labels for this product category and that a reparability index similar to that in France should be considered.<sup>3</sup>

Responses noted that future ecodesign and energy labelling requirements should consider how to encourage the uptake of smart appliances. A trade association said digital energy labels should be considered and that nudges, such as listing products on retailer websites in order of energy efficiency, could be effective. One stakeholder said customers tend to choose cheaper, less efficient options unless they are taxed or tariffed; or unless the customer is making a conscious effort to improve their household energy-use.

## Resource Efficiency/Circular Economy

Various suggestions were given in relation to resource efficiency and the circular economy. One of these was to implement a reparability index. Stakeholders also put forward the idea of 'product passports'. There were calls to improve access to spare parts for the end user and to make repairs easier including the ease with which products can be broken down into compartment parts – all of these measures would reduce barriers to repair. One stakeholder

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<sup>3</sup> France introduced Europe's first 'reparability index' in January 2021. Products belonging to five categories - smartphones, laptops, TVs, washing machines, and lawnmowers - will receive a score from 1 to 10. Scoring criteria include access to repair information (instructions manuals, technical diagrams, etc.), ease of disassembly, and the price and availability of spare parts.

suggested that greater resource efficiency can be achieved by prioritising products with the highest impact and focusing requirements on the most important criteria.

It was also suggested that ecodesign requirements on resource-use - including criteria for durability, repairability, upgradeability, component reusability, and recycled and critical raw material content - should be expanded to a greater number of products.

Although this consultation did not ask a question about how to improve ecodesign policy for electric motors in future, we did receive views on this from one stakeholder. This response argued that it is important to consider how the product is used in addition to its energy efficiency; there is a trade-off between increasing the energy efficiency of electric motors and achieving greater resource efficiency. The response also said that future ecodesign policy should consider the fact that electric motors have a long lifetime and the industry has well-established maintenance and repair services; product packaging is based on renewable sources, which contributes towards resource-efficiency objectives; and digitalisation can be used to optimise performance.

## Repairers Register

There were calls throughout the consultation responses and the stakeholder meetings to establish a register of professional repairers for certain energy-related products in GB. However, concerns were raised by manufacturers around who has responsibility for policing such a register and for judging the competency of a repairer. A suggestion was made for an 'electricity register' that would be equivalent to the gas safety register and provide some reassurance with respect to safety concerns when carrying out repairs. An environmental NGO suggested that a national register of professional repairers could lead to job-creation.

## Other suggestions for improving energy-related products policy

Several specific suggestions were made by stakeholders throughout their responses:

- Increase enforcement and market surveillance.
- Make doors compulsory on commercial refrigeration designed to serve non-perishables.
- Increase the durability of products further, for example by requiring washing machine components to last at least ten years.

In addition, respondents to the consultation made some more general comments about how the Government should approach ecodesign and energy labelling policies in future:

- An environmental NGO said that opportunities to expedite the policy development and implementation process should be considered.
- Stakeholders representing trade associations said that future policy should be mindful of creating barriers to trade in Great Britain, as this could create an additional cost to suppliers which would likely be passed onto the consumer in the form of higher prices.

- The Government should consider setting new ‘tier’ requirements’ where if a certain product within its category has the potential to be more energy efficient, it should have stricter requirements than other products within that category.
- Another stakeholder said to continue to work with the EU and to go further than them in future if possible with the aim of minimising unnecessary costs to business and maximising the competitiveness of UK businesses .
- Research should focus on how to effectively communicate efficiency to consumers.
- Future regulation should aim to drive systematic change.

## Next Steps

The Government would like to thank those who contributed to this consultation. The views of those who contributed have informed the decisions made in this Government response.

We intend to lay the Regulations in Parliament in early 2021.

## Contact Details

Enquiries regarding this publication should be sent to: [efficientproducts@beis.gov.uk](mailto:efficientproducts@beis.gov.uk)

# Annex A: List of Respondents

Those who responded to the consultation either through Citizen Space or email were:

Nisbets Plc

GAMBICA

British Pump Manufacturers' Association Ltd

Green Alliance

British Industrial Truck Association

Hampshire County Council

SUEZ UK

BEAMA Ltd

The Restart Project

WRWA

EVA

LG Electronics

techUK

ADE

AVA

Samsung Electronics

Which?

AMDEA

The attendees of the stakeholder meetings were:

<b>Industrial Goods</b>	<b>White Goods</b>	<b>Electronic Displays</b>
GAMBICA	AMDEA	techUK
Sciaky Electric Welding Machines Ltd	FEA	BEAMA
Lincoln Electric (UK) Ltd	GDHA	Samsung
GE Energy Power Conversion	Beko	Sony
Rockwell Automation	Electrolux	HP
Powell UK	BSHG	Panasonic
Nidec Control Techniques Ltd	Vestel	Sky
	Samsung	LG
	Miele	Apple
	Whirlpool	

## Annex B: 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.

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