



The Association of Manufacturers of Domestic Appliances



Dear {{ contact.FIRSTNAME | default : "Members and Partners" }}

Welcome to our March 2021 newsletter

A message from the CEO - Paul Hide



Welcome to AMDEA's second newsletter of 2021.

It remains frustrating that electrical retailers are still some way off opening their doors for the first time in 2021 across the UK. Let us hope that the potential re-opening date of 12 April is not pushed back further.

It is, however, encouraging that sales of domestic appliances, both large and small, remain buoyant and equally encouraging that many smaller electrical retailers have adapted well to the requirement to sell online, delivering to home, and running click and collect services.

AMDEA runs a sell-in statistics service for contributing members. The final outturn for 2020 showed that MDA grew in volume by approximately 2% in 2020 and the industry forecast is for a similar level of year-on-year growth in 2021.

We can be thankful that our industry has proved to be very resilient throughout the pandemic and the 'stay at home' requirements are making more households think about upgrading or adding to their home appliances portfolio.

New Energy Labels are required to be displayed on all product pages, now that we have passed the 1 March enforcement date, so do check that your product web pages are displaying the new GB labels. AMDEA has launched a consumer-facing campaign, promoting our message across Facebook, Twitter and Instagram platforms, as well as national and local media PR.

AMDEA will be running a Register My Appliance campaign week from 26 April, partnering with the Government Office of Product Safety and Standards and Domestic and General. The campaign is being developed via our member Consumer/ Campaigns group, with the objective of increasing overall levels of appliance registration. We will share more details with you in the April newsletter.

AMDEA's 'inbox' of topics of activity continues to grow and we are working as hard as

we can to support our members' trade in the UK and overseas. We remain engaged in resolving many of the post-EU withdrawal pain points for manufacturers, related to both importing and exporting, as well as selling within the internal market between GB and NI. As these challenges recede and we start to see a pathway out of the Covid-19 related restrictions, we expect Government focus to return to many of the projects that were put on ice in 2020. AMDEA will continue to be at the table representing our members' interests on all key issues and opportunities.

Our new-look newsletters, both weekly and monthly, have received many complimentary comments. We hope you like the new format and information contained within. If you have any feedback as to how we can make them even more informative for you, please do contact me directly, I welcome your feedback.

In this month's edition:

- Energy Labelling
- Ecodesign/Circular Economy/Environmental Issues
- Register My Appliance
- Safety/Indelible Marking
- WEEE / Compliance Fee
- EU Withdrawal
- Social Media
- AMDEA Meetings

Energy Labelling



AMDEA educates consumers on how to buy eco-friendly appliances

AMDEA's new consumer campaign argues that with an estimated 102 million domestic cooling and washing appliances in use in the UK, even modest measures, like helping individual households or businesses to opt for the most efficient products available, can make a big impact on carbon reduction.

With as much as 14% of the UK's electricity consumption spent on domestic washing and refrigeration, AMDEA has published an online guide to help householders to understand the new labels and encourage them to choose wisely for both their pockets and the impact on the environment.

New research for AMDEA has revealed that concerns over disposable cash are higher than environmental considerations for appliance buyers. Price was the top priority for the majority (64.5%), even though over a third (37%) believe that when choosing products environmental impact mattered more to them than a year ago, and a similar 36% claim to have always placed importance on sustainability. Even though the payback of reduced running costs seem attractive to 87%, people buying appliances are still mostly motivated by the upfront purchase price of a machine.

Other data suggests that UK households are running more than nine million cooling and washing appliances that are over 10 years old, potentially built at a time when machines were far less efficient. In the survey, when asked about replacing their oldest appliances, that might be running in the garage or shed, one in four said they could not afford to replace them.

Other findings of the survey included:

- Respondents were keen on the idea of buying or moving into a rental home with

high efficiency machines – 71.2% would be influenced if the property had these appliances.

- Those asked were also warm to the idea of buying more efficient appliances with incentives to do so: 84% would be influenced to buy a more costly yet efficient model if a grant or discount were offered. With cash discounts (92%), or VAT free purchase (78.8%), offering the biggest incentives to motivate people to purchase a more costly, efficient model.

For full details on AMDEA's new campaign, click [here](#).



Eco-design/Circular Economy/Environmental issues



French Circular Economy Matters

France, maybe due to its hosting of the Paris Climate Conference, is playing a high-profile role in matters relating to the environment.

As an illustration of this, the French national association, GIFAM, provided APPLiA with presentations that AMDEA subsequently circulated to its members. The presentations covered:

1. The Repairability Index
2. Ecodesign and spare parts
3. Labelling of endocrine disruptors
4. Eliminating unsold new stock
5. Plastic packaging
6. The potential for a Durability Index
7. A 2025 goal for the 100% recycling of plastic
8. Microfibre filters for washing machines
9. Triman logo
10. A penalty for placing the Green Dot logo on packaging from April 2021
11. The prohibition of mineral oils in packaging
12. A Repair Fund

The one that appears to be the most contentious is Item 10, the Green Dot system penalty. AMDEA has asked APPLiA to clarify if this means:

1. French manufacturers can place the Green Dot logo on product if the product is being exported to Spain or Cyprus (Green Dot is mandatory in these countries). But they cannot use it for sales in France without paying the penalty.

or

2. If a product is exported (by a non-France based manufacturer) to France and Spain or Cyprus, in common packaging, there will be no penalty for using the Green Dot logo in France.

APPLiA has contacted GIFAM with our clarification request and a response is awaited.

Eco-design of kettles

APPLiA, in consultation with AMDEA, has submitted detailed concerns to the EU

Commission and its consultants on the draft legal text for the proposed eco-design of kettles.

The key recommendations in the APPLiA submission are:

1. Clearly define that the scope is limited to appliances with the primary function of boiling water.
2. Take 100 °C, at standard atmospheric pressure, as the reference point for boiling water for all assumptions in the study.
3. Kettles with immersed heating elements shall not require a Lift-off/Switch-off mechanism.
4. Revise the reparability requirements.
5. Delete all recyclability and recycled content requirements (given the lack of implementing standardisation available).
6. Delete chemical requirements given the existence of specialised legislation (e.g. REACH, RoHS etc).
7. Reconsider the introduction of information requirements.

Microfibres

APPLiA has proposed to commission some European research to support the development of an industry position and proposed solutions for home laundry appliances.

Register My Appliance



Register My Appliance campaign week - starting 26 April

AMDEA will run a Register My Appliance campaign week commencing 26 April. The activity will be run in partnership with the Government Office for Product Safety and Standards and the UK's largest collector of household appliance data, Domestic and General.

The campaign will be built around a narrative of "Keep the heart of my home safe - Register my appliance - right now."

We will use social media channels to land the message, alongside collaborations with key industry and fire safety stakeholders.

SAFETY/ INDELIBLE MARKING



Indelible marking of stationary appliances

Last month there was the second of the CPL/61 Workgroup meetings on indelible markings of stationary appliances where the minutes have been distributed to the members already.

One of the discussion points of the meeting was the response to the questionnaire

which went out to certain groups (members of AMDEA being one group), but so far, the response has been slow. As it is very important that Workgroup receive these questionnaires filled in, to further discuss the issues around indelible marking, a reminder to fill in the questionnaire is to be communicated back to the respective organisation as soon as possible.

As the meeting progressed, the issue come up in the discussion was the identification of appliances involved in a fire event. One thing which came out of the discussion was that where appliances from AMDEA members were concerned, if photographic information was available, the members themselves could probably identify their own products which were involved in the fire.

Feedback from the representative of London Fire Brigade at the meeting said, in principle, photographic information could be obtained, but sometimes it can be difficult to take pictures of appliances which are involved in a fire because of the practicalities of the situation which the fire officer finds themselves in, but the representative was positive about it. In general, it requires further discussion/investigation at a later date.

BEIS Study on AI & Product Safety

There was an initial Webex Interview by BEIS on the study of AI & Product Safety. BEIS would want, at a later date, to invite manufacturers to a workshop. Details to follows.

WEEE / COMPLIANCE FEE



WEEE targets must be set at achievable levels and not exceed recovery cost

AMDEA is currently in discussion with Defra to ensure that the final costs in 2020 do not exceed the actual costs of dealing with the waste recovered (which is in line with the JTA proposal as part of the winning bid for running the Compliance Fee scheme) and to ensure that the 2021 targets are set at achievable levels.

Large WEEE collections have remained consistent across the past 12 months, helped in the main by the fact that the old appliance is often collected by the vendor who delivers the new one. The 2021 Defra target proposals for both Cooling and Small WEEE collections have been and continue to be impacted by the closure and restricted visiting options of local recycling centres.

AMDEA believes that small WEEE collections will continue to be negatively impacted by Covid-19- related restrictions. Q1 2021 figures show substantial reductions in collections and therefore the targets need to be adjusted/ set to reflect realistic rates of return. We have also requested a flexible approach to the setting of the Compliance Fee in 2021, as Defra agreed last year.

The cross-industry 'recycle your electricals' campaigns will continue to run throughout 2021, encouraging us all to separate and recycle small electricals. More information on the campaign can be found [here](#).

UK WEEE collection targets

AMDEA has circulated to its members Defra's proposed WEEE collection targets for 2021. Given the potential disruption to waste collection facilities caused by the recent lockdown, AMDEA is concerned that the targets, particularly for small domestic appliances, are challenging.

We are currently drawing together members' views so that we can provide Defra with an AMDEA position before Defra's closing date for comment on 15 March 2021.

EU WITHDRAWAL



Third-party certification rules

For most products, conformity to CE marking and UKCA marking requirements is via a supplier's declaration of conformity, i.e. an assessment by the manufacturer taken under their own responsibility that their goods comply with all the applicable laws. But sometimes, if the regulators consider the risk presented by products is especially high, the product's conformity has to be assessed by an organisation independent of the manufacturer.

Within the EU, the CE marking has therefore to be accompanied by a four-digit number of a 'Notified Body' (e.g. a certification body recognised by a Member State): within GB, the UKCA marking needs to be accompanied by a four-digit number of an 'Approved Body'. Even though the UK played a significant part in setting up the EU system, the UK was not able to secure a Mutual Recognition Agreement (MRA) with the EU on this type of conformity assessment.

Without an MRA, UK conformity assessment bodies (CABs) are no longer able to carry out mandatory conformity assessment for products being placed on the EU market and conversely EU CABs are no longer able to carry out mandatory conformity assessment for products. Despite this lack of a formal MRA, some Notified Bodies have arrangements with Approval Bodies to share test reports and similar information and so this is something that AMDEA members would be wise to check if this conformity assessment arrangement applies to them. A presentation on such matters, presented by BEIS and the UK Accreditation Service, was circulated to AMDEA members.

Of course, the harmonised standards that support the EU system for approving products (in particular, the Regulation on Accreditation and Market Surveillance) continues to be of importance to AMDEA members. Consequently, this month AMDEA attended the meeting to discuss the Standardisation Request.

Radio equipment and cybersecurity

There is a raft of legislation in force or under development in the EU concerning multiple aspects of cybersecurity. However, these are generally not concerned with CE marking and therefore about placing goods on the EU (and NI) market. However, as wireless communications increasingly replace wired networks, the Commission and EU Member States are looking at introducing Delegated Acts under the Radio Equipment Directive (RED) to introduce cybersecurity requirements into this CE marking legislation (which is also law in GB, but more on that later).

As with most legislative proposals within the EU, there is a long gestation period and discussions on the above have been ongoing for well over a year. However, the Commission has now issued their first informal text for discussions with Member States

and other stakeholders, which is a prelude to the formal creation of legislation.

In addition, the Commission has also circulated its first draft standardisation request for comment by CEN, CENELEC and ETSI. AMDEA is following developments on this topic via their European partner, APPLiA, as well as inputting directly to CEN/CENELEC.

The original EU RED was transposed into UK law as the Radio Equipment Regulations 2017, which has (due to the UK's exit from the EU), has since been revised by the Product Safety and Metrology etc. Regulations (as amended numerous times). Hence, as the EU firms-up its requirements, so the UK will need to decide whether GB should enact similar requirements (NI, of course, adopting whatever becomes law in the EU).

RoHS Exemptions

AMDEA has circulated to its members an update on the UK Government's recently updated guidance on applying for a RoHS exemption.

The guidance detailed the process from establishing the relevant criteria all the way through to renewing/changing/deleting an exemption.

It was noted that the guidance related solely to Electrical and Electronic Equipment (EEE) placed on the Great Britain market. There is no change to the position in the EU.

Additionally, post-Brexit, if an exemption is required in Britain, as well as the EU, then exemption requests in each jurisdiction will be required.

BEIS/ICF Policy Study

In the summer, AMDEA participated in a BEIS Call for Evidence on post-Brexit policy for energy-related products (ErP). We have recently been informed that BEIS, in partnership with a consultancy, ICF, will utilise some of this in a Policy Study. Please note that we have yet to see a formal release of the conclusions drawn from the initial Call for Evidence.

A meeting was called by the study co-ordinators for 4 March 2021 and AMDEA attended. Ahead of the meeting, BEIS/ICF issued a list of products/product types that they felt they should be concentrating on. This list was circulated to AMDEA members.

AMDEA was concerned that the commenting period following the meeting was a short one (one week) and it raised this at the meeting. Whatever develops we will continue to follow this closely.

Following this meeting, AMDEA is consulting with its membership in order to have an agreed position in place for a follow-up meeting that is due to take place at the end of March/end of April - date still to be confirmed.

Designated standards

Designated standards are GB's counterpart to EU's harmonised standards, in that they provide a presumption of conformity with legislation. This can either be because the legislative requirements are only given in outline, as in 'essential requirements' covering safety, electromagnetic compatibility (EMC) and radio performance; or they can be detailed test methods that enable measurement of detailed requirements in eco-design and energy labelling.

Within the EU, the relationship between legislation and standardisation was first enunciated in the "New Approach" in the mid-1980s and has evolved over the decades ever since. Hence, the EU has a Regulation that defines in law how standards that support EU's regulatory requirements are to be requested, how a harmonised standard is to include the linkage between its requirements and the associated EU legal obligations, and many other things.

However, this hasn't led to anything like a utopian state that is to be envied, as the citation of these harmonised standards has, for, some years now, been bedevilled by bureaucracy within the European Commission and dissonance between the Commission and the European standards organisations.

Now that the UK has left the EU it must set up a system that clearly and transparently describes how GB laws will be supported by standards. Naturally, the intent is to learn what has worked well in the EU, what hasn't, and formulate our system accordingly.

AMDEA has met, and continues to meet, with Government (principally BEIS) and BSI to define such a system: naturally, it does this in conjunction with other industry associations.

As the laws regulating products were largely established when UK was an EU Member State, so the first list of designated standards were simply a replica of EU harmonised standards. But, as neither laws nor standards are unchanging, so must the GB system recognise that deviations at some point will be inevitable, while of course recognising the undesirability of technical barriers to trade between GB and the EU (and of course between GB and NI).

Hence, a high-wire balance must be established – a balance which also takes into account the desire of UK to enter into agreements with other countries around the world.

SOCIAL MEDIA



Follow and interact with AMDEA on social media

We're on [Facebook](#), [Twitter](#) and [Instagram](#): click on the icons below to join the conversation.



AMDEA MEETINGS



All AMDEA meetings are being held as Webex remote-joining conferences until further notice.

If you are not receiving invitations to the meetings in this section, and think that you ought to be, please e-mail your regular AMDEA team member contact.

AMDEA meeting dates

23 April - Consumer/Campaigns Group
2 June - Spares and Service Panel
23 June - AMDEA Board
1 July - Safety Liaison Panel
6 July - Joint TC and SAP
16 July - Consumer Group

8 Sept - Spares and Service Panel
13 October - AMDEA Board and AGM
22 October - Consumer Group
26 October - Joint TC and SAP
1 December - Spares and Service Panel

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