

Liquid Gas Europe's Response to the European Commission's Consultation on Energy Labelling Regulation for Water Heaters

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Introduction

Liquid Gas Europe (LGE) underlines the role of liquid gases—and in particular renewable liquid gases (rLGs) such as bioLPG (biopropane) and renewable DME—in delivering reliable, affordable heat and hot water, notably for rural and off-grid households and light-commercial users. As drop-in fuels, rLGs can enable significant lifecycle greenhouse-gas reductions while relying on existing infrastructure, helping ensure a pragmatic and inclusive transition for consumers who cannot readily electrify.

Summary of analysis & key asks (energy labelling)

LGE supports clearer consumer information, but the draft risks misleading comparisons and reduced usefulness for fuel-fired appliances:

- The A–G rescaling would place all LPG water heaters in the same class, limiting consumers' ability to distinguish between products; LGE asks for an explicit clarification (recital/guidance) that rescaling is not a judgement on product quality.
- The new η_{wh} class thresholds (e.g., >200% for class A for higher load profiles) reflect heat-pump physics, not necessarily superior "heat delivery services" (e.g., temperature/ramp-up); LGE asks for a mandatory explanatory statement in the product information sheet clarifying this.
- The new noise emission class could create inconsistent outcomes for flued gas appliances unless test conditions are clear; LGE asks to clarify the noise test configuration, indoor/outdoor attribution, and verification tolerances.
- The scope expansion to larger load profiles (3XL–4XL) and certain CHP water heaters may disproportionately affect off-grid/light-commercial LPG systems; LGE asks for a service-capability statement (e.g., service temperature, ramp-up time) in product information for these categories.

1. New A-G rescaling places all LPG water heaters under the same category, making it difficult for consumers to choose between different appliances

What changed

Existing Energy Labelling (EU) No 812/2013

- Multi-tier A+++ to G scale for water heaters and packages.
- Class determination set out in Annex II (water heaters) and Annex IV (packages).

New draft Energy Labelling Regulation

- Introduces a single A–G scale, consistent with Regulation (EU) 2017/1369.
- Explanatory text states that the annexes “*provide for an empty A class and a rescaling of the rest of the classes from B to G*”.
- New class limits defined in Annex II, Table 1 (water heaters) and Annex IV (packages).
- Label layout and scale presentation specified in Annex III and Annex V.

LPG relevance

LPG water heaters may appear to “lose” classes without any change in efficiency or emissions.

⇒ **Ask:** Explicitly state (recital or guidance) that rescaling is not a judgement on product quality, mirroring the clarification sought for space heaters.

2. η_{wh} -based class boundaries for high load profile only reflect heat-pump intrinsic physics, not superior heat delivery services

What changed

Existing regulation

- Energy classes derived from η_{wh} (%) under Annex II (812/2013), but numeric class boundaries are not consumer-visible.

New draft

- Explicit numeric thresholds by maximum load profile set out in Annex II, Table 1.
- For profiles L–4XL, Class A requires η_{wh} values >200%.
- Annex III requires these numeric thresholds to be printed on the label arrows.

LPG relevance

LPG water heaters cannot physically access higher classes regardless of real-world service performance.

⇒ **Ask:** Require a mandatory explanatory statement in the product information sheet clarifying that $\eta_{wh} > 100\%$ reflects heat-pump physics, not superior service (such as higher temperature or quicker ramp-up).

⇒ .

3. Noise emission class added to the label

What changed

Existing regulation

- Noise requirements mainly associated with heat-pump water heaters.

New draft

- Introduces airborne noise emission classes A–E.
- Limits in Annex II, Table 2.
- Noise class and dB(A) value displayed per Annex III, point 2(e).

LPG relevance

Fan-assisted and flued LPG appliances may appear less favourable even where noise is appropriate for installation context.

⇒ **Ask:** The Energy Labelling Regulation should clarify the noise test configuration (e.g. at what distance of the appliance the noise is measured), indoor/outdoor attribution, and verification tolerances applicable to flued gas water heaters, to ensure consistent measurement and enforcement and to avoid disproportionate impacts on LPG appliances whose noise characteristics differ fundamentally from those of heat pump systems.

4. Scope expansion to larger load profiles discriminates against typically off-grid and light-commercial LPG systems

What changed

Existing regulation

- Labelling focused on domestic-scale water heaters.

New draft

- Scope aligned with Ecodesign via Article 1:
 - load profiles up to 3XL and 4XL,
 - cogeneration water heaters <50 kW,
 - tanks up to 2000 L.
- Reflected across Annexes II–V.

LPG relevance

Off-grid and light-commercial LPG systems are disproportionately affected.

⇒ **Ask:** Require a service-capability statement (including service temperature, ramping-up time, etc.) for 3XL–4XL and CHP water heaters in Annex VI.



Annexes

Water heating energy efficiency classes of water heaters, by maximum load profiles, η_{wh} in %

Energy label class	Declared tapping profiles				
	3XS and 2XS	XS	S	M	L to 4XL
A	55	84	160	210	260
B	49	49	120	160	210
C	46	46	90	120	160
D	43	43	70	90	120
E	< 43	< 43	49	70	90
F			46	49	49
G			< 46	< 49	< 49

Declared tapping profile	Description
3XS	Extremely small hot-water demand
XS	Very small hot-water demand
S	Small hot-water demand
M	Medium hot-water demand
L	Large hot-water demand
XL	Very large hot-water demand
XXL	Extra-large hot-water demand
3XL	Very high hot-water demand
4XL	Extremely high hot-water demand



Acoustic airborne-noise-emission classes

Sound Power Level dB(A)	$P_{\text{rated}} \leq 6 \text{ kW}$		$6 < P_{\text{rated}} \leq 12 \text{ kW}$		$12 < P_{\text{rated}} \leq 30 \text{ kW}$		$30 < P_{\text{rated}} \leq 70 \text{ kW}$	
	Indoor	Outdoor	Indoor	Outdoor	Indoor	Outdoor	Indoor	Outdoor
A	30	45	30	45	35	50	45	60
B	35	50	35	50	40	55	50	65
C	40	55	40	55	45	60	55	70

IN

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E

D	45	60	45	60	50	65	60	75
E	≥ 60	≥ 65	≥ 65	≥ 70	≥ 70	≥ 78	≥ 80	≥ 88