

Mr. Stephan Kolb
European Commission
DG Energy Directorate
ENER.DDG1.C.3
200 rue de la Loi

1049 Brussels

17 September 2010

ANEC/ BEUC additional comments on possible Ecodesign requirements for water heaters

Dear Mr Kolb,

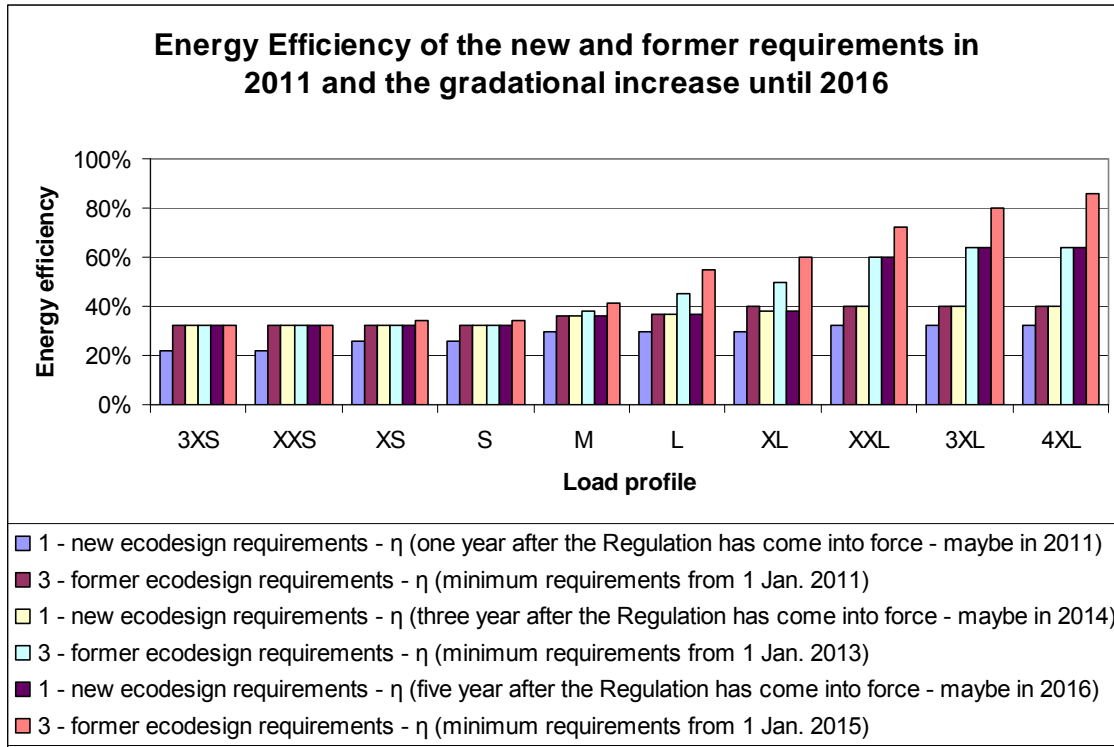
Thank you for consulting us on the updated working documents outlining possible Ecodesign and Energy Labelling requirements for water heaters.

ANEC and BEUC strongly support the development of specific Ecodesign and Energy Labelling requirements for this product group and encourage the Commission to progress rapidly. In this context, we ask you to take the following consumer views into account:

Timing of the Ecodesign measure

The ambition level of the measure has changed several times since the first Consultation Forum meeting on water heaters which was held in February 2008. The values proposed today for the three steps of energy efficiency requirements for different boiler sizes vary little for small water heaters (3XS until M size water heaters) and considerably for larger water heaters (mainly the load profiles of XXL-4XL) as demonstrated by the figure below.

.../...



Source: Öko-Institut, 2010.

In comparison with the originally proposed values, the new requirements are far less ambitious for the large load profiles.

As the technical solutions for more energy efficient appliances are already available and the Ecodesign requirements will be introduced much later than envisaged in 2008, we consider however that the steps of ecodesign requirements including those for hot water storage tanks should be implemented earlier.

NOx and CO limit values

We call for the introduction of limit values for NOx emissions after three years instead of five years. We also call for limit values for CO emissions to be set within an ambitious timeframe.

Energy Labelling scale

We reiterate our demand to develop a fuel independent Energy Label based on the closed A-G scale. Introducing an Energy Label for water heaters with three additional classes on top of class "A" from the outset - as has been proposed by the Commission in the latest working documents - would not be in line with the requirements of the new Energy Label Framework Directive which allows introducing additional classes on top of class "A" only to accommodate future technological development over time.

Pictograms need to be clear

The Commission aims at developing an Energy Label which is as much as possible language neutral. However, from a consumer perspective the pictograms on the labels for water heaters are far from self-explanatory and can even be misleading.

.../...

As mentioned in our previous comments on the same product group, the sizes "S", "M" and "L" are usually relatively understood by consumers when related to clothes but this is not the case in relation to water heaters for which no harmonised sizing scale exists or is known to the public. The indication of the time span of 22h00 to 7h00 on the label is also unclear. The information should be given in written text in the language that is understood by the consumers in the country where the product will be placed on the market. This is easily feasible for businesses (which already translate systematically e.g. price related information or use instructions) and is already done, whether mandatorily or voluntarily, for many other product groups in the EU.


Support to consumers for the transition towards more energy efficient water heaters

As electric resistance storage water heaters are still installed in a large number of households, it has to be ensured that consumers will find valid alternatives for replacement at reasonable costs. Member States should thus support consumers through e.g. national incentive programmes.

Kind regards,



Sylvia Maurer
Senior Policy for Safety and Environment
BEUC



Laura Degallaix
Programme Manager for Environment and
Services
ANEC