

Wet Appliances and Water Efficiency Labelling: The Case for Excluding Washing Machines, Washer-Dryers and Dishwashers from MWELS

Details

Released on: 11/09/2026

Author: Dr Alex Martin, AMDEA Senior Technical Manager

Contact: alex.martin@amdea.org.uk

About AMDEA

AMDEA represents the majority of home appliance manufacturers, importers and distributors in the UK. Its members include over 150 leading brands that produce the appliances people use for cooking, cleaning, laundry and personal care, including the wet appliance categories considered in this paper. AMDEA's associate members are leaders in appliance repair, reuse and recycling.

Executive summary

AMDEA asks Government to:

1. Remove household washing machines, washer-dryers and dishwashers from the scope of the Mandatory Water Efficiency Labelling Scheme before the Regulations are laid.
2. Recognise that these products already provide regulated water consumption information through mandatory energy labelling requirements.
3. If Government nevertheless proposes to retain wet appliances, publish the complete product-specific evidential, legal, consumer, methodological and cost-benefit justification for doing so before proceeding.

AMDEA recognises the importance of water demand management and supports effective measures to strengthen the UK's long-term water resilience. Consumers should have access to clear, reliable information that helps them understand the water implications of the products they purchase and use. AMDEA does not therefore object to the objectives of the Mandatory Water Efficiency Labelling Scheme, or "MWELS", in principle.

AMDEA's concern is specific to the proposed inclusion of household washing machines, washer-dryers and dishwashers, referred to in this paper as "wet appliances".

These products are not entering mandatory water labelling for the first time. Water consumption is already regulated, measured, declared, displayed and verified through established ecodesign and energy labelling legislation. Existing GB and EU wet appliance energy labels display water consumption alongside energy use, capacity, programme duration, noise and other relevant performance characteristics.

Government has acknowledged that water use information already appears on energy labels. Its stated concern is that a numerical consumption value may not be as clear and simple for consumers as a banded water efficiency

class. This identifies a concern about the presentation and interpretation of existing information, not an absence of regulated information.

Importantly, MWELS would not replace the existing numerical value with a banded classification. The proposed MWELS label would itself display both a water efficiency class and a litres-per-cycle value. For wet appliances, the proposal would therefore add a second official numerical presentation and a second statutory classification system alongside the existing energy label.

Moreover, for washing machines, the litres-per-cycle value displayed through MWELS may differ from the value displayed on the energy label. The existing energy label figure is a weighted value based on a combination of full, half and quarter loads. By contrast, the proposed MWELS methodology appears to use a full-load test result. The same appliance could therefore present consumers with two different official water consumption figures at the point of sale.

A preference for a different presentation format does not, by itself, justify a second mandatory label. Government has not demonstrated why any additional interpretive support could not be provided through the established energy labelling route, or why presenting consumers with two statutory labels would improve understanding rather than introduce duplication and confusion.

The proposed approach raises six principal concerns.

1. No product-specific information gap has been demonstrated

Wet appliances already display regulated water consumption information at the point of sale. Government has not identified a product-specific market failure, information gap or deficiency in the existing legislative requirements that would justify a second mandatory consumer label.

2. The same appliance may display different official water consumption figures

The proposed MWELS label would display both a water efficiency class and a litres-per-cycle figure. For washing machines, the MWELS figure appears to be based on full-load water consumption, while the energy label uses a weighted figure combining consumption at full, half and quarter loads.

Subject to Government confirming the intended methodology, the same washing machine could therefore present consumers with two different official litres-per-cycle figures. This would not simplify the information already provided. It would create a direct inconsistency at the point of sale.

3. Two labels and differently structured class scales create a clear and foreseeable risk of consumer confusion

The energy label uses an A-to-G scale, whereas MWELS would use an A-to-F scale. The same class letter would therefore represent a different relative position under each scheme.

In online retail settings, consumers could encounter a compact blue MWELS indicator beside the existing energy class indicator, potentially without sufficient space or context to distinguish their respective meanings.

AMDEA's consumer research supports consolidation rather than the accumulation of additional labels. Across two nationally representative surveys, 67.0% and 64.3% of consumers agreed that new labels should only be introduced if they replace existing labels. In the second survey, 62.8% agreed that new information should be added to existing labels rather than presented separately.

4. The proposed methodology contains gaps and uncertainties

The draft Regulations appear not to specify the water reduction factor required to calculate the water efficiency class for dishwashers. Without that factor, a dishwasher class cannot be calculated from the legislative provisions as drafted.

The interaction between the applicable measurement and rounding requirements is also unclear. The stage at which a result is rounded, the precision retained and the direction of rounding may affect the class assigned to a product, particularly where a result falls close to a class boundary.

Government has not published sufficient evidence demonstrating how the methodologies and constants were selected, whether they were calibrated for the applicable European test programmes and the GB product market, or whether the resulting A-to-F scale provides meaningful differentiation.

5. MWELS would duplicate an established statutory system

MWELS would not merely reuse a data point already generated for energy labelling. It would create additional legal and operational obligations relating to label generation, product information sheets, technical documentation, product registration and re-registration, QR codes, digital information and point-of-sale display.

Government has not demonstrated that the incremental consumer benefit would outweigh the resulting costs, complexity and risks.

6. The GB-Northern Ireland distinction remains unexplained

The draft Regulations would apply the MWELS provisions for wet appliances in Great Britain but not Northern Ireland, where EU energy labelling legislation continues to apply under the Windsor Framework.

Government should explain whether the continued application of EU energy labelling legislation in Northern Ireland contributed to the decision not to apply MWELS to energy-related products there. It should also explain how it assessed the corresponding consumer confusion risk in Great Britain under the energy information legislation applicable there.

For these reasons, AMDEA asks Government to remove household washing machines, washer-dryers and dishwashers from the scope of MWELS before the Regulations are laid.

Contents

1.	<i>Introduction and AMDEA's position</i>	4
2.	<i>The inclusion of wet appliances has not been justified</i>	5
3.	<i>Government has identified a presentation concern, not a gap in regulated information</i>	6
4.	<i>MWELS would duplicate an established statutory product information system</i>	8
5.	<i>MWELS risks conflicting official information and consumer confusion</i>	9
6.	<i>The proposed methodology is incomplete and has not been adequately validated</i>	12
7.	<i>Unresolved legal and UK internal market issues.....</i>	16
8.	<i>Conclusion and action requested.....</i>	18
	Appendix A: Illustrative comparison of energy and MWELS labels (dishwashers)	20

1. Introduction and AMDEA's position

AMDEA recognises the importance of water demand management and the need for effective measures to support the UK's long-term water resilience. Pressure on water resources was brought into sharper focus by the dry and hot conditions experienced during summer 2026.¹

Consumers should have access to clear, reliable and useful information about the water implications of the products they purchase and use. AMDEA therefore accepts the broad policy objective behind MWELS and does not object to mandatory water efficiency information where a genuine consumer information gap has been identified.

Home appliance manufacturers have contributed to substantial improvements in product efficiency through technological innovation and product development, while complying with increasingly demanding ecodesign, energy labelling and other legislative requirements.

This paper addresses a narrower, product-specific question: whether household washing machines, washer-dryers and dishwashers should be included within the scope of MWELS.

AMDEA considers that Government has not demonstrated that wet appliances require a second mandatory water label. Water consumption for these products is already:

- Measured under prescribed test conditions;
- Declared as a regulated product parameter;
- Displayed through mandatory energy labels;
- Included in product information sheets;
- Supported by technical documentation; and
- Subject to verification and market surveillance.

MWELS would therefore not fill an absence of mandatory water information. Nor would it simply convert the existing numerical value into a banded rating. It would introduce a second statutory route for communicating water-related information by displaying an additional official class and an additional official litres-per-cycle value at the point of sale.

AMDEA's position is product-specific. This paper does not consider whether MWELS may add value for product categories that do not already provide equivalent mandatory consumer-facing water information. Nor does it seek to determine every technical or implementation question that may arise across the Scheme as a whole.

For wet appliances, however, Government should demonstrate a clear incremental consumer benefit before imposing a second mandatory label. On the evidence currently available, that case has not been made.

¹ Environment Agency, *Dry weather and drought in England 2026: summary reports* (updated 4 September 2026); Natural Resources Wales, *Dry weather blog: 2026* (updated 27 August 2026).

2. The inclusion of wet appliances has not been justified

2.1 The policy objective is accepted

Reducing water demand is an important public policy objective. The [Government's response](#) to the 2022 MWELS consultation stated that regional water resource management plans indicate that an additional 4,000 million litres of water per day will be needed in England by 2050, with more than half expected to come from demand reduction.²

MWELS is intended to contribute to this objective by informing consumers about product water consumption through an A-to-F colour-coded system, encouraging more water efficient purchasing decisions and supporting a shift towards more water efficient products.

AMDEA recognises those objectives. The question is not whether demand reduction matters. It is whether including wet appliances within MWELS is necessary, effective and proportionate when regulated water consumption information is already provided through existing legislation.

2.2 Necessity is the unresolved question

Washing machines, washer-dryers and dishwashers are not products for which information about water consumption is absent. The relevant information is already required by law and displayed to consumers through the energy label, enabling them to compare the water consumption of different appliances and take this into account when making a purchasing decision.

The threshold question is therefore product-specific. Government should identify the additional consumer problem that MWELS is intended to address for these products.

A general case for reducing water demand does not establish the need for a second label on every product that uses water. Nor does the ability to create a water efficiency classification establish that doing so will improve consumer understanding or influence behaviour in a beneficial way.

Government should identify:

- The relevant information gap, market failure or deficiency in the existing requirements;
- The evidence that those requirements are not delivering their intended outcome;
- The additional behavioural or environmental benefit expected from a second label; and
- Why that benefit cannot be achieved through a less duplicative route.

Government has explained how MWELS would operate for wet appliances, including proposed classifications, database registration, QR code arrangements and point-of-sale requirements. Explaining how a regulatory mechanism would operate is not the same as demonstrating why it is needed.

² Defra, *UK mandatory water efficiency labelling: summary of responses and government response* (updated 29 September 2023), "Introduction" and "Summary".

2.3 Inclusion should be assessed against recognised regulatory considerations

The Government's [Regulatory Action Plan](#) states that regulation should be proportionate, evidence-based, non-duplicative and supportive of growth and competitiveness. It also emphasises the need to reduce unnecessary complexity and regulatory burdens.³

Those principles are particularly relevant where additional legislative requirements are proposed for products already subject to an established statutory system.

Drawing on those priorities and established principles of good regulation, AMDEA considers that the inclusion of wet appliances should be assessed against six considerations:

- **Necessity:** has a clear consumer information gap, market failure or regulatory deficiency been identified?
- **Evidence:** is there evidence that existing arrangements are failing to achieve their intended outcome?
- **Proportionality:** are the expected benefits sufficient to justify the additional regulatory burdens imposed?
- **Effectiveness:** is there evidence that the proposed measure will materially improve consumer understanding or behaviour?
- **Consistency:** is the proposal coherent with existing product legislation and wider regulatory objectives?
- **Practicality:** can the measure be implemented efficiently without creating unnecessary complexity, duplication or market disruption?

On the information available to AMDEA, the inclusion of wet appliances has not been demonstrated against these considerations.

3. Government has identified a presentation concern, not a gap in regulated information

3.1 Government has acknowledged that water information already exists

The Government's [consultation response](#) acknowledged that "some water use information is included on energy labels". It explained that this information was not considered sufficiently clear and simple because it was displayed as "a single number and not a banded approach".⁴

The response also stated that, for products requiring a GB energy label that already included some water efficiency information, Government would "not seek more than the existing water usage information collected for the energy label".⁵

That acknowledgement is central to the assessment of wet appliances. Government is not suggesting that consumers currently receive no regulated water information. Its concern is that the existing information is not

³ HM Treasury and Department for Business and Trade, *A new approach to ensure regulators and regulation support growth: Regulation Action Plan* (17 March 2025), particularly "Tackling complexity and the burden of regulation", "Reducing uncertainty across our regulatory system" and "Challenging and shifting excessive risk aversion".

⁴ Defra, *UK mandatory water efficiency labelling: summary of responses and government response* (updated 29 September 2023), Government response to Question 3, p. 9.

⁵ Defra, *UK mandatory water efficiency labelling: summary of responses and government response* (updated 29 September 2023), Government response to Question 3, p. 9.

presented in its preferred format. The issue identified is one of presentation and interpretation, rather than the absence of information.

However, MWELS would not replace the existing numerical water consumption value with a banded classification. The draft Regulations appear to require the MWELS label to display both the water efficiency class and the litres used per cycle.

The proposal would therefore not resolve the stated concern by substituting a band for a number. It would add:

- A second official numerical water consumption value;
- A separate official water efficiency class;
- A differently structured A-to-F scale;
- A separate label and compact online indicator; and
- A separate statutory product information system.

For washing machines, the additional numerical value may also differ from the value already displayed on the energy label because the respective methodologies appear to use different load conditions. This possibility makes it particularly important that Government demonstrates how the proposal would simplify information for consumers.

3.2 A consumption value and an efficiency class are different

AMDEA recognises that water consumption and water efficiency are not identical concepts. A consumption value communicates the amount of water used under defined test conditions or for a prescribed programme. An efficiency class is an interpretive or comparative judgement that places the product within a rating scale.

A banded class may therefore appear to answer a question that a consumer could ask on seeing a litres-per-cycle figure: whether that level of consumption is relatively good or poor.

AMDEA does not dismiss that distinction. However, the existence of the distinction does not establish the need for a separate statutory label.

An efficiency class is not a neutral restatement of a measured value. It is an official judgement derived from a specified methodology, class thresholds, product capacity assumptions, reference programmes and rounding requirements.

Introducing that judgement for products already carrying regulated water consumption information requires evidence that it is technically sound, meaningful to consumers and preferable to improving the interpretation of information through the established energy labelling route.

3.3 Less duplicative alternatives have not been assessed

If Government considers that consumers require additional support to interpret existing water consumption figures, it should explain why that support cannot be provided through:

- Clearer consumer guidance;
- Improved presentation of existing information;
- Enhanced point-of-sale explanations;

- Digital access to supporting product information; or
- Future development of the established GB energy labelling route.

Government has not demonstrated that a separate MWELS label is the only, or the most proportionate, means of addressing its stated presentation concern.

The relevant comparison is not between a numerical figure and a banded class viewed separately. It is between improving an established label and requiring consumers to interpret two official labels presented together.

A preference for a banded presentation does not, by itself, establish a necessity for a second mandatory labelling system, particularly where that second system would retain a numerical value and add a separate classification.

4. MWELS would duplicate an established statutory product information system

4.1 Water consumption is already regulated, displayed and verified

Water consumption for wet appliances is a regulated product parameter. It is not voluntary marketing information or an unverified manufacturer claim.

For washing machines, the existing energy label includes weighted water consumption in litres per cycle for the eco 40-60 programme. This is displayed alongside energy consumption, rated capacity, programme duration, spin-drying efficiency and airborne acoustical noise emissions.⁶

For washer-dryers, the energy label provides information for the washing cycle and the complete wash-and-dry cycle, including water consumption, energy consumption, rated capacity, cycle duration, spin-drying efficiency and airborne acoustical noise emissions.⁷

For dishwashers, the energy label includes water consumption in litres per cycle for the eco programme, together with energy consumption, rated capacity in place settings, programme duration and airborne acoustical noise emissions.⁸

The associated product information sheets provide further information, while technical documentation must support the declared values. Test methods and reference programmes are prescribed, and market surveillance authorities may verify compliance.

The existing legislative requirements therefore do considerably more than place a single number on a label. They regulate how water consumption information is generated, calculated, declared, presented, substantiated and checked.

4.2 Water use forms part of a wider product performance balance

Water consumption cannot be considered sensibly in isolation from appliance performance.

⁶ Energy Information Regulations 2011, SI 2011/1524, Regulation 6 and Schedule 1; Commission Delegated Regulation (EU) 2019/2014, Annex III, point 1.1, and Annexes V and VI.

⁷ Energy Information Regulations 2011, SI 2011/1524, Regulation 6 and Schedule 1; Commission Delegated Regulation (EU) 2019/2014, Annex III, point 1.2, and Annexes V and VI.

⁸ Energy Information Regulations 2011, SI 2011/1524, Regulation 6 and Schedule 1; Commission Delegated Regulation (EU) 2019/2017, Annex III and Annexes V and VI.

A washing machine, washer-dryer or dishwasher must deliver acceptable cleaning, rinsing, drying, fabric care, programme duration, energy efficiency and usability. Reducing the amount of water used does not necessarily improve the overall environmental or consumer outcome if it compromises performance or causes consumers to use additional cycles, pre-rinse dishes, handwash items or adopt other less efficient practices.

The existing ecodesign and energy labelling requirements recognise this relationship by presenting water consumption alongside other product characteristics. MWELS would extract water performance from that broader context and present it through a separate statutory classification.

Before doing so, Government should demonstrate that isolating water performance in this way would support better-informed decisions rather than create an oversimplified impression of overall product merit.

4.3 MWELS would create additional legal and operational obligations

MWELS would not simply reuse an existing data point without further consequences.

As drafted, the Regulations would create additional duties concerning:

- Generation and supply of the MWELS label;
- Preparation and maintenance of a separate product information sheet;
- Supporting technical documentation;
- Product database registration and periodic re-registration;
- Label generator and QR code arrangements;
- Provision of information to dealers;
- Display in physical stores;
- Display on retail websites and online marketplaces; and
- Correction and ongoing management of product information.

These requirements would operate alongside the existing energy labelling system. Suppliers, dealers and persons responsible for online marketplaces would need to manage parallel labels, data flows, digital assets, product records and point-of-sale controls.

The proportionality question is not therefore whether some existing water consumption data can be reused. It is whether the incremental consumer benefit of a second statutory system justifies the additional compliance, systems, supply chain and point-of-sale obligations it would create.

Government has not published a product-specific assessment demonstrating that this test has been met.

5. MWELS risks conflicting official information and consumer confusion

5.1 The same appliance may display two official water consumption figures

The proposed MWELS labels for wet appliances would not display only an A-to-F classification. The draft Schedules indicate that the standard and small labels would also show the relevant litres-per-cycle figure.

MWELS would therefore not replace the numerical figure already displayed on the energy label with a banded classification. It would add another statutory litres-per-cycle value and another official classification.

For washing machines, a significant issue arises concerning the basis of the additional figure.

The existing energy label displays weighted water consumption for the eco 40-60 programme. The weighted figure reflects performance at a combination of full, half and quarter loads under the applicable energy labelling methodology.

By contrast, Government's written clarification indicates that the MWELS calculation would use the full-load result rather than the half-load option.⁹ The proposed methodology also refers to clause 8.6 of BS EN 60456:2016+A12:2023.¹⁰ The water consumption value displayed on the GB energy label is a weighted value calculated using the load conditions prescribed by Regulation (EU) 2019/2014.¹¹

Full-load consumption will not ordinarily be identical to the weighted energy label figure.

Subject to Government confirming the intended calculation and data source, the same washing machine could therefore display:

- One official litres-per-cycle value on the energy label, based on a weighted combination of load conditions; and
- A different official litres-per-cycle value on the MWELS label, based on a full-load result.

Both values might be technically correct within their respective methodologies. That would not make their simultaneous presentation clear to consumers.

A consumer is unlikely to know that one figure represents a weighted combination of full, half and quarter loads while the other represents a full-load result. The consumer may instead conclude that one of the figures is incorrect or may be unable to determine which figure should inform the purchasing decision.

This outcome would directly undermine the stated objective of making water information clearer and simpler. It would also be difficult to reconcile with Government's previous indication that it would not seek more than the water usage information already collected for the energy label.

Government should therefore confirm:

- Which water consumption value must appear on the MWELS label;
- The precise test provision and load condition from which that value is to be derived;
- Whether that value is identical to the figure displayed on the energy label;
- Whether existing energy labelling test results can be used without further testing;
- Whether suppliers would be required to undertake a separate clause 8.6 test series; and

⁹ Defra, *AMDEA MWELS Questions – Response* (2026), response to the question “Which water value is to be used to calculate the Water Efficiency factor (WEf)?”: “it would be based on a full load (not the half load option)”.

¹⁰ Defra and Environment Agency, *Mandatory Water Efficiency Labelling Scheme: Technical Briefing* (16 January 2026), Appendix F, “Testing Method – Washing machines”, referring to clause 8.6 of BS EN 60456:2016+A12:2023.

¹¹ Energy Information Regulations 2011, SI 2011/1524, regulation 6 and Schedule 1; Commission Delegated Regulation (EU) 2019/2014, Annex III, point 1.2(VIII), and Annex IV, point 6(1), as applied and amended in Great Britain.

- How consumers are expected to understand any difference between the two figures.

If a separate test series is required, Government should explain how that requirement accords with its statement that it would not seek more than the water use information already collected for energy labelling.

5.2 The same class letter would represent different positions

The two schemes would also use differently structured classification scales.

The energy label uses seven classes from A to G, with a green-to-red presentation. MWELS would use six classes from A to F and a different colour treatment. [Appendix A](#) provides an illustrative comparison of the energy and MWELS labels for a dishwasher.

The same letter would therefore represent a different relative position under each scheme. A class B under an A-to-F scale does not occupy the same position as a class B under an A-to-G scale.

The risk is especially apparent in online retail settings. The compact MWELS class indicator may be only 10 mm high and may not include the word “water”. It could appear beside the existing energy class arrow wherever the product is displayed with its price.

Consumers could therefore encounter, for example, a blue MWELS “B” beside a green energy class “C”. Without sufficient explanatory context, they may not understand:

- That the letters relate to different performance characteristics;
- That the scales contain different numbers of classes;
- Why the product has received different classifications;
- Whether one class is more important than the other; or
- How the two classifications should influence the purchasing decision.

This creates a clear and foreseeable risk of confusion, rather than a merely abstract concern.

5.3 Government has recognised dual labelling concerns but not published combined label testing

The Government’s consultation response recorded concerns that dual labels could confuse consumers and that, for energy-related products already carrying information about water usage, the proposed water label would need to align with the energy label.¹²

Government responded that the MWELS label and supporting information would be designed clearly to limit confusion. However, making the MWELS label clear when viewed in isolation does not determine whether the combined point-of-sale presentation will be clear.

Government should test the labels in realistic physical and online retail settings. That testing should assess whether consumers understand:

- The purpose of each label;

¹² Defra, *UK mandatory water efficiency labelling: summary of responses and government response* (updated 29 September 2023), response to Question 3, p. 8.

- The relationship between the water consumption figures;
- The relationship between the respective class scales;
- The data and programmes on which each figure is based;
- Why two official water-related signals are being presented; and
- Whether the combined presentation improves or impedes purchasing decisions.

The testing should include examples in which the MWELS and energy labels display different litres-per-cycle figures, as well as differently coloured compact indicators displaying different class letters.

The results should be published before Government decides to retain wet appliances within scope.

5.4 AMDEA's consumer evidence favours consolidation

AMDEA commissioned two waves of nationally representative consumer research in 2026 to understand the way UK consumers engage with home appliance information and labelling.

The first wave, conducted by Opinium among 2,000 UK adults in the first quarter of 2026, found that 67.0% of consumers agreed that new labels should only be introduced if they replace existing labels.¹³

The second wave, also conducted by Opinium among a nationally representative sample of 2,000 UK adults, produced closely aligned findings:

- 64.3% agreed that new labels should only be added if they replace an existing one; and
- 62.8% agreed that new information should be added to existing labels rather than presented separately.¹⁴

The consistency between the two surveys supports a clear conclusion: consumers favour simpler, better-integrated information rather than the accumulation of standalone labels.

For wet appliances, where water consumption already appears through the energy label, Government should demonstrate that MWELS would improve the consumer journey overall. It should not assume that presenting consumers with more mandatory information will necessarily result in better information or better decisions.

6. The proposed methodology is incomplete and has not been adequately validated

6.1 A statutory class requires robust validation

The apparent simplicity of an A-to-F class should not obscure the technical judgement behind it.

A water efficiency class is the product of prescribed test conditions, calculation methods, reference programmes, capacity assumptions, constants, class boundaries and rounding rules. Consumers may understand the resulting class as a straightforward official judgement about product merit without knowing how it was derived.

¹³ AMDEA, *Consumer Insight Report: Spring 2026* (April 2026), based on nationally representative research conducted by Opinium among 2,000 UK adults in Q1 2026.

¹⁴ AMDEA, *Consumer Insight Report: Summer 2026* (July 2026), based on nationally representative research conducted by Opinium among 2,000 UK adults in Q2 2026.

Government should therefore demonstrate that the proposed classifications:

- Can be calculated with legal certainty;
- Are based on complete and coherent methodologies;
- Allow fair comparison between relevant products;
- Meaningfully differentiate products available on the GB market;
- Do not structurally favour or disadvantage particular appliance formats;
- Align with the prescribed test standards and programmes; and
- Are understood by consumers in the intended way.

The material currently available does not provide that assurance.

6.2 The dishwasher class appears incapable of calculation as drafted

Schedule 5 of the draft Regulations provides that the dishwasher water efficiency class is to be determined using a water efficiency rating, or “WEf”.

The calculation requires the application of a water reduction factor, or “WRf”. A value of 0.30 is specified for washing machines in Schedule 6, but Schedule 5 does not appear to specify a corresponding factor for dishwashers.

Government’s written response also records that a water reduction factor is needed for dishwashers but does not supply the required value.¹⁵

Without that value, suppliers and enforcement authorities cannot calculate a dishwasher class from the Regulations as drafted.

The omission is significant. Member analysis provided to AMDEA indicates that the assigned class is highly sensitive to the value selected. A 14-place-setting dishwasher using 9.5 litres per cycle could fall around the class A/B boundary under one plausible factor but could be classified as E if the washing machine factor of 0.30 were applied.¹⁶

Member analysis also indicates that the consumption-per-place-setting figures in Government’s January 2026 Technical Briefing may not be mathematically equivalent to the WEf formula in Schedule 5 across different dishwasher capacities. Those figures should not be treated as resolving the omission of the dishwasher water reduction factor from Schedule 5 unless Government demonstrates that the formula and figures produce consistent outcomes.¹⁷

Government should therefore:

- Specify the dishwasher water reduction factor;

¹⁵ Defra, *AMDEA MWELS Questions – Response* (2026), response stating that a water reduction factor is needed for dishwashers.

¹⁶ Analysis provided to AMDEA by a member, September 2026, applying the formula and class thresholds in Schedule 5 of the draft Regulations to a 14-place-setting dishwasher with water consumption of 9.5 litres per cycle.

¹⁷ Draft Mandatory Water Efficiency Labelling Regulations 2026, Schedule 5, paragraphs 2-3; Defra and Environment Agency, *Mandatory Water Efficiency Labelling Scheme: Technical Briefing* (16 January 2026), “Dishwashers”, p. 4; analysis provided to AMDEA by a member, September 2026.

- Explain how the factor was derived;
- Reconcile the Wef formula in Schedule 5 with the consumption-per-place-setting figures in its Technical Briefing;
- Demonstrate that the formula and those figures produce equivalent outcomes across the relevant range of dishwasher capacities; and
- Publish the effect of the selected factor across the current GB dishwasher market.

No supplier should be required to apply a statutory product classification that cannot be calculated from complete and unambiguous legislative provisions.

6.3 The interaction of the measurement and rounding requirements is unclear

The material reviewed by AMDEA appears to prescribe, or contemplate, different levels and stages of precision without explaining clearly how they interact:

- The cited washing machine test standard appears to require water consumption to be reported to the nearest whole litre;¹⁸
- Government's written clarification refers to bandings and expected rounding to one decimal place;¹⁹ and
- The draft Schedules provide for the fractional water efficiency rating to be rounded down to the nearest half-rating increment.²⁰

These are not merely presentational differences. The stage at which a result is rounded, the precision retained and the direction of rounding may affect the class assigned to a product.

By way of illustration, analysis provided to AMDEA by a member indicates that the boundary between classes A and B for an 8 kg washing machine may be approximately 28.2 litres. If an underlying result of 28.4 litres is reported to the nearest whole litre, it could be expressed as 28 litres and fall within class A. An underlying result of 28.6 litres could be expressed as 29 litres and fall within class B. On that basis, measured results differing by only 0.2 litres could lead to different official classes.²¹

The example does not, by itself, determine the correct classification because that depends on the final legally prescribed calculation and rounding sequence. It demonstrates why those requirements must be complete, internally coherent and unambiguous before the Regulations are laid.

Government should identify clearly:

- The underlying measured value to be used;
- The precision with which that value is initially recorded;
- Whether the value is first reported to the nearest whole litre;

¹⁸ BS EN 60456:2016+A12:2023, relevant provisions on reporting water consumption.

¹⁹ Defra, *AMDEA MWELS Questions – Response* (2026), response to the question on normalisation and rounding rules following the meeting of 24 February 2026.

²⁰ Draft Mandatory Water Efficiency Labelling Regulations 2026, Schedule 6, paragraph 3, and Schedule 7, paragraph 4.

²¹ Analysis provided to AMDEA by a member, September 2026, applying the formula and class thresholds in Schedule 6 of the draft Regulations to an 8 kg washing machine.

- The stage at which each rounding operation takes place;
- The applicable number of decimal places at each stage;
- The rule governing calculations near a class boundary;
- The treatment of values falling exactly on a boundary;
- Whether the Wef is to be rounded down before or after comparison with the class thresholds; and
- Which requirement takes precedence if the cited standard and the draft Regulations prescribe different approaches.

Government should also confirm whether existing energy labelling results provide acceptable evidence or whether a separate test series would be required.

If a separate five-run test series under clause 8.6 is required, Government should identify the resulting testing, cost and implementation implications and explain how that position accords with its statement that it would not seek more than the water use information already collected for energy labelling.

6.4 The source and calibration of the methodology should be published

AMDEA understands that elements of the proposed methodology, including the Wef formula, the washing machine base consumption calculation, the water reduction factor and the half-increment rounding approach, may reflect methodology used under the Australian WELS scheme.

Government should confirm whether that understanding is correct.

If the proposed methodology has been adapted from another jurisdiction, Government should identify:

- The source of the methodology and constants;
- The product population and test programmes against which they were originally calibrated;
- Whether they were recalibrated for the applicable European standards and eco programmes;
- Whether they were recalibrated for products placed on the GB market; and
- What validation was performed before their inclusion in the draft Regulations.

Government should also publish the modelled distribution of products across the proposed A-to-F scale.

If most products fall within one or two classes, the label may not provide meaningful differentiation. If the highest classes are effectively unattainable, the scale may operate as a punitive judgement rather than a useful consumer comparison. Either outcome would be relevant to the necessity and effectiveness of the proposal.

6.5 The methodology may distort comparison between appliance formats

The dishwasher methodology raises a further concern relating to product size and format.

Member analysis of product data indicates that consumption is influenced by appliance type, including whether the product is tabletop, compact, slimline or full-size, and not solely by the number of place settings.

A classification structured principally around water consumption per place setting may favour larger, full-size appliances and disadvantage smaller-format products. Consumers often select a smaller appliance because of

household size, available kitchen space or installation constraints. A smaller-format dishwasher may therefore receive a poorer water class even though it is the appropriate product for the consumer's circumstances.

Government has suggested that smaller products tend to be less efficient, that consumers are likely to compare products of similar size, and that consumers would benefit from knowing that smaller-capacity products may be less efficient.²²

Those assertions require evidence. A statutory class visible at the point of sale is likely to be understood as a general official judgement of efficiency. Government should demonstrate that the methodology will not create distorted comparisons or penalise consumers whose choice is constrained by space, capacity requirements or installation conditions.

6.6 Technical drafting requires further scrutiny

Schedule 7, paragraph 5, of the draft Regulations refers to "BS EN IEC 6512:2020+A12:2023".²³ This appears to be a typographical error: the title, ISBN and publication date given in the accompanying footnote correspond to BS EN IEC 62512:2020+A12:2023. Government should confirm the intended reference and correct the drafting accordingly.

This apparent error, together with the missing dishwasher factor, the potentially non-equivalent dishwasher formula and table, and the unresolved measurement and rounding requirements, reinforces the need for complete technical validation before wet appliances are subjected to the proposed classifications.

7. The proposed GB-Northern Ireland distinction raises unresolved legal and UK internal market issues

7.1 Wet appliances would be covered in Great Britain but not Northern Ireland

As drafted, the Regulations would apply the MWELS provisions for washing machines, washer-dryers and dishwashers in Great Britain but not Northern Ireland.²⁴

In Northern Ireland, relevant EU ecodesign and energy labelling legislation continues to apply under the Windsor Framework.²⁵ In Great Britain, corresponding energy information requirements apply through domestic legislation drawing on the same underlying product-specific measures.²⁶

The legal mechanisms differ, but wet appliances in both markets already display regulated water consumption information through energy labels.

Government should explain why an additional mandatory water label is considered necessary in Great Britain but is not to apply to comparable products in Northern Ireland.

²² Defra, *AMDEA MWELS Questions – Response* (2026), response to AMDEA's question on size bias and potentially distorted class outcomes following the meeting of 24 February 2026.

²³ Draft Mandatory Water Efficiency Labelling Regulations 2026, Schedule 7, paragraph 5 and accompanying footnote.

²⁴ Draft Mandatory Water Efficiency Labelling Regulations 2026, Regulations 1(3)-(4)(a) and 4(1)(b)-(d).

²⁵ Windsor Framework, Article 5(4) and Annex 2, paragraph 9; Commission Regulations (EU) 2019/2023 and 2019/2022; Commission Delegated Regulations (EU) 2019/2014 and 2019/2017, as amended.

²⁶ Energy Information Regulations 2011, SI 2011/1524, Regulations 3 and 6 and Schedule 1, as amended.

7.2 Government should explain whether the distinction reflects incompatibility with the energy label

A direct question arises from the territorial distinction:

Did the continued application of EU energy labelling legislation in Northern Ireland, including Article 6(c) of Regulation (EU) 2017/1369, contribute to the decision not to apply MWELS to energy-related products there? If so, how did Government assess the risk that an additional water label might mislead or confuse consumers concerning the consumption of water during use?

Government should also explain how it assessed the corresponding risk in Great Britain under the energy information legislation applicable there. Wet appliances placed on the GB market already display mandatory energy labels containing regulated water consumption information. Although the applicable legal mechanisms differ, consumers in both markets encounter an energy label that addresses water as a resource consumed during use.

If the exclusion of energy-related products from MWELS in Northern Ireland was adopted for a different reason, Government should identify that reason clearly.

7.3 Energy labelling legislation addresses confusing resource information

Article 6(c) of Regulation (EU) 2017/1369²⁷ provides that suppliers and dealers of products covered by relevant delegated acts must not provide or display other labels, marks, symbols or inscriptions that are likely to mislead or confuse customers concerning the consumption of energy or other resources during use.

Water is an “other resource” consumed during the use of washing machines, washer-dryers and dishwashers.

The draft MWELS Regulations contain their own provision concerning misleading information,²⁸ but it is framed by reference to labels that do not comply with MWELS and that are likely to mislead or confuse consumers about the water efficiency class.

These provisions address different questions.

A label might comply with the technical requirements of MWELS and accurately state the MWELS class while its combined display with the energy label nevertheless creates confusion concerning water consumption or relative efficiency.

The relevant assessment must therefore consider the labels together. Government should publish its legal and consumer assessment of the combined presentation before retaining wet appliances within scope.

7.4 GB-only obligations may affect common supply arrangements

Wet appliances are commonly managed through shared product data, stock and distribution systems across Great Britain, Northern Ireland and Ireland.

Applying MWELS to Great Britain alone may well require market-specific product information, labels, QR codes, retail data and online display arrangements. Depending on the final implementation model, it may also affect

²⁷ Regulation (EU) 2017/1369 of the European Parliament and of the Council, OJ L 198, 28 July 2017, p. 1, Article 6(c), as applicable in Northern Ireland; and the version of Regulation (EU) 2017/1369 applicable in Great Britain, as amended, Article 6(c).

²⁸ Draft Mandatory Water Efficiency Labelling Regulations 2026, Regulation 15(1).

packaging, stock management, warehousing, product variants and controls intended to prevent products or information being directed to the wrong market.

Some physical stock consequences may be reduced if compliance can be achieved entirely through digital and point-of-sale measures. However, a digital model would still require market-specific data flows, accurate label generation, managed URLs or database links, dealer and marketplace controls, correction processes and continuing legal responsibility.

Government should publish a UK internal market assessment addressing the effects of applying MWELS to energy-related products in Great Britain but not Northern Ireland. It should also clarify how the proposed GB requirements would operate for products managed through common Great Britain, Northern Ireland and Ireland stock and distribution arrangements, including the controls expected where products may be redirected between markets.

8. Conclusion and action requested

8.1 Wet appliances should be removed from scope

AMDEA supports effective water demand management and the provision of clear, reliable product information.

Its concern is specific to household washing machines, washer-dryers and dishwashers. These products already display regulated water consumption information through established ecodesign and energy labelling legislation.

For wet appliances, MWELS would not fill an absence of mandatory information. Nor would it simply replace a numerical value with a banded rating. It would establish an additional water efficiency classification, an additional official litres-per-cycle presentation and a separate statutory product information system alongside the existing energy label.

Government has not demonstrated that this duplication is necessary, effective or proportionate.

8.2 The available evidence weighs against a second label

The case for excluding wet appliances rests on several connected findings:

- Regulated water consumption information is already provided;
- Government has identified a presentation concern rather than an information gap;
- The proposed MWELS label would display a litres-per-cycle value as well as a class;
- The MWELS label may display a different official litres figure from the energy label because the two figures appear to be based on different load conditions;
- Consumers may encounter two differently structured class scales and compact indicators;
- AMDEA's consumer research favours consolidation rather than label accumulation;
- The dishwasher calculation appears incomplete as drafted;
- The dishwasher formula and supporting table may not produce equivalent outcomes;
- The interaction of the measurement and rounding requirements is unclear and may affect the class assigned near a boundary;
- The methodology has not been shown to be adequately calibrated or validated;

- The GB-Northern Ireland distinction remains unexplained; and
- No product-specific assessment has demonstrated that the incremental benefits outweigh the additional costs and complexity.

Taken together, these matters do not support the imposition of a second mandatory point-of-sale label.

8.3 Action requested before the Regulations are laid

AMDEA therefore asks Government to remove household washing machines, washer-dryers and dishwashers from the scope of MWELS before the Regulations are laid.

This would allow the Scheme to focus on product categories for which a clearer consumer information gap may exist, without duplicating the established energy labelling requirements applicable to wet appliances.

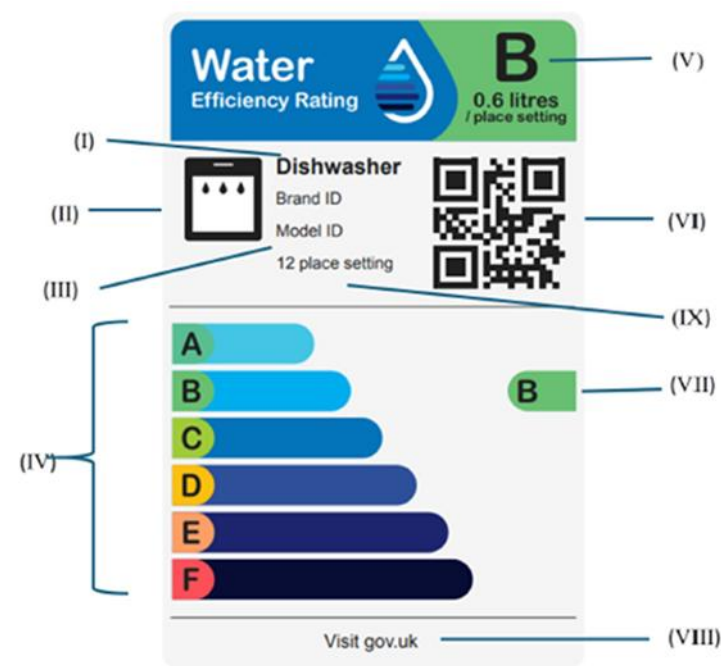
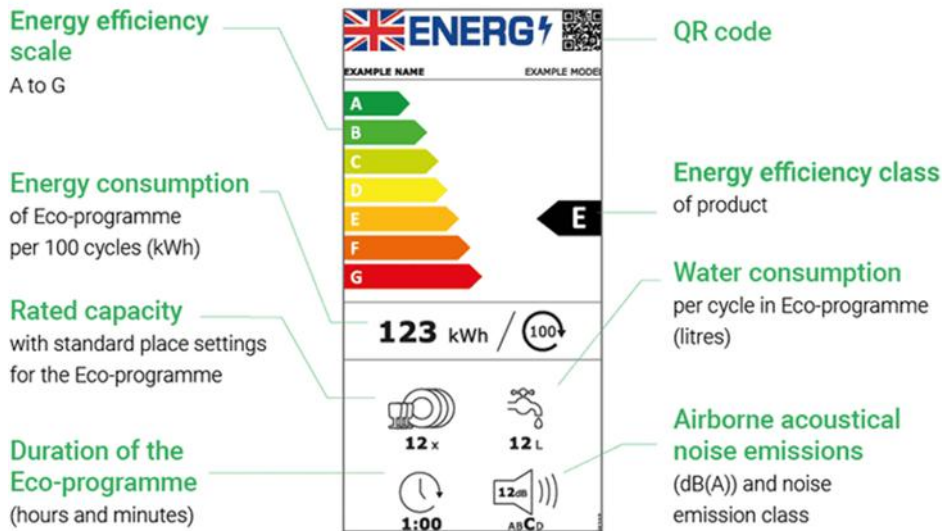
If Government nevertheless proposes to retain wet appliances, it should publish before the Regulations are laid:

- Its product-specific evidence of the consumer information gap or market failure;
- The results of combined label consumer testing in realistic physical and online retail settings;
- Its assessment of compatibility with existing energy labelling legislation;
- Confirmation of the precise water consumption values, test provisions and load conditions to be used;
- Confirmation of whether existing energy labelling test results can be used or separate testing is required;
- The complete and corrected product methodologies;
- Unambiguous measurement, calculation and rounding requirements;
- Evidence validating the formulae, constants, class boundaries and market distribution;
- An updated Impact Assessment, including a product-specific cost-benefit analysis for washing machines, washer-dryers and dishwashers;²⁹
- Confirmation of whether the Impact Assessment has been submitted to the Regulatory Policy Committee and, if not, the basis on which independent scrutiny is considered not to be required; and
- Its assessment of the GB-Northern Ireland distinction and resulting UK internal market impacts.

Until that evidence has been published and assessed, the inclusion of wet appliances would be premature.

²⁹ Defra, *Consultation on Mandatory Water Efficiency Labelling* (September 2022), Annex F; Defra, *Summary of responses and government response* (29 September 2023), “Impacts”, confirming that updated figures would be reflected in the Impact Assessment accompanying the statutory instrument.

Appendix A: Illustrative comparison of energy and MWELS labels (dishwashers)



- point I: product type description (e.g. "Dishwasher");
- point II: product information icon (i.e. dishwasher image);
- point III: brand ID and model ID;
- point IV: performance panel;
- point V: water efficiency class with the litres used per cycle based on the eco cycle, and without the litres used per cycle based on the eco cycle for the compact labels;
- point VI: QR code;
- point VII: marker positioned at the same level as the appropriate bar within the performance panel, indicating the product's water efficiency class;
- point VIII: government website URL;
- point IX: space for additional information.