



Brussels, 17 June 2020

WG4 - Water heaters – Impact assessment Assistance to the European Commission

Remarks on the draft interim document

ECOS, the EEB and the Coolproducts campaign followed the preparatory study for the review of the water heater Ecodesign and Energy Labelling Regulations and provided [written comments](#) on the preparatory study in May 2019 and [on the discussion document for WG 4](#) in March 2020. The following comments are preliminary remarks on the draft working documents for discussion on 25 June.

We have noticed two main issues with the proposal, regarding the change in the ecodesign requirements and the energy labelling scale.

2.6 – Ecodesign requirements

The proposal weakens the energy efficiency requirements for large size electric water heaters (from XXL to 4XL). While we see a rationale for an increase of the efficiency requirements for fossil fuel and heat pump water heaters, **we see no rationale for weakening the requirements for electric water heaters** and allowing these large electric water heaters on the market again. There are more energy efficient and cost-effective alternatives available than electric water heaters in this class size¹.

2.8 Product Labelling of water heaters

As previously stated, we support a thorough rescaling of the energy label for water heaters now, also taking the opportunity to change the PEF from 2.5 to 2.1 and to revert to an A-G scale, so as to avoid consecutive changes in the label in 2021 or 2022, and then again a rescaling to an A-G scale in 2026. The proposal to add A++ and A+++ classes simply to avoid a rescale of the label is not sensible. A clear signal needs to be sent to consumers to drive them towards the most efficient technologies as soon as possible and changing the scale twice will be extremely confusing.

In the Annex 1, another proposal is made for a rescaling, which includes a logical distribution of label classes, but that also has three empty classes in the bottom of the scale (E, F, and G) as well as use of three classes above “A”. We propose instead to rescale to a closed A-G label scale, where the proposed “A+++” is replaced with “A” and the proposed “D” is replaced with “G”. This will be a logical label scale that will be understandable for consumers and that will follow the decision to rescale all energy labels to avoid label classes above “A”.

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¹See Least Life Cycle Costs - Special review study on Water Heaters - 2016 page 29 - https://www.ia-wh-art7.eu/downloads/Special%20Review%20Water%20Heaters%20FINAL%20REPORT%2020160711_.pdf