

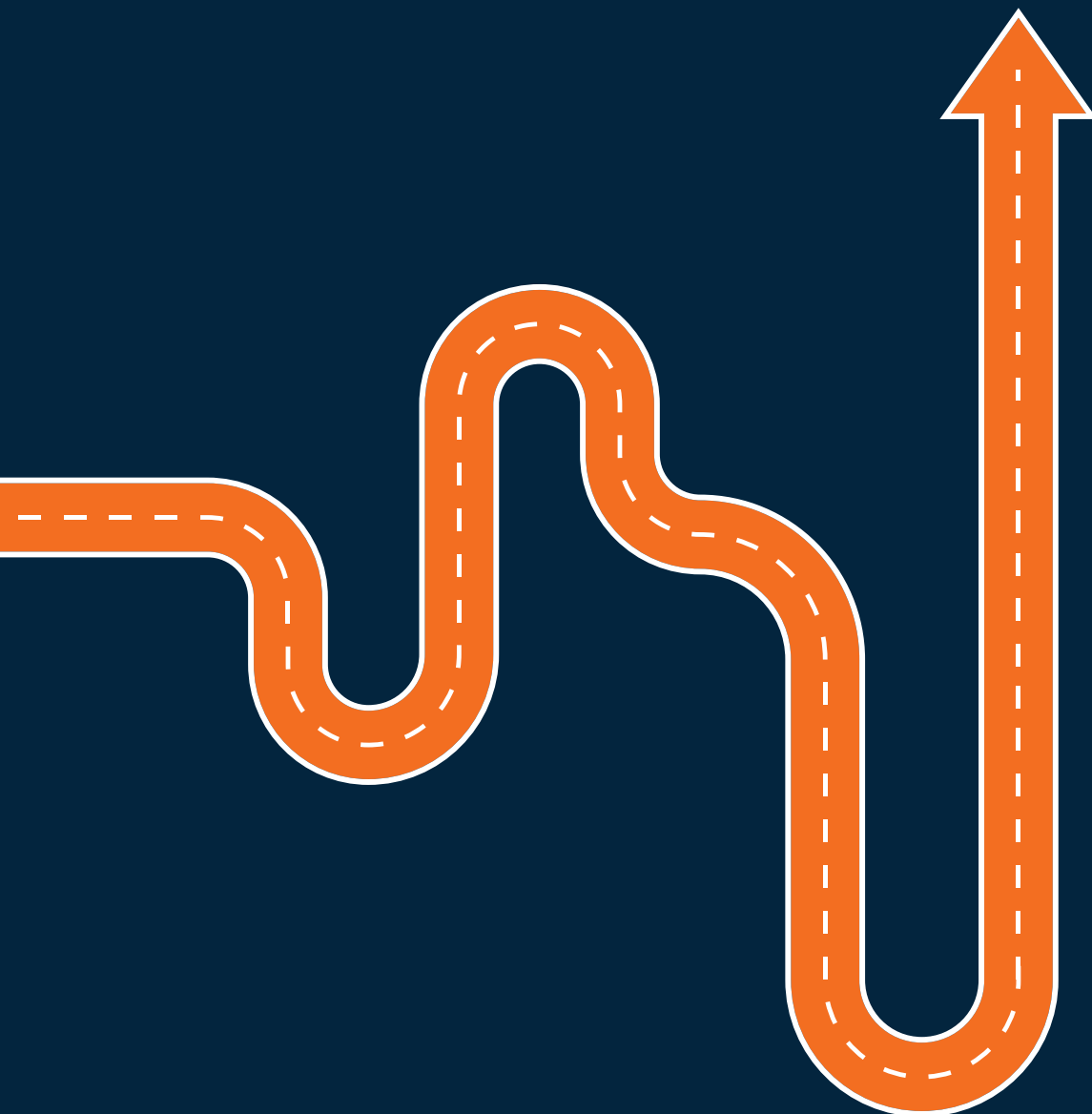


The Association of Manufacturers
of Domestic Appliances

AMDEA's Roadmap to deliver the UK's Sustainable Appliance Future

The Association of Domestic Appliance Manufacturers (AMDEA) is the UK trade association for the manufacturers of small and large domestic appliances; representing over 80% of the domestic appliance industry as a whole and closer to 95% of the market leaders in large white goods.

Revised
October
2024



AMDEA Roadmap to A Sustainable Appliance Future Update

Introduction by Paul Hide



For over a century, domestic appliances have significantly enhanced the quality of life in the UK. With 98% of the 28 million households owning at least one large appliance and many small appliances¹, these marvels of invention and engineering help us prepare, cook and keep food, as well as maintaining personal and home hygiene and care. In 2023 alone, UK sales reached over 15 million large and 60 million small appliances², contributing nearly £12bn annually to the economy and supporting numerous jobs³.

Domestic appliances also play a crucial role in reducing environmental impact. AMDEA members are committed to net-zero homes and a sustainable economy, adhering to UN Sustainable Development Goals and COP 28 agreements. By sourcing sustainable materials, ensuring carbon-neutral manufacturing and delivery, and

using recycled materials, they aim for a net-zero supply chain. Manufacturers are developing ever-more energy and water efficient products. Energy and water efficiency labels have been in use for thirty years, and recent recalibrations reflect significant improvements. Manufacturers focus on durability, with many large appliances lasting over ten years, and some exceeding twenty years. They prioritize reparability and material recovery at the end of an appliance's life.

AMDEA's consumer awareness campaigns like "Know Watt's What," launched in 2022, educate users on efficient energy and water use as well as tips for care and repair promoting longevity.

The "Register My Appliance" initiative ensures appliances are registered for safety updates.

Product innovation remains key, with manufacturers continuously introducing safer, more efficient products whilst utilising the benefits of new technologies. Government support through policies and legislation is essential to sustain these advancements without disadvantaging manufacturers or consumers.

This document outlines 18 recommendations for government actions to support continued innovation and ensure UK consumers have access to the most efficient, innovative safe and affordable appliances produced by manufacturers. We welcome further discussion on our proposals.

Paul Hide
CEO, AMDEA



Recommendations that support the transition to net-zero and the UK's sustainability goals, the trade of appliances across borders and safeguarding consumers:

Domestic appliances need to be included in Government policies on net-zero as they are fundamental in helping to achieve net-zero homes and buildings. Washing machines and dishwashers account for around 10% of water used in the average home⁴. Showers account for approximately 20% of water used in the home. Domestic appliances account for approximately 31% of household energy use⁵. This usage could be dramatically decreased through householders using the most efficient eco-appliances, or through applying the tips on sustainable use promoted by the industry's Know Watt's What campaign. We invite all relevant Government departments to work closely with AMDEA and the industry to ensure net-zero policies incorporate domestic appliances going forward.

Reducing trade barriers is necessary to facilitate the movement of domestic appliances across borders. UK consumers should not be disadvantaged through extra costs brought about by differing product requirements for the UK. Mutual recognition of and compatibility with international regulatory requirements is vital to the free flow of the trade of products across borders, to promote market accessibility whilst ensuring that costs are minimised.

Proper cost-impact assessments and timely stakeholder consultation on draft regulations as well as building in sufficient implementation time for the supply chain are vital to building a new regulatory framework fit for the UK's post EU member status. In addition, greater cross-departmental cooperation across Government is needed to avoid conflicting announcements that create confusion, increase costs and administrative burdens.

As domestic appliance manufacturers continue to develop digital and cyber technologies as well as technology to mitigate safety risks, Government needs to take a fresh approach to safety frameworks that support developing technical innovation whilst at the same time not conflicting with environmental and sustainability frameworks.

AMDEA's 18 recommendations in brief:

Transitioning to a net-zero and circular economy:

1. Update the 2021 Energy Related Products Policy Framework to support appliances' participation in the circular economy.
2. Ensure that enhanced UK Extended Producer Responsibility (EPR) regimes present a level playing field with EPR fees reflective of actual costs.
3. Ensure greater compatibility between UK and EU chemical regulations
4. Speed up efficiency innovations through manufacturing rebates.
5. Incentivise the choice of repair versus replacement through lower VAT levels, repair grants and more professional repairers:
6. Extend the Warm Homes Plan to include domestic appliances .
7. Standardise messaging and align with industry to influence householder efficiency behaviour.
8. Build long-term whole home optimisation considerations into the development of smart, flexible, and secure electricity systems.

Continuing the free-flow of appliances across borders, at no extra cost to consumers:

1. Ensure that UK and EU regulatory frameworks are compatible and that consultation timelines are aligned to support the coordinated implementation of new requirements.
2. Consult manufacturers early to assess the impact and feasibility of new policies/regulations.
3. Ensure the incorporation of the essential 'placed on the market' principle in new regulations
4. Recognise CE marking indefinitely..
5. Labelling requirements should make consumer messaging clearer by not duplicating information.
6. Maintain the UK's leadership role in CEN/CENELEC. clearer by not duplicating information.
7. Include early policy design alongside regulatory co-ordination in government co-ordination ambitions.

Safeguarding consumers:

1. Regulate and enforce online trading requirements to ensure that products, including spare parts meet UK safety standards.
2. Provide sufficient powers and resources to UK regulatory enforcement officers.
3. Empower UK regulatory enforcers to co-operate across borders through international agreements.
4. Coordinate consumer protections and needs with sustainability policies driving extended appliance lifetimes.



Plug in
to savings



RECOMMENDATION

Transitioning to Net-Zero Homes and a greater Circular Economy:

We call upon Government to deliver the regulatory and householder incentive support that will enable the critical role that appliances can play in achieving net-zero homes and a circular economy. These recommendations focus on Government policies that can enable appliance manufacturers and householders to achieve these imperative sustainability goals whilst avoiding unnecessary price rises.

1. Update the 2021 Energy Related Products Policy Framework to support appliances' participation in the circular economy:

Failure to revise the ecodesign framework risks that more energy and water efficient products available in the EU (European Union) will not be available to UK consumers, and that products from the EU that are no longer compliant with EU ecodesign rules are "dumped" onto the UK marketplace.

2. Ensure that enhanced UK Extended Producer Responsibility (EPR) regimes present a level playing field, with EPR fees reflective of actual costs:

The 2021 Environment Act set the framework for enhanced EPR; the cost of collecting, sorting and recycling household waste will no longer be covered by council tax revenues but by producers of the waste. Packaging EPR is in development while waste electrical and electronic equipment (WEEE) EPR and battery EPR are expected. Each regime will increase compliance costs for domestic appliance manufacturers placing products on the UK market. The Government needs to ensure that:

- There is a level playing field with online retailers and digital marketplaces targeted as producers alongside product manufacturers, resellers, importers and distance sellers.
- EPR fees reflect the actual cost of collection and sorting with material revenue differentiated by material type, meaning costs and revenues are allocated back to specific materials.
- All collected materials are processed through the relevant EPR system.

- Fees paid by producers reflect their actual share of material contributed to the waste stream.
- Local authorities collect domestic waste for recycling in the most efficient and consistent way, ensuring high householder participation and delivering materials for sorting and recycling with the least contamination possible.
- The packaging EPR regime is designed and implemented in recognition of all packaging producers, not simply the producers from those industry sectors that use the most packaging (e.g., food and drink and fast-moving consumer goods).'

3. Ensure greater compatibility between UK and EU chemical regulations:

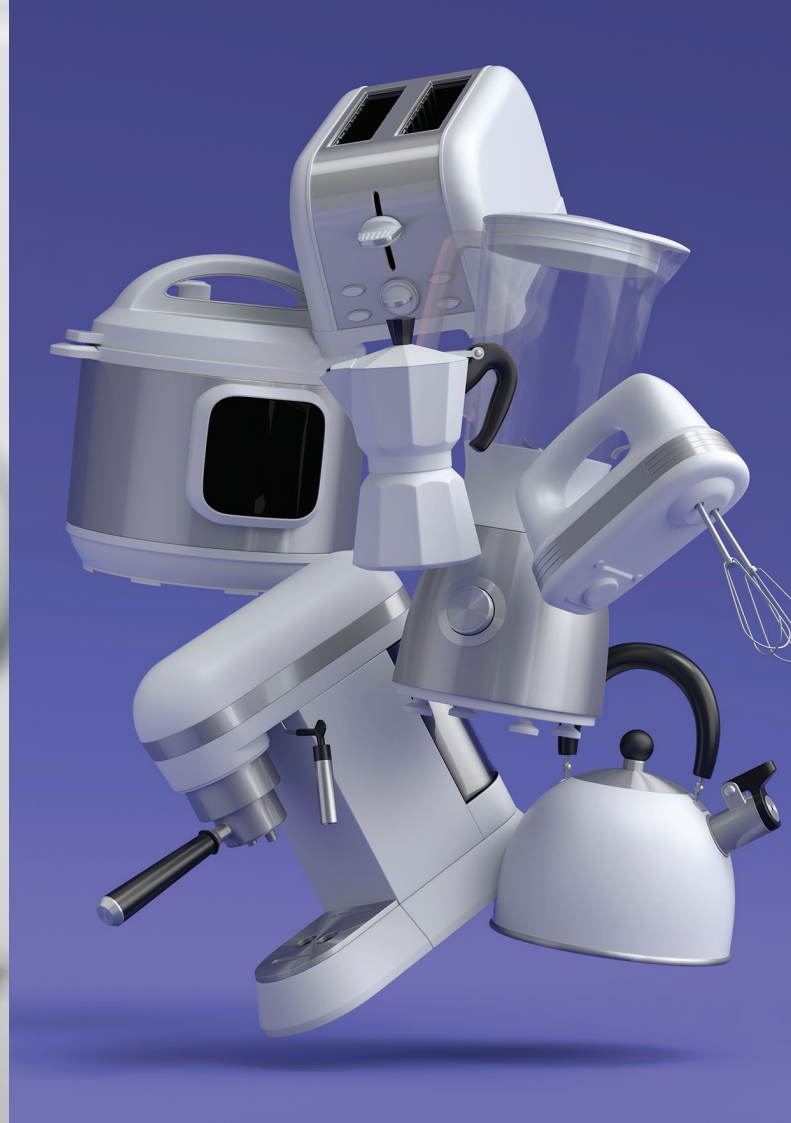
The Government's approach to UK REACH, RoHS and Food Contact Materials needs to be affordable for industry and consumers through harmonisation with EU requirements. If the UK has standalone chemical regulatory requirements, manufacturers will incur extra costs which will be passed onto consumers.

4. Speed up efficiency innovations through manufacturing rebates:

Incentivising research and development through manufacturing rebates will result in faster innovations for more energy and water efficient appliances. We need greater levels of incentives to ensure that the UK is a place that encourages investment in technological innovation and manufacturing, supporting the economy, jobs and ensuring UK consumers have access to the most water, energy, and material efficient products.

5. Incentivise the choice of repair versus replacement through lower VAT levels, repair grants and more professional repairers:

- Lower VAT on repair costs will encourage more consumers to repair rather than replace appliances. AMDEA recommends that Government introduces incentives for safe repair or refurbish extending the product life and supporting greater numbers of refurbished pre-used products.
- Harmonise regulations and standards governing spare parts with those of the EU to ensure that commonly used spare parts are readily available to UK consumers and professional repairers, helping extend product lifespans.



- Encourage a new generation of professional repairers to service, repair and refurbish appliances: Government apprenticeship schemes (including access to the industry levy) must be revised to encourage industry participation. UK frameworks must encourage high standards for professional repairers, ensuring that repairs are conducted safely, and that professional repair is an attractive career path for young people.
- Clarify liability rules when products are repaired by third parties: Repair and refurbishment markets depend upon a regulatory framework that is fit for purpose. Appliance manufacturers cannot be held liable for repairs conducted by third parties or when non manufacturer authorised and specified parts are used.

6. Extend the Warm Homes Plan to include domestic appliances:

Offer inclusive and accessible grants aimed at lower income households towards buying modern energy and water efficient domestic appliances. This will help all households reap the rewards of savings through more energy and water efficient products whilst supporting the goal of delivering of energy efficient homes.

7. Standardise Government messaging to align with industry advice to influence efficiency behaviours:

Government departments should promote messages that promote behaviours on appliance efficiency by amplifying ongoing industry sustainability campaigns.

8. Build long-term whole home optimisation considerations into the development of smart, flexible, and secure electricity systems:

Energy smart appliances (ESAs) are consumer facing devices designed by manufacturers across a diverse range of industry sectors. New product and service innovations are emerging, bringing with them a need to manage multiple ESAs within one home for the benefit of householders and the secure operation of the electricity grid. Supply chains are global and for some appliances volumes sold in GB markets are relatively small. Solutions to immediate net zero challenges need to accommodate longer term objectives.

Continuing the free-flow of appliances across borders, at no extra cost to consumers:

Maintaining open access to UK markets requires retaining compatibility with common International and/or European requirements. Any new requirements specific to GB must align with international requirements to avoid complications in international trade, which would disadvantage both consumers and producers. The following recommendations enable the Government to ensure that UK consumers can continue to access the range of innovative, safe, and efficient appliances produced by manufacturers at competitive prices:

1. Ensure that UK and EU regulatory frameworks are compatible and that consultation timelines are aligned to support the coordinated implementation of new requirements:

GB requirements that are not compatible with EU regulations disrupt the operation of the UK Internal Market in addition to constraining trade with the EU. This could necessitate the production of 'GB only' products, limiting the choices available to consumers and driving up costs. Because the UK market is relatively small, manufacturers need to be able to offer the same products in GB as in the wider EU. As the EU advances its regulatory framework, AMDEA requests that the UK Government conducts simultaneous engagement with stakeholders on similar policies/ regulations to identify specific requirements for the UK market. If implementation periods do not align then the additional costs and administrative burdens are likely to be unavoidable.

2. Consult manufacturers early to assess the impact and feasibility of new policies/ regulations:

Effective regulation requires thorough impact assessments and early stakeholder input to overcome challenges in bringing compliant products to market.

3. Ensure the incorporation of the essential 'placed on the market' principle in new regulations:

The process of developing, manufacturing, and shipping compliant appliance products is complex and spans eighteen to twenty-four months. It is crucial to adopt the 'placed on the market' principle rather than the 'made



available' principle in all product legislation. Established regulatory practices for appliance safety and ecodesign demonstrate that the "placed on the market" principle is critical for functional and enforceable implementation timelines, and it prevents significant amounts of retail stock from either being scrapped, which is environmentally detrimental, or expensively modified.

4. Recognise CE marking indefinitely:

UKCA marking should integrate the evolving requirements of CE marking to enable mutual recognition. New UKCA standards must align with internationally recognised CE standards as they develop. In Northern Ireland, lack of alignment may cause challenges due to its unrestricted access to the UK market, potentially leading to extensive circumvention.

5. Labelling requirements should make consumer messaging clearer by not duplicating information:

Details about products, including adherence to international standards and efficiency in water and energy use, are already mandated on packaging or at the point of sale for many appliances. The content and compliance rules for new product labelling should be co-ordinated across Government departments to prevent consumer confusion and reduce unnecessary industry burdens. Increasing the use of digital labelling can help minimise industry burdens and avoid confusing consumers with joint UK/EU labelling requirements on similar areas of conformity. The Government needs to back consumer awareness initiatives for all new information requirements.

6. Maintain the UK 's leadership role in CEN / CENELEC:

The leadership role of the UK in CEN/CENELEC to shape the international agreements supports UK innovation and access to international markets. The relationship between the UK's leadership role in CEN / CENELEC and conformity with relevant European standards is critical to a free flow of trade. Our industry and the BSI benefit from the continued common understanding and agreements with international standards partners, as do consumers.

7. Include early policy design alongside regulatory coordination in cross-governmental coordination ambitions:

Traditional product policies need to adapt to emerging technologies, just as horizontal digitalisation policies may be vertical through a diverse range of industry sectors. Exchanges between the responsible Departments could help draw in insights early on that support the regulation of global supply chains in a changing environment.

Safeguarding Consumers:

Government needs to take a fresh approach to digital and fire safety through regulatory frameworks that foster innovations in the safety, security, and performance of domestic appliances. The UK safety framework must not conflict with environmental and sustainability frameworks.

1. Regulate and enforce online trading requirements to ensure that products, including spare parts meet UK safety requirements:

Enhancing and policing safety standards within online marketplaces should be a priority for UK safety frameworks to ensure consumer safety and security. UK consumers need to be protected as much when purchasing goods online as when they purchase goods on the high street. UK based retailers and e-tailers should be protected from competition from non-compliant international sellers.

2. Provide sufficient powers and resources to UK regulatory enforcement officers:

Improvements are needed in market surveillance. Regulations are ineffective without adequate monitoring and oversight of products on the market, both online and on the high street, to protect consumers and ensure a level playing field for responsible companies.

3. Empower UK regulatory enforcers to co-operate across borders through international agreements:

Regulators across borders need the ability to support one another through powers established in national frameworks as well as under global arrangements.

4. Coordinate consumer protections with sustainability policies driving extended appliance lifetimes:

Data and digital frameworks should support innovations to optimise product performance;; e.g. technologies allowing products to self-diagnose a need for repair or optimise performance. AMDEA and City University of London are conducting research into how innovative technologies can be utilised securely. At the same time, consumer protection regulations need to ensure that appliances using older technologies are still able to be used safely as more consumers favour keeping and repairing older machines, or purchasing second-hand appliances.



We trust that you have found our recommendations helpful, we look forward to working with you to ensure that the UK domestic appliance industry continues to deliver the most efficient, reliable, safe and sustainable products for UK householders. For more information please visit:

- www.amdea.org.uk
- [Know Watts What](#) - AMDEA
- or contact us at comms@amdea.org.uk



FOOTNOTES

1. Consumer Appliances in the United Kingdom Euromonitor International, November 2023.
2. Consumer Appliances in the United Kingdom Euromonitor International, November 2023.
3. Consumer Appliances in the United Kingdom Euromonitor International, November 2023.
4. Demos 'Flowing Forward, Safeguarding the UK's water system' December 2023.
5. Top five energy consuming home appliances- Energy Saving Trust).





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