

**Submission of the Consumer Council to the
Subcommittee on Energy Efficiency (Labelling of Products)
Ordinance (Amendment of Schedules) Order 2009**

Rated Washing Capacity of Household Washing Machines

In determining the scope of the mandatory energy efficiency labelling scheme for washing machines with regard to rated washing capacity, it is important to consider the local retail market situation, the energy labelling schemes of other jurisdictions, the interests/concerns of various stakeholders and the applicability of relevant test standards.

1. It is observed that household washing machines (including both washers and washer-dryers) of rated washing capacity higher than 7kg are not uncommon in the local retail market. Although the rated washing capacity values of these machines are currently mostly below 10kg, the rapid evolution of manufacturing designs and technology means that their rated capacity of household washing machines could continue to increase in the near future.
2. In the Council's test report on washing machines published in February 2009, 4 out of 18 (around 22%) of the tested models had rated washing capacity higher than 7kg, with the highest model being of 8.5kg.
3. Elsewhere, the Australian consumer body, Choice Australia, published a test report on washing machines in July 2009 in which 23 out of 49 (around 47%) of the tested models had rated washing capacity higher than 7kg, with the highest one up to 9.5kg.
4. The UK consumer body, Which?, also published a test report on washing machines in 2009 in which 53 out of 196 (around 27%) of the tested models had rated washing capacity higher than 7kg, with the highest one up to 11kg for 1 model.
5. As far as scope of regulation is concerned, in Australia and Canada, the scope of their mandatory energy efficiency labelling

schemes for washing machines has no limit in terms of rated washing capacity. In Mainland China, the mandatory scheme applies to washing machines of rated washing capacity not exceeding 13kg.

6. Looking at the interests of stakeholders, excluding washing machines of high washing capacity from the mandatory labelling scheme is not beneficial to consumers as they may not be able to compare the energy efficiency between different machines in order to make informed choice among the high capacity models.
7. As for producers/manufacturers, if washing machines of high washing capacity are excluded from the scheme, producers /manufacturers might consider declaring a higher rated washing capacity for their less energy efficient models to avoid the requirement of displaying their energy efficiency on the energy label. If this became a common scenario, effectiveness of the scheme would be jeopardized and consumers would be confused.
8. Referring to relevant test standards, the scope of IEC 60456, which applies to horizontal drum type washing machines, has no limit in terms of washing capacity. On the other hand, the scope of JIS C 9606, which applies to impeller type or agitator type washing machines, has a limit in terms of washing capacity of not exceeding 10kg.

Taking the above into account, the Council recommends that the scope of the mandatory energy efficiency labelling scheme should also cover washing machines of rated washing capacity higher than 7kg. However, in view of the limitation of the scope of relevant test standard, it may be appropriate to limit the scope of the scheme to rated washing capacity not exceeding 10kg. Therefore, it is suggested that the scope of the scheme should cover all washing machines of rated washing capacity not exceeding 10kg. It is also recommended that the Administration review the scope from time to time through market research, study of production trends and applicability of relevant test standards.

Consumer Council
4 December 2009