

Preparatory study for the Ecodesign and Energy Labelling Working Plan 2020-2024

Comments following the stakeholder meeting, 26 March 2021

April 2021

EPEE – representing the refrigeration, air-conditioning, and heat pump industry – welcomes the opportunity to comment on the presentation and outcome of the stakeholder meeting. EPEE’s position and recommendations on the relevant aspects of the study are as follows:

A. Product groups

Low-temperature emitters

EPEE would like to stress that similar products are already covered in regulations EU206/2012, EU2281/2016, EU811/2013, EU813/2013 and others. **Any potential for double regulation should be identified and avoided** from the start of the Ecodesign process.

Air curtains

EPEE agrees with the study team and supports excluding air curtains from the scope of the Working Plan. EPEE would recommend against regulating them as a separate product group under Ecodesign as they do not meet eligibility criteria as regards their negligible volume of sales.

Swimming pool heaters

EPEE agrees with the study team and supports including swimming pool heaters, provided heaters do not eventually risk double-regulation when products are already covered by existing Ecodesign requirements.

Industrial Smart Sensor

EPEE would recommend against the inclusion of this product group in the Working Plan, to avoid likely instances of double regulation of products and components covered by existing Ecodesign Lots.

To support the above statement, EPEE believes it is not evident which products will be affected and would appreciate clarification on the definition of “industrial smart sensors” and thus on the scope and coverage of the proposed inclusion.

B. Horizontal aspects

Lightweight design

EPEE recommends against imposing lightweight design requirements. Weight saving is a natural part of industrial and design development and is already widely pursued.

Recycled content

Epee notes that the envisaged requirements would be difficult to enforce as regards imported products and/or materials. **EPEE recommends keeping the obligation for post-consumer recycling content out of the scope of the Working Plan.**

Durability

Our industry raises doubts as how market surveillance authorities could enforce the propose measure and how to treat repair costs exceeding the value of the product itself.

Firmware and software and Scarce & critical raw materials

EPEE recommends letting market dynamics deal with efficiencies as regards software and critical raw materials. EPEE notes that in both cases, it will be difficult for surveillance authorities to enforce the provisions and that testing will require additional resources.

As concerns firmware and software, EPEE believes horizontal requirements may be ill-fitted as each product group may need appropriate and separate provisions. EPEE would appreciate the preparatory study illustrates real-world examples where minimum requirements on software increased durability and energy and resource efficiency.

EPEE also notes that manufacturers in principle strive to avoid using critical raw materials and rare-earth elements as they create undesirable supply-chain dependencies.

ABOUT EPEE:

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning, and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of over 50 member companies, national and international associations from three continents (Europe, North America, Asia).

EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment.

EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

As an expert association, EPEE is supporting safe, environmentally, and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies.

As part of the activities EPEE and its members are undertaking to raise awareness on sustainable cooling, EPEE has launched a broader [#CountOnCooling campaign](#). The [EPEE White Paper](#) "Count on Cooling: A five-step approach to deliver sustainable cooling" examines the crucial role of cooling in the 21st century.

For more information, please see our websites www.epeeglobal.org and www.countoncooling.eu

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