

Meeting Minutes of the 2nd stakeholder meeting of the Preparatory Study and Impact Assessment support study on professional dishwashers

Project Preparatory study and Impact Assessment support study on professional dishwashers

Event 2nd stakeholder meeting of the Preparatory Study on professional dishwashers

Date & time 01 July 2025, 10:00 – 17:00

Location Hybrid: “Centre de Conférences Albert Borschette”, 1049 Brussels & Online

Documents Available at <https://ecodesign-commdishwashers.eu/en/stakeholder-meetings>

Participants	Partner/Institution	People
	VITO	Gabriela Espadas Aldana
	Oeko-Institut	Kathrin Graulich, Martin Möller
	Trinomics	Laurent Zibell
	Ecomatters	Mieke de Jager, Maria Papavasileiou, Eelco van IJken (online)
	Fraunhofer ISI	Antoine Durand
	Fraunhofer IZM	Eduard Wagner (online)
	European Commission (ENV)	Wojciech Sitarz
	A.I.S.E. - European Detergents Association	Alessandro D'Augusta Perna (online)
	ADLER S.p.A	Giuseppe Spiaggia (online)
	BAM	Andrea Harrer (online)
	BMUV	Kathrin Ludwig (online)
	Bonferraro - Smeg	Alberto Brunelli (online), Diego Ziviani (online)
	CEFIC	Bernd Kappenberg (online), Jerome Tisaun (online)
	Chemische Fabrik Dr. Weigert GmbH & Co KG	Mareike Lohmann (online)
	Comenda S.p.A	Erika Barcella (online), Alessandro Rigo (online)
	Danish Energy Agency	Thore Stenfeldt (online)
	DIHR – Ali Group	Claudia Vezzaro
	Efcem Italia	Mattia Merlini
	Electrolux Professional	Fabio Sinatra
	Federal Environment Agency Germany (UBA)	Gunar Gebauer (online)
	Federal Ministry for Economic Affairs and Energy (BMWE)	Sascha Neuendorf (online)
	FEICA	Dimitrios Soutzoukis

Meeting Minutes of the 2nd stakeholder meeting of the
Preparatory Study and Impact Assessment support study on professional dishwashers

FH Muenster	Britta Rummler (online)
Foodservice Equipment Association (FEA)	John Cunningham (online)
FPS Economy, SMEs, Self-employed and Energy	Joachim Nelis
Germany – German Environment Agency (UBA)	Patrick Bastian (online)
HKI	Sascha Deisel, Andreas Helm (online)
Hobart GmbH	Klaus Padtberg (online); Verena Wiedenhöfer
ICF	Tom Lock (online)
iFixit GmbH / Right to Repair EU	Thomas Opsomer (online)
Jestic Food Service Solutions	Nick Price (online)
KEITI	Intae Jeong (online)
MEIKO Maschinenbau GmbH & Co. KG	Bernhard Cichon (online)
Miele	Luise Christmann (online), Michael Escher (online)
ONNERA GROUP S.COOP	Alberto Gil Enríquez (online)
Sika Switzerland	Nathalie Kowalski (online)
Silicones Europe, a sector group of Cefic	Alice Salmon (online)
Smeg SpA	Eliseo Mantovani (online)
Topten Switzerland	Nadja Groß (online)
VGG	Thomas Näger
Winterhalter Gastronom GmbH	Markus Gessler
Winterhalter UK Ltd	Glenn Roberts (online)
ZVEI e.V.	Theresa Seitz

Agenda:

Time	Topic	Presenter	Institution
10:00	1. Welcome Opening Remarks ESPR: state of play	Wojciech Sitarz	DG ENV
10:15	2. Overview of the Preparatory Study	Kathrin Graulich	Oeko-Institut
10:30	3. Task 1 – Scope and definitions – Main changes after review	Martin Möller	Oeko-Institut
10:45	4. Task 2 – Market analysis – Main changes after review	Laurent Zibell	Trinomics
11:00	5. Task 3 – Users – Main changes after review	Kathrin Graulich	Oeko-Institut
11:15	6. Task 4 – Technologies – Main changes after review	Martin Möller	Oeko-Institut
12:00	Lunch break		
13:30	7. Task 5 – LCA & LCC of Base Cases	Mieke de Jager	Ecomatters
14:15	8. Task 6 – LCA & LCC of Design Options	Martin Möller Mieke de Jager	Oeko-Institut Ecomatters
15:00	Coffee break		

Time	Topic	Presenter	Institution
15:30	9. Outlook: Task 7 – Scenarios / policy options	Antoine Durand	Fraunhofer ISI
16:15	10. Substances of Concern	Eelco van IJken	Ecomatters
16:45	11. Next steps of the study Closing remarks	Kathrin Graulich Wojciech Sitarz	Oeko-Institut DG ENV
17:00	End of meeting		

- 1. Welcome | Opening Remarks | ESPR: state of play – Wojciech Sitarz (DG ENV)**
- 2. Overview of the Preparatory Study – Kathrin Graulich (Oeko-Institut)**
- 3. Task 1 – Scope and definitions – Main changes after review – Martin Möller (Oeko-Institut)**
 - No questions or comments during the meeting.
- 4. Task 2 – Market analysis – Main changes after review – Laurent Zibell (Trinomics)**
 - One stakeholder questions the estimated lifespan of the machines and assumes that the lifespan of BC2-4 would be more than 8 years whereas 12 years for BC1 seem to be too high. Answer by study team: Task 2 (Table 4-7 in the report) is the source; the study team will check if previous stakeholder feedback on this point has been considered in the review.
- 5. Task 3 – Users: Main changes after review – Kathrin Graulich (Oeko-Institut)**
 - One stakeholder questions the active mode of BC5 + BC6 being 8 hours (see table 5-4 in the report); at least for BC5 it seems to be not realistic as it's not possible that there is 8 hours non-stop operation. Answer by study team: the data is based on stakeholder feedback as detailed in the study report.
 - One stakeholder questions the additional water consumption for BC2 of 86L per 100 plates due to pre-rinsing (Table 5-12 in the report) as not being realistic and would be restricted by the flow rate of the spray (5 litres). Answer by the study team: data was derived from a scientific study, where this volume was measured/asked from professional users.
- 6. Task 4 – Technology – Main changes after review – Martin Möller (Oeko-Institut)**
 - With regard to products with standard improvement design options / “Hot water connection for almost all machines” (slide #102 of presentation): one stakeholder points out to make a difference between 'ready for hot water connection' and machines that actually are connected to the hot water as most machines are technically ready for hot water connection, but are not actually connected. Answer by the study team: the actual use of hot water is based on lower values (Table 5-26 in the report) so this is reflected in the calculations. Wording in MEERP Task 4 report will be updated.
 - One stakeholder informs that reverse osmosis is not only applicable to BC1 but also to BC2.
- 7. Task 5 – LCA & LCC of Base Cases – Mieke de Jager (Ecomatters)**
 - One stakeholder asks where the cycle values and water volumes are taken from for the calculations in Task 5? Answer by the study team: The values are based on MEERP Task 3: Cycles in Table 5-4 (page 108) and water volumes Table 5-18 (page 140)

8. Task 6 – LCA & LCC of Design Options – Mieke de Jager (Ecomatters) & Martin Möller (Oeko-Institut)

- Upon the question if ABS should be included in the design options, and if so, at what quantity (see slide #158 of the presentation), one stakeholder informs that ABS is mostly used in small amounts for the front-end (user interface) in BC1+2; more seldom in BC3 and not in BC5+6. Manufacturers don't use ABS because of the resistance against chemicals; therefore, it is out of context (better not to include). One manufacturer informs that they use ABS in all BC2-6 for electronics casings as heat resistance against flammability, but not in a high amount. Another stakeholder confirms that ABS not important (for the design options).
- Upon the question on whether energy for hot water should be taken into account or not in the calculations of design options (see slide #158 of the presentation): one stakeholder suggests that hot water should be taken into account, but they don't know the source of the heat (if it is sustainable or not) - "we don't have the solution". Another stakeholder states that the customer can choose when ordering the machine if they want it to be connected to external hot water source or not.

9. Outlook: Task 7 – Scenarios / policy options – Antoine Durand (Fraunhofer ISI)

- Reusability (slide #162): One stakeholder asks why reusability is presented as an issue although reusability of commercial dishwashers is low according to the study report. Answer by the study team: the left column of that table summarises the ESPR article 5 requirements in one cell whereas the right column lists those issues that were identified as considerable for commercial dishwashers. Indeed, reusability is not the main hotspot (which is use phase + raw materials production); the study team will add this to the presentation.
- Measurement standard (slides #163-169, 179):
 - a. On the suggested proposal to define a reference programme and reference machine in the current standard for BC2 and BC3, the study team explains during the meeting that it would be good to have data on the resource consumption, cleaning performance etc. as it is currently not easy to make a comparison between machines. The performance of an 'average machine' might be used to provide benchmark values in the regulation.
 - b. One stakeholder points out that if a reference machine would be included, then the whole standard would have to be revised. The current standard is only aimed at measuring the consumption of appliances, but not at comparing the appliances to other appliances.
 - c. Stakeholder feedback during the meeting suggests that there is no need to add a reference machine to the standard itself; only the current measurement data on performance and energy consumption of appliances would have to be collected and would be needed to set thresholds and a label in the regulation (not in the standard).
 - d. It is further informed that the standard performance according to EN IEC 63136:2019 has to be tested together with the hygiene performance according to standard EN 17735. However, as there are different programmes for different purposes it is harder to define a 'standard programme' for commercial dishwashers; what seems more important is achieving the hygiene performance.
 - e. With the measurement standard, also the soiling can be measured. i.e. it is discussed that a requirement could be included in the regulation to measure the resource consumption and re-soiling at a certain minimum threshold for the soiling performance. A minimum requirement might be set in the regulation on the ratio between the soiling and the resource consumption.

- f. Applicability of the EN IEC 63136:2019 to other dishwasher categories than BC2+3:
 - i. BC1: According to stakeholder feedback, the present standard for BC2+BC3 would not be applicable to BC1 (e.g. resoiling not relevant for water-change machines). It is proposed to rather check if the performance standard of household dishwashers could be applied.
 - ii. BC4: Using the standard, as proposed by the study team, with plates won't provide reasonable results as everything will be clean which would not be the case for the typical wash ware (pots, pans, utensils).
 - iii. BC5+BC6: customised machines which are very different from batch-based machines, i.e. there is no standard machine, thus it would be difficult to have a reference performance. Answer by the study team: Instead of setting requirements for the energy performance, as there is no possibility to compare the machines, a back-up solution could be to set minimum requirements on specific design aspects as proposed on slide #171 to improve the overall energy performance of these categories. Further stakeholder feedback and ideas are welcome.
- Spare parts (slide #172):
 - o One stakeholder asks why the spare parts **delivery time** is set at 5 days although it is usually 15 days for other product categories regulated under EU Ecodesign.
 - o Another stakeholder confirms that it is important to include a requirement on the availability of spare parts. Although this might be business as usual for high-end manufacturers, it is reasonable as back-stop for lower-end machines. A period of 5 days of delivery is supported, as users heavily rely on the appliances. For example, for smartphones the period is also 5 days.
 - o Another stakeholder points out to the existing regulation on refrigerators with direct sales function as a rather comparable product category; in that regulation, a delivery time of spare parts of 15 days and the availability of 8 years after placing the last product on the market is required.
 - o One stakeholder further proposes to consider reasonable repair costs, i.e. a requirement for **spare parts prices**.
 - o Answer by the study team: A 15-day period is required e.g. for household dishwashers. For commercial dishwashers, a shorter delivery time is proposed as spare parts have to be delivered quickly anyway. As another example, in the product category EV chargers it turned out that the manufacturers are anyway providing spare parts services for satisfying the customers so that a short delivery time might be feasible. The Stakeholders are asked to provide feedback on their spare parts service and habits and if/why the 5 days would be too short.
- Digital Product Passport DPP (slide #177): One stakeholder asks if the results of the ongoing EC's open public consultation (OPC) on the DPP, ending that day, are taken into account when setting product specific requirements? Answer by DG ENV: The OPC is about rules for DPP service providers on the technical aspects, also for the revision of the NLF legislation. For products with an Energy label, data have to be provided in EPREL; for products without Energy label, the ESPR requires then a DPP as information system. If a DPP system for a regulated product category is not ready, requirements would only be applicable once the system is ready. Experiences from other product categories will be considered (DPP for batteries to be started from 2026).

- Implementation date of policy measures (slide #179): The suggested timeline ('Feasibility for a regulation covering all aspects e.g. by 2029') seems to be very ambitious. Answer by the study team: The proposed date has not yet been discussed with the EC and not yet been impact assessed; starting point was estimating an implementation of a regulation in the year 2026 or 2027, with the requirements then usually starting about 2 years later. Based on the following impact assessment, the timelines for different requirements (information requirements, performance requirements) might be specified and split. Requirements being easier to implement may start from the beginning, whereas more difficult ones only later.

10. Substances of Concern – Eelco van IJken (Ecomatters)

- One stakeholder appreciates that the approach for household and commercial dishwashers and the other current product groups (household + commercial laundry appliances) is the same on this topic.
- It is asked if the suggested follow-up study with recyclers on Article 2(27)d for the limited scenario (see slide #186) will also be done in the highly ambitious and intermediate scenario? As it is not manufacturer's knowledge how to identify SoCs that affect recycling, a follow-up study for the SoCs for article 2(27)d would be helpful for all scenarios. Answer of the study team: it will be checked with the Commission if this option can be considered.

11. Next steps of the study | Closing remarks – Kathrin Graulich (Oeko-Institut) & Wojciech Sitarz (DG ENV)

- Stakeholders would rather appreciate an extension of the feedback deadline of 15 August 2025 due to the summer holiday period.