

Position on the review of Energy Labelling Regulation 626/2011 (ENER Lot 10) for air-to-air heat pumps, air conditioners, and comfort fans

14 February 2022

EXECUTIVE SUMMARY AND RECOMMENDATIONS

The European Commission is reviewing energy labelling Regulation (EU) No 626/2011 for air-to-air heat pumps, air conditioners, and comfort fans (ENER Lot 10). EPEE, the voice of the air conditioning, heat pump, and refrigeration industry in Europe, supports the EU ecodesign and energy labelling policies, and agrees with the need to keep the legislation up-to-date and in line with the latest technological and market developments.

This paper provides EPEE's position on the most recent proposals from the Commission on the review of ENER Lot 10. We explain our support for a merged energy label for air-to-air heat pumps, air conditioners, and comfort fans (ENER Lot 10) and local space heaters (ENER Lot 20), as we believe that this will help consumers choose the most energy efficient products.

- 1.** Continue merger proposal of energy labels for heating products.
- 2.** Efficiency to be considered further in terms of granularity

Introduction

EPEE, the voice of the air conditioning, heat pump, and refrigeration industry in Europe, welcomes the opportunity to provide comments on the ENER Lot 10 energy labelling proposals. We welcome the Commission's consideration of the industry comments following the last Consultation Forum meeting, and we support the need for reviewing the energy labelling rules in line with the latest technological and market developments.

Nonetheless, we believe that certain aspects could be further optimised. Please see our recommendations with further explanation below.

EPEE support for the consumer study on energy labelling of space heaters and air conditioners

1. Continue merger proposal of energy labels for heating products

EPEE supports the merger of the energy labels for (space) heaters (ENER Lot 10) and air conditioners (ENER Lot 20), as we believe that this step can foster the achievement of the EU heating decarbonisation objectives. One single label layout for all heating products helps consumers choose the most efficient technologies to heat their home by ensuring comparability of different solutions. Moreover, the same principle has already been applied for the existing energy label for heat pumps and boilers (ENER Lot 1), meaning that the proposed approach is fully coherent and in the same spirit as in existing legislation.

EPEE fully endorses the consumer study, concluding that merging of labels will help the consumer to select the most efficient heating solutions.

2. Efficiency to be considered further in terms of granularity

EPEE welcomes solutions that foster simplicity and easy-to-read energy labels that emphasize one scale when comparing different technologies that deliver the same function.

EPEE questions the conclusion regarding efficiency on the label, as this value was not properly displayed on the energy label for the consumer survey to draw a proper conclusion. Therefore, we would like to see a further study on that aspect in particular. Furthermore, using consumption on the energy label for systems that highly rely on parameters such as the building shell, climate and users seems not appropriate, as it may prevent users from selecting the better solution for their needs.

EPEE highly recommends to pair the ENER Lot 20 energy label review study with a consumer study aiming for solutions to the granularity issue within technology categories in the context of the merger proposal. EPEE suggests that this is the ideal opportunity for the Commission services to contract additional consumer testing in this regard. We are fully supportive to further assist in identifying solutions on the granularity aspect.

ABOUT EPEE

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 as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment. Please see our website (<https://www.epeeglobal.org/>) for further information.