reaLIFEstandards

Deliverable D3.1 - Intervention plan for ANEC

Publication date: 30.04.2023

Lead author: ANEC

Project coordinator: ECOS

Co-funded by the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor the granting authority can be held responsible for them.

1. The reaLIFEstandards project

Technical standards have a broad impact on the safety and well-being of citizens and the environment. Therefore, it is necessary to ensure that the participation of societal stakeholders in the development of standards is strengthened. Ensuring civil society participation in EU standards-making is fundamental to deliver standards that can support Europe's climate and energy goals.

Standardisation plays a key role in supporting EU legislation on the clean energy transition, in particular on the Ecodesign and Energy labelling regulations, as well as on energy management and audits. These policies are crucial for the implementation of the EU's 2030 energy and climate framework and its 2050 climate neutrality objective. To ensure regulations can deliver the energy savings they were designed to bring about and to adequately implement the Energy Efficiency First principle, appropriate, repeatable, reproducible standardised test methods are needed. They should account for real-life usage reflecting average end-user behaviour and be robust to deter circumvention.

The goal of ***reaLIFEstandards*** is two-fold: (i) to ensure the effective participation of environmental and consumer stakeholders in standardisation, and (ii) to promote the integration of environmental and consumer interests in standards underpinning the clean energy transition. In the framework of this action, project partners will participate in the technical work within the European and International Standardisation Organisations to provide expertise, understand and challenge industrial interests and influence the drafting of standardisation deliverables. The project will directly foster civil society participation in standards-making, pushing for a more inclusive standardisation system, by raising awareness on the importance of environmentally robust standards that account for consumer expectations.

2. Introduction

This deliverable is part of Work Package 3 'Consumer voice influencing Ecodesign and Energy Labelling standardisation'. Led by ANEC, WP3 will make sure that product-specific and horizontal standards to support Ecodesign and Energy Labellingtakle consumer aspects into consideration and are fit-for-purpose to underpin EU regulation. ANEC will participate in drafting the product-specific and horizontal technical standards within the relevant groups in CEN, CENELEC, ETSI, ISO and IEC, as well as influence discussions in standardisation strategic groups, while seeking synergies with environmental representation.

This document constitutes the deliverable D3.1 "ANEC Intervention Plan". The aim of this document is to help ANEC identify the priority areas for promoting and defending the consumer perspective in the field of ecodesign and energy labelling standardisation. It will provide a summary of the state of play and forthcoming relevant standardisation deliverables related to ecodesign and energy labelling, supporting the creation of a list of priority standards that ANEC will focus on for the duration of this project.

Ecodesign and Energy Labelling policies are supported by numerous standards covering a wide range of product categories. As the revision of regulations will be ongoing and existing EU standards will be revised, new regulations and concepts will gain prominence within the energy-related product policy field, leading to the development of yet more standards. To maximise our impact on standardisation deliverables, it is thus critical to identify and prioritise the standardisation work that ANEC will be influencing. The present deliverable will provide a list of priorities fulfilling that purpose. This list will set the direction based on the information available at the time of drafting; it may be reviewed if and as necessary throughout the duration of the project.

3. Method and selection criteria

The methodology applied to prioritise the areas of intervention combines multiple criteria, which will be used to rank each standardisation deliverables, from high to low priority. ANEC shall use the following criteria:

- Consumer relevant: It is important that consumer considerations are considered to ensure that standards do not lead to a backlash from consumers suffering as a result of inadequate or poor-quality products.
- Timing / status of the process: the regulatory and standardisation processes, as well as the existence of a standardisation request, determine whether engagement in the standardisation process allows for an effective and results-based contribution. In addition to standardisation work currently taking place in response to existing Standardisation Requests issued by the EC, the content of the Annual Union Work Programme (AUWP) for European standardisation and the standards required under Commission's Ecodesign and Energy Labelling Working Plan for 2022 2024 will provide further direction to the prioritisation exercise.
- Expertise and Access: this criterion relates to the availability of technical expertise, as well as the ability to access the standardisation processes, at European and international level.
- The selection should also align with ANEC's annual priorities and the choice of technical bodies it is involved in, which are decided upon in consultation with the members of its General Assembly and of its Working Group and Steering Committee. This internal prioritisation exercise uses a priority setting guide based on similar criteria: (1) relevance of the standardisation work for consumers; (2) effectiveness and feasibility and (3) sustainability of ANEC participation.

While consumer relevance should always be of primary importance in the ranking of priorities, the weighing of other criteria can be more flexible and assessed on a case-by-case basis, as it is acknowledged / considered that timelines and standards developments are difficult to predict and can be subject to change. Likewise, a lack of expertise and access can be more or less easily overcome. The priority ranking given to each standardisation deliverable should reflect the best possible compromise between the criteria.

ANEC will monitor all relevant standardisation and regulatory developments, give each of them a priority ranking according to the criteria listed above and their weighing, and extract the most relevant ones to input into a short list of priorities, presented below in this document.

It is reminded that overall, the priorities outlined in this deliverable may be modified throughout the duration of this project, notably due to external factors such as unexpected political developments or delays in the standardisation process.

4. Priority work area and associated standardisation work

- ## Domestic laundry appliances

CLC/TC 59X/WG 01 (and subgroups)

Regarding laundry appliances, the CLC TC 59X WG 01 and its sub-groups are responsible for maintaining the following standards EN 60456 on performance of washing machines EN 61121 on performance of tumble dryers and EN 50229 on performance of washer-dryers, in order to answer the needs of the Commission. These standards need to be updated due to the revision of energy labelling and ecodesign regulations undertaken by the European Commission and the process is ongoing, with the issuance of two draft standardisation request in late 2022 (for washing machines and washer driers) and early 2023 (for tumble driers).

The performance of home laundry products such as washing machines probably impacts every family in the EU. Ensuring washing, rinsing and drying performance is maintained or improved in an environment of increasing regulatory requirements is of clear concern to consumers. ANEC therefore plans to continue participating in WG1 on laundry appliances, WG1-6 on detergent, and WG1-9 on tumble driers.

- ## Domestic dishwashers

CLC/TC 59X/WG 02 Dishwashers

Regarding dishwashers, the CLC TC 59XWG 02 Dishwashers is responsible for the maintenance of EN 60436 “Electric dishwashers for household use - Methods for measuring the performance in accordance with technical needs and regulatory requirements”. The WG 02 continues working on amendments to EN 60436,

implementing necessary changes regarding the implementation of new reference machines, new reference detergent type E, replacement test materials, the introduction of anti-circumvention measures and the increased measurement accuracy of testing conditions.

Currently, the WG is working on replacements for the current reference materials to guarantee a smooth transition between the reference systems, but a valid standardisation request is needed to follow the principles and rules established by the EU commission and develop a repeatable, reproducible and consumer relevant test. The development of such a standardisation request has been requested by the WG in 2023.

ANEC will continue to follow the work on dishwashers to make sure that the necessary amendments to the standard and the implementation of the new standardisation request reflect real-life consumer use and behaviour, and provide the right information to the consumer.

- ## Domestic vacuum cleaners

C**LC/TC 59X/WG 06 (and subgroups)**

On vacuum cleaners, the main standardisation group is the CLC TC 59X WG06 "Surface cleaning appliances", which is tasked to amend the EN 60312-1 ("Vacuum cleaners for household use - Part 1: Dry vacuum cleaners - Methods for measuring the performance") and to develop the requirements embedded in the mandate M/540 regarding ecodesign and energy labelling of vacuum cleaners. These include requirements for the durability of the hose and operational motor lifetime, for water filters, for full-size battery-operated vacuum cleaners, for robot vacuum cleaners, for energy efficiency measurement with loaded and empty receptacle and on market-representative carpets and floors and for the determination of measurement uncertainties.

In 2022, the main priority of the WG 06 was to review the comments on IEC 62885-2 2nd edition, which will feed into the mirroring draft European standard FprEN 60312:2017/A11:2022. This work will continue in 2023 and ANEC intends to continue participating in this activity, and in that of the sub-groups WG06-05 on anti-circumvention and WG06-06 on battery related items. The creation of

another subgroup, tackling further material efficiency and circular economy requirements is also expected for 2023 or 2024, and would be of great interest to ANEC.

Overall, ANEC sees a need to continue its involvement in the work of the WG 06 (and its sub-working groups) in the areas of robot, noise and cordless vacuum cleaners, as well as battery related items, as these new types of surface cleaning devices are growing in popularity and essential appliances for consumers.

- ## Electronics

CLC/TC 100X (and subgroups)

CLC/TC 100X deals with the standards in the field of audio, video and multimedia systems and equipment based on the work carried out by IEC TC 100X, as well as any European requirements. The relevant work items of the group include specifications on the external power supply interoperability as well as standards in relation to electronic displays and computers.

In 2022, the IEC TC 100X/TA 19 finalised the new edition of the standard IEC 62087-X, which specifies the determination of the power consumption and related characteristics of audio, video and related equipment. The IEC 62087-X cannot be adopted as such under the European SReq, due to scope differences, so the CLC/TC100X proposed to mirror the IEC 62087-X into a European EN standard, while developing a homegrown EN referencing relevant clauses of EN 62087-X and adding methodology for parts that would not be covered in EN 62087-X.

ANEC intends to actively participate in that work, which will set a methodology to measure the energy consumption linked to several configuration parameters that are all very relevant to an everyday-use by consumers.

ENER 05 – Series of standards following Standardisation Request on Displays

The draft standardisation request as regards electronic displays was approved in the vote of the Committee of Standards in December 2022, and is now in its finalisation stages. ANEC plans to get involved in the standardisation process that follows the publication of the SR, targeting specifically the standards covering non-professional displays announced in the Annex 1 of the draft SR.

ENER 03 - Standardisation Request on Computers

The Preparatory study on the Review of Ecodesign Regulation 617/2013 (Lot 3) showed that there were significant gaps in the current Ecodesign regulation on computers and that a revision of the regulation could lead to significantly more savings. The same preparatory study also showed that one of the largest missed savings comes from not tackling energy efficiency when computers are undertaking work. Next to this poor energy efficiency, additional consumer-focussed issues such as durability, software longevity, repairability, water ingress protection and hazardous materials are either not addressed at all, or only minimally addressed, in the current Ecodesign Regulation on computers.

This situation is very detrimental to the consumer as personal computers have become an indispensable appliance in daily life, essential to the functionality and productivity of European consumers. A draft standardisation request regarding personal computers was expected for 2022 but was delayed. Once the the standardisation request issued, it will be a priority for ANEC to participate in the standardisation work to support the upcoming revision of the regulation.

- Material efficiency

CEN-CLC/JTC 10 Material efficiency (and subgroups)

CEN and CENELEC published in 2019 and 2020 all the EN 4555X series of European horizontal standards related to material efficiency aspects for Ecodesign products under the request M/543. The work was done by the CEN/CLC JTC 10, which is now looking into improving these standards and providing guidance to other standardisation bodies to transpose the EN 4555X series into product specific standards.

ANEC has been actively involved in the development of all the standards prepared under mandate M/543 and has established its presence in all sub-working groups of the CEN/CLC JTC 10, including the latest project prEN 45560 "Circular-ready design". These standards are of paramount importance to consumers, who would benefit from more sustainable products, designed with an approach that does not only account for energy efficiency but also for material efficiency.

ANEC considers this project of very high consumer relevance and strategic importance for upcoming Ecodesign regulations and standards and beyond,

especially in view of the adoption of the Ecodesign for Sustainable Products Regulation and the increased attention to material efficiency requirements envisaged.

C**LC/TC 59X/WG 23 Material efficiency of household and similar electrical appliances**

In April 2022, the WG published the technical report "TR 50727:2022 - Material efficiency - Household and similar electrical appliances - Assessment of applicability of EN 4555X", which assesses the applicability of the EN 4555x series to household and similar electrical appliances that are in the scope of ecodesign (2009/125/EC). The TR also highlights where further work will be needed to apply each of the EN4555X standards to specific household and similar electrical appliances. ANEC has participated in the drafting of this TR and will continue following the any upcoming development around it.

The CLC TC 59X WG23 "Material efficiency of household and similar electrical appliances" is currently focussing on washing machines, with the development a whole product durability standard prEN50731:2022 "Material Efficiency - Household and similar electrical appliances — Durability – Measurement method for the assessment of the reliability of washing machines for household use." ANEC considers this first product sustainability standard project of strategic importance as the WG is trying to create a methodology that would not only measure reliability of washing machines, but that could potentially also set the path forward for developing a further catalogue of such standards. That is a priority for CLC TC59X as reliability and durability requirements will be introduced in the legislation. ANEC has been actively participating since 2021 and considers this a high priority work as we need to ensure that the standard will be founded on strong and meaningful methodologies that deliver performance measuring processes that are relevant for consumers.

- Strategic Ecodesign & Energy Labelling standardisation

As consumer representatives in the European standardisation bodies, we find it important to have influence over strategic standardization activities related to ecodesign and energy labelling, further to those specific to a product or product

category. Standardisation bodies at horizontal level address highly relevant issues such as circumvention, obsolescence, tolerances, and uncertainty, which are crucial to maintain the performance and safety of domestic appliances. We mean to participate in those horizontal bodies to contribute keeping a seamless link between performance and safety of domestic appliances and to influence standardisation practices and methods to better reflect real-life conditions and consumer behaviour.

ANEC intends to participate and contribute to the CEN-CENELEC Ecodesign Coordination Group (Eco-CG) that acts as a coordinating platform for standardization issues related to ecodesign and energy labelling policies. We plan also on participating in specific Eco-CG Task Forces, particularly those related to identifying horizontal issues related to ecodesign requirements or discussions on household appliances or digital products. ANEC will ensure that consumer considerations are taken into account in these discussions to ensure consistency and harmonization across all ecodesign-related standards.

Summary of priority standards Priority work area and associated standardisation work

Table 1 - Short list of standards

Work area	Standard reference (if applicable)	Standard name/work description	Standardisation committee (if applicable)
Domestic laundry appliances	EN 60456	Clothes washing machines for household use - Methods of measuring the performance	CLC/TC 59X/WG 01-06
	EN 50229	Electric clothes washer-dryers for household use - Methods of measuring the performance	CLC/TC 59X/WG 01-06
	EN 61121	Tumble dryers for household use - Methods for measuring the performance	CLC/TC 59X/WG 01-09
	prEN50371	Durability - Measurement method for the assessment of the reliability of washing machines for household use	CLC/TC 59X/WG 23
Domestic dishwashers	EN 60436:2020/AXX	Electric dishwashers for household use - Methods for measuring the performance in accordance with technical needs and regulatory requirements	CLC/TC 59X/WG 02
	EN XXX	Standards following SR on dishwashers	CLC/TC 59X/WG 02
Domestic vacuum cleaners	FprEN 60312:2017/AXX	Vacuum cleaners for household use - Part 1: Dry vacuum cleaners - Methods for measuring the performance	CLC/TC 59X/WG 06

Co-funded by the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor the granting authority can be held responsible for them.

Electronics	EN XXX	Series of standards following SR on Computers	TBD
	prEN 50XXX	Ecodesign assessment of electronic displays	CLC/TC 100X/WG 01
	EN 62087-X	Audio, video, and related equipment - Determination of power consumption	CLC/TC 100X/WG 02
Material efficiency	prEN 45560	Material efficiency aspects for products in scope of Ecodesign legislation; Method to achieve circular designs of products	CEN-CLC JTC 10

Co-funded by the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor the granting authority can be held responsible for them.