

Ecodesign & Energy Labelling Factsheet

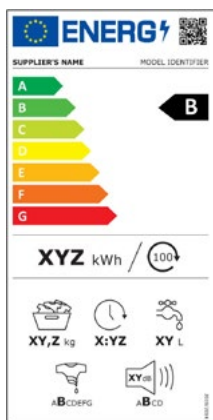
This document presents information about Ecodesign and energy labelling, how these regulations can facilitate the transition to electric hobs, and how national partners can engage in the process.

[Ecodesign](#) and energy labelling policies aim to reduce the energy consumption and environmental impact of products on the EU market.

The Ecodesign legislation sets mandatory performance requirements for the energy efficiency and environmental performance of products on the EU market. It requires manufacturers to design and produce - and importers to import - products that consume less energy, are more durable, and have a lower environmental impact. Ecodesign can address the lifetime of the product, but is focused on the design phase which is the most energy intensive. The goal of Ecodesign is to promote sustainable production and consumption practices, reduce carbon emissions, and save consumers money on energy bills. Through this legislation, the least efficient products are removed from the market. Ecodesign requirements are the reason the EU market has moved away from incandescent lightbulbs. The energy efficiency standards were so stringent that incandescent lighting technology was phased out and replaced by CFLs and now LEDs.

from A/green (most efficient) to G/red (least efficient). The label can also include information on the product's energy consumption (in kWh, and MJ for gas ovens), as well as other indicators such as noise level, volume of the product, water consumption, and other environmental impact indicators. There is not currently an indicator of pollutant emissions on energy labels. Through this legislation, more efficient products are promoted to buyers. In 2019, the energy label was recognized by 93% of consumers and 79% considered it when buying energy-efficient products, according to the [Special Eurobarometer 492](#).

Ecodesign and energy labels work together to promote sustainable production and consumption practices by encouraging the manufacture and purchase of energy-efficient products. By reducing energy consumption and environmental impact, these regulations help to address climate change and promote a more sustainable future. These policies are estimated to avoid approximately 230 million tonnes of oil equivalent (Mtoe) by 2030. Households can save an average of up to €285 per year on their energy bills and European companies can benefit from €66 billion in extra revenue.



The [energy label](#) provides information on energy performance and other criteria to buyers. Manufacturers and retailers are required to label products sold in stores and online. Energy labels provide buyers with clear and comparable information about the energy performance of the product, which helps them make informed purchasing decisions. The energy label must include information on energy efficiency in different classes, ranging

[“Exposing the Hidden Health Impacts of Cooking with Gas”](#) report, co-authored by CLASP and the [European Public Health Alliance](#), found that over 700,000 children in the EU have suffered asthma symptoms in the last year associated with cooking on gas, and that gas cooking hinders the EU's climate targets to transition to a net-zero economy. The report also highlighted that no EU-wide or Member State policies are in place to sufficiently mitigate the health and environmental risks of gas cooking. Ecodesign and energy labels represent an immediate opportunity to change this.

Figure 1: Energy Label for Washing Machines

CURRENT ECODESIGN AND ENERGY LABELLING FOR DOMESTIC COOKING APPLIANCES

Environmental and energy performance for domestic cooking appliances, including hobs, ovens, and cooker hoods, is regulated by [Ecodesign Regulation EC 66/2014](#) and the [Energy Labelling Regulation EC 65/2014](#). Some items of concern in the existing regulations include:

- **Gas hob energy performance is measured in a way that favors gas appliances.** Before being placed on the market, appliances are tested against energy performance and other criteria. Gas hobs are tested in a way that does not reflect real-life circumstances. For example, very large pans are used to test efficiency of gas burners so that less heat is lost / the flame is kept below the pan. However, many households use pans that are smaller than the flame they set for cooking, so the flame ends up around the sides of the pan, emitting more heat and pollution than necessary. CLASP therefore assumes current gas hob efficiency is overestimated.
- **Gas and electric hobs follow different energy performance requirements.** These products are tested differently, using different metrics and conditions, so gas hob efficiency requirements do not mirror efficiency requirements for electric. For example, electric hobs are tested using stainless steel pans (to accommodate induction hobs), whereas gas hobs are tested with aluminum testing pans, which are significantly more conductive.
- **There are no requirements to test for, report on, or limit emissions from gas cooking appliances.** Pollution from gas cooking is not considered in the regulations, even though there is precedent to measure and report on NOx levels from boilers ([per the Ecodesign and Energy Label for Space Heaters](#)).
- **Gas and electric hobs are not covered by an energy label, making it impossible for people to make informed purchasing decisions.** Hobs are the only cooking appliance without an energy label (both ovens and range hoods require an energy label). Not only are they

tested differently, the efficiency difference between technologies is underestimated – decisionmakers see no point in creating an energy label if most products fall within one or two labelling classes. There is also no pollutant emissions information available on the label.

The European Commission (EC) is reviewing the Ecodesign and energy labelling regulations for cooking appliances, and a new set of regulations are expected to be adopted in 2024. In 2022, the EC published a [study](#) that evaluates the existing regulations and proposes recommendations to revise requirements. **The study made little to no reference on the indoor air pollution and associated impacts from gas cooking appliances. The energy reductions from transitioning from gas to electric cooking were also severely underestimated, because of misconceptions around gas cooking efficiency.** The EC therefore missed an opportunity to positively impact the environment and public health.

STRATEGY TO TRANSITION TO ELECTRIC COOKING IN THE EU

The revision to Ecodesign and energy labels for domestic cooking appliances is the quickest mechanism to phase out harmful gas cooking appliances and transition to electric cooking. The gas cooking advocacy campaign is calling for the following changes to the regulations:

1. **Adopt a new test method to assess the energy and emissions performance of gas and electric hobs.** CLASP is developing a common test method so that energy efficiency levels of gas and electric hobs can be measured in the same, comparable way. This test method will also, for the first time, require hobs to be tested for pollution emissions levels. CLASP is working with experts and laboratories across Europe to demonstrate that the test method is correct and effective.

- 2. Define new, stringent energy efficiency requirements based on a common test method.** If gas and electric hob energy efficiency can be assessed in a comparable way, efficiency requirements can also be set in a comparable way. The new test method will likely show gas hobs are significantly less efficient than electric hobs, as gas burners emit and lose more heat than electric burners. The EC can therefore set comparable and ambitious efficiency requirements to ensure both gas and electric hobs are more efficient, reducing energy consumption, energy bills, and carbon emissions. Gas hob technologies may not meet these new requirements, ultimately phasing these products out of the market. CLASP will call for the EC to phase out harmful gas cooking appliance sales, using stringent efficiency requirements.
- 3. Introduce a new energy label for hobs, as soon as possible.** A common test method will also allow for the development of an A-G energy label that would enable people to compare the efficiency or other characteristics such as pollutant emissions of gas and electric hobs. The stark difference would encourage people to purchase electric over gas. This label should be made available as soon as possible to allow people to make informed purchasing decisions.
- 4. Report on and ideally set limit levels for pollutants from cooking appliances.** Hob and oven producers should be required to test, report, and share information with buyers and users on pollution levels from their cooking appliances. This should happen as soon as possible. The EC should set mandatory limits on allowable and 'safe' pollution levels. At the very minimum, a pollutant icon should be included on the energy label.

The next opportunity to feed into the policy process is expected on 30 November 2023. The EC will organize a consultation meeting, known as the "Consultation Forum", inviting national policymakers and experts, industry and civil society representatives to discuss draft Ecodesign and Energy Labelling regulations. Only invited members are invited to attend. Other interested stakeholders and partners can feed into the process through their national policymakers or European civil society organizations (EEB, ECOS, ANEC-BEUC, and CLASP). They can also contribute through a written comments period following the meeting.

CLASP will prepare and disseminate a position paper with recommendations, supported by technical evidence, to improve or revise the regulations. We will share the position paper with interested organisations so they may endorse and reuse or repurpose the paper and submit their own comments to the consultation and with national policymakers.

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