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Position of ECOS, EEB, Friends of the Earth Europe, WWF EPO, CAN Europe and INFORSE Europe on the EC Working Documents on the Ecodesign and Energy Labelling of kitchen appliances (coffee machines, ovens, hobs, grills and domestic range hoods)

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Coffee machines

Environmental NGOs welcome the Commission's proposal to potentially incorporate coffee machines into a regulation on kitchen appliances, following on from the latest consultation forum on the 18th April. If this would not be the case, and instead only standby guidelines would be issued – as had been proposed before this meeting- this could set a dangerous precedent for other product groups; we see a clear risk that no regulation at all is considered. Lack of action would further mean wasting thousands of Euros of public money spent on the preparatory study and Commission staff working on this product group, especially in times of austerity. **We therefore insist on drawing up Ecodesign measures and labelling proposals, as appropriate, on all product groups including coffee machines**, in order to bring about the calculated savings. Should -despite the aforementioned arguments – only guidelines be adopted, we would expect as a minimum, the recommendations from market monitoring organisation Topten to be taken on board.¹

We are ready to work with the Commission, Member States and all interested stakeholders to identify ways of moving forward with a specific regulation for this product group.

Oven, hobs, grills and domestic range hoods

We welcome the working documents on domestic and commercial ovens, hobs, grills and domestic range hoods. We strongly support the fast adoption of implementing measures on these products, in order to bring about the related energy savings.

¹ http://www.topten.eu/english/recommendations/recommendations_coffee_machines.html&fromid=

Scope

Considering the size and market growth of microwaves, it is disappointing that they are excluded from the scope. Instead, for products with lower saving potentials such as these, the starting point could be an energy label, ecodesign requirements related only to standby as well as information requirements to foster innovation and differentiation.

Ecodesign requirements

Domestic electric ovens/hobs as well as commercial gas ovens/hobs are the products with the highest savings potentials, according to the preparatory study. **Priority should be given to setting minimum requirements for these products.**

We question the lack of improvement in the energy performance of domestic electric hobs in Tier II, since radiant and induction hobs can achieve much higher efficiencies (the latter up to 84% according to online market data). The same question applies for commercial hobs at Tier II. We understand that by increasing the efficiency requirements in this Tier for electric hobs, it could wipe out the standard, energy guzzling ones and leave on the market only the induction and radiant hobs, which come at a higher cost. If however a label is implemented at Tier 1, this could create further competition and subsequently bring prices down. **Ecodesign requirements at Tier II for domestic and commercial hobs therefore need to be more ambitious.**

According to the preparatory study, the LLCC for commercial appliances (Lot 22: deck ovens and combi steamers, Lot 23: electric hobs – fry tops and gas hobs) is identical (or very close) to the BAT, so there is no significant cost barrier to achieve this. **We therefore call for Tier II to be set at the BAT for electric combi-steamers and rack ovens as well as for electric deck ovens.**

Concerning the different timing of entry into force for the domestic products compared to the commercial ones, we appreciate that this is to allow for the development of further standards concerning the commercial sector. **We strongly urge the Commission to issue the respective mandates and speed up the standardisation work** in order to establish the standards as soon as possible, since the adoption of ecodesign measures for the commercial sector depends upon these.

Energy labelling

We support a comprehensive and comparable labelling, i.e. **labelling for all appliances based on primary energy**, therefore not differentiating between gas and electricity. This has been already put forward for boilers and water heaters therefore consistency should be ensured.

We also call for labelling of domestic and commercial hobs, for which the working document states that early measurements show only 15% differentiation in the energy performance of domestic hobs. However, in Task 6 of the preparatory study it is indicated that electric hobs have 25% variance. Moreover, more than 20% difference between induction and radiant hobs is suggested by the base case annual estimated consumption figures: radiant = 240kWh/year; induction = 190kWh/year, in the preparatory study.

We also regret that no energy labelling is introduced for commercial ovens; this sector seems underdeveloped in ecodesign terms and needs further incentives to develop its improvement potential. Labelling would give greater visibility to more efficient appliances as well as facilitate Green Public Procurement. **Energy labels for hobs (domestic and commercial) as well as commercial ovens should be introduced.** While there are large

variations within commercial ovens, there are some standard types that have a large share of the market; these could be targeted for Ecodesign measures and Energy Labelling.

Concerning ovens, labels should include not only the energy efficiency class but also the average **annual energy consumption (kWh/year)**, where applicable. At the consultation forum on the 18th April, there appeared to be a concern amongst manufacturers that existing appliances may be downgraded under the new labelling scheme. It needs to be stressed that the new labelling scheme is different to the existing scheme so old labels are irrelevant and this should not be seen as downgrading. It is not acceptable that the new label is elaborated in such a way as to reduce the number of the so called 'downgrades'. **Consideration should be given to informing consumers that the domestic oven labelling is an entirely new scheme – for example, rebranding the label could help to minimise confusion.**

Moreover, classes A-G should be spread more evenly (currently 17.5 and 20 EEI units of range on A and B and only 10 for other classes) to avoid favouritism for A (too many ovens are in this category under the existing labelling scheme for domestic ovens) and B classes as well as minimising incentives for improving A and B ovens, especially if they are at the bottom end of their label range. Concerning the initial 6 months transition period, during which both labels could be applied, we fear that this could lead to confusion. A clear switch over date would minimise this.

For domestic range hoods, it is not clear why four versions are put forward. **The label should start with A-G**, allowing the higher classes (A++, A+++) to promote innovation.

Concerning the verification procedure, clarifications should be given concerning the variation in the tolerance limits (from 1 to 10% for different measurements).

Measurement methods

For ovens, we understand that the measurement method does not specify in which mode the oven shall be tested, which is crucial since most ovens nowadays are able to operate in several modes. **The ovens should be tested in all dry heating (no-steam) modes without grill or microwave.** Normally this is hot air heating and direct heating. The energy efficiency index should be calculated as the average of the results for the different modes. Without the inclusion of all normal operating modes, the manufacturer can choose arbitrarily the most efficient mode for Ecodesign and Energy Labelling, which is currently a problem with the labelling of domestic ovens.

Regarding the energy efficiency calculation of gas appliances, the proposed method is highly speculative. The compensation factor for gas appliances seems as an attempt to negate the Primary Energy Factor. This compensation factor has no justification due to the following reasons:

- Legal: there are no clear European wide regulations that require additional extraction equipment to be installed with gas ovens, in addition to the extraction needed for a cooking zone.
- Technical: gas oven manufacturers assert that gas ovens are perfectly safe in use without turning on additional extraction equipment.
- Behavioural: many gas oven users either don't have additional extraction equipment, or if they do, would not normally switch it on while only the gas oven is on.

Consequently, **no additional energy consumption should be taken into account when calculating the energy efficiency of gas ovens.**

Concerning the measurement standard for hobs, a revision of this is required to ensure consistency and comparability in implementing the potential energy labelling for these products (e.g. different units are used for measuring water quantities: g,kg,L etc).

Finally, both domestic and commercial hobs/grills are measured for energy consumption for one hour of operation – this is unlikely to be representative of typical domestic grill use as most domestic cooking is less than ½ hour nowadays.

Information requirements

It is important to **include websites of retailers/suppliers** in the information requirements (and not only those of manufacturers), since most online sales will be through these.

For domestic ovens, the inclusion of the **annual energy consumption** and standby power would be useful information to users. Similarly, for domestic hobs indicating the annual energy consumption, standby power as well as the **Energy Efficiency Index (EEI) for the whole hob** rather than each cooking zone would make information clearer to consumers.

In the Technical Documentation for domestic ovens, the **Annual Energy Consumption (AEC)** should be included.