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Concerning EUP Lot 2 - Water Heaters

Facing the 2nd Consultation Forum on the 8th of July 2008, SBBA hereby wants to share our opinion with you, it especially concerns Electrical water heaters. We also refer to our letter from February 22nd.

SBBA is the association of companies in Sweden that produce or deliver electrical water heaters and electric, gas, oil, wood pellet or wood log heating boilers.

SBBA believes that it is important to reduce the CO₂ emissions in Europe and that energy using products such as water heaters and boilers are important products to further develop in this aspect. We understand the complexity in writing regulations for all of EU considering the different conditions in the various countries / regions. We hope that a solution can be reached where our suggestions below are considered, without jeopardizing the common measures for Energy efficiency and CO₂-reduction.

We think that it is the wrong decision that electrical water heaters in Sweden shall be "discriminated" compared to water heaters running on other energy sources. The reasons for this are the following:

- In Sweden and also in some other countries a large proportion¹ of the electricity is produced without emitting CO₂. Electricity thereby is a more climate friendly way to produce hot water than for instance gas or oil. For EU to then to set rules that favour CO₂-emitting technologies before less emitting ones seems wrong.
- In the family dwellings that are heated by electrical radiators, the Electrical Storage Water Heaters (ESWH) can of course in many cases be substituted by an exhaust air heat pump for water heating. This will be done by the consumer voluntary if it is an economically favourable option. But for summer cottages, small shops etc. an ESWH is often the only practically possible and economically feasible alternative.
- To replace the ESWH with an Electric Instantaneous Water Heater is not possible in the Swedish electrical distribution system because the effect is too high (10-40 kW).

Worth adding is that Sweden has a very limited gas distribution system.

We find it very important that national conditions are taken into account in order to get optimised solutions for lowest CO₂ emissions. Electrical Storage Water Heaters is a product group that has to be available on the market, in all sizes, for difficult installation conditions also in the future!

We therefore suggest either of the following:

1. Possibility for national exceptions also for the minimum requirements in Annex I, not only for the minimum requirements in Annex III.
2. Adjustment of the "2,5 factor" for electricity.
3. It is not practical to introduce minimum requirements on 1st of January 2009.

This is an important issue to the Swedish energy sector, consumers and manufacturers. If it is so that there is something that we have not understood in the documentation, we apologize. Due to the short time we have not been able to calculate fully the consequences of the suggested requirements.

Magnus Davidsson, 2008-07-03

¹ More than 90 % for Sweden, see Report Energy in Sweden 2007, Swedish Energy Agency