

Template for comments

Please review the Task Reports, fill in this template and send it per email to:

eco-kettles@isi.fraunhofer.de

Please note that the comments might be published online (e.g.

https://ec.europa.eu/energy/studies_main/preparatory-studies/ecodesign-and-energy-labelling-preparatory-study-electric-kettles_en) and used for the work of this preparatory study

Comments from: ECOS-EEB-Coolproducts	Date: 28.10.2020	Document: Submitted after the exchange with stakeholder	Project: Ecodesign preparatory study for electric kettles (DG ENER)
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Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ Question (e.g. Table 1)	Type of comment ¹	Comments	Proposed change	Observations of the project team
			ge	ECOS would like to express its support of assessing the possibility of an energy label for electric kettles. This is important to be able to award bonuses to kettles with specific environmentally friendly features. Without an energy label these bonuses would only have the effect of making sure certain types of kettles would still be able to be sold on the EU market even though the general environmental performance is poor. This is not the best way of making use of bonuses.	Assess the possibility of an energy label for kettles, especially in light of being able to award meaningful bonuses to kettles with specific environmentally friendly features.	
181-189			te	Is there no measurement phase foreseen for lower temperature settings? As presented, there are various temperatures possible (60° for fine green tea, 70° for green tea, 80° for white tea, 95 for coffee, black tea, pre-boiling water for cooking) and should be accounted for.	If temperature settings are possible, measure the same as for maximum temperature (heat up 1 litre from cold to each set temperature individually). Include this into the calculation for the average yearly amounts for the yearly energy consumption calculation. Alternative: measure the lowest possible temperature for the kettle.	
194-206			te	See comment above. Other than the Topten approach, neither is taking different temperature settings into account.	If temperature settings are possible, measure the same as for maximum temperature (heat up 1 litre from cold to each set temperature individually). Include this into the calculation for the average yearly amounts for the yearly energy consumption calculation. Alternatively assign a bonus per temperature setting. e.g. if the lowest temperature is 80°, the bonus is -5%. but the lowest temperature is 60°, the bonus is 10%. Define bonus for the most common temperatures of kettles with temperature setting.	
205-206			te	Is the yearly consumption calculated as stated in option c (Topten approach)?	Define the calculation of the yearly consumption or reference it clearly to the previously presented calculations.	
217-239			te	There is no plan on how to account for different temperature settings.	Define how different temperature settings are taken into account (rewarded with a bonus for yearly energy or for energy efficiency). The benefits of different temperature settings can be best accounted for with an energy label.	

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244			te	ECOS would like to express its support of providing the indicative time of boiling.		
246			te	A visible temperature display of the water in the kettle (during heating up, but also during the keep-warm-phase) could help the user to decide whether they want to re-boil the water in the kettle or if it is still hot enough for their purpose.	Add a point 2.4 for a visible temperature display (especially with double-walled and keep-warm-function).	
246			te	It is important that the pre-setting of the keep-warm-function is always off by default and will return to "off" once the cycle is terminated (e.g. after the 30min automatic shut off, when a user starts to boil water again for the next coffee and wants the keep-warm-function on, they have to actively set it to "on" again.)	Add a point 2.5 to design the keep-warm-function in such a way that every time the user wants it, it needs to be switched on, the default is always "off", also after it has been turned to "on", it needs to return to "off" after the cycle has ended.	
262-269			te	In the presentation a stakeholder comment on recyclability states that a common definition for "Recyclable" is missing. We would like to point out that this cannot count as a reason not to request electric kettles to be recyclable, given that quite a number of European product regulations (such as in the case for packaging or end of life vehicles) are introducing requirements for the recyclability of products. To do so they refer to operational definitions for recyclability (e.g. as part of the revised essential requirements for packaging, operational definitions to indicate if a packaging is "recyclable" are now using a combination of quantitative metrics such as recycling rates of packaging together with design for recycling criteria) . We therefore propose to follow a similar approach for kettles: a requirement for the recyclability of at least 75% of the weight of kettles, to be demonstrated based on recycling data relating to the material streams found in kettles (e.g. plastic, steel, copper, ...) and dedicated design for recycling guidelines such as, for example: dismantling & separability of each material (or at least 75% of the kettle), existence of collection and treatment logistics for material streams found in kettles, possibility		

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				of treatment of each material of the kettle within a certain geographical range, proof of uptake of such recyclate in new products, etc.		
262-269			te	In line with the European Green Deal and the Circular Economy Action Plan, the study should assess the setting of a minimum mandatory requirement in new kettles for the recycled content from Post-Consumer Recyclate (PCR). This will drive the use of high-quality recycled material in the production of new kettles and help reduce reliance on virgin raw material.	Assess the setting of a minimum mandatory requirement in new kettles for the recycled content from Post-Consumer Recyclate (PCR)	
			re	As referred to in slide 33 of the study team's presentation ECOS has a preference to assess Energy performance through the Topten approach with: measure energy for 1l, with highest and if applicable, each temperature, the least the lowest possible temperature (2 or more cycles) Keep warm function for 30min Using the EEI with a reference kettle is the least preferred option, especially since the other options would work well for the assigned purpose. Reference models should only be used if the other options (a-c) cannot be applied.		

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