**Position of ECOS, EEB, Friends of the Earth Europe, WWF EPO, CAN Europe and INFORSE Europe on the 2nd 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 industry proposal concerning the legally binding application of the coffee machine guidelines. The fast adoption of these would be a step in the right direction and enhance the energy efficiency of these appliances. We would however call for the incorporation of the following:

**The auto-power down should not be allowed to be deactivated by the user or any other function.** Such a possibility would negate the savings generated from these guidelines. Moreover, the programming functions should not allow the excessive prolongation of time until the machine turns into standby/off mode (e.g. up to 15 hours, as found in some real life cases). We recommend that **default values of the levels put forward in the draft shall be identical with the maximum programmable times for these functions.**

## Oven, hobs, grills and domestic range hoods

We welcome the revised working documents on domestic ovens, hobs, grills and domestic range hoods as well as the various improvements made since the previous draft. We strongly support the fast adoption of implementing measures on these products, in order to bring about the related energy savings.

### Scope

We understand that commercial appliances, some of which exhibited considerable

potential energy savings potential, were removed on grounds of insufficient data and in order not to delay the process any further. However, the existence of DIN 18873-12 or similar standards concerning the measurement method on commercial ovens should be taken up at the European level. **We therefore recommend speeding up the related standardisation process by providing the necessary mandate** to the European standardisation organisations. This is essential since the adoption of ecodesign measures for the commercial sector depends upon the availability of harmonised standards. Moreover, a reference that **consideration should be given to commercial products during the revision of the measure should be at least made in the recitals** of the future regulation.

We welcome the incorporation of the **combined ovens with microwave function** in the scope; however, considering the size and market growth of microwave ovens it is disappointing that these are still excluded from the scope. Instead, for products with lower saving potentials such as microwave ovens, the starting point could be an energy label (which would also allow the comparison of combination microwave ovens with the traditional microwave ovens thus fostering innovation and differentiation), combined with ecodesign requirements related only to standby, as well as information requirements. An energy label for microwave ovens is already used in other parts of the world (e.g. China).

## Ecodesign requirements

We applaud the introduction of a Tier III for domestic ovens and hobs in line with the **Top performer approach**. This Tier has already been used in other implementing measures and will send the long term signal to industry regarding these products.

### HOBS

We **welcome the improvement in the energy performance of domestic electric hobs** at Tier II, as we had previously pointed out. **There is still room for improvement at Tier III, if an energy label for hobs is introduced at Tier 1**, which could stimulate competition and differentiation for these ovens. This would subsequently bring prices down, since radiant and induction hobs can achieve much higher efficiencies (the latter up to 74%[1]). We understand that by increasing the efficiency requirements in this Tier for electric hobs, it could wipe out the solid plate, energy guzzling ones and leave on the market only the induction and radiant hobs that come at a higher cost; this would be addressed by the energy label. It should be highlighted that the Tier III for other Ecodesign measures – such as circulators - wiped out more than 90% of the market; the ambition should be therefore maintained.

### OVENS

We **welcome the improvement in the energy performance of electric and gas fired ovens** at Tier II and Tier I respectively, as we had previously suggested. We question why the Tier II requirements for gas fired ovens have been relaxed with respect to the previous Working Document (WD).

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[1] Vale and Vale, 2000. The New Autonomous House. New York: Thames & Hudson, p137

### HOODS

**The improvement in the energy performance of hoods at all tiers is a positive step forward** as well as the decrease of the time in between the various tiers. We understand that Tier 1 can be made more ambitious, since only 1 out of 19 hoods would be wiped out from the market, based on Danish data.

## Measurement methods

### OVENS

As highlighted in our previous position paper, we understand that the measurement method for ovens 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. In the current proposal, 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.

### HOBS

**The removal of the compensation factor from the energy efficiency calculation of gas appliances is commended upon**, since it appeared as an attempt to negate the Primary Energy Factor and was highly speculative.

**We support a measurement method that would take into account the energy used throughout the entire cooking process, considering actual consumer behaviour** (for example, one that considers the heat source turned down after the boiling point and not before, as stipulated in the current draft of the CLC standard, which does not reflect real life cooking conditions). We call for the use of a harmonised method.

We also seek clarification as to why the method for measuring efficiency for gas hobs requires 3.7kg of water in 220mm pot compared to 2 kg of water in 220 mm pot for electric hobs.

## Market surveillance/ Verification

Concerning the verification procedure (for both energy labelling and ecodesign requirements), we welcome the decrease of the tolerance limit variation for the EEI values from 8% to 5%.

## Information requirements

It is important to **include the 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. Moreover, in the Technical Documentation for domestic ovens,

the **Annual Energy Consumption (AEC)** should be included.

## Energy labelling

We strongly support a comprehensive and **comparable labelling for all appliances based on primary energy**, therefore not differentiating between gas and electricity. Such a label has been already put forward for boilers and water heaters therefore consistency should be ensured. The energy label should be addressing the entire appliance and not just specific zones of this.

### HOBS

We **call for the energy labelling of domestic 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. **When comparing with lot 1, the current proposal on energy labelling of boilers has 3 classes with a range of efficiencies at 6%**. This could be easily taken up for hobs, based on the above, considering also that the measurement accuracy of the standards under development concerning the energy consumption is less than 1%. According to tests carried out by Sweden, hobs on the market today can show up to 35% difference in energy efficiency performance.

### OVENS

Concerning ovens, labels should include not only the energy efficiency class but also the average **Annual Energy Consumption (kWh/annum)**, where applicable. AEC is more useful to consumers than per cycle since it clearly conveys the relative proportion that any particular appliance contributes to the total energy use of a home and the relative impact of each appliance. This in turn can help consumers identify the most energy consuming appliances and subsequently influence consumer behaviour towards reducing their energy use. If AEC can be used for range hoods, then it should be used for all appliance groups.

At the first consultation on kitchen appliances, there appeared to be a concern amongst manufacturers that existing appliances would be downgraded under the new labelling scheme. **We reiterate that the new labelling scheme is different to the existing scheme so old labels are not relevant 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 15 and 20 EEI units of range on A++, A+/A respectively and only 10 for class B ) to avoid favouritism for A+/A (too many ovens are in this category under the existing labelling scheme for domestic ovens). 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.

**HOODS**

We welcome the removal of A+ to A+++ for the kitchen hoods and the use of an A – G, as raised in the first consultation, since it will provide more clarity. The introduction of the AEChood will allow for total annual calculations for a home and should be maintained. However, the top classes are not nearly as ambitious (e.g. A - <80 (previously A+++ < 39). Since there is a risk that the A label be filled within a reasonable time, we propose that A-label is shifted upwards and becomes similar to the previously proposed A++ label, at a later stage.

**END**