Follow-up of the review studies for Ecodesign and Labelling regulations for space and water heaters:

EHI comments in the wake of the 1st WG 4 “Water Heaters” meeting of 20 January 2020 – updated with additional input

Please find below EHI comments in the wake of WG 4 meeting of 20 January 2020, based on VHK Discussion Document (version of 20 December 2019) and the presentation from this meeting (version of 13 February 2020). Following further discussion among EHI Members, additional input is provided (in blue color).

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| 1  | Discussion Document for 1st WG 4 meeting | 1.3.1 | 2-3 | Align Ecodesign & Labelling 3XL / 4XL | EHI recommends that energy labelling should be applied to water heaters and combination heaters with load profiles up to 2XL. This would help solve the following issues:  
- manufacturers need to assess their water heater / combination heater twice to apply the ecodesign Regulation (according to 3XL or 4XL) and the energy labelling Regulation (according to 2XL);  
- consumers see two contradicting efficiency values in product fiches for the same product;  
- tests of 3XL or 4XL water heaters carried out with a 2XL load profile do not reflect conditions as close as possible to actual conditions of use.  
- Water heaters with 3XL or 4XL profile are primarily for commercial purposes, for which the Energy Label is not intended. | EHI proposes to introduce an energy labelling exemption for products with load profiles of 3XL and 4XL. |
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We agree it is important to support solar thermal and understand the need to adapt the calculation method of $\eta_{WH}$ in the solar package label, especially when QnonSol is not available. For this purpose, Assotermica has developed a method. Moreover, information on the reduced annual energy consumption of the solar package is missing. Such information could be added in the product fiche of the solar package (or any other package).

EHI recommends using an alternative method for solar package label calculation, when QnonSol is not available (see enclosed: 20200514_Lot1-2_review_WG4_proposal_Solar_Package_Label).

In addition, EHI proposes to display the annual energy savings on the product fiche of the solar package (see enclosed: 20200514_Lot1-2_review_WG4_proposal_Energy_Saving_Calculation_solar_packages_Qhe).