

Comments of the Netherlands on the working documents regarding ecodesign requirements for and energy labelling of water heaters and hot water storage tanks

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The Netherlands welcome the Commission proposals for an Ecodesign implementing measure and an energy label for water heaters and hot water storage tanks. These are important product groups in the framework of achieving the EU climate change goals because the (potential) energy savings from this products are very large.

In general we support the Commission document and ask the Commission to adopt the measures as quickly as the relevant (formal) procedures allow.

General remarks

We noticed the following major changes with regard to foregoing version.

Energy Efficiency requirements

The energy efficiency requirements for the second phase are reduced for the maximum load profile XL. Although we understand the reason behind this change, we ask the Commission not to further reduce any of the energy efficiency requirements.

Third party certification

Third party certification is no longer required in the current proposal. The notes do not give a reason for this change; can the Commission explain why third party certification is no longer required?

Maximum load profile as a basis for requirements and determination of label class

Using only the maximum load profile simplifies the testing and verification; we support this. However, in order to make more clear that the energy efficiency requirements and the label class are based on measurements at the maximum load profile, we suggest the following:

- ecodesign requirements, Annex I (2), under (1) and Annex V (a): add “maximum” to “load profile” in the heading of the table(s);
- ecodesign requirements, Annex I (2), under (2): add “maximum” to “load profiles” (both in the heading and in the requirement);
- ecodesign requirements, Annex I (2), under (4) (c), (ii): add “indicated by the appropriate letter(s) according to Table 1 of Annex II” after “maximum load profile”;
- ecodesign requirements, Annex II (2), under (b) (ii): delete “declared”. The load profile applied is the maximum load profile. Although this is also the load profile that should be provided (declared) by manufacturers, it avoids confusion to use only the wording “(maximum) load profile”;
- ecodesign requirements, Annex II (3), under (i): change “declared” into “maximum”;
- energy label, Annex II (1), under (1) (a) (i) VI: change “declared” into “maximum” (as in (b) (i) IX)

Addition of “3XS” load profile

With the addition of the 3XS load profile, the exclusion of water heaters that do not meet the output performance of the smallest load profile (i.e. 3XS) is deleted. Does this implicitly mean that any water heater (according to the definition of Article 2 (1)) that does not at least meet the 3XS load profile is banned from the market?

For water heaters with 3XS load profile no limitation of the storage volume V is required (Annex I (2), under (2)). We suggest to set the maximum storage volume for the 3XS load profile at 7 litres.

Hot water tanks; scope

We support the inclusion of hot water tanks.

Regarding the scope, also products that deliver (hot) drinking water are included. While we support this, we assume that beverage machines (connected to an external water supply) delivering coffee, tea or soup etc. (and not only the hot water) are out of scope.

Smart control bonus reduced

We support the reduction of the smart control bonus.

Definition of equivalent water heater not included

In the current draft no definition of an equivalent water heater is included. Why?

Installer label included

We support the installer label (Energy label, Article 4 (3) under (a)).

Detailed comments

- Ecodesign requirements, Annex I point 3 under (1): the limit for the standing loss of storage tanks with volume V should read: $16,66 + 8,33 \cdot V^{0,4}$ Watt.
- Ecodesign requirements, Annex II: There is no heading for Table 1.
- Ecodesign requirements, Annex II, Table 1, useful flow rate should be always “f” (and not “F”).
- Ecodesign requirements, Annex V under (a): please add “%” behind the efficiency values.
- Ecodesign requirements, Annex V under (b) should read: $5 + 4,16 V^{0,4}$ Watt, where V is the storage volume in litres.
- Energy label, Annex V point 3 under (a): “Article 4, point 3(b)” should be “Article 4 (3) (a)”.
- Energy label, Annex VI: There is no heading for Table 1.
- Energy label, Annex VII point 4: the formula for Q_{total} should read:
$$Q_{\text{total}} = \{0,6 \cdot 366 \cdot (Q_{\text{ref}} + Q_{\text{distref}}) - Q_{\text{sol}}\} / \{ \eta_{\text{awhbu}} + (0,1 \cdot \eta_{\text{awhbu}} - 0,1) \}$$

Since $(0,1 \cdot \eta_{\text{awhbu}} - 0,1)$ is a correction on η_{awhbu} , meaning that the efficiency of the water heater should be lower when used as a backup, we suggest the following wording of the formula:
$$Q_{\text{total}} = \{0,6 \cdot 366 \cdot (Q_{\text{ref}} + Q_{\text{distref}}) - Q_{\text{sol}}\} / \{ \eta_{\text{awhbu}} - (0,1 - 0,1 \cdot \eta_{\text{awhbu}}) \}$$
- Energy label, Annex, IX, Table 8: the E-F class boundaries for the 3XS and XXS maximum load profile (23 %) do not correspond with the ecodesign energy efficiency requirements for these maximum load profiles (22 %). We suggest to change the class boundaries to 22 %.
- Working Document on transitional methods of measurement and calculation, Part 2, 1(5): the definition of storage water heater is not equal to the definition used in Annex I, 1(5). We suggest to align the definitions.
- Working Document on transitional methods of measurement and calculation, p. 22, last sentence: table 9 is not referenced in the text above.