EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR ENERGY

Directorate C - Renewables, Research and Innovation, Energy Efficiency
C.4 – Energy Efficiency: Buildings and products

31 January 2020

Minutes
Ecodesign and Energy Labelling Consultation Forum (X03609) on local space heaters (review) 10 September 2019

1. WELCOME AND INTRODUCTION

After welcoming participants, COM introduced the meeting with administrative remarks concerning the organisation of DG ENER and directorate C, including the arrival of a new Director General and the split of unit C3.

Participants: See "Attendance list" in Annex

2. ADOPTION OF THE AGENDA

The agenda was adopted without modification.

3. PRESENTATION OF THE DISCUSSION PAPER ON THE COMBINATION OF THE ENERGY LABEL FOR LOCAL SPACE HEATERS AND AIR-TO-AIR HEAT PUMPS

COM presented its discussion paper on the possibility of enabling the consumer to compare energy efficiencies for local space heaters of less than 50 kW and air-to-air heat pumps of less than 12 kW by means of the energy label, based on the assumption that these products serve the same purpose, as this is currently the case for space heaters. Adopting the same approach for local space heaters has advantages and disadvantages.

Based on this presentation, COM requested members of the Consultation Forum to provide feedback on:

- introducing an energy label for air-to-air heat pumps ≤ 12 kW and local space heaters ≤ 50 kW that is based on the same energy efficiency classes;
- the inclusion of electric local space heaters in the scope of this label;
- the inversion of the energy efficiency figures, $(1/\eta_{(s,h)})$, to avoid that the $\eta_{(s,h)}$ of heat pumps head to infinity with decreasing conversion factors;
- the addition of the energy efficiency number to the energy label in proximity to the arrow to allow more differentiation between products of the same category; and

- proposed energy efficiency classes.

4. FEEDBACK AND DISCUSSION WITH STAKEHOLDERS

ECOS gave a short presentation in support of its position to adopt stricter regulations for electric heaters.

NL, IT, recalled that the current absence of electric local space heaters from the label is the result of a compromise based on the assumption that including them would not stimulate improvement of their energy efficiency.

BE, DK, DE, NL, AT, expressed support for the idea of merging labels. No local space heaters, except heat pumps, are expected to see technological improvements. It is important to train/inform consumers on the various existing technologies and the label can be a tool for that. No rebound effect should be expected. DE considers that commercial heaters should not be included in such a label.

IT, NO oppose a merge. This would be similar to what happened for lighting and could lead to a rebound effect, whereby competition on price would lead to lower efficiency; the reasons for the original compromise are still valid and other tools exist to demonstrate that heat pump are more efficient (IT). Heat pumps and electric local space heaters have different functions (IT, NO). Electrical local space heaters can represent a better alternative than fossil fuel-based local space heaters (NO).

NL, SE consider that even with high use of renewable energy, efficiency is important. Peaks in the electricity grid need to be reduced (SE).

AT expressed concern that with the current proposal that excludes heat pumps above 12 kWh, the best class for 12 to 50 kWh would only be D, E, F.

FR declared that the question is relevant but needs to be further assessed. BE would like to know what was the effect of merging lots 1 and 2 (COM clarified that this should be available at a later stage during the process). SE would like to see an assessment of the capacity of the proposed label to drive product development. Granularity is very important.

SE stated that EPREL should make it possible to develop applications that will allow the consumer to compare systems.

BE considered that for future reviews, it would be necessary to take into account energy mixes for online labelling.

INFORSE/ECOS, ANEC/BEUC, EPEE, EEB supported the idea of a single label. Thresholds that would allow for 2 classes for electric local space heaters could be sufficient (INFORSE/ECOS, EEB). It is important for consumers to be able to compare and to raise awareness (ANEC/BEUC, ECOS). Having no label is worse since competition will then be only on price (EEB, ECOS). Even with limited granularity, there could be strong ecodesign requirements (ECOS). Having a separate label would be misleading (EEB). EPEE supports the inclusion of the primary energy efficiency but not the inversion of the energy efficiency figures.

M. Raquet (Energy adviser of EP Greens/EFA group) asked how consumers are supposed to compare if there is no label.

EHI questioned the usefulness of indicating the energy efficiency percentage, with regard to consumer understanding, inflated claims and ability of market surveillance authorities to verify.

APPLiA, EUHA and EHI oppose the merge. This would remove all incentives to improve and could be misleading to consumers (e.g. for underfloor heaters), and indicating the energy efficiency score would not be sufficient. Products are not comparable, as the average electric local space heaters is less than 2kWh while fuel base local space heaters are higher, the infrastructure is different and average hours of use is different. Electrical local space heaters emit less GHG. There is a risk of price competition, to the detriment of product quality.

COM closed the discussion and indicated that options would be studied during the next steps (Impact Assessment). Comments should be provided by 10/10/2019.

5. PRESENTATION OF THE MAIN FINDINGS OF THE REVIEW STUDY

Viegand Maagøe presented the main findings of the review study on local space heaters.

BE stated that with regard to third party conformity assessment, in the framework of this regulation, the risk assessment should be related to energy efficiency rather than health.

Following a question form DE regarding heaters up to 300 kW, Viegand Maagøe clarified that they had no country specific data for each product group.

6. DISCUSSION OF THE DRAFT REGULATION AMENDMENT

NL expressed its preference for a new regulation rather than an amendment.

Article 1 – Subject matter and scope

DE, SE considered that controls should be included in the scope.

Article 2 - Definitions

Consistency should be checked between the new terminology proposed in the definitions and the rest of the regulation the new terminology (ANEC/BEUC).

It should be clarified that the heat output of electric space heaters means the heat output form the storage core (APPLiA).

(1)

IT expressed its preliminary disagreement with the proposed definition, moving from a well-defined function (“reach and maintain a certain level of human comfort”) to a contribution to a function (“contribute to a certain level of human thermal comfort”). It is not clear who would define the purpose of appliances. EHI agrees that the definition could be an issue, providing the example of towel heaters of 40 W that should not be considered local space heaters. One could envisage excluding everything below 100 W.

DE, DK, NL considered that "with the purpose of" is clear enough.

"Contribute to a certain level" should be clarified as it could be ambiguous (IT), but could be clarified in the FAQ or guidelines (NL).

DK proposes reformulating to "local space heater means a device which converts electricity into heat with the purpose of contributing …"

(7)

DE – "sealed" is the opposite of "open", "connected" or "placed under" would be more appropriate.

(8), (33), (34)

DE – unclear what kind of appliances fall under these definitions, proposed merging definitions. After an exchange with Viegand Maagoe, DE stated that more thinking is needed.

(9)

DE suggests deleting "that is equipped with a cord supply and plug by the manufacturer"

(12)

EUHA – previous definition was better.

(16)

This definition should be deleted (APPLiA).

(22)

A fan heater can be intended as an air heating product and therefore be excluded from the regulation. It is suggested to add "intended to distribute hot air also outside the space where it is situated" (APPLiA). The new definition is aligned with Regulation 2016/2281 (COM).

(31)

Towel heaters below 40 W should not be included (EHI).

Definition should be changed to "Towel rail **heater** means a fixed **electric**…" (DE).

(32)

The definition should not only refer to oven but also heating plates (APPLiA).

Article 7 – Review

ECOS, ANEC/BEUC, INFORSE/ECOS claimed the proposal was not ambitious enough and that stricter ecodesign requirements for energy efficiency and for emission of nitrogen oxides should not be postponed. Resource efficiency should be included in the current review (ECOS).

DE, IT, ECOS argued that outdoor units are inherently inefficient. INFORSE/ECOS proposed limiting the power of outdoor heaters.

DE considers that the main parameters for gas and liquid fuel are already covered by other framework legislation and does not see the benefit of adding third party certification. INFORSE/ECOS considers third party certification should be mandatory.

COM clarified that fume and odor removal inclusion is unintended. DE considers it does not fall under ecodesign. INFORSE/ECOS, ANEC/BEUC consider it should be included.

Annex I – Definitions applicable to Annexes II to V

DE proposes to add definitions for thermal efficiency, idle mode and off mode. Watts should be used instead of kilowatts.

With regard to definitions 7 and 8, DE stated that it is not possible for market surveillance authorities to measure auxiliary energy consumption separately. As electric heaters adjust by on/off, it might be argued that minimum electric power requirement is null. There should be a standard method of measurement. Definitions 6, 7 and 8 should not apply to electric local space heaters.

SE considers that "idle" mode should in fact be "thermostat off" (idle is used in other products for something else).

Annex II – Ecodesign requirements

The application date should be coherent with the heating season (EHI, APPLiA).

1.

Number of digits after the comma should be harmonised (NL). COM clarified that the figure given for local space heaters equal or below 250 W was a typo and would be corrected (46,1 instead of 41,6).

EEB questioned the absence of resource efficiency requirements and called for challenging the impact of the life span of electric local space heaters that people tend to consider as disposable. Viegand Maagoe remarked that the recycling rate was very high.

IT suggested to delete definition (xiii) and that everything below 200 W should be exempted.

DE asked whether it made sense to have a separate category for towel rails, as there is only little difference with fixed electric heaters. It should be clarified how eco-design requirements apply to products without controls to prevent legal dispute.

SE welcomed the inclusion of towel rails heaters; some are so big that they act as local space heaters. There should be a working time limit for towel rails. Big towel rails should have the same requirements as 'normal' space heaters.

NL does not support the idea of having a lower wattage limit for application. It might be a good idea to merge towel rails above 250 W with normal local space heaters.

APPLiA supports the proposal for having a different category. The annual use of towel rails is lower than other local space heaters. EHI supported different requirements for towel rails because of lower time of use.

ANEC/BEUC reiterated that the current proposal is not ambitious enough and claimed that the review paid only little attention to energy efficiency. Viegand Maagoe argue that splitting the open and close fronted categories was a major progress.

INFORSE/ECOS stated that more could be done in terms of efficiency for gaseous and liquid fuels as more efficient technologies are already available and on the market. 250 W threshold for towel rails is too high; it should be decreased to 150 W to make a difference between towel warmers and local space heaters.

2.

ANEC/BEUC, supported by INFORSE/ECOS asked why some product categories are excluded from NOx requirements and requested that other pollutants be included (e.g. polyaromatic hydrocarbons, soot, etc. identified in the review study). This is very critical for flueless products.

3.

ECOS considered that clear visibility and legibility criteria are needed. Reparability should be considered.

IT, DE, SE welcomed the new approach for slave heater controls. IT, supported by various participants, suggested using pictograms for controls requirements. Listing functions necessary to comply with the ecodesign requirements is not easy (IT). The product does not always include the controls (DE, APPLiA). A list of compatible controls should be listed, a simplified approach (e.g. classes of controls) should be looked into.

SE, ANEC/BEUC, INFORSE/ECOS regretted the lack of resource efficiency requirements. The inclusion of electronics is on the increase in an environment that is not ideal due to high temperature. Reparability and the availability of spare parts is therefore key.

There are heaters on the market that have part of the controls integrated and part external. They do not have complete functionality (insufficient functionality) to comply with ecodesign (APPLiA). A CE declaration has to be given by the supplier and that should be based on a complete solution.

IT, NL, there should be no reference to the energy label.

Not clear how to deal with F(4) in case of an external controller (APPLiA).

Annex III – Measurements and calculations

SE, NL suggests introducing low power modes definitions and requirements (off, standby, network standby), like in regulation 1275/2008. EHI agreed and argued that local space heaters cannot be at the same time in off mode and thermostat off (should not be called idle). Low power modes should be added to the formula.

DE and ANEC/BEUC proposed banning pilot flames in domestic appliances (functional requirement).

There should be an additional column for towel rails heaters in tables 7 and 8, which should not replace the radiant heaters column (DE). COM clarified that the visibly glowing radiant should use the factors of the fixed electrical heaters.

APPLiA stated that visibly glowing and fixed heaters should be rated differently as they are different.

Viegand Maagoe clarified that the "useful efficiency" terminology was changed to "thermal efficiency" for commercial heaters only.

APPLiA proposed a definition for idle mode: "minimum power consumption of the product while it is active by constantly monitoring the room temperature for x hours without heat demand but will activate the heating function in case of an upcoming heat demand. The transitional period is not considered as idle period as define in EN 60675". APPLiA also proposed changes to the F(4) formula (see written comments).

ANEC/BEUC proposed to convert all Net Calorific Value to Gross Calorific Value for consistency.

INFORSE/ECOS stated that there is a case for more regulation on electric heaters, for example requiring presence detection for all electronic controls. There should also be a requirement for accuracy of electronic thermostats for electric local space heaters and mechanic thermostats for other local space heaters.

Annex V – Indicative benchmarks referred to in Article 6

Annex V should be updated to reflect the new Conversion Coefficient (DE). For commercial local space heaters, benchmarks are outdated for luminous local space heaters from 92 to 95% and for tube local space heaters from 88 to 98%.

EHI indicated it would welcome an update of the FAQ and guidelines (e.g. guideline 31), a transitional period of 2 years and an entry into force coinciding with the heating season.

For table 2, auxiliary power consumption for maximum and minimum heat output is included in the heat output (APPLiA). Idle and off should be added in the table. Watts should be used rather that kilowatts.

7. AOB

None.

ANNEX – Attendance List for 10 September 2019

Commission Services	
DG ENER	C.3
European Parliament	
Greens / EFA Group	
Member States	
BE	Federal Ministry for Economy
	FPS Health, Food Chain Safety and Environment
BG	Ministry of Economy and Energy
CZ	Ministry of Industry and Trade
DK	Danish Energy Agency
DE	Bundesanstalt für Materialforschung und –prüfung (BAM)
	Ministry of Environment, Climate Protection and the Energy Sector
	UBA
IE	Enterprise Ireland
FR	Ministère de l'Ecologie, du Développement Durable et de l'Energie
IT	ENEA
LV	Consumer Rights Protection Centre
LU	ILNAS
NL	Netherlands Enterprise Agency
AT	Energy Agency
PL	Ministry of Energy
PT	Directorate General for Energy and Geology
SK	Ministry of Economy
FI	Finnish Ministry of Environment
SE	Swedish Energy Agency
NO	The Norwegian Water Resources and Energy Directorate
Organisation	
ANEC	
APPLiA	
BEUC and ANEC	
CLASP	
ECOS	
EEB	
EHI - European Heating Industry	
EHPA	
EPEE	
EUHA	
Eurovent	
Inforse Europe	
JRAIA	
Liquid Gas Europe	
ORGALIM	
VHK	
VIEGAND	
Viegand Maagøe	