

EUHA REACTION TO COMMISSION DRAFT MEASURES FOR ENERGY LABELLING AND ECODESIGN REQUIREMENTS FOR LOCAL SPACE HEATERS

21 June 2013

Executive Summary

In the context of the interservice consultation on the draft measures for energy labelling and ecodesign requirements for local space heaters, the Electric Underfloor Heating Alliance would like to reinforce the following points:

- Electric heating is a tried and tested technology that will be increasingly needed in the future and should be supported by decision-makers. No market distorting measures should be taken, especially not if they create costs, complexity and risks to consumers with no environmental benefits.
- The Members of EUHA welcome the maintaining of the exclusion of electric room heaters from the energy labelling scheme and the adoption of minimum efficiency standards as a feasible and appropriate alternative to a multi-fuel energy label.
- The Alliance is committed to continue working closely with the European Commission in the definition and deployment of measures and strongly supports the objective of energy savings.

About electric and electric underfloor heating

Electric heating and electric underfloor heating often suffers from an antiquated image when it is in fact a solution for today's and tomorrow's energy and environmental challenges. It is a tried and tested technology that is the best (or only) option for many of its applications. Any legislation that would discriminate against this technology will create costs and burdens for consumers, with neither health nor environmental benefits.

A user-friendly comfort technology

- Electric underfloor heating answers consumers' demand for comfort, typically in bathrooms and kitchens.
- Easy-to-install, suitable for all floor types and require minor finishings.
- Low installation costs and virtually maintenance free.
- Electric underfloor systems are also silent and invisible.

For safe and healthy living spaces

- Electric underfloor heating is, unlike many other combustion systems, totally risk free for consumers.
- It helps to create a healthy indoor climate, as comfort is attained at lower room temperatures.
- The low heat prevents burn injuries and provides for dry and non-slippery floors.
- Like electric cars or trains in traffic, electric heating can contribute to the improvement of mainly indoor but also outdoor air quality.

A sustainable technology

- Electric heaters are 100% efficient as all energy is transformed into heat with no losses. Electricity is merely an energy transportation system and probably the most convenient today and for the decades to come.
- With warm floors consumers get a comfort feeling at lower room temperatures than with cold floors, and this allows major energy and cost savings for consumers.
- Electric heating combines perfectly with electricity that comes increasingly from renewable and local sources
- Electric heating can help make grids smarter when combined with modern controls, thus facilitating the development of renewable energy generation.
- Our systems combine perfectly with passive/zero-energy houses where the quality of the insulation reduces the need for (central) heating systems but increases the demand for comfort.
- With low purchase and installation costs but relatively high operational costs electric devices give an extra and effective incentive to better insulate households.

Should local room electric heating appliances be subject to an energy label?

The answer is: it depends on the label. While electric heaters are 100% efficient in transforming electricity into heat, a product specific labelling scheme could help consumers identify systems within this product group that have the best controls and allow to save energy. See section below on controls.

However, a so-called multi-fuel energy label that would cover the great variety of products that fall under the LOT 20 of local space heaters would have no environmental, economic or social benefits and must be avoided. The EUHA was happy to see that the European Commission and Member States during consultations have understood this well. We now call upon NGOs to carefully consider the following points before calling for a multi-fuel energy label.

A multi-fuel label has no consumer value

- Consumers are choosing local space heaters in accordance with specific needs (comfort, aesthetics, practicality) and constraints (gas access or not, possible evacuation of fumes or not). Product switch options are very limited.
- A multi-fuel label would allow consumers to compare products they would never consider as alternatives such as an open fire and an electric underfloor heater, will this help them to choose what is best for their bathroom or will it just create confusion?
- In the field of local space heaters, consumers ask to compare the products that are sold on the same shelf, that serves the same purpose, and that uses the same technology.

A multi-fuel label has no environmental value

- A multi-fuel energy label would put those products that consumers want to compare in the same or almost the same label category. Not using the full range of labels will have a perverse effect: consumers prefer a cheap product with an E label to a more expensive but more efficient one with only D label.

- Likewise, producers will prefer to put the cheapest possible products on the market and will have no incentive to invest in innovation.
- The purpose of the energy labelling scheme is to reduce energy consumption and to achieve market transformation. By making everything and nothing comparable, a multi-fuel label will on the contrary favour the buying and market placement of cheaper and less efficient products in ALL categories of Lot 20.

A multi-fuel label has no scientific or rational basis

To make all Lot 20 products fall under the same labelling scheme, it has been suggested to use a conversion factor or primary energy factor (CC or PEF) to take into account energy losses from the production and transportation of energy.

The EUHA firmly condemns such an approach for the following reasons:

- Information on how the energy is produced is relevant, but consumers should get it from their energy provider, whatever the type of energy. It is not and cannot be the responsibility of appliance manufacturers.
- Introducing a multi-fuel label would transform the energy label into a fuel label or an environmental label, for which other legal tools exist.
- The current PEF or CC has no scientific basis but is a hat-trick estimation that is not verifiable or transparent. As the EU seeks to achieve science-based decision making the EUHA demands that the PEF be openly reviewed and based on transparent criteria before being fixed into any EU rules.
- The current PEF or CC does not reflect the reality and diversity of electricity production today with electricity increasingly coming from renewable sources, up to 40% in Sweden for example.
- Many Lot 20 products and electric underfloor heating systems in particular (80%) are installed by professionals, this is even mandatory in Scandinavian countries. The energy labelling rules are intended for consumer products only.
- All market transformation objectives of an energy label would be better addressed by Ecodesign measures, creating fewer burdens on businesses and on public services. A multi-fuel label would fail to the principle of proportionality that should guide all EU rules.

Ecodesign, our support for high standards and effective controls

The EUHA has been and continues to be supportive of the work carried out by the European Commission in the development of all tasks of ENER LOT 20, being a particular advocate of the deployment of measures aiming at strengthening the role of control systems, which are to improve energy efficiency and in turn reduce negative impacts on the environment.

The EUHA is supportive of the European Commission Ecodesign proposals that should allow the market placement of more efficient products that will still be reasonable in terms of costs and not too complex in terms of use.

The EUHA is also committed to the objectives and implementation of the EPBD in Member States.

On the matter of efficiency standards, the EUHA is aligned with and supportive of the position of the European Committee of Domestic Equipment Manufacturers (CECED).

On controls and efficiency standards we would still like to make the following general comments:

- To achieve the current minimum level of efficiency all available control options will need to be used. This does not take into account the aversion of end-users for complexity. The human reality is that well used simple controls are more efficient than badly programmed advanced controls.
- All controls need to be weighed against their real life potential. While for example open window functions can certainly save much energy, presence control could on the contrary lead to user dissatisfaction and lead them to set higher temperatures. Distance controls would have disproportionate costs in regards to their benefits for non-central heating appliances.
- The need for controls also varies from each consumer's constraints. The better houses are insulated, the less relevant they can become
- To allow product differentiation and competitive practices on any market, there needs to be a certain margin between the minimum efficiency standard and the maximum achievable efficiency. This is not the case in the current proposals.

The Electric Underfloor Heating Alliance - EUHA - unites manufacturers to promote the interests of the product sector within a new electrified smart grid infrastructure. The group promotes the adoption of higher efficiency electric underfloor heating systems, providing primary but mainly secondary comfort heating in low energy demand buildings.

Its current members are: Danfoss, Fenix Group, Kima, Pentair, OJ electronics, Ebeco and Nexans.

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