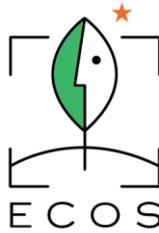


EUROPEAN ENVIRONMENTAL
CITIZENS ORGANISATION
FOR STANDARDISATION



ORGANISATION EUROPÉENNE
ENVIRONNEMENTALE CITOYENNE
POUR LA NORMALISATION

Brussels, 8 January 2019

Jean-Claude Juncker
President
European Commission
Rue de la Loi 200
B-1049 Brussels
Belgium

Miguel Arias Cañete
Commissioner for Climate Action and Energy
European Commission
Rue de la Loi 200
1049 Brussels
Belgium

Subject: Appeal of annulment of Regulation (EU) No 665/2013

Dear President Juncker, dear Commissioner Cañete,

We are writing in relation to the decision of annulment of Regulation (EU) No 665/2013 related to vacuum cleaners which was announced by the General Court of the European Union on 8 November 2018.¹ This Court's decision holds that the test method for the measurement of the performance of vacuum cleaners does not comply with the essential elements of the Ecodesign Directive 2010/30/EU.

While we acknowledge that the existing test method should be more representative of consumer behaviour, we strongly believe that the regulation should not be annulled. The Regulations for vacuum cleaners² together are expected to save 19 terawatt hours (TWh) per year by 2020, equivalent to the electricity produced by 26 medium size coal power plants. An annulment will not only deprive the European market and consumers of those energy savings but will also compromise consumer trust of the EU Energy Label.

We urge the European Commission to:

- **Appeal** the General Court's decision immediately, in order to maintain the delivered benefits and the integrity of the Label as a whole;
- **Issue**, in line with Article 7 of Regulation (EU) No 665/2013, a Standardisation Request to the European Committee for Standardisation and to the European Committee for Electrotechnical

¹ General Court of the European Union, PRESS RELEASE No 168/18, Luxembourg, 8 November 2018

² Regulation (EU) No 665/2013 and Regulation (EU) No 666/2013

Standardisation to develop a more representative measurement method for the performance of vacuum cleaners involving a partly-loaded instead of an empty receptacle;

- **Proceed** swiftly with the revision of Regulation (EU) No 665/2013, explicitly requesting that the harmonised European standard underpinning it must be based on a more representative measurement method for the performance of vacuum cleaners involving a partly-loaded instead of an empty receptacle.

ECOS has long been calling for test methods which represent real-life conditions experienced at consumers' homes to deliver the energy savings expected by the product-specific Ecodesign regulations and build consumer confidence. For vacuum cleaners, we have been calling for measurement methods for annual energy consumption, dust pick-up and dust re-emission that are based on a partly-loaded receptacle rather than an empty one.

We have also been strong supporters of the Ecodesign and Energy Labelling policies. In our view, these policies make a significant contribution towards reaching the EU's climate and energy savings goals and provide multiple benefits to consumers and the European Single Market alike.

Appealing the General Court's decision on the Regulation for vacuum cleaners will give a strong signal that the European Commission remains ambitious with the Ecodesign and Energy Labelling policies and will avoid setting undesirable precedence.

We would be happy to discuss this with you and your team in a meeting at your best convenience.

Yours sincerely,



Laura Degallaix

ECOS Director