

Brussels, 15 June 2012

Comments on Commission Working Document on Eco design requirements for domestic and commercial ovens, hobs, grills and domestic range hoods

In view of the institutions further proceedings on eco design requirements for domestic and commercial kitchen appliances, Orgalime would like to provide the following additional comments to the debate that complement our earlier submissions and the points raised at the meeting of the Consultation Forum.

We comment on this particular draft implementation measures as, in contrast to other implementation measures, it affects several branches of Orgalime's constituency and raises the horizontal concern of arriving at a proper definition of the products covered.

1. Making a clear distinction between domestic and commercial kitchen appliances:

Making a clear distinction between domestic, commercial and industrial products in the future implementing measures would be helpful for establishing effective legislation and for facilitating enforcement.

For this purpose, the proposed product group classification in the draft implementing measures should, in our view, be specified, in particular through including a proper definition of the products regulated and a clear distinction between domestic and commercial products. The broader context in which kitchen appliances, such as ovens, grills or hobs, are used is important. Products for domestic use, products for commercial and industrial use should not be mixed into one eco design implementing measure as they have separate manufacturing and functionality requirements.

Experience shows that the scope interpretation of such product groups which mix domestic and commercial appliances is led by comparisons with domestic/consumer market product categories and usage patterns, which are not usually relevant to commercial sector products. Indeed, the design and manufacturing process of domestic and commercial equipment is different (i.e. thickness of the metal, use of stainless steel because according to specific uses, difference of volume).

Orgalime, the European Engineering Industries Association, speaks for 34 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 22 European countries. The industry employs some 9.7 million people in the EU and in 2010 accounted for some €1,510 billion of annual output. The industry not only represents some 28% of the output of manufactured products but also a third of the manufactured exports of the European Union.

2. Implementation of eco design requirements

We welcome the Commission's general intention to complete and finalise as soon as possible the remaining Eco design implementing measures for product groups already identified under the existing Working Plans, including the implementing measures on kitchen appliances. However, we urge the Commission to avoid cutting the necessary compliance deadlines for industry to conform, to compensate for delays in the early stages of preparing the implementing measures on domestic and commercial ovens, hobs, grill and hoods.

It is proposed to apply the first tier eco design requirement from 1 January 2014 onwards. However, this short delay risks increasing the costs for companies and reducing their ability to devote the necessary resources on research and development for energy efficient products. This, among other, might limit the opportunity for manufacturers to bring new product developments to the market. In addition, harmonised standards on measurement procedures and methods are not yet available.

Orgalime therefore calls for reasonable compliance deadlines for industry. This would help improve legal certainty and tie in with practical realities of manufacturing processes.

3. Definitions:

Combi-steamer oven

The Commission Working Document defines a 'Combi-steamer oven' as "*an oven in which hot air and steam can be used separately, together, or in sequence in a temperature range from 30°C to 300°C and a moisture range from 0 percent to 100 percent in a non-pressurised atmosphere where the cooking and preparing processes are operating successively or in isolation as programmed without interrupting the cooking process;*" (Annex I, section 1.10)

However, steam, beside the main heat source, is also used in commercial ovens e.g. bakeries. Thus, the definition could also include commercial bakery ovens, which is presumably not intended. In case of different requirements for combi-steamers and commercial ovens, this will result in contradictions: in bakery ovens, due to process reasons (desired product quality at the surface), steam is generally used only at the beginning of the baking process, but not separately. In case of external generation of steam, this could be used separately in bakery ovens theoretically. In practice, due to baking process reasons (desired baking product quality), it is not applied separately, as this is not the main purpose. Therefore, bakery ovens for commercial use should be excluded from the definition of combi-steamer oven.

Therefore, Orgalime suggests modifying the definition as follows: '*Combi-steamer oven' means an oven in which one of the core functions is to allow hot air and steam to be used either separately, or together, or in sequence in a temperature range from 30°C to 300°C and a moisture range from 0 percent to 100 percent in a non-pressurised atmosphere where the cooking and preparing processes are operating successively or in isolation as programmed without interrupting the cooking process;*'

Grill appliances

In addition, the definition of "grill appliances" as proposed in the Commission Working document is, in our view, too broad and may result in uncertainties for the application of the future eco design requirements. The definition given in the BIO IS report (task 8) on lot 23 is, in our view, more precise.

Grill appliances should therefore, in our view, be defined as proposed in the BIO IS report, namely as: "*Appliances designed for cooking food in oil or its own juices by direct contact with either a flat, smooth, hot surface (e.g. polished steel, or chrome plate) or a hot channelled cooking surface (e.g. polished steel or chrome) where plate temperature is thermostatically controlled*".

4. Product efficiency requirements

The Commission Working Document proposes minimum energy efficiency performance requirements for commercial electric and commercial gas ovens (Annex 1, section 2.c, table 3 and section 2.d, table 4). However, both categories: “commercial electric ovens” and “commercial gas ovens” cover a broad range of equipment, such as combination ovens, fan-forced ovens or multiple deck ovens, which should all be properly defined to avoid overlaps and conflicting requirements in case requirements are not similar for all categories of ovens.

Indeed, a multiple deck electric oven could be suited with a fan and therefore also be a "fan-forced electric oven". However, a definition is missing for 'Combination electric oven'.

Orgalime suggests clarifying the categories of electric and gas ovens, as follows:

- Combination electric oven (except multiple deck electric ovens)
- Fan-forced electric oven (except multiple deck electric ovens)
- Multiple deck electric oven.

And:

- Combination gas oven (except multiple deck gas ovens)
- Fan-forced gas oven (except multiple deck gas ovens)
- Multiple deck gas oven

We also propose to include a definition for “Combination electric oven”, which should read as follows: "*electric oven, which can be operated in conventional mode as well as in fan-forced mode*", and a definition for a “combination gas oven” as follows: "*gas oven, which can be operated in conventional mode as well as in fan-forced mode*".

