

Topten Focus

Merged Energy Labelling for local space heaters, air conditioners and comfort fans: Topten’s recommendations

This summer, the consultation forum for the merged energy labelling of local space heaters, air conditioners and comfort fans has taken place. Topten would like to share in the present Topten Focus the main points that should be taken into consideration based on the outcome of the meeting on June 24th, 2022.

Provide a clear message in the form of the merged label

Topten welcomes the merging of regulations for room appliances with the same function into one energy label and the corresponding widening of the scope to include electric joule room heaters and comfort fans. Especially in the context of a challenged economy, the market cannot afford to misdirect consumers who often believe that class A models even of different room heating technologies are similarly efficient; true efficiency – and long-term cost savings – should be clearly reflected by a higher class rating. Inefficient technologies, on the other hand, should be clearly identifiable by low energy class ratings through the merged label.

Incentivize innovation through setting stringent class thresholds

Current benchmarks show that the proposed class thresholds need to be tightened in order to incentivize innovation. For both heating and cooling class scales, market improvements until the entry into force of the regulation should be taken into account when adjusting the thresholds and **ensuring that class A is initially empty.**

For example, of the 213 heat pumps and reversible air conditioners currently listed on Topten (Table 1), up to 26 models already reach class A. The best model reaches an EEI value between 343 and 381 (depending on the correction factors for control features), by far exceeding a proposed class A threshold of 290.

Table 1: Future energy classes for the heating function of current BAT products for heat pumps and reversible air conditioners on the EU market (Source: Topten.eu). Lacking the declaration of integrated control features, the sum of correction factors has once been set to 0 % and once to 100 %.

	Draft Energy Classes (Heating)							
	Sum Correction Factors = 0 %				Sum Correction Factors = 100 %			
	A	B	C	D	A	B	C	D
Heat Pumps without inverter	-	31	44	-	18	24	33	-
Heat Pumps with inverter	8	5	41	1	8	33	14	-
Reversible Air Conditioners	-	2	71	10	-	26	57	-
Sum	8	38	156	11	26	83	104	0

For the cooling function, no air conditioners currently reach class A. However, class B is already too populated – and is likely to be even more so upon entry into force of the merged regulation – and should be tightened.

Keep the calculation of the energy efficiency index simple

The Working Document proposes correction factors in the calculation of the energy efficiency index across all technologies that incentivise the integration of control features. This not only adds unnecessary complexity but also poses the risk that such control features will be added in low quality by manufacturers in order to improve the calculated EEI – while not truly reducing or even increasing the overall energy consumption of the product. **Topten recommends eliminating both this risk and the correction factors in the EEI calculation.** Keep the efficiency calculation simple and transparent for consumers and advertise the control features separately.

Provide complete product information sheets

There are gaps in the data required in the product information sheets. These documents should **display the energy efficiency index and all factors influencing it**, especially a list of **all applicable control features** (should the latter remain part of the EEI calculation). The draft regulation should focus on closing this gap and by doing so provide more transparency to consumers and market authorities.

Comfort fans – give the energy label and MEPS a fair chance

The energy labelling and MEPS for comfort fans in the EU are new and have the goal to stop environmental dumping of inefficient models into the market. The draft regulation proposes class thresholds that are already significantly exceeded by BAT models (Figure 1). The new regulation will only have a fair chance to move the market if **class A is set to be empty upon entry into force** – both for ceiling and non-ceiling fans – and if the lower classes are not rendered obsolete by Tier 1 of the MEPS. To simplify matters, we also recommend **harmonising the future EU MEPS with the 2022 Chinese MEPS.**

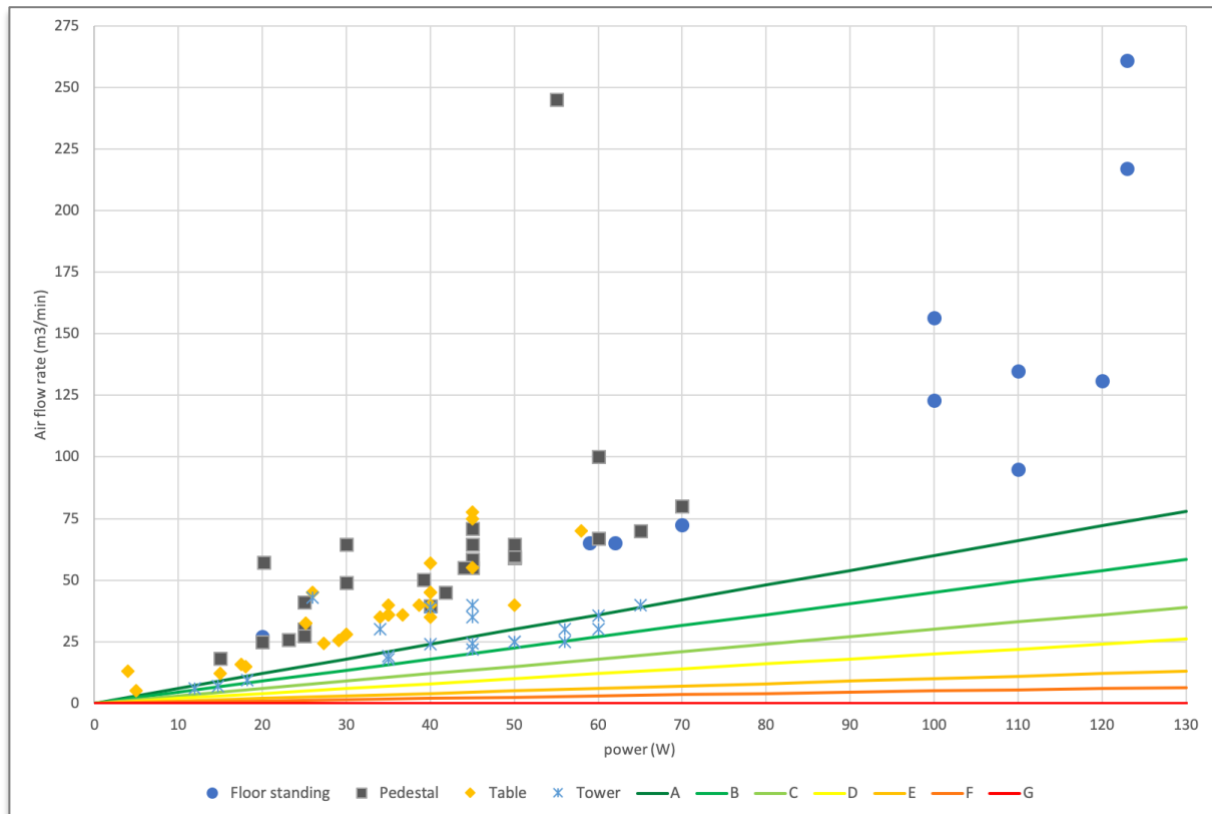


Figure 1: Proposed energy class thresholds for non-ceiling comfort fans in the EU, combined with the distribution of BAT products on the European market (according to construction types) in relation to the air flow rate (data gathered by Topten, August 2022).

More Information:

- [Download full Policy Recommendation](#) (available on Topten.eu)
- [Download this Topten Focus as PDF](#)
- Contact: policy@topten.ch

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