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UW/FVKN/LRCN

Comments on working document for possible standby and off mode requirements

Dear Mr Brisaer,
Dear Mr Eifel,

During the consultation forum on 19 October 2007, it was highlighted that the preparatory study only investigated a limited set of products. The study did not include building integrated products and connected products. An extrapolation to these products which might possibly include heating boilers and water heaters is in our opinion not justified.

The working document refers to the WEEE directive 2002/96/EC to define the scope of the future implementing directive. We do not agree to this as already today uncertainties are created due to different interpretations by Member States. We strongly recommend that the legal basis of the eco-design directive is maintained in the interest of enforcement and market surveillance. Any reference to an Art. 175 directive should be regarded as not being supportive in that respect.

Heating boilers and hot water heaters are subject to preparatory studies which will result in implementing measures. The preparatory studies on boilers and water heaters deal in detail with on-mode, off-mode, start-stop and auxiliary energy*. These requirements are dedicated to boilers and water heaters and differ from the standby and off mode requirements that apply to electrical plug and play appliances. Due to these fundamental differences we request that boilers and water heaters are excluded from the scope of a stand-by off mode implementing measure.

We look forward to your response and remain,

Yours faithfully,


Udo Wasser
Secretary General


Felix Van Eyken
Regulatory Affairs Director

Encl.: References in lot 1 and lot 2 studies.

References in lot 1 and lot 2 studies

www.ecoboiler.org

Boilers - Task 4

- 2.4.4. heat loss in excess combustion air
- 2.4.5 fuel loss
- 2.6.2 flue gas losses in on-mode
- 2.6.3. losses through the generator envelope in on-mode
- 2.6.4. standing losses in off-mode
- 2.6.5. start stop losses
- 2.9. auxiliary energy

www.ecohotwater.org

Water heaters - Task 4

- 2.4.4. heat loss in excess combustion air
- 2.4.5 fuel loss
- 2.6.2 flue gas losses in on-mode
- 2.6.3. losses through the generator envelope in on-mode
- 2.6.4. standing losses in off-mode
- 2.6.5. start stop losses
- 2.9. auxiliary energy
- 6.3.2. standby energy consumption (substations)
- 6.3.3. start stop losses (")
- 6.3.4. auxiliary energy (")
- 7.3.2. off-mode (gas/oil fired instantaneous combis)
- 7.3.3. start stop losses (")
- 7.3.4. auxiliary energy (")
- 8.3.2. off-mode (gas/oil fired integrated combis)
- 8.3.3. start stop losses (")
- 8.3.4. auxiliary energy (")
- 9.3.1 on-mode (separate cylinders)
- 9.3.2. off-mode (")
- 9.3.3. auxiliary energy (")
- 10.3.1 on-mode (gas/oil storage water heaters)
- 10.3.2. off-mode (")
- 10.3.3. auxiliary energy (")
- 11.3.1 on-mode (gas/oil instantaneous water heaters)
- 11.3.2. off-mode (")
- 11.3.3. start-stop (")
- 11.3.4. auxiliary energy (")
- 12.3.1 on-mode (electric storage water heaters)
- 12.3.2. off-mode (")
- 12.3.3. start-stop (")
- 12.3.4. auxiliary energy (")
- 13.3.1 on-mode (electric instantaneous water heaters)
- 13.3.2. off-mode (")
- 13.3.3. start-stop (")
- 13.3.4. auxiliary energy (")
- 15.3.1 on-mode (heat pumps)
- 15.3.2. off-mode (")
- 15.3.3. start-stop (")
- 15.3.4. auxiliary energy (")