

To BEIS Smart Energy Team

BEIS Smart Appliances Consultation

Joint Industry Letter – calling for EU alignment in the development of a voluntary smart appliance label

BEAMA and AMDEA represent the full breadth of the appliance industry covered within scope of the Ecodesign Lot 33 Smart Appliances study. BEAMA represents manufacturers of electric heating, heat pumps, storage ventilation and controls (including gateway devices and CADs) products. AMDEA represent the range of household appliances covered within the scope (including washing machines, dishwashers, tumble dryers, fridge freezers etc).

As industry bodies we have been closely involved with the Ecodesign Lot 33 work on smart appliances over the last 3 years, specifically working alongside our EU trade association APPLiA. We are very aligned therefore in our view on how any labelling for the sector should be developed to support the rollout of smart appliances. While we have put forward our own separate responses to the BEIS consultation we submit this letter to outline our shared views and key recommendations. With this letter we also invite BEIS to continue to work closely with us as industry bodies to ensure the best outcome for consumers and the industry.

Our comments:

- We agree in principle that a voluntary labelling scheme could incentivise the market for smart appliances.
- We would disagree with BEIS's stated intentions with regard to setting 'technical' and 'functional standards'. Interoperability and other mandatory principles should be determined through the standardisation process led by industry, and fully aligned with European and International standards. We advise against setting any regulation referencing specific technical standards.
- Regardless of the UK's exit from the European Union our members will continue to sell into a European market and therefore any divergence from EU product regulation or labelling schemes would add costs and potential market barriers. Separate labelling requirements in the UK will create undue administrative burden and cost which will be passed to the consumer, to avoid disincentivising manufacturers selling into the UK market. We therefore strongly recommend that any UK approach is closely integrated and aligned with the Lot 33 proposal, and its outcome.
- Setting parameters for a labelling scheme that applies to such a broad range of appliances and that focuses solely on demand side flexibility (not energy efficiency) has its challenges. Certain appliances will have distinct characteristics that may affect the role they play in the Demand Side market. We therefore cannot assume 'one size fits all' in terms of functional requirements and set a horizontal measure across all products in scope. We ask BEIS to be mindful of existing product regulation through Ecodesign and energy labelling when considering options for smart appliances.



Our individual responses will provide further details. Both AMDEA and BEAMA are also engaged with the BSI project and will be hosting a workshop with APPLiA in the Autumn to demonstrate our industry's work to achieve interoperability for smart appliances.

Kind regards

Dr Howard Porter, BEAMA CEO

A handwritten signature in black ink, appearing to read 'Howard Porter', written in a cursive style.

Douglas Herbison, AMDEA CEO

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