



Joint Position on the combination of the energy labels for local space heaters (ENER Lot 20) and air-to-air heat pumps (ENER Lot 10)

Brussels, 15 September 2021

Introduction

The undersigned associations welcome the 16 June 2021 publication of the European Commission's report of the study on consumer understanding of the energy label for space heaters and air conditioners.¹ The report provides further clarity on consumer interpretation of energy labelling classes without further context.

However, based on this report, the Commission is evaluating the possibility of merging the energy labels for ≤ 50 kW local space heaters (ENER Lot 20) and ≤ 12 kW air-to-air heat pumps (ENER Lot 10), as it could remove consumer confusion about which product type is more energy consuming on the basis of the energy labelling classes alone: merging the energy labels has, according to supporters of the merger, the potential of directly influencing end-user choices towards more energy efficient heating technologies.

The undersigned associations strongly disagree with the introduction of an integrated energy label for heating technologies, as a merger of the energy labelling classes for both product categories will not help meet the energy labelling's objectives. This paper explains that 1) local space heaters and air-to-air heat pumps are not comparable, 2) merging different energy labels will not help improving the effectiveness of the energy label, and that 3) the consumer study itself does not univocally support the merger of the energy labelling scales.

¹ This report was subsequently presented at the Consultation Forum on Ecodesign and Energy Labelling of Tuesday 6 July 2021.

1. Local space heaters and air-to-air heat pumps are incomparable products

As acknowledges in Recital 5 of Regulation (EU) 2015/1186, the typical use and energy consumption of local space heaters is different of other space heating products, which in itself was already reason enough for the regulators to propose different energy labelling scales. The technologies are not comparable and lumping them together would lead to skewed results by giving the impression that they are interchangeable.

Local space heaters and air-to-air heat pumps are not interchangeable for customers, since they, among other aspects, provide different functionalities (i.e., purposes), have highly different heating capacity ranges, impose different installation requirements, and bear different costs. As such, the products covered in ENER Lot 20 (storage heaters, radiant heaters, electric underfloor heaters, etc.) have a different way of operating than the products covered by ENER Lot 10.

2. Merging different energy labels will not help improving the effectiveness of the energy label

The current energy labels for the different heating categories allow customers to choose the most energy efficient product model within the product categories that are most suitable for their specific purposes. This means that the current model offers sufficient granularity for consumers to make informed choices: the consumer first selects which product type is most suitable for heating a specific room, and then can make a well-informed choice about the most efficient models available.

Merging the energy labels will reduce the active energy classes down compared to totally different heating technologies. Consumers will obtain less information on what the best appliance of a specific product group is. At best, this will confuse the consumer, and we believe it will limit the incentive to invest in improving the energy performance of heating.

3. No clear-cut answers from the consumer study on merging the labels

The 16 June 2021 consumer study concludes that combining the energy labels of different product groups could better inform consumers in choosing the least energy consuming technology, and that is exactly the issue with comparing incomparable product groups: the optimal space areas for which they are being used are different, which means that granularity is needed in order to differentiate the different product groups to allow for optimal choices for specific purposes.

About the undersigned associations

About EHI, the Association of the European Heating Industry

EHI represents 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.

About the Electric Underfloor Heating Alliance (EUHA)

The EUHA is a formal group of manufacturers united 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 and secondary comfort heating in low energy demand buildings. See also: www.euha-alliance.eu.

About the European Infrared Heating Alliance (EIHA)

The EIHA is a network of European infrared heating manufacturers that provides interested parties with objective, well-founded information, and works to establish and promote infrared heating in the market. In addition, the EIHA represents the interests of the infrared heating industry towards the EU institutions to support the development of policy and legislation aimed at facilitating the uptake of energy efficient and comfortable heating. See also: www.ig-infrared.com.

About EuropeOn

EuropeOn is the European voice of the electrical contracting industry since 1954. With 1.8 million professionals in over 300.000 businesses and with a turnover of over 200 billion euros, electrical contractors provide electrical installations for buildings and infrastructure, enabling cities and citizens to take part in the Energy Transition. EuropeOn addresses energy, climate, mobility, building and skills policies. The association is campaigning in favour of #Skills4Climate and #EUGreenRecovery. It is part of the Electrification Alliance, Construction 2050, the Platform for E-mobility, and the Forum for European Electrical Domestic Safety. www.europe-on.org