**(DRAFT) Minutes Review Water Heaters 1st stakeholder meeting**

**Comments for revision: PRD 26/1/18**

1st Stakeholder meeting ecodesign preparatory study 'ecohotwater-review'

**Date/time**: 23 Jan 2018, 14:30 – 17:00 Water heaters

**Location**: Conference Centre Albert Borschette (CCAB), Room 4A, Rue Froissart 36, 1040 Brussels, Belgium

**AFTERNOON session: Water heaters**

*Introduction and Task 1 Water Heaters*

The meeting is hosted by the Commission but conducted by and responsibility of the contractor. In that sense Veerle Beelaerts (EC) welcomes the participants. René Kemna (VHK) is chairing the meeting, introduces the study team and gives the floor to Martijn van Elburg (VHK) to present results for Task 1 on the Water Heater study. After the presentation there is room for a Q&A on Task 1.

Schuberth (DE) asks whether the Smart Control Factor will be evaluated. Kemna replies that it is certainly on the agenda and requests all stakeholders and in particular surveillance authorities and notified bodies to give feedback.

Stefan Albrecht (Solar Heat Initiative) asks for solar heat to be recognized as a heat generator, as other forms of renewable energies.

Rode (NO) asks whether the present study will expand upon the special review study by assessing separate requirements per type, for the categories identified in the Water heater glossary. Kemna replies that the previous assessment showed that for the EU setting separate requirements for electric vs. non-electric water heaters is not advisable. He recognizes that a promise was made to look into the matter more extensively in this review study and points at the vast collection of data in Task 2, to be elaborated in further tasks. So he asks what more Norway wants specifically and if it could put that in writing. Rode mentions that he would like to see the same LLCC evaluation as in the specific review study, not for just two categories[[1]](#footnote-1) as in the review study but for all separate water heater categories mentioned in the (glossary of) review study. Siderius (NL) states that the Netherlands is not in favour of setting specific requirements per water heater technology and refers to the ongoing study on smart appliances that assesses the need for demand response systems. Lopes (SE) added that Sweden thinks that, while the labelling scheme could stay as is, Ecodesign requirements for certain technologies such as small gas fired water heaters, could be more stringent. Rode (NO) mentions the specific Norwegian problems, e.g. with the ban on oil-fired appliances. Kemna reminds Norway and the audience that the special review study mentioned -- in detail-- several solutions for the Norwegian problem and more specifically that certain potential loopholes should not be addressed in the study for the benefit of Norway.

Abrecht (Solar Heat Initiative) mentions that certain solar devices are specifically produced and marketed for use in the Mediterranean area only, but have to be rated according the average climate conditions. Can this be changed so that correct performances can be compared? Kemna adds that he has seen A+ gas instantaneous water heaters being compared with A labelled solar water heaters. It is odd to see fuel fired heaters having a higher energy efficiency class than solar water heaters . Gerard van Amerongen (Solar Heat Europe/ESTIF) clarified that solar devices, as part of a package can achieve up to A+++.

Van Amerongen states that problems with thermosiphon systems (typical for Mediterranean climates, requiring a product label) can be solved if (1) an improved calculation method is applied (changes to transitional Method and Regulation needed), (2) three arrows for efficiency are shown on the label (one for each climate), and (3) the obligation to label the integrated storage tank in thermosiphon systems is skipped (considering that it is an integral part of product). Problems related to component-based solar devices (typical for rest of EU, requiring a package label) are related to (1) the still complex (or not self-explanatory) calculation required for the package label, (2) the need for the solar supplier to create technical documentation for the system supplied which requires access to technical documentation of component suppliers, (3) information on components is still difficult to attain (the database could help, although the current description does not foresee this), (4) as most Information Fiches are related to inclusion of solar devices, it makes sense to have the fiche(s) created by the component suppliers, not the final supplier, and (5) the fact that many solar systems are also supplying heat for space heating asks for a more accurate calculation of solar contributions to space heating.

Kemna wants to know if stakeholders can live with a simplification of the package label, whereby the presence of a solar device simply increases the label by one class. Pittner (Bosch) thinks that the package label, requiring simple additions, is already as easy as it can be.

Siderius (NL) states that rather than adding more arrows on the label itself, he would prefer the extra information to be accessible through the product database. Rode (NO) prefers to have a label for each climate zone. Schuberth (DE) mentions a German website which allows suppliers to automatically generate package labels by simply selecting the components from a large component database[[2]](#footnote-2).

Nowak (EHPA) is not in favour of specific requirements per fuel/energy type, nor does he support multiple arrows on the label for multiple zones and prefers this information to be accessible through the database.

Sabbati (EHI) has anecdotal evidence that manufacturers do use the package label, but installers don't as the calculation is too difficult (unclear), there is no incentive from market surveillance and there is no business interest served with package labels. Kemna adds that he has anecdotal evidence that certain solar installers rather sell components in multiple instances, to avoid the requirement to create a package label.

Pittner (Bosch) thinks the package label is the preferred alternative to separate labels for tanks, temperature controls, etc. but admits that installer involvement in the evaluation (and improvement) of these labels is urgently needed. Abrecht (Solar Heat Initiative) agrees and states that the current implementation of solar in the package label is strange (linked to heat generator power?)

Lopes (SE) mentions that the renewable energy directive, in Article 14, requires installers of renewable energy systems to be certified. This could be combined with a training for the package label.

Mondot (CETIAT) asks whether the inconsistency between the max. load profile in ecodesign (4XL) and labelling (2XL) can be removed.

Siderius would like to know the relevance of the package label: How many have been issued? Van Amerongen replies that in the Netherlands the solar package label is linked to subsidies and some 600 grants have been issued.

Dias (LabelPack A+) presents the results of the LabelPack A+ survey. Some of the highlights: (1) implementation was generally poor, mostly because lack of interest, (2) some good and useful tools exist besides the ones from Labelpack A+ (example VDZ Germany) but no 100% coverage of EU, (3) number of package labels reduced over time, in part because of reuse of existing labels but mainly lower interest, (4) no market surveillance means no risk if no labels are supplied, (5) retrofit sales, meaning additional collectors or changes to existing systems, are not labelled, (6) package label is not a quality assurance label (relevant to consider in relation to subsidy schemes).

*Task 2 Water Heaters*

Kemna presents the findings of Task 2 on the EU Water Heater market, indicating the positive changes in the market as regards increased efficiency and (inflation corrected) price drop and including data from CECED.

Rode (NO) asks whether the study should only consider the variable part of the energy costs and disregard the fixed part (connection charges). Siderius (NL) replies that this tariff structure is not always the case and he thinks we should not be changing the currently used methodology on energy tariffs. He adds that as ecodesign/labelling regulations are aimed at the internal market, there is no way of knowing where the product will end up, and thus the EU has to be treated as a single market.

Sabbati (EHI) confirms that most members agree with the general numbers for the market (possibly some deviation at country level) and would like to know how the average of the CECED data was calculated. Kemna replies that the CECED data is averaged on the basis of models present in the database. He invites stakeholder to provide similar data for other types of water heaters (mainly gas, as CECED data is mostly electric WH).

Sabbati mentions the contributions that EHI has made in the draft task reports and would like to know how it is used. Kemna replies that the meetings with EHI are highly appreciated and that the country sales data were useful to confirm the acquired BRG data but could not be used in the report because of confidentiality. The study team is still hoping that EHI will be able to set up a model efficiency database (no need to be sales-weighted) that could serve as an input in the study.

Caroline Haglund Stignor (RISE) is surprised the average size of storage tanks is not bigger. An explanation is that storage tanks in heat pumps are not included, and that Sweden has many homes supplied by district heating.

Lopes (SE) repeats that he is pleased with the market data as this will help to assess the energy label scales and possibly ecodesign energy requirements for water heaters.

*Any other business*

Kemna prefers to receive written comments on the task reports discussed within one month so that they can be incorporated in a next draft of the task reports, but adds that none of the task reports will be considered 'final' until the very end of the study.

The meeting is closed at 17:30.

26.1.2018 / MVE/RK

1. The current Ecodesign limits apply across all water heater categories in the scope. The 2016 review study looked at the consequence of splitting minimum Ecodesign limits according to the Least Life Cycle Costs (but neglecting other aspects impacting the limits) between electric and fossil-fired water heaters, for 10 tapping profiles (3 largest in detail), 29 countries and/or –where applicable- 3 climate zones. [↑](#footnote-ref-1)
2. http://www.heizungslabel.de [↑](#footnote-ref-2)