

The Consumer Voice in Europe

ECODESIGNING DOMESTIC COOKING APPLIANCES

BEUC comments following the consultation forum of 18 March 2024 on the Ecodesign and Energy Labelling of ovens, hobs and fume extractors



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EC register for interest representatives: identification number 9505781573-45



Co-funded by the European Union

Ref: BEUC-X-2024-042 - 23/04/2024

Why it matters to consumers

Having well-functioning cooking appliances is an important part of a comfortable, liveable home. Consumers need to be able to compare different products, which sometimes use different technologies, to be able to make an informed choice when they purchase their next cooking appliance. Their durability is also crucial, given how frequently they are used and the length of their lifetime.

We welcome the European Commission's proposal to revise the Ecodesign and Energy Labelling requirements for hobs, ovens and cooking fume extractors.

These written comments serve as feedback to the consultation forum of 18 March 2024.

The energy savings and greenhouse gas emissions reductions potential for these products are considerable when looking at the combined consumption of households in the EU, even though these are likely to lead to only limited financial savings for individual households. However, our focus in these comments is placed elsewhere, including on reparability, a consolidated energy label and on emissions from gas cooking.

We call on the Commission to:

1. Tackle indoor air pollution

Recent studies¹ have shown the catastrophic impact of indoor air pollution from gas-fired appliances for human health. As many as 700,000 children are believed to suffer from asthma due to households cooking with gas.

As a result, we believe it is essential for the Commission to address this public health issue and to **introduce NOx emission limit values in the Ecodesign requirements for gas-fired hobs and ovens.**

The Commission should introduce such values in the current revision of the Ecodesign regulation for cooking appliances, even if this entails a short delay in the publishing of the final requirements. This is too important an issue to be left to the next revision of these product groups, given that the current draft text foresees the next revision of the regulation to take place in seven years' time.

2. Create consolidated energy labels

The following changes should be introduced in this review, even if they entail a short delay in their publication, given that the current draft text foresees the next revision of the regulation to take place in only seven years' time.

¹ European Public Health Alliance and CLASP, '[Exposing the Hidden Health Impacts of Cooking With Gas](#)' (May 2023).

This would be too late considering that we must progress considerably in the next years to electrify homes with renewable energy and to reduce fossil fuels in the residential sector. As it makes economic sense for many consumers to self-generate electricity and use it partly for cooking, a comparable energy label can be useful when making the overall, larger investment decisions to retrofit the house.

Hobs

It is unhelpful to consumers that there is no energy label for **hobs** and that gas-fired and electric-run hobs use different test methods which mean the results for these two technologies are not comparable, even though they perform the same function.

We support the use of a new testing method which makes it possible to produce comparable results for gas and electric hobs and to introduce a common energy label. There is a strong likelihood that consumers will increasingly switch away from gas-fired appliances in the future, given the need to phase out fossil fuels, and consumers need to have a better idea about the running costs for all hobs to make better-informed decisions.

Ovens

The test methods for gas-fired ovens and electric **ovens** are different, which means the results are not comparable and there is, as a result, no common energy label. This makes it very difficult for consumers to compare products across technologies. The basis for the energy label is to make it possible for the consumer to see in an instant which appliance is more efficient.

We therefore support the introduction of a common testing method for gas-fired and electric ovens and a common energy label. This will help consumers choose the more efficient appliance more easily, regardless of the technology used.

We also welcome the decision to rescale the energy classes for **ovens** in the A-G scale, with the classes divided as suggested in the JRC study. However, the ambition should be higher because the JRC's data is based on 2020 data and this regulation will be long-lasting.

In addition, it is important that the new revision keeps the A energy class empty so as to push manufacturers to produce more energy-efficient appliances in the coming years.

3. Ignore calls for hydrogen-ready requirements

We support the Commission in not including any information requirements about appliances which might be hydrogen-ready. Hydrogen will be a costly technology for households and require adaptations to existing kitchen infrastructure and piping. Marketing appliances as H₂-ready could lead some consumers to believe that this may be a technology they could in future benefit from. The energy label should trigger beneficial purchase decisions for consumers and not lead to wasteful ones.

4. Ensure spare parts availability and inclusion of repair score

It is important that consumers can access spare parts easily and at low cost to extend the lifetime of their ovens, hobs or fume extractors. Too often, the high cost or time it takes to access a spare part, such as a broken knob or button, can lead to the consumer to replace the product instead of having the broken spare part replaced. This is a wasteful and expensive process which can be countered by ensuring **spare parts are available for at least ten years after the last unit was sold or for the expected lifetime of**

the product in case it is longer than ten years. This is important because many ovens and hobs last for longer than ten years.

It is also important that the appliances are designed in a way to make access to the most breakable parts easy. The most common failures for ovens are not heating up correctly because the temperature sensor is no longer working correctly and having broken knobs/buttons. The door not closing properly can also be a common source of failure, as is the ignition system in gas ovens. For gas hobs, the most common failures are the spark plug not sparking, a faulty gas valve, insufficient gas mains pressure, whereas for electric hobs, common failures include a faulty electrical connection, breakage of the glass covering the plate, faulty on/off switches.

BEUC also supports the inclusion of a repair score in this revision of cooking appliances. Doing so would allow consumers to factor in the repairability of a product when they make their choice of purchase. It is important for consumers to know which product can be more easily repaired as it is a source of great frustration when an appliance has to be thrown away because of the inaccessibility of a broken part.

5. Introduce noise emissions for cooking fume extractors

BEUC supports the creation of a label for noise emissions levels with four distinct classes A-D, where the top class is left empty to incentivise manufacturers to produce less noisy appliances in the coming years.

