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The Consumer Voice in Europe

Consumer organisations comments on draft Ecodesign and Labelling rules for Kitchen Appliances

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Summary

This paper focuses on consumer-relevant proposals by the European Commission regarding Ecodesign requirements and energy labelling of ovens, hobs and range hoods (hereafter referred to as *kitchen appliances*). The European Commission's proposals were formulated in working documents circulated on 11 June 2012, after a first meeting with stakeholders in April 2012.

As with other Ecodesign and Energy Labelling lots, ANEC and BEUC support the overall aim of the proposal to reduce the energy consumption of kitchen appliances and deem that Ecodesign requirements and the Energy Label are the best instruments to accomplish these goals. We **support** specifically the Commission's proposals to

- Create a single energy scale for both gas and electric ovens, to enable easier comparison between the efficiency of the different technologies;
- Implement the requirements in three stages (1, 3 and 5 years after entry into force of the regulations) to provide industry with visibility;

We nonetheless express **reservations** and seek clarifications on several of the draft provisions:

- We disagree with the rationale to exclude microwave ovens from the scope of the regulations, especially the Energy Label;
- We do not support the instalment of classes beyond "A" such as A⁺, A⁺⁺ or A⁺⁺⁺ from the onset as we argue that it undermines the once-effective "Buy A" message sent to consumers willing to save energy;
- We reiterate our suggestion that manufacturers provide a booklet on efficient cooking as part of an Ecodesign information requirement, to tackle the unaddressed issue of inefficient cooking behaviour;
- We propose to bring the deadline for review of the Energy Label forward from 7 years to 5 years;
- We believe the requirements for hobs to be based on an unclear methodology which artificially favours electric induction hobs.

Introduction

On the basis of three distinct preparatory studies, the European Commission has assessed that kitchen appliances present a significant annual energy savings potential of 6.1TWh by 2020, i.e. approximately 0,7% of the total current EU residential electricity consumption¹. Considering the very slow migration of the market towards more efficient appliances, the Commission deems that only Ecodesign and Energy Labelling rules can help realizing the aforementioned savings potential.

In this paper, ANEC and BEUC comment on the most consumer-relevant provisions found in the draft regulations.

General comments

- One key aspect of energy and kitchen appliances is that consumer behaviour plays a large role in the energy efficiency of cooking. The preparatory studies have elaborated on this aspect, as ANEC and BEUC experts have on the occasion of the preparatory stakeholder meetings. Yet the Commission has not yet proposed instruments such as information requirements under the Ecodesign Directive to help addressing this dimension (see below for our detailed proposal);
- As is often the case with Ecodesign preparatory studies and ensuing draft regulations, the data used to make projections largely originates from the industry itself (mostly CECED in the present case). This puts into question the robustness of the approach and could lead to an Energy Label becoming obsolete before it even becomes mandatory. Clearly, more funding for preparatory studies is needed so as to acquire more independent data;
- In these cases where the Commission could alleviate the impacts of its dependency on data submitted by the industry, it fails to seize opportunities. The most telling example is the proposal not to reclassify ovens on a typical A to G scale, as is perfectly authorized even under the new Energy Labelling Directive, but to simply extend the previous label to an A⁺⁺⁺ to D scale. Considering that a majority of the ovens would fit in an A class now accounting for very average efficiency, the move to an A⁺⁺⁺ to D scale has misleading psychological consequences for these consumers would still believe in the simple “Buy A” message.

¹ The preparatory studies estimate that ovens, range hoods and hobs taken together currently account for an annual energy consumption of 94 TWh, i.e. **11,2%** of the residential electricity consumption in the EU.

Scope: include microwave ovens

The Commission's proposal:

The Commission proposes to exempt microwave ovens from the scope of the regulations because *"the worst and the best performing ovens are close to each other [in terms of energy efficiency]"*. As a result, no Ecodesign requirement or Energy Label would apply to ovens which have "microwave heating" as their primary cooking function.

ANEC/BEUC position:

We disagree with the reasoning of the Commission and suggest that the Energy Label should be applied to microwave ovens. It is correct that microwave ovens which have no other cooking function than "microwave heating" all show roughly similar levels of energy consumption. In that sense, there is no need to compare the models between each other. However, it appears that microwave ovens are usually more efficient than "combination microwave ovens", which can either microwave or grill food. Consumers might want to compare the efficiency of both categories of microwave ovens. Moreover, consumers might also want to compare the efficiency of a microwave oven with that of a traditional oven. For the above-mentioned reasons, we argue that the Energy Label should apply to all categories of domestic gas and electric ovens, including microwave models.

→ Recommendation: Ecodesign requirements for microwave ovens might not be needed, but an Energy Label is to enable comparisons with combis and other cooking technologies.

Information requirements: include a booklet on efficient cooking

The Commission's proposal:

For each category of appliance, the Commission proposes that standard information requirements (model identification, number of cooking zones, number of cavities, etc) be communicated to consumers by means of a product fiche. The Commission does not propose information requirements to address the central issue of consumer behaviour, e.g. information booklets educating consumers on the impacts of cooking habits on energy consumption.

ANEC/BEUC position:

The preparatory studies have established that a large part of the energy savings potential presented by kitchen appliances relies directly on consumer behaviour². Although no requirement can be set on consumer behaviour itself, information requirements can be set under Ecodesign regulations. We call on the Commission to set an Ecodesign information requirement whereby manufacturers must include an information booklet on efficient cooking and ship this booklet with the appliances. In that regard, we elaborate on the Preparatory Study recommendations². To the extent

² See notably the Preparatory Study for Ecodesign requirements of EuPs – Lot 23 Domestic and commercial hobs and grills by BIOIS Intelligence Service: Task 3 report "Consumer behaviour", August 2011, page 28: *"There is a lot of potential to improve energy consumption of hobs and grills by changing consumer behaviour. Providing information to users on ways to cook efficiently is thought to be worthwhile and to have a greater impact on energy consumption than improvements in design"*.

possible, the booklet will be customized to fit the specific model considered. The booklet should explain that cooking habits have direct impacts on energy consumption and should offer various tips for cooking efficiently. For example, the importance of putting a lid on one's stove should be explained. ANEC/BEUC and their members would welcome cooperation with the manufacturers to elaborate on the contents of the booklets once the obligation to provide such a booklet is included in the regulation.

→ Recommendation: under information requirements, manufacturers should provide a booklet on "efficient cooking" with each appliance, detailing ways for consumers to limit their energy consumption when cooking.

Energy Label: keep a common label for gas and electric ovens

The Commission's proposal:

The Commission proposes that gas and electric ovens be compared against the same energy efficiency scale.

ANEC/BEUC position:

We strongly support having a common label for gas and electric ovens. The single Energy Label will facilitate comparisons between products for consumers who have access to both types of energy. We agree that not all consumers in Europe do have access to both types of energy when it comes to cooking. For these consumers, a common label will have no negative impact; but a common label will be beneficial for all other consumers.

→ Recommendation: keep the single Energy Label for all ovens irrespective of their energy source.

Energy Label: bring forward the deadline for review

The Commission's proposal:

The Commission proposes that the labelling requirements shall be reviewed depending on technological progress and not later than seven years after its entry into force.

ANEC/BEUC position:

While we accept that kitchen appliances are not a fast-moving target in terms of energy efficiency, we argue that a deadline of 7 years for the review of the labelling provisions is too distant, especially compared to the regulations on other appliances (between 3 and 5 years for typical white goods). Bringing the deadline for review forward is all the more important as from our experience the possibility to review a measure ahead of the deadline in light of technological development is purely theoretical and has not yet been used by the Commission for any of the Ecodesign regulations.

→ Recommendation: bring the deadline for review of the Energy Labelling Delegated Act forward from 7 years to 5 years.

Energy Label for ovens: the proposal is detrimental to consumers

The Commission's proposal:

The Commission proposes that thresholds to reach energy classes beyond A are such that no model of electric oven would currently score better than A, on the basis of market data communicated by CECED to the preparatory study for ovens. However, a few gas ovens would score in A⁺.

ANEC/BEUC position:

We express reservations with regards to the thresholds proposed by the Commission. The Commission is presented with an opportunity to review the existing label for electric ovens; it should therefore in our opinion propose thresholds that entail a distribution of ovens in all classes from A to G. Instead, under the current proposal, only a few models would be labelled below C, within an A⁺⁺⁺ to D scale. The new label for ovens would not so much be a new label whereby products are reclassified than a continuation of the old label. The benefit for the industry is clear, since the worst ovens will be ranked "D", an admittedly better-looking grade than "G" in the eyes of consumers. At the other end of the spectrum, the market will be concentrated on the "A" grade and it will left to the consumer to understand that an "A" letter no longer stands for excellence, but for "Average" in the wake of the extension of the label to A⁺, A⁺⁺ and A⁺⁺⁺.

Furthermore, we refer to the aforementioned remark that it is regrettable that such an important part of the proposals and projections are made on the basis of data supplied by the industry itself.

→ Recommendation: stick to an A to G label for all ovens, especially considering that very few ovens are currently rated below C.

Ecodesign requirements for ovens: an approach in three stages

The Commission's proposal:

The Commission propose to regulate the energy consumption of ovens in three consecutive tiers (1,3 and 5 years after entry into force of the regulation).

ANEC/BEUC position:

We support the proposal to set targets in three stages: that proposal will provide the industry with all necessary visibility for its future investments and design cycles.

→ Recommendation: keep the approach in three stages.

Ecodesign requirements for hobs: clarifications needed

The Commission's proposal:

The Commission proposes a new methodology to calculate the energy efficiency of hobs. The methodology differs from the harmonised standardized test developed in CENELEC TC59X WG10 and had not been presented on the occasion of the first meeting in April. In our understanding of the new methodology and proposed Ecodesign requirements, the induction technology would be greatly favoured.



ANEC/BEUC position:

We ask the Commission for clarifications on the methodology presented for determining the energy efficiency of hobs. We suspect that the proposed methodology artificially favours electric induction hobs. Considering the high price tag of induction hobs, the need to purchase compatible cookware and the uncertainties around the electromagnetic fields generated by induction hobs and their public health impacts, we would oppose any regulation leaving only induction hobs on the market.

→ Recommendation: clarify the methodology recommended for hobs, or use the standard defined in CENELEC TC59X WG 10.

END.