

UK Mandatory Water Efficiency Labelling

Overview

General Comments

Scottish Water supports the principle of water efficiency labelling. It is crucial that we support customers in understanding the value of water and the link between water, energy and the surrounding environment. A label of this type will support more informed choices when purchasing products that use water.

Detailed Response

Specific Comments

1	Does the list of products we selected set the right level of ambition?
<p>No</p> <p>We would suggest adding electric showers as well as other common bathroom items such as bidets and separately sold shower heads (these may be covered by shower assembly solutions). We would also suggest that power washers and other garden equipment such as lawn spraying units are included, displaying an average volume used over time eg 1000 litres per hour.</p> <p>In recent years, over and above the increased size of paddling pools, there has been an increase in the sale of inflatable toys and slides that have a continual flow/spray of water. It would be advantageous to show the average volume used over time eg 500 litres per hour.</p>	
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?
<ul style="list-style-type: none"> • agree 	
3	In what ways can the impacts of dual labelling on manufacturers be minimised?
<p>Provide clear criteria and definitions for what must be displayed.</p>	



4	To what extent do you agree or disagree that the example label designs appropriately deliver water efficiency information to a consumer?
<ul style="list-style-type: none"> • agree 	
5	Are there any additional elements required in the labelling specification?
<p>Consider the possibility of quoting the minimum litre value for band A. This would allow a customer to draw the comparison with the best perceived volume. While we understand the reason for the blue colour scale, customers recognise green for good and red for bad. This would offer consistency with the approach to energy labels.</p>	
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?
<ul style="list-style-type: none"> • agree 	
7	What would be the most effective way for energy information to be included in the label?
<p>To provide the greatest awareness of the link between hot water and energy, an average cost per measure of hot water used could be developed.</p>	
8	To what extent do you agree or disagree that the display requirements are suitable to ensure water label visibility to the consumer?
<ul style="list-style-type: none"> • agree 	
9	To what extent do you agree or disagree with the information we propose for the database in annex E?
<ul style="list-style-type: none"> • agree 	
10	Should any additional information to that set out in Annex E be included in a database?
<p>NO</p>	
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



	<p>labelling?</p> <p>Please outline and provide explanation.</p>
	<ul style="list-style-type: none"> • Scottish Water has no comment
12	<p>Please outline the criteria which you consider the enforcement authority should fulfil, and explain your reasons?</p>
	<p>No additional criteria from items listed in “Enforcement” section</p>
13	<p>To what extent to you agree or disagree with proposed mandatory water efficiency labelling enforcement plan?</p>
	<ul style="list-style-type: none"> • agree
14	<p>Do you have any further comments on the enforcement plan?</p>
	<p>No</p>
15	<p>To what extent do you agree or disagree that these figures are accurate?</p>
	<ul style="list-style-type: none"> • Scottish Water has not comment.
16	<p>To what extent do you agree or disagree that the costs and benefits are accurate?</p>
	<p>From a Scottish domestic perspective, it should be noted that this will not directly reduce water charges. Only metered supplies would immediately and directly benefit from reduced bills through reduced consumption.</p>
17	<p>To what extent do you agree or disagree that there is limited impact on smaller companies?</p>
	<ul style="list-style-type: none"> • Scottish Water has no comment
18	<p>To what extent do you agree or disagree with our assessment of equality impacts?</p>
	<ul style="list-style-type: none"> • agree



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?
<ul style="list-style-type: none">• No further comments	

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