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**Joint position on a discussion paper from the European Commission regarding the combination of the energy label for local space heaters (Lot 20) and air-to-air heat pumps (Lot 10)**

This document provides the views from several EU Associations (i.e. the signatories) on the merging proposal regarding two energy labelling Regulations[[1]](#footnote-2), following the Consultation Forum of the 10th of September 2019. It further reflects on the Commission’s discussion paper of the 19th of July 2019, as well as the suggestions shared by Member States’ representatives and stakeholders along the Consultation Forum.

**Why the energy label for local space heaters and air-to-air heat pumps should be based on distinct energy efficiency classes:**

In its discussion paper, the European Commission raises the question “whether or not consumers should be able to compare the energy efficiencies of those products by means of a single energy label, e.g. by introducing the same energy efficiency classes for all products on a ‘combined’ energy label (air-to-air heat pumps ≤12 kW and local space heaters ≤50 kW).”

From the perspective of the signatories, if a heating product has a comparable function to another heating product, then a comparable energy label between them is generally an appropriate tool for consumer information purposes. *Why?* Because, for some product types, a comparable energy label has a unique enabling role: it has the potential of directly influencing end-user towards choosing more energy efficient heating technologies. Further, if the label is consistently applied to all space heating appliances, it may also contribute to a level-playing field between different technologies providing the same heating function.

For local space heaters and air-to-air heat pumps, the signatories are however unconvinced that the proposed combination of the energy labelling Regulations (EU) 2015/1186 and (EU) 626/2011 will help meet the energy labelling Regulation’s objectives[[2]](#footnote-3).

First, ‘Lot 10’ and ‘Lot 20’ products do not really fulfil the same purposes:

* While Lot 10 products are providing both heating and cooling functions, Lot 20 products only provide heating ones;
* Lot 20 products aim at heating one room, whereas Lot 10 products can cool / heat more than one room in residential and commercial buildings – e.g. multi split air-conditioners up to 12 kW can supply up to four indoor units, usually located in different rooms;
* As acknowledged in Regulation (EU) 2015/1186 under its Recital 5 “*the typical use [of Lot 20 products] and therefore also energy consumption of local space heaters is different to that of other space heating products being regulated*”[[3]](#footnote-4). This latter is one of the reasons why the Regulation sets “*a labelling scale different to that of other space heating products.*”

Additionally, the merging proposal will not help to improve the effectiveness of the energy label, e.g. facilitating well-informed purchasing decisions based on the energy consumption of products; rather, it will reduce the active energy-classes down to two for each sub-type of a product (e.g. instead of the current four active classes for Lot 10 products and seven active classes for Lot 20 products). Therefore, it will significantly reduce the granularity of information provided to the consumer.

Lastly, regarding the promotion of innovation and investment into the production of more energy efficient products, the proposed decrease in the number of active classes for each sub-type of products will undoubtedly disincentivize manufacturers to improve the energy performance of their products when these would fall in the middle of a new larger energy label class. Indeed, it would be simply impossible for them to ever reach the top energy-classes.

**For all these reasons, the signatories are not in favour of introducing an energy label for air-to-air heat pumps ≤ 12 kW and local space heaters ≤ 50 kW that is based on the same energy efficiency classes.**

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**About EHI, the Association of the European Heating Industry**

EHIrepresents 90% of the European market for heat and hot water generation, heating controls and heat emitters, 80% of biomass central heating, as well as 75% of the hydronic heat pump and solar thermal markets. Our Members produce advanced technologies for heating in buildings, including: heating systems, burners, boilers, heat pumps, components and system integrators, radiators, surface heating & cooling and renewable energy systems. In doing so, we employ directly more than 160.000 people in Europe and invest more than 700 million euro a year in energy efficiency. [www.ehi.eu](http://www.ehi.eu)

**About EUHA, the Electric Underfloor Heating Alliance**

EUHA unites manufacturers to promote the interests of the product sector within a new electrified smart grid infrastructure. The group promotes the adoption of higher efficiency electric underfloor heating systems, providing primary but mainly secondary comfort heating in low energy demand buildings. EUHA’s 9 members The EUHA members work in close cooperation with the EU institutions and other stakeholders while providing information and advice on how to improve the sustainability of the electric underfloor heating systems. [euha-alliance.eu/](https://euha-alliance.eu/)

1. Energy labelling Regulations (EU) 626/2011 and (EU) 2015/1186. [↑](#footnote-ref-2)
2. Energy labelling Regulation (EU) 2017/1369, recital (2): “Energy labelling enables customers to make informed choices based on the energy consumption of energy-related products. Information on efficient and sustainable energy-related products makes a significant contribution to energy savings and to reducing energy bills, while at the same time promoting innovation and investments into the production of more energy efficient products. Improving the efficiency of energy-related products through informed customer choice and harmonising related requirements at Union level benefits also manufacturers, industry and the Union economy overall.” [↑](#footnote-ref-3)
3. Energy labelling Regulation (EU) 2015/1186, recital (5). [↑](#footnote-ref-4)