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## **Mandatory Water Efficiency Labelling Consultation – Yorkshire Water Response**

Dear Sir / Madam,

Thank you for the opportunity to respond to the consultation on mandatory water efficiency labelling.

Overall, we strongly welcome the Government's proposals. The impacts of climate change and population growth mean that reducing demand is vital if we are to meet our environmental ambitions and ensure a resilient supply of water into the future. Mandatory water labelling has the potential to provide clear and simple information to allow customers to make decisions about how to reduce their water use.

Our research has consistently found that customers have little understanding about their water use and the contributions from appliances and products around the home. When customers are asked about their willingness to reduce their consumption, most are willing to make at least some form of reduction in their household use.

Even those who attach a higher emotional value to certain high water use activities, such as maintaining an attractive garden by using a hosepipe, are open to making changes in other areas. However, customers consistently express a desire to be provided with more information in order to be able to make informed decisions about their use. Efficiency labelling is a vital tool in allowing consumers to understand their water use and make decisions about action.

Evidence from energy efficiency labelling and water efficiency labelling schemes elsewhere in the world also suggests that mandatory labelling drives improvements in manufactured product standards and results in the most inefficient devices being quickly removed from the market.

In order to maximise the benefits of the proposed labelling system, we would strongly encourage Government to set minimum product standards as part of the scheme, which tighten over time to ensure that there is progressive innovation and improvement of efficiency standards.

Linking the labelling scheme to building regulations is also crucial to maximising the potential benefits. Requiring developers to install only the most efficient fittings as rated

by the labelling system would ensure water efficient devices are installed throughout the household and would mean developers do not have to deal with a complex Per Capita Consumption (PCC) calculation, which often does not reflect real world water usage.

Finally, we would also encourage the Government to support a cross sector behaviour change campaign linked to the introduction of mandatory labelling. There is evidence to suggest that some customers avoid using 'eco' settings on devices due to the perception that they aren't as effective. Therefore, any mandatory labelling system must be accompanied by a robust public information campaign which ensures customers are informed of the need to save water, and of the benefits of purchasing more water efficient products.

A significant reduction in PCC will require a properly resourced, large-scale behaviour change programme delivered and supported by a range of stakeholders including Government, local authorities, water companies, NGOs and others. Such behaviour change campaigns will have less sustained impact if left to water companies alone to deliver.

Reductions in PCC which aren't delivered by maximising the potential benefits of a mandatory labelling scheme will need to be delivered elsewhere, potentially through more burdensome demand-side interventions, or through complex and costly demand side infrastructure. Therefore we would encourage the Government to take opportunity to maximise the benefits of the scheme as early as possible.

We look forward to supporting the Government to progress the development of this important initiative. Our full response to the consultation is set out below. Please do get in touch if we can provide any further information.

Yours sincerely

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# Consultation response

## Question 1: Does the list of products we selected set the right level of ambition?

No

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

Whilst we are broadly supportive of the product list specified in the consultation document and the justification for the selection of those products, we believe that two additional product groups should be considered:

**Electric showers:** whilst electric showers are generally more efficient than non-electric showers, we believe they should still be included in the scope of the labelling requirements. Doing so would encourage further innovation and efficiency and would allow customers to see that electric showers are more efficient when making purchasing decisions.

**Products for outdoor use:** outdoor use of water for washing cars, watering the garden and other uses tends to occur mostly during the summer when pressure on water resources is at its highest. Whilst over the course of a year the amount used by outdoor devices may not be as high as the other uses which have been identified as being in scope for the label, we believe it is important to include outside-use products due to the high volume of water and the importance of reducing peak demand.

We would also encourage the Government to ensure that the list of products covered by the scheme is subject to regular review to ensure that new products which emerge are covered by the mandatory labelling requirements as soon as possible.

## **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

We believe that a standalone will be clearer for customers and will ensure the widest possible use. Combining with the energy label risks restricting its use as not all water using products use energy.

**Question 3: In what ways can the impacts of dual labelling on manufacturers be minimised?**

Dual labelling is common in many countries and the impacts on manufacturers should not be overly burdensome. The proposals to ensure that the requirements for the proposed water label are consistent with the existing energy labelling requirements will make things simpler for manufacturers as most manufacturers will be familiar with the process and requirements of the scheme.

**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

**Question 5: Are there any additional elements required in the labelling specification?**

We support the proposal for the use of a QR code to provide additional information. This should include information on how customers should use and maintain their products to maintain maximum efficiency over time. The additional information should also include guidance on how to identify and address potential issues, for example the known problem with leaks in dual flush toilets.

Consideration should also be given to linking to information around Water Supply (Water Fittings) Regulations to ensure that customers have information on protecting water quality when installing new devices in their homes.

**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.

**Question 7: What would be the most effective way for energy information to be included in the label?**

We support the proposal for energy information to be included on products which require energy to heat water, but which do not directly use energy themselves. An approach which displays relative performance, rather than providing actual use (e.g. in kWh) would be clearer to customers.

**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

**Please include any additional comments on the above proposals.**

We support the proposals to ensure visibility of the label. In addition to ensuring labels are visible at all points of sale, we would also encourage the Government to support a cross sector information and behaviour change campaign to support the launch of the label. Highlighting the benefits of choosing more water efficient products will help to drive down PCC but will also help to increase consumer demand for more efficient products, driving innovation and improvements.

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

Strongly Agree.

**Question 10: Should any additional information to that set out in Annex E be included in a database?**

No

**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?**

No

**Question 12: Please outline the criteria which you consider the enforcement authority should fulfil, and explain your reasons?**

We are supportive of the proposal that enforcement authority should monitor and investigate compliance with the labelling requirements and be able to sanction non-compliance. This should include an ability to assess the accuracy and effectiveness of the testing of products carried out by manufacturers.

**Question 13: To what extent do you agree or disagree with proposed mandatory water efficiency labelling enforcement plan?**

Agree

**Question 14: Do you have any further comments on the enforcement plan? [open text]**

N/A

**Question 15: To what extent do you agree or disagree that these figures are accurate?**

Don't know. We do not have any additional insight to provide us with a view as to whether the information is accurate. However, the proposed savings in the modelling align with the experiences of other water labelling schemes across the world, suggesting that they are robust.

**Question 16: To what extent do you agree or disagree that the costs and benefits are accurate?**

Agree

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

Agree.

**Question 18: To what extent do you agree or disagree with our assessment of equality impacts?**

Disagree.

We are disappointed that the Government has opted not to introduce minimum standards for sale on the basis that equality impacts will be eliminated if no products are removed from sale.

Not introducing minimum standards is a missed opportunity which will limit the impact of the proposed labelling scheme. The Energy Savings Trust modelling found that the most effective scenario was a mandatory labelling scheme linked to minimum standards and building regulations. This approach assumed that the first minimum standards would not come into force until 5 years after the scheme was introduced. The EU energy label which

also used a 3-year minimum standards cycle, allowing for sufficient notice before products would be removed from sale.

We believe this approach would be sufficient to reduce potential equalities impacts and would ensure that the scheme is as effective as possible.

**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?**

N/A

