**Ecodesign Lot 20 - Final Review Study**

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| Summary | BEAMA, UK |
| By Adrian Regueira-Lopez | May 30, 2019 |

# Summary of findings and recommendations

### A number of loopholes were identified, such as the categories of portable and fixed heaters, the definitions of towel rails and the exemption of slave heaters. The definitions of each will be further clarified in this review.

### The definition of a local space heater has been updated and is as follows, to avoid appliances circumventing the regulation by declaring a different purpose (e.g. decorative) or that they can’t ‘reach and maintain a certain level of human comfort’ (e.g. towel rails and flueless gas appliances):

### *‘local space heater’ means a device that is equipped with one or more heat generators with the purpose of converting electricity or gaseous or liquid fuels directly into heat to contribute to a certain level of human thermal comfort in the enclosed space in which it is situated by direct heat transfer, possibly combined with a heat output to other spaces or with heat transfer to a fluid.*

### The definition of a portable electric heater has been updated and is as follows:

### *‘electric portable local space heaters’ are electric local space heaters provided with a cord supply and plug by the manufacturer which are designed to be portable in order to be operated on different rooms or locations. Portable appliances with features which can be used to fix them to a wall and/or floor shall comply with the requirements of fixed electric local space heaters.*

### The definition and exemption of slave heaters is recommended to be removed, and information requirements added to all heaters and controls sold unbundled to provide clear instructions on the necessary functions of external controls to meet the Ecodesign requirements.

### The Conversion Coefficient has been updated from 2.5 to 2.1, in light of recent changes to the Primary Energy Factor under the Energy Efficiency Directive. Minimum efficiency requirements, however, will be scaled to counteract this.

### Minimum requirements will not be increased in this review (apart from the PEF re-scaling).

### The introduction of automatic programming and control accuracy to the correction factors (controls) with a bonus of 0.5% each, has not been recommended by the consultant. This would’ve resulted in a lesser bonus for week timers (F(2) options), due to the limited contribution to energy savings and the uncertainty of the savings.

### Tower heaters have been included in the scope of the regulation. Their proposed definition is below:

### *‘towel rail’ means a fixed local space heater which is equipped with additional features so that to hold and dry or warm towels.*

### A stricter energy efficiency requirement will be in place for towel rails with a rated capacity of 250 W or greater. The correction factors (i.e. control options) will be the same for both.

### Air curtains, outdoor heaters and mixed-use radiators have been considered but not included to the scope, as they don’t fit with the definition of a local space heater.

### It is suggested to change the formula for the low power modes for electric local space heaters in order to include idle, off and standby modes and to make the calculation independent of the compliance with the standby regulation. Limit values will be set for each of the low power modes. F(4) will be zero if all three power modes are lower than the set values (as previously the case if compliant with the standby regulation), but will not be if either of the isn’t.

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