

Ecodesign and Energy Labelling for Cooking Appliances

Comments on the Consultation Forum 18 March 2024

Brussels, April 2024

The European Public Health Alliance (EPHA) welcomes the opportunity to provide comments on the Working Documents for Ecodesign and Energy Labelling measures for domestic cooking appliances and supports the European Commission's endeavours to **protect the health of Europeans through the draft Ecodesign Regulation**. We stress the importance of ensuring that the ongoing revision of the Ecodesign Regulation for domestic cooking appliances **addresses the pollution stemming from gas hobs by setting NO₂ emission limits, and enhances the energy efficiency criteria** for these products.

EPHA has consistently advocated for the Health in All Policies (HiAP) approach, emphasising the **need to address health concerns and regulate harmful pollutants from gas cooking** in the ongoing review of the Ecodesign measures for domestic cooking appliances. The current Ecodesign Directive 2009/125/EC has already established limits on air pollutant emissions for other appliances and equipment that involve fuel combustion, such as solid fuel space heaters, local space heaters, and boilers, demonstrating the feasibility of implementing similar limits for NO₂ and cooking appliances in the revised Regulation.

A [report](#) by the Collaborative Labeling and Appliance Standards Program (CLASP) and EPHA, with technical analysis by the Netherlands Organisation for Applied Scientific Research (TNO), has shed light on the alarming health risks associated with exposure to elevated levels of NO₂ emissions from gas cooking in European households, with a significant percentage of households using gas cookers exceeding the World Health Organization's recommended daily limits for NO₂ exposure. Given the severity of this situation, **prioritising NO₂ emission limits in the ongoing Regulation revision is of paramount importance**. This approach will not only promote cleaner air but also safeguard public health and drive environmental sustainability. By adhering to best practices and scientific evidence, we can ensure that the revised Regulation effectively tackles the pressing challenges posed by NO₂ emissions from cooking appliances, ultimately contributing to healthier living spaces for millions of European citizens.

Proposing a **NO₂ emission limits of 6ng/J**, as recommended by CLASP, is a crucial step towards phasing out harmful products from the market. This measure will significantly enhance indoor air quality, particularly benefiting vulnerable groups such as children and individuals with pre-existing respiratory conditions who are most susceptible to the adverse health effects of NO₂ pollution.

EPHA supports the use of CLASP's NO₂ measurement test method as the interim solution until a formal standard is established, ensuring immediate progress towards cleaner air. CLASP's method offers a more accurate and representative way to measure NO₂ emissions, which are crucial for their potential health impact in the home environment.

Lastly, EPHA underscores the critical importance of **enhancing the energy efficiency requirements for cooking appliances**, recognising the multifaceted benefits this policy measure can bring. Improving

energy efficiency requirements can **drive technological advancements and innovation in the industry**, while yielding significant **environmental advantages** linked to reduced energy consumption and greenhouse gas emissions. These environmental benefits, in turn, can have positive impacts on human health by mitigating air pollution and reducing the risk of a wide array of health issues associated with environmental degradation and climate change. Improved energy efficiency requirements may also contribute to **aiding the alleviation of energy poverty**, if coupled with initiatives to ensure that enhanced appliances are equitably accessible. Energy poverty affects millions of households in Europe, hindering their ability to afford essential services like heating, cooling, and cooking, negatively impacting their physical and mental health. The [Commission Recommendation on energy poverty](#) recognises the crucial role of ecodesign and ecolabeling measures in driving structural improvements in product policies, with the potential to help mitigate energy poverty in the long term. Mandating more energy-efficient and affordable cooking appliances can contribute to alleviating the financial and health burden on vulnerable households through two primary avenues. Firstly, by ensuring that cooking appliances sold on the EU market consume less energy, potential price increases associated with adopting more efficient cooking technologies can be offset. Secondly, the savings associated with purchasing energy-efficient cooking appliances can release resources for essential needs, positively impacting the overall health and well-being of individuals and communities.

To address this issue, EPHA suggests the following actions:

- Progressively facilitating the accurate comparison of energy efficiency between gas and electric hobs, using the existing gas test method with aligned pot sizes and the same metrics until further information has been collected to develop a more representative test method.
- Introducing additional energy efficiency product information requirements for gas and electric hobs in online and print instruction manuals by 2025, informing consumers of the real efficiency of their cooking appliances in the absence of an energy label, and enabling the European Commission to gather data for the next policy review.

Thank you for considering our comments. We are confident that, by implementing these revisions, we can significantly improve pollutant emissions and energy efficiency of cooking appliances on the EU market, reduce exposure to harmful air pollution and vulnerability to energy poverty for consumers, and contribute to a more sustainable and healthy future for all.

Who we are

EPHA is a European NGO alliance advocating for better health. We bring together national and European public health civil society organisations, including health professionals and patient and disease groups. Together with this unique and diverse membership, we are working to improve health and strengthen the voice of public health in Europe.

EPHA is a change agent in the public interest, independent from commercial funding. To learn more about EPHA, please visit [our website](#).