

Call for Evidence - European Water Resilience Strategy

APPLiA, representing the home appliance industry, welcomes the European Commission's initiative to develop a European Water Resilience Strategy. We strongly support the strategy's focus on ensuring proper resource management, addressing water scarcity, enhancing the competitiveness of the water industry, and promoting a water-wise circular economy. This paper focuses specifically on the "Water Efficiency First" principle and how modern home appliances can contribute significantly to its implementation.

Water Efficiency First principle

APPLiA recognises the "Water Efficiency First" principle as crucial for the effectiveness of the Water Resilience Strategy. We believe that modern home appliances, particularly dishwashers, washing machines and washer-dryers, play a vital role in achieving water efficiency at the household level. These appliances offer substantial water savings compared to older models and traditional handwashing methods. Promoting their widespread adoption is a direct contribution to Europe's water resilience.

Quantifiable Benefits of Home Appliances

Significant Water Savings: Handwashing uses up to 10 times more water than automated dishwashing in current dishwashers¹, while modern washing machines consume significantly less water than older models, with some achieving reductions of 30% or more annually for an average family. These savings translate to a substantial reduction in overall water consumption across Europe. UK consumer organisation Which? recently demonstrated the possible water savings by using a dishwasher - [link](#).

Why did water consumption reduce so much for home appliances? The current Energy Label and Ecodesign requirements, which prioritise energy efficiency, have also led to a decrease in water usage in appliances. This is because heating water is a major energy-consuming process within these appliances; thus, reducing water volume is an effective way for manufacturers to meet energy efficiency targets. Consequently, a separate, dedicated measure for water consumption in washing machines and dishwashers at the EU level is redundant and would create unnecessary double regulation.

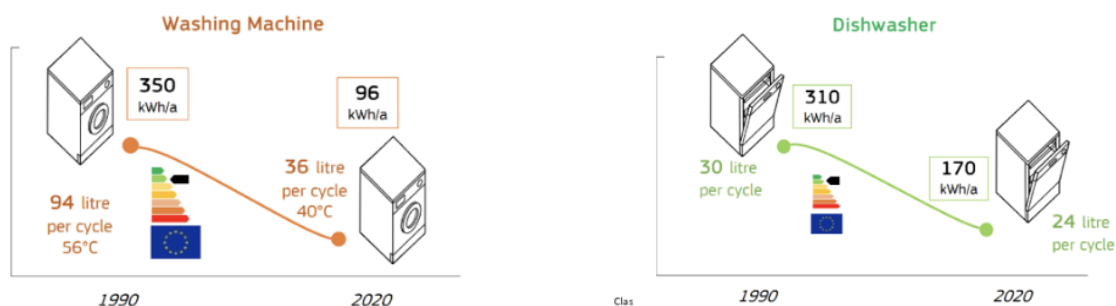
¹ JRC 2017 Base case: 9,6 l for 13 PS - handwash study 2007: 108 l for 12 PS (9,03 l / PS)



Reduced Water Bills: Lower water consumption directly translates to lower water bills for consumers, creating a financial incentive for adopting water-efficient appliances. This helps offset the initial purchase cost.

Environmental Protection: Reduced water consumption preserves precious water resources, protects vital ecosystems, and strengthens Europe's resilience against the increasing impacts of climate change.

Energy Savings: Modern appliances often combine water efficiency with energy efficiency. For example, modern washing machines can use up to 25% less energy than a 10-year-old model². On the energy label of a dishwasher, you can see its exact consumption per 100 cycles. The energy costs in the table on this page are based on an energy price of € 0.40 per kWh and 280 cycles per year, which is over 5 cycles per week. These numbers were calculated by the European Union. An A energy label dishwasher is more expensive to purchase, but you can save about € 730 on your energy bill after 15 years compared to the F energy label dishwashers.



[**errata corrige:** the graphs provided above are not reflecting correctly the text included in the EIA report which states the following on page 99: *In 1995, the average DW consumed 27 litres of water per cycle, and without measures, this was expected to remain at a constant 24 l/ cycle from 1999 onward. Due to the measures, the consumption decreased to 10 l/cycle in 2020 and expected 9 l/cycle by 2030.*]

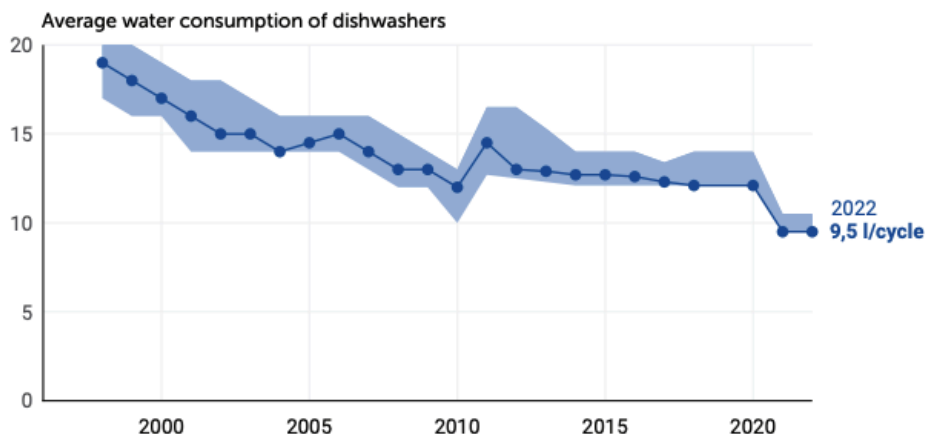
The Ecodesign Impact Accounting (EIA)³ report is a crucial document published by the European Commission that assesses the environmental and economic impacts of the Ecodesign Directive. The above diagrams are from the 2023 EIA and show the energy and water reduction of a washing machine and dishwasher when comparing 1990 to 2020.

APPLiA's yearly data⁴ further highlights the significant progress the industry has made in water efficiency.

² However, it is important to acknowledge that water is essential for effective rinsing in washing machines. Current energy label and ecodesign regulations include minimum requirements for rinsing effectiveness, recognising that overly restricting water usage can negatively impact washing performance. Therefore, while water efficiency is a key goal, a balance must be struck to ensure adequate rinsing and cleaning results.

³ <https://op.europa.eu/en/publication-detail/-/publication/392bc471-76ae-11ed-9887-01aa75ed71a1/language-en>

⁴ <https://statreport2023.applia-europe.eu/>



Accessibility and Affordability - A Key Challenge

While the benefits are clear, affordability remains a significant barrier. The current reality is that a substantial portion of European households (approximately 55%) cannot afford a dishwasher. Addressing this affordability gap is crucial for realising the full potential of water-efficient appliances.

Recommendations for the European Commission

To maximise the impact of the "Water Efficiency First" principle and ensure equitable access to water-saving technologies, APPLiA recommends the following actions:

Targeted Financial Incentives: Implement financial incentives and support schemes specifically for appliances in the highest energy and water efficiency classes. These could include rebates, tax breaks, or subsidized financing options. These incentives should be designed to directly address the affordability gap.

EU-wide Coordination and Best Practice Sharing: Conduct a thorough screening of existing measures across Member States and facilitate coordinated action between the European Commission and Member States to ensure effective implementation and avoid duplication of efforts. This should include sharing best practices and identifying successful models that can be scaled up across the EU.

Dedicated EU Funding: Allocate dedicated EU funding to support research and development of even more water-efficient appliance technologies and to finance consumer incentive programs.

Consumer Engagement and Education: Implement communication campaigns to raise consumer awareness about the benefits of water-efficient appliances and encourage



sustainable water usage behaviors. This should include clear and accessible information on water consumption labels and potential savings.

Incentivise Sustainable Choices: Explore mechanisms to reward consumers for their investments in water-efficient appliances and encourage water-saving behaviours. This could include water pricing structures that incentivise conservation or other innovative reward programs.

Conclusion

By prioritising the "Water Efficiency First" principle and implementing the recommendations outlined above, the European Commission can unlock the significant potential of modern home appliances to contribute to a water-resilient and sustainable Europe. APPLiA is committed to working with the Commission and other stakeholders to achieve this shared goal.

Reference contact

Korrina Hegarty *Senior Policy Director*
korrina.hegarty@applia-europe.eu