



# electric Handdryer Association

Hygienic · Environmentally friendly · Efficient · Economical

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## **Position Paper on electric Hand Drying**

**The electric Hand Dryer Association (eHA)** is pleased to work with European Commission to achieve its objectives for the Eco Design Initiative and adopting a Clean Energy policy. We believe our collective efforts and technological developments of recent years have been aligned with these goals. In connection with the 2016-2019 Work Plan, the eHA would like to highlight the below key success factors as relates to our industry. We hope to demonstrate that electric hand dryers can play a meaningful role in allowing the EU to successfully transition to a low-carbon economy.

### ***Key success factors for hand drying regulation:***

1. Electric hand dryers have favorable characteristics as compared to other hand drying methods as discussed below.
2. The use of electric hand dryers compared to other hand drying methods contributes to a low carbon economy. Studies show that using hand dryers as a drying system produces up to 75% less carbon emissions than other systems
3. The electric hand dryer has also proven to be the most economical hand drying system. Controlling public spending is a continuous objective within the EU, and specifically for the 2016-2019 Work Plan. Choosing hand dryers for public places can help meet this goal, particularly high speed, energy efficient classes of dryers.
4. Electric hand dryers are a hygienic hand drying solution. However, several studies have been published that show that no one drying system is more hygienic than another. Additionally, the industry has added new features to dryers (e.g. HEPA filters, antibacterial materials) to further improve their hygiene for sensitive locations.
5. Hand dryers should not be regulated for sound levels beyond existing statutes. It is generally the case that the speed of a hand dryer is directly correlated with both energy efficiency and noise level, such that a faster dryer saves more energy, but is also louder.
6. There are many types of hand dryers. The pending legislation must be carefully crafted to appropriately consider each option.
7. It is in the EU's interest to preserve their domestic hand dryer industry. The industry consists of mostly small and medium-sized companies many of which are headquartered and manufacture within the EU. The implementation of the regulation should enable them to continue to have the necessary resources to maintain their contribution to the EU's economy in terms of employment and innovation.