

EUHA & EURELECTRIC REACTION TO COMMISSION'S PROPOSED MEASURES FOR ENERGY LABELLING AND ECODSIGN REQUIREMENTS FOR LOCAL SPACE HEATERS

6 August 2013

Executive Summary

In the context of the Commission's proposals for energy labelling and ecodesign requirements for local space heaters notified to the WTO, the Electric Underfloor Heating Alliance (EUHA) and the Union of the Electricity Industry - EURELECTRIC, would like to emphasise the following points:

- Electric heating is a tried and tested technology that will be increasingly needed in the future and should therefore be supported by decision-makers. No market-distorting measures should be taken since they risk creating costs, complexity, and risks to consumers with no environmental benefits.
- The draft ecodesign rules set out very demanding minimum efficiency requirements. They will require investments and products change from EUHA members who nonetheless support these measures as they will steer the market towards higher standards.
- EUHA and EURELECTRIC are extremely concerned by the last minute inclusion of product information obligations on electric products. This addition makes no sense from a scientific and logical point of view and is sending incomprehensible and mixed messages to consumers.
- The proposed penalisation of electric space heating equipment runs contrary to the Commission's energy roadmap 2050 vision of decarbonisation (including heating) through low-carbon electrification. The carbon content of electricity has shrunk and continues to decrease, so that its conversion coefficient is in need of revision..
- Both EUHA and EURELECTRIC strongly support the EU energy efficiency goals and are contributing to their achievement.

Ecodesign: Our support for high standards and effective controls

The EUHA & EURELECTRIC continue to support the work carried out by the European Commission in the framework of ENER LOT 20, particularly the deployment of measures aimed at strengthening the role of control systems in order to improve energy efficiency and thereby reduce negative impacts on the environment.

The minimum efficiency standards proposed by the draft ecodesign rules are extremely demanding and will require major investments from manufacturers. We nonetheless welcome these measures, as we believe they will help steer the market towards higher quality and environmental standards.

However, we are extremely concerned that the proposal includes a last-minute discriminatory information obligation for electric heaters that has not been subject to any impact assessment or public consultation. According to the Commission's plans, as of 2016 a mandatory warning on products, packages, user manuals, and websites should state: *'This product is not suitable for use as your main source of heating due to its high energy consumption and costs (equivalent to energy labelling class G)!'.*

EUHA and EURELECTRIC call upon the EU Member States and the European Parliament to reject these information obligations for the following reasons:

Unsound and unscientific

- The primary energy factor consumption in Europe of any electric device - not just heaters - appears high because **the EU uses a "primary energy factor" or "PEF" that has no clear, transparent or scientific definition. This discriminates against electricity, favouring fossil fuelled end-user appliances instead.** The PEF looks in detail at energy losses in the production and transfer of electricity but fails to factor in energy losses incurred in producing and transporting gas, coal, oil and wood to consumers.
- The G-class energy label, to which the warning refers, appears baseless and without foundation.
- In its energy roadmap 2050, the Commission advocates a clear path towards decarbonisation through electrification, also in heating. The carbon content of electricity has fallen and is steadily decreasing. Picking fossil fuels as winners for local space heating equipment by penalising electric equipment poses a stark contradiction to the energy roadmap's vision. This new Commission proposal clearly discriminates against electricity and devices using it. **Yet at the same time the EU is encouraging major investments in electric decarbonisation and in electrification. Where is the logic?** Electric heaters have a major role to play in improving indoor and outdoor air quality in cities and other places.
- Electricity is the energy transmission network of the future. Discriminating against these devices is perverse and confusing to consumers.

Zero market transformation, zero innovation

- The Commission's proposals concern a group of products (Lot 20) designated as LOCAL (=secondary) space heaters; including a warning on primary heating doesn't make sense.
- 80% of electric underfloor heating devices installed are intended for secondary heating only. The information obligations therefore target a minority behaviour thereby limiting the scope of any potential benefits.
- The ecodesign and energy label proposals are intended to promote innovation and behaviour change. **The current proposal has a punitive nature** and will not encourage the industry to develop more efficient technologies.

Adding red-tape

- The information obligations create high administrative costs for the industry and have not been properly analysed through a risk assessment. For example, company websites would have to be restructured for European markets.
- Online and on-product markings will also be expensive to control for authorities. This provision therefore clearly fails to meet the EU objective of reducing regulation and cutting red-tape.

Short-sighted

- Electric underfloor heating, along with other electric heating devices, are the perfect match for well-insulated and low energy buildings, where the need for heat production is low and the demand for comfort is high and no maintenance needed.
- Electric heating devices are also the low-cost ideal solution for houses equipped with solar energy production panels or districts with CHP. Discriminating against electricity is short-sighted and leads to additional costs for consumers who will be encouraged to invest in devices that come with higher purchase and maintenance costs, as well as a shorter lifespan.

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 (EUH) answers consumers' demand for comfort, typically in bathrooms and kitchens.
- It is easy-to-install, suitable for all floor types and requires minor finishings.
- EUH comes with low installation costs and is virtually maintenance-free.
- Electric underfloor systems are also silent and invisible.

For safe and healthy living spaces

- EUH, unlike many other combustion systems, is 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 indoor and local outdoor air quality, with no airborne particles and gases (CO₂, NO_x) involved, as with (local) combustion of gas, oil or coal.

A sustainable technology

- Electric heaters are 100% efficient as all energy is transformed into heat with no losses. Electricity is merely the most cost effective energy transportation system and probably the most convenient today and for the decades to come, compared to other distribution systems.
- A feeling of comfort from warm floors at lower temperatures allows for major energy and cost savings for consumers.
- Electric heating harmonizes 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 offer ideal solutions for 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 additional and effective incentive for household insulations. in

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.

The Union of the Electricity Industry - **EURELECTRIC** is the sector association which represents the common interests of the electricity industry at pan-European level, plus its affiliates and associates on several other continents. We currently have over 30 full members which represent the electricity industry in 32 European countries.