



Raising standards for consumers



The Consumer Voice in Europe

CONSUMER ORGANISATIONS' COMMENTS ON ECODESIGN AND ENERGY LABELLING FOR LOCAL SPACE HEATERS

European Commission's draft legislative
proposal of July 2019

Contact: Aline Maigret – sustainability@beuc.eu – anec@anec.eu

Reference: BEUC-X-2019-098 - 19/12/2019
ANEC-PT-2019-ErP-004

**ANEC, THE EUROPEAN ASSOCIATION FOR THE CO-ORDINATION OF CONSUMER REPRESENTATION IN
STANDARDISATION**

Av. de Tervueren 32, box 27 – 1040 Brussels - +32 (0)2 743 24 70 - www.anec.eu
EC register for interest representatives: identification number 507800799-30

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • consumers@beuc.eu • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45



Funded by the European Union



Raising standards for consumers



The Consumer Voice in Europe

Why it matters for consumers

The use of heaters contributes to the monthly budget that consumers dedicate to their energy bill. Thanks to Ecodesign and Energy labelling measures, these appliances are becoming more energy-efficient over time and generate savings and benefits for consumers. Lower emissions will also improve air quality in Europe and reduce related health problems.

Summary

Local space heaters (LSHs) are covered at EU level by Ecodesign requirements and Energy labelling since 2018, under Commission Regulations (EU) 2015/1188 and (EU) 2015/1186 respectively. We welcome that the European Commission is now reviewing the Ecodesign requirements to reflect technological developments and current usage patterns.

In this paper, ANEC and BEUC give recommendations regarding the draft legislative proposal put forward by the European Commission in July 2019.

In a nutshell, we believe the European Commission should:

- Go ahead with its proposal to merge the Energy labels for heat pumps and LSHs;
- Ensure that also electric heaters are included in the same label;
- Include 'slave heaters' in the Ecodesign scope as proposed, and ensure the rules are as robust as possible;
- Consider investigating a ban of 'flueless heaters';
- Set stricter Ecodesign requirements for Nitrogen Oxides (NOx) emissions.

ANEC, THE EUROPEAN ASSOCIATION FOR THE CO-ORDINATION OF CONSUMER REPRESENTATION IN STANDARDISATION

Av. de Tervueren 32, box 27 - 1040 Brussels - +32 (0)2 743 24 70 - www.anec.eu
EC register for interest representatives: identification number 507800799-30

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • consumers@beuc.eu • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45



Funded by the European Union

1. Ecodesign proposal

1.1. Definitions: room for improvement

Under 'definitions', the following elements should be reworked and clarified as they might cause confusion and legal uncertainty:

- Under Article 2, the proposed definitions often lack clarity and could lead to confusion. For example:
 - New definition (8) of 'balanced flue local space heater' seems to have been mixed up with 'closed fronted, open combustion local space heaters'.
 - New definition (34) of 'balanced flue/closed combustion local space heater': the definition does not refer to the supply of combustion air which is in our view essential for this type of device.
- The new wording used for product categories is not systematically updated throughout the text (e.g. in Annex II point 2 on NOx emission requirements).
- New product categories (e.g. "balanced flue local space heaters") are not systematically added in the various specifications of the old text (e.g. with respect to the NOx emission requirements).

→ The European Commission should double check all the proposed definitions and category names throughout the document. New product categories should also be verified.

1.2. Scope: 'slave heaters' must stay in

Regulation 2018/1188 currently exempts slave heaters¹ from any requirements. As there is broad consensus that this exemption creates ambiguity about which products are included (creating a loophole in the regulation),² the European Commission proposes to remove the scope exemption for slave heaters, i.e. to include them in the scope of the regulation. We welcome the European Commission's effort to do so, despite the intrinsic difficulty of the issue.

¹ According to definition (16) of Art. 2 of (EU) 2015/1188: "slave heater means an electric local space heater which is not capable of autonomous operation and needs to receive signals sent from an external master controller, not being part of the product but connected to it by pilot wire, wireless, power line communication or an equivalent technique, in order to regulate the emission of heat into the room in which the product is installed".

² This is according to the final preparatory study: <https://www.eco-localspaceheaters.eu/the-study>

Raising standards for consumers

The Consumer Voice in Europe

For consumers to be able to establish a correct combination between the two products (the slave heater and the control unit), a univocal terminology is essential. The legal text should therefore specify what exactly is meant by 'product category' (e.g. one of the definitions of Art.2, with the exact same wording) and by 'functions' (e.g. one or more functions of Tables 7 & 8, and combinations thereof). We would also welcome that the European Commission provides for each type of electric heaters the list of combinations that satisfy the minimum requirement. Lastly, we note that the issue of the treatment of the auxiliary energy use of the controls of slave heaters remains unsolved, and further investigation would hence be needed.

- **We agree with the European Commission that slave heaters should be included in the scope (i.e. that the exemption from the scope is deleted), taking into account EN 60675 revision in which these products are considered.**
- **A unique terminology should be used for all products.**
- **The issue of the auxiliary energy use needs further study and clarification.**

1.3. The review should happen sooner

We agree with the European Commission that "the appropriateness of fume and odour removal requirements" should be assessed in the next review. This issue is important from a consumer perspective both when it comes to comfort and health. However, waiting 5 years before assessing the need for stricter Ecodesign requirements for energy efficiency seems too long to achieve a 55% reduction of greenhouse gas emissions by 2030 – as committed by the European Commission's president Ursula von der Leyen.

- **The European Commission should envisage a revision sooner than 5 years after the entry into force.**

1.4. More ambitious energy efficiency requirements

More ambitious energy efficiency requirements should be put forward by the European Commission. In Article 7 of Regulation (EU) 2015/1188, the evaluation of stricter requirements for energy efficiency is explicitly mentioned as first point. The 1.5-page analysis in the (250+ page) review study does not seem to be an adequate basis for concluding an update of these requirements are not needed.

- **The European Commission should put forward stricter Ecodesign requirements for energy efficiency.**

ANEC, THE EUROPEAN ASSOCIATION FOR THE CO-ORDINATION OF CONSUMER REPRESENTATION IN STANDARDISATION

Av. de Tervueren 32, box 27 – 1040 Brussels - +32 (0)2 743 24 70 - www.anec.eu
EC register for interest representatives: identification number 507800799-30

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • consumers@beuc.eu • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45



1.5. More ambitious requirements for NOx emissions

Like all combustion devices, fuel LSHs emit nitrogen oxides (NOx) when in use. NOx can have a harmful effect on the environment and human health - contributing to e.g. respiratory problems such as asthma.³ We are disappointed with the level of ambition proposed by the European Commission for the following reasons:

- **The requirements set in the proposal are no improvement to the existing ones.** Requirements on NOx emissions currently apply to liquid and gaseous fuel local space heaters, and the proposal does not look into expanding the rules to more types of LSHs. The EU Commission justifies the lack of new requirements to the [lack of data of NOx-levels against the current minimum requirement in the Regulation]. It is in our view an invalid reason for not putting forward new requirements, especially given the importance of the issue.
- **The NOx requirements do not cover all product categories,** notably 'open to chimney heaters' and 'flueless heaters'.⁴ The rationale behind such an exclusion from the NOx requirement should be detailed by the European Commission. Those products would in our view need very strict NOx requirements, as users sometimes directly inhale the combustion gases.
- **The newly defined product categories ('balanced flue', etc.) should also be covered by an adequate NOx requirement.**

- ➔ **The European Commission should properly evaluate the current NOx emission requirements in the Regulation against real life data to assess whether stricter requirements should be put forward.**
- ➔ **The NOx requirements should cover all types of combustion heaters, both existing and newly defined categories, without exception.**

1.6. Ecodesign must insist on resource efficiency

The proposal omits to put forward requirements on resource efficiency, which is regrettable. Making such requirements would fit the Ecodesign Work Plan 2016-2019 as well as the EU's 'circular economy' objectives.

³ <https://www.epa.gov/particle-pollution-and-your-patients-health/health-effects-pm-patients-lung-disease>

⁴ For flueless heaters we recommend the European Commission to investigate the possibility to set requirements that would ban these appliances from the market. See section 1.10.

Raising standards for consumers

The Consumer Voice in Europe

- **The European Commission should put forward requirements on the availability of spare parts for a minimum number of years and with a defined delivery time.**
- **A list of spare parts needs to be defined for each type of sub-products covered under this measure.**

1.7. Make information easy to understand

The way any information will be communicated should be carefully thought through and consumer understanding should be assessed via a consumer survey. As a matter of example, it is unclear whether consumers understand the sentence 'This product is not suitable for primary heating purposes. Furthermore, the requirements should be refined to ensure the visibility of such information, such as minimum character size.

- **We recommend the European Commission to check consumer understanding of any information requirement via a consumer survey (as allowed under the Energy labelling framework).**

1.8. Provide complete efficiency information

We disagree that the efficiency values do not need to be provided in the information sheet for electric resistance heaters. Indeed, in Annex II of 2015/1188, the efficiencies for combustion heaters must be reported according to Table 1. However, in Table 2, the efficiency of electric resistance heaters is not included. We believe that those consumers who are interested in a more technical level of information should be properly informed about the energy-guzzling nature of these devices.

- **The European Commission should ensure that the information sheet (Table 2) includes the efficiency value for electric resistance heaters.**

1.9. Aim for a full 'pilot flames' ban

During the review study, industry reported that commercial heaters that are still on the market no longer contain pilot flames. This led the European Commission to propose to remove the corresponding term 'F(5)' from the efficiency formula for this kind of product.

Raising standards for consumers

The Consumer Voice in Europe

However, in case a commercial heater with a pilot flame reappears on the European market (e.g. a new import), the flame would not be considered in the efficiency calculation anymore. To avoid such a situation and as the value of F(5) would be zero in the absence of pilot flame, the proposal to remove F(5) does not change the calculated efficiency.

In addition, given that producers of commercial heaters have been able to phase out pilot flames, the same should go for domestic heaters. It is already technically possible and will result in lower fuel consumption and emissions. Like for domestic gas water heaters, it is possible to eliminate pilot flames. The European Commission should therefore investigate whether it would be possible to ban this substance or not.

- ➔ **Investigate whether the regulation can completely phase out pilot flames for *all* local combustion heaters.**
- ➔ **In the meantime, keep F(5) in the formula.**

1.10. Consider investigating a ban of flueless heaters

Although the European Commission's proposal puts forward NOx emission limit for most combustion heaters, it does not do so for flueless heaters despite the indoor air quality and health risks associated to their use. An information requirement on NOx emission is insufficient.

- **Flueless LSHs cause air quality issue and health risk.** When in use, flueless heaters spew combustion gases into the room, leading to inhabitants inhaling them directly. In their tests, Euroconsumers⁵ exclude local space heaters emitting CO, CO₂ and NO_x in the room as recommendations to consumers are to avoid them and opt for other alternatives such as electric LSHs or air conditioners. Furthermore, the Ecodesign preparatory review study highlights the various pollutants that can be found in the air of households such as "polyaromatic hydrocarbons, soot, ultrafine particles, water vapour, NO₂ and CO₂ exceeding guideline values".
- **Flueless heaters are inefficient.** The Ecodesign preparatory review study also mentions that in order to dilute the combustion gases and to supply fresh oxygen for the flame, substantial ventilation of the room is needed. It creates a major heat loss, significantly reducing the overall efficiency of the heater.

⁵ Euroconsumers is an alliance of consumer groups who inform consumers, offer them personalised services, and defend their rights in 5 countries: Belgium (Test Aankoop/Test Achats), Italy (Altroconsumo), Portugal (DECO Proteste), Spain (OCU - Organisation of Consumers and Users), Brazil (Proteste).

Raising standards for consumers

The Consumer Voice in Europe

Given both the acute health risks to inhabitants and the overall inefficiency of these appliances, the European Commission should consider investigating banning flueless heaters. It should help consumers who rely on this technology to resort to safer and more efficient options.

In this view, we note that the review study⁶ estimates that the number of gaseous and liquid flueless heaters sold annually in the European Union is rather small, i.e. 13,000 and 1,000, respectively. A ban would therefore have a limited effect on the market and on consumers, especially as alternatives are readily available, e.g. flued heaters (for high powers) or distant control (e.g. of air-to-air heat pumps or electric resistance heaters to preheat the house before arrival).

→ **The European Commission should consider investigating a ban of flueless heaters.**

2. Energy labelling proposal

The European Commission wishes to discuss a proposal to merge the label for air-to-air heat pumps ≤ 12 kW and local space heaters ≤ 50 kW to facilitate consumers' comparison. The proposal already takes into account the rescaling according to the 2017 Energy labelling framework requiring the deletion of the proven-to-be confusing 'plusses' (A+, A++, A+++), therefore going back to the well-known close A-G scale. Below we reiterate a long-standing concern to include electric heaters in the scope of the Energy label (2.1) and we share our views on the European Commission's proposal to merge the labels (2.2).

2.1. Electric heaters should get an energy label

Under the current proposal, electric heaters are set to be exempted from energy labelling requirements, thereby making it more difficult for consumers to understand the high energy consumption rates of these appliances. Indeed, if the well-known energy label were to be displayed on electric heaters, these products would consistently rank in the lowest classes of the scale.

Electricity heating costs are a huge burden for many consumers already confronted with high energy bills. As such, exempting electric heaters from the Energy label would deprive consumers of a reliable tool to compare energy consumption between heating devices.⁷

⁶ Table 19, pg.113.

⁷ It should be noted that for central heating boilers and water heaters a unique label for all technologies providing the same functions is already in place since the introduction of the label. The single label thus also covers all central electric resistance heating products.



Raising standards for consumers

The Consumer Voice in Europe

2.2. Group heat pumps and LSHs under the same label

The European Commission consulted stakeholders on whether the energy label for air-to-air heat pumps ≤ 12 kW and local space heaters ≤ 50 kW – currently dealt with separately – should be merged into a 'combined' label. The rationale behind this proposal is that these technologies differ but serve the same purpose, i.e. space heating. Therefore, combining the labels could facilitate the comparison of different technologies with the same application by introducing the same energy efficiency classes for the appliances in the scope of Regulation (EU) 2015/1186 and Regulation (EU) 626/2011.

European consumer organisations support this approach as it will most likely enable consumers to more easily compare appliances designed to heat a room, clearly displaying what technologies are more efficient and therefore which one can help them save money over time. In addition, this proposal has the potential to simplify the current patchwork of legislations.

Regarding the proposal to also include electric heaters in the merged label, we believe such option could provide more transparency to consumers on the poor performances - and related high cost in the use phase - of these appliances (see 2.1). However, more discussion on how to translate this idea into a scale is needed. For example, the effect on the reduced differentiation (and potentially stimulation) among e.g. different types of heat pumps should be investigated. As the difference in energy efficiency is so high between electric heaters and the other technologies, the scale could then only differentiate between the efficient and the inefficient appliances. In our view, manufacturers should continue to be strongly stimulated to improve the efficiency of heat pumps for example. We consider that heat pumps are important devices that will continue to be used in the future, and where there is still room for improvement.

This issue can in principle be solved by including e.g. the efficiency value on the label. However, it should be verified by means of consumer testing how this can be done in practice, in order to ensure consumers properly differentiate between different products.

ANEC, THE EUROPEAN ASSOCIATION FOR THE CO-ORDINATION OF CONSUMER REPRESENTATION IN STANDARDISATION

Av. de Tervueren 32, box 27 – 1040 Brussels - +32 (0)2 743 24 70 - www.anec.eu
EC register for interest representatives: identification number 507800799-30

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • consumers@beuc.eu • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45



Funded by the European Union



Raising standards for consumers

The Consumer Voice in Europe

- **The European Commission must ensure that the energy-inefficient and expensive-to-run electric heaters are in the future display an EU Energy label to provide clear information to consumers.**
- **We support the proposal from the European Commission to combine the label for air heat pumps ≤ 12 kW and local space heaters ≤ 50 kW as it will ease comparison for consumers. All local space heaters (heat pumps; gaseous, liquid and solid fuel heaters; and electric resistance heaters) should be covered by a single label, therefore enabling consumers to compare the wide range of efficiencies among technologies fulfilling the same purpose.**
- **We propose that the European Commission investigates by means of a consumer survey how the efficiency value could be mentioned on the common label. Provided such information can be understood, we would favour the display of the efficiency value as it would enable for further differentiation within each technology and class.**

END

ANEC, THE EUROPEAN ASSOCIATION FOR THE CO-ORDINATION OF CONSUMER REPRESENTATION IN STANDARDISATION

Av. de Tervueren 32, box 27 - 1040 Brussels - +32 (0)2 743 24 70 - www.anec.eu
EC register for interest representatives: identification number 507800799-30

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • consumers@beuc.eu • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45



Funded by the European Union



Raising standards for consumers



The Consumer Voice in Europe

Annex 1. Explicit answers from ANEC/BEUC to the questions asked to stakeholder by the European Commission – discussion paper proposing to merge the Energy label for air-to-air heat pumps ≤ 12 kW and local space heaters ≤ 50 kW t

Whether or not the members of the Consultation Forum are in favour of:

- 1) 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
YES (see 2.2)
- 2) the inclusion of electric local space heaters in the scope of this label
YES (see 2.1)
- 3) the inversion of the energy efficiency figures,
NO. The reason quoted in the European Commission discussion paper, namely the efficiency going to infinity, does not seem correct. With the present EED convention that the PEF of renewable energy is 1, the efficiency can never become larger than the SCOP.
- 4) the addition of the energy efficiency number on the label,
YES, as it would enable for further differentiation between products. However, our support to this proposal holds firm only if it is proven that consumer properly understand the meaning of the displayed figure.
- 5) the proposals in Annex II.
The column "With electric local space heaters" is the most acceptable one in our view.

ANEC, THE EUROPEAN ASSOCIATION FOR THE CO-ORDINATION OF CONSUMER REPRESENTATION IN STANDARDISATION

Av. de Tervueren 32, box 27 – 1040 Brussels - +32 (0)2 743 24 70 - www.anec.eu
EC register for interest representatives: identification number 507800799-30

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.twitter.com/beuc • consumers@beuc.eu • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45



Funded by the European Union