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Energy Efficiency compliant Products 2014 (EEPLIANT 2014) Work Package 6 - Joint Testing - Space Heaters and Combination Heaters with a Rated Output of 400 kW or less

Minutes from Stakeholder Meeting, 01.06.2015 in Brussels

TIME AND VENUE

1 June from 13:30 to 15:30

In PROSAFE's offices, Avenue des Arts/Kunstlaan 41, Brussels, Belgium

AGENDA

1. Opening and welcome
2. Presentation of the EEPLIANT Action and Work Package 6
3. Input from stakeholders to WP6
4. Discussion of future involvement of stakeholders in WP6
5. Any other business
6. Closing of open session

ATTENDEE LIST

Marcos Gonzalez Alvarez, European Commission, DG Energy

Paolo Basso, EHI

Stephen Biswell, United Kingdom

Bjarke Hansen, Denmark (WP Leader)

Antoanetta Marinova, Bulgaria

Eleonora Piccinni, Orgalime

Torben Rahbek, PROSAFE (Facilitator)

Linn Stengård, Sweden

Evert van Wilgenburg, the Netherlands

Bram Verckens, Belgium

MINUTES FROM MEETING

1 Opening and welcome

The WP Leader opened the session and welcomed the stakeholders to the meeting.

The participants briefly introduce themselves.

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2 Presentation of the EEPLIANT Action and Work Package 6

The WP Leader briefly presented the EEPLIANT action, its scope and purpose.

- The Action has 6 participating authorities from 6 Member States. The Danish Energy Agency leads the Working Group.
- The scope of WP6 covers heaters intended for space heating or for combined space and water heating. Even this comprises a lot of different product groups:
 - The Ecodesign directive applies to heaters with a rated output up to 400 kW.
 - The energy labelling directive applies to heaters with a rated output up to 70 kW.
 - Both directives apply to oil- and gas-fired boilers, electric boilers, heat pumps and even more products for space and water heating.
 - The energy labelling directive also applies to packages of space heaters, temperature controls and solar devices as well as packages of combination heaters, temperature controls and solar devices. (The heater must have a rated output not exceeding 70 kW if the package should fall under the energy labelling directive.)
 - Oil-, gas-fired and electric boilers for combined space and water heating with a rated output up to and including 70 kW
 - Space and combination heaters

This very wide scope makes it necessary for WP6 to focus on some of the groups.

- WP6 has identified three issues in its work that are new in the ERP regime:
 - The sales channels are different. Normally these products are purchased from installers who usually don't have the products on display (and who may not know their legal obligations to label the products with its energy consumption). Showrooms are found in some countries, where private consumers can see the products before they buy them.
 - The concept of selling products in "packages".
 - Some of these products (the big ones with an output exceeding 70 kW) are not sold to private consumers but to professional consumers (business to business).
- The budget for the Action is estimated to be:
 - Manpower from the Member States: 14½ man months (plus contributions from external consultants)
 - Approximately 90 working days from the PROSAFE Facilitator.
 - 373.500€ for product purchase and testing. (The total budget for the complete EEPLIANT Action is 2½ million €.)

The WP Leader finished by presenting the Group's thoughts about its cooperation with stakeholders:

- General exchange of information.
- Input to the Member States' selection of product (groups) for the Action.
- Market knowledge, in particular about any weaknesses in the market.
- Ideas on how to approach the point of sales and in particular the installers.

3 Input from stakeholders to WP6

The WP Leader invited the stakeholders to present their perspectives on and "wish list" to the Action. First he gave the floor to EHI (the European Heating Industry).

EHI started by explaining that the organisation represents 39 EU market leaders in thermal comfort solutions plus 13 industrial heating organisations. EHI went on to give some figures to show the importance of the

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sector: 40% of all EU's energy consumption is spent in buildings, and 85% of that is spent on heating and hot water. There are some 120 mill central space heaters installed in the EU.

The challenge is that 65% of these systems are class C or D, only 26% are class A or B. According to the Impact Assessment of the European Commission proposal for the Energy Labelling Directive, heating appliances would represent about half of the total cost-efficient savings potential of the considered appliances within the scope of the ELD. Still, 20% of all heaters sold in 2014 were class C or D that will be banned after 26 September 2015.

The representative went on to present a number of quick checks that could indicate whether a product might be non-compliant:

- Does a product with an energy label fall within the scope of the energy labelling directives (thermal output not exceeding 70 kW, storage capacity not exceeding 500 l).
- Is the label design correct with respect to timing? (There are differences between the 2015 and 2019 label for heaters.)
- Does an electric water storage heater carry the correct off peak symbol?
- Is it possible to achieve the indicated energy efficiency or is it physically impossible (can be checked from the technical documentation).
- Are the pumps used high efficiency pumps?
- Does a package include high temperature or low temperature heat pumps. Only high temperature heat pump can be used in packages.

There are also a number of simple checks for packages:

- The package as well as the individual products within it must be labelled.
- Each individual appliance must fulfil the Ecodesign requirements. Products cannot be boosted with additional components.

The representative also offered some advice on WP6's selection of products:

- Focus at conventional gas boilers in class B and C. The represent a well-known technology and the market is used to it so the demand is there, but:
 - Type B boilers can only be installed in exceptional cases when they replace another type B boiler that is connected to a collective chimney.
 - Type C boilers will in general not meet the future minimum requirements on the market.
 - Conventional boilers are already checked by third party laboratories.
- Heat pumps. It is an emerging technology and there is a risk that the market is "polluted" by non-compliant low efficiency products. The tests could fall in two stages:
 - First, focus on compliance with specific ERP requirements (efficiency and noise) that are based on parameters that are not checked by notified bodies.
 - Second, focus on compliance with product standards.

The presentation prompted a number of questions:

Q: How many EHI members produce heat pumps?

A: Many of the EHI members do so, but they are often more known for the rest of their product line. Most of the big EU producers of boilers also produce heat pumps.

Q: Where should the Action look for non-compliant products?

A: EHI replied that they had highlighted some areas where they would expect problems. DK added that they only found few problems with boilers. They had seen problems with air-air heat pumps some years ago, but the impression was that they had disappeared by now after a series of intensive market surveillance actions.

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Q: How does industry deal with the installers' obligation to label their products?

A: The manufacturers have their own way to calculate the values on the package label for their products. The EU Commission tool can be used for the other packages.

Q: What is the price difference between a class B boiler and a class A boiler?

A: The difference is large already now, and we have to wait and see where the prices will go after 26 September. The experience from other sectors is that the low-efficiency products normally disappear quickly.

The WP Leader then gave the floor to Orgalime. The representative explained that Orgalime has a lot of expertise in this area and they are happy to support the Action and to contribute to it. The biggest difference between Orgalime and EHI is that EHI is specific to this sector whereas Orgalime organises manufacturers of mechanical and electrical goods in general. The two organisations have some members in common.

The WP Leader thanked and gave the word to the European Commission, DG ENER. The Commission representative also discussed choice of product groups:

- Focus on class B and C boilers.
- There are weaknesses in the legislation: If an authority comes across a boiler, it is difficult to check when the boiler was actually installed.
- Likewise for the package label: The values are not difficult to calculate, but it is complicated to check if the dealer or installer has actually fulfilled his obligations.
- Check the lower end of the market (the smaller boilers) and focus the market surveillance on the consumer market.
- Still, it is also interesting to check a number of big heaters.
- It would be interesting also to check combination heaters with boilers and hot water heaters. The testing is complicated, and more insight into this topic would be useful. He urged the Action not to forget the hot water heating part.
- How can the authorities deal with the third party certificate during the market surveillance? It only covers efficiency and not all of the other requirements.

Finally, the Commission noted that the Action should share its information with the Commission and the Member States.

This presentation also prompted a number of questions:

Q: Will the Action focus on how market surveillance is carried out or on removing non-compliant products?

A: The Action is a follow-up of the ECOPLIANT project. The intention is to implement some of market surveillance tools that were developed in ECOPLIANT, carry out some practical market surveillance and learn from it. However, the test budget is fairly low so the focus has to be on learning.

Q: The delegated acts are directed to the consumers, but the installers seldom provide the energy labels. How can the consumer decide based on information from the label?

A: The information should be passed on to the consumer, and the dealer should even provide an energy label for each product.

Q: Has the Commission done anything to communicate with the installers' association?

A: Yes, but the EU installers association is composed of the national installer associations. No special communication had taken place. EHI added that they - as a European association - did not communicate directly with them either, but the national associations had organised national meetings and specific information and training sessions with national installer associations (e.g. in France, UK, Italy, Spain and others).

Q: Will the Action share its results with the ADCO group?

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A: Yes.

Q: What would the Commission consider to be a good outcome of the Action?

A: The Commission would like to know if different compliance schemes (e.g. use of 3rd party laboratories or not) influences the compliance level. It could be useful when revising the directives. They also wanted to understand what the barriers to market surveillance are, and what could be done to increase the level of compliance with the regulation.

The WP Leader then opened the floor for questions in general:

Q: Can the stakeholder help with identifying test laboratories that can do the testing for the Action?

A: Orgalime offered to contact their national organisations that would be able to provide names. (Reply received after the meeting via email: Now all boilers had have to be tested by an official test house and certified by a Notified Body under the Boiler Efficiency Directive (92/42/EEC). As all laboratories have to be accredited, the list could be taken also for Market surveillance purpose. The LABTQ laboratories can be addressed - see <http://www.labtq.eu/main.html>.)

Q: Is it possible to get any indication of businesses' costs for compliance assessment?

A: Orgalime replied that such information is difficult to retrieve - 90% of their members are SME's. They would try to ask and see what input they would get back.

Q: UK has had issues with components that were replaced with low-cost components apparently manufactured in third countries. Would industry happen to know their origin? Does industry see a similar issue?

A: EHI replied that their member are global players and they are also on the emerging markets, but their focus is on the EU market. EHI will check if they know of issues linked to import of components from overseas countries.

(Reply received after the meeting via email: Spare parts must be authorised by the manufacturer - especially for the gas appliances - as the components are named in the certification. So it is not possible to take just any spare part which is offered on the market.)

The WP Leader closed the discussion and thanked the stakeholders for their input.

4 Discussion of future involvement of stakeholders in WP6

The WP Leader opened the discussion by asking what sort of communication the stakeholder expected from the Action.

Orgalime replied that they would be interested in knowing the results from the Action and they would disseminate such information via their website and their working groups. Likewise, if the Action wanted input or had specific questions, they could send questions to Orgalime that could ask their members.

EHI confirmed that they had the same interests. They had even already published different information about the EEPLIANT Action on their website.

Orgalime asked about the plan and noted that they would like to receive a draft timeline as soon as possible. The WP Leader replied that the outline timeline was ready:

- The EEPLIANT tools would be adapted by the end of summer 2015.
- Next step would be training of the market surveillance officials. It would take place towards the end of the year.
- The market surveillance activities would be carried out in first half of 2016 where products would be sampled and tested.
- Testing would fall in two stages: First, a control of the technical documents and second, the laboratory testing.
- The Action would end in summer 2017.

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The Commission asked if the Action would get back to stakeholders once they had obtained the first overview of the products and procedures. The WP Leader replied that WP6 would request feedback on the principles and the overall approach, but not on the selection of individual products.

The Commission explained that they were interested in following the progress with the testing, the market surveillance, etc. They would contact CEN to enquire about the standards.

5 Any other business

Nothing.

6 Closing of open session

The WP Leader thanked the stakeholders for their valuable input and closed the open part of the meeting.