BEAMA Consultation Response - UK mandatory water efficiency label (FINAL)

Question 1: Does the list of products we selected set the right level of ambition? [yes, no]

[If no], please outline why not and what other product(s) we might consider labelling in future and why?

No.

A greater level of technical detail is needed regarding how the scheme would function to be able to give input on whether the scope is appropriate. When examining the scope given in the consultation document the most obvious product category which appears to be missing is electric showers but we believe they should not be in scope. BEAMA consider that electric shower products should not be included in scope as labelling of such products is inappropriate for three key reasons:

1. The electrical/thermal efficiency of an electric shower with a particular element size – regardless of manufacturer - will be near identical so there would be nothing to differentiate one product from another.
2. Water use will be less with a lower power unit, however, positive user experience declines with declining power. A 7.5kW shower in cold weather provides a feeble flow of warm water. Users are likely to take longer with a lower power unit to get sufficiently wet and then rinse off than a more powerful unit, and therefore more likely to use more water.
3. If the label worked in the way intended, then contractors/installers, drawn towards offering the best efficiency, will tend to fit the lowest power unit they can. This will result in unhappy users and destroy the reputation of these products.

Question 2: To what extent do you agree or disagree that a standalone water label only is the most appropriate way to deliver mandatory water efficiency label policy? [strongly agree, agree, neutral, disagree, strongly disagree, don’t know-no answer]

Neutral

Question 3: In what ways can the impacts of dual labelling on manufacturers be minimised? [open text]

Regarding dual labelling and minimising unnecessary burden on manufacturers it is important to note that a water label scheme already exists. We strongly encourage policymakers to use the Unified Water Label (UWL) as a means of delivering on the goal of increasing water efficiency in the UK market. Most products placed on the UK market are also sold in other markets (e.g. the EU single market). Having a unique UK requirement may result in manufacturers making the decision to reduce the number of products placed on the UK market. This is because it would be more costly to test and label multiple products therefore to reduce initial outlay manufacturers may consider that reducing their UK product ranges would give cost savings. Using the UWL however would eliminate this potential issue as this is already in use and applied across European markets.

Question 4: To what extent do you agree or disagree that the example label designs appropriately deliver water efficiency information to a consumer?

[strongly agree, agree, neutral, disagree, strongly disagree, don’t know-no answer]

Neutral.

Question 5: Are there any additional elements required in the labelling specification? [open text]

We note the similarities between the blue scaled label and the UWL previously mentioned. As it is the intention to introduce a label of similar design extra burden of development, testing and labelling costs for manufacturers can be avoided by using the UWL. Additionally using a labelling system that is already in place would be a responsible use of UK taxpayer money and Government resources as this would save time and reduce unnecessary duplication of work already undertaken.

Question 6: To what extent do you agree or disagree that including energy information on the label (for taps and non-electric showers) would be beneficial?

[strongly agree, agree, neutral, disagree, strongly disagree, don’t know-no answer]

Disagree.

Question 7: What would be the most effective way for energy information to be included in the label? [open text]

For many products that would be covered by a mandatory water label energy information is not relevant as they do not use energy. Energy using water heating products are already covered by energy label requirements and a further energy label may be confusing for consumers. While the UWL does include an indication of energy usage for relevant products this can be removed should a mandatory label require it. We support the exclusion of energy information from a water label.

Question 8: To what extent do you agree or disagree that the display requirements are suitable to ensure water label visibility to the consumer?

[Strongly agree, agree, neutral, disagree, strongly disagree, don’t know-no answer] Please include any additional comments on the above proposals. [open text]

Neutral

In most cases professional installers are employed to install the types of products that would be covered. This means consumers are often not the sole decision makers when installing plumbing appliances. This is a fundamental difference between the home appliance (e.g. washing machines, Refrigerators, TVs etc.) and the plumbing appliance sectors. As professional installers are the ones often making the actual purchase of the product displaying the label at point of sale doesn’t make sense for these product types. We therefore believe that having the buy in of the professional sector is a necessity for the efficacy of any labelling scheme. This includes buy in from manufacturers as the relationship between plumbing professionals and manufacturers is key to which products are used and how information is presented to the consumer.

Question 9: To what extent do you agree or disagree with the information we propose for the database in annex E?

BEAMA takes a neutral position when considering the information suggested for the database. We consider that the range of the information in the database needs further discussion to make sure the outcome is an effective tool. Some of the proposed parameters are difficult to provide (e.g. noise levels) and pricing cannot be set as there is distribution and installers to take into account. It is important to note that the manufacturer is not the last link in the chain. We consider that most of the information suggested to be included in the database is in fact not useful in the consumers purchasing decision. We would also like to highlight that efficiency is not wholly suitable as the rate of flow necessary for a particular application is subjective to that application. E.g. a shower with a low flow rate is water efficient however it may not be effective for its purpose.

Question 10: Should any additional information to that set out in Annex E be included in a database? [yes, no (if yes, please explain - open text)]

Yes.

Like with the EPREL database the water efficiency label for a product should be displayed on the database page for that product. We also draw to the consultation team’s attention the fact that more comprehensive data may be stored in a BIM database for the product.

Question 11: Are there any existing standards or regulations beyond those listed from pages 99 - 104 of the EST technical report, which you consider may have implications for the delivery of mandatory water efficiency labelling?

Please outline and provide explanation [open text

BEAMA agrees with the BMA response to this question.

Question 12:

Please outline the criteria which you consider the enforcement authority should fulfil, and explain your reasons? [open text]

Any authority that enforces the water efficiency label must have suitable resources and funding to be able to effectively ensure a level playing field across the industry. The majority of manufacturers selling on the market will comply with labelling requirements however there are always those actors which do not follow the rules. It is therefore essential that if a mandatory label is introduced that it is effectively enforced. Without effective enforcement it will be easier for substandard products to be placed on the market which will not only present issues for water efficiency but also potentially for consumer safety.

Question 13:

To what extent to you agree or disagree with proposed mandatory water efficiency labelling enforcement plan? [strongly agree, agree, no preference, disagree, strongly disagree.]

No preference.

Question 14:

Do you have any further comments on the enforcement plan? [open text]

No further comment

Question 15: To what extent do you agree or disagree that these figures are accurate? [strongly agree, agree, neutral, disagree, strongly disagree, don’t know-no answer]

Please provide any information to support your view (open text)

Neutral

No further comment

Question 16: To what extent do you agree or disagree that the costs and benefits are accurate? [strongly agree, agree, neutral, disagree, strongly disagree, don’t know-no answer]

Please provide any information to support your view (open text)

Disagree

BEAMA considers that the costing assessment given in the consultation document is an underestimate. The data used in the EST report to reach these values is out of date and due to recent increases in prices does not accurately represent the process costs for manufacturers. Effective enforcement in this area is key in protecting the UK markets and consumers from inferior or misleading products and therefore adequate funding is essential.

Question 17. To what extent do you agree or disagree that there is limited impact on smaller companies?

[strongly agree, agree, neutral, disagree, strongly disagree, don’t know-no answer] Please provide any information to support your view (open text)

Neutral

Question 18: To what extent do you agree or disagree with our assessment of equality impacts? [strongly agree, agree, neutral, disagree, strongly disagree, don’t know-no answer]

Please provide any information to support your view [open text]

Agree

Question 19: In addition to the previous questions, is there any other information you would like to share regarding the proposed UK mandatory water efficiency labelling? [open text]

Nothing to add