



September 17, 2014

Common address to Mr Wolfgang Hormel, Chairman CEN/TC 57; Mr Mindert Van Rij, Chairman CEN/TC 109; François Vuillaume, Chairman CEN/TC 48

Subject: Consideration of the 'out-of-the-box' mode in the European standards related to the energy efficiency of water heaters and other appliances for hot water production

During the development of European standards related to the *EC Regulations 812/2013* and *814/2013*, with regard to the ecodesign requirements and energy labelling of water heaters, hot water storage tanks and packages of water heater and solar device, the issue of different operating modes - such as eco-modes and buttons in some water heaters - has been raised.

Despite the concerns expressed by ECOS during the drafting process of the EN 13203 series in CEN/TC 109/WG 4, no reference to the 'modes' issue has been made in EN 13203-2 - where the efficiency calculation is addressed - in order to define the setting in which the appliances shall be tested. We believe this lack of specification in the relevant standards needs to be tackled in order to avoid losing the potential energy savings expected from the regulations; to avoid misinforming consumers with energy labels which correspond to tests performed in modes that may not reflect normal use conditions, and to allow for a fair and honest comparison between products.

The publication of the European Commission's Communication on the aforementioned regulations - in the *Official Journal of the European Union, C 207, 3 July 2014* - now makes an explicit reference to the mode in which the water heaters need to be tested, by providing a definition of the 'out-of-the-box mode' in section 4 of the document.

We welcome this development as we believe that it clarifies the situation. Hence, we urge the Technical Committees, developing standards for the energy efficiency calculation of such products, to accommodate the clarification brought by the transitional methods document by reference to the clarification in the standards.

We look forward to your consideration of our request and to constructive discussions ahead.

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