

Paolo Tosoratti
DG ENER - C.3.
European Commission
Rue De Mot 24
1040 Brussels

Brussels, 10th July 2018

Dear Mr Tosoratti,

Your team is currently working with high priority and strong engagement on the establishment of the EU Product Registration Database for Energy Label - “EPREL” – as stipulated in Regulation 2017/1369. We appreciate this work, as well as the open exchange at technical level. However, we highlight that this is a complex IT project which bears high risks with respect to its realisation. We are concerned by the risk that EPREL may not provide in time the necessary functionalities to ensure an efficient and functional registration of models and data upload on a large scale.

Now, as we enter the second half of 2018, with only a few months until the foreseen start of the product registration by suppliers in November 2018 (in line with the planning published at the occasion of the EPREL consultation forum of 12/03/2018), industry sectors are increasingly concerned about the timing of the project. We remain ready to help and identify, together with the Institutions, necessary solutions.

Many companies in our memberships have to manage thousands and sometimes hundreds of thousands of models. Other companies may have less models, but still face great challenges in uploading data. To register data in EPREL, they will need a properly and securely functioning system-to-system data transfer (S2S), as well as a web interface for file upload and a user interface. In order to ensure data transfer from the supplier’s side, companies need sufficient time to prepare their own interfaces and data structures. Then, both parties, industry and your team, will need additional time for debugging during data transfer tests.

This is why the S2S upload needs to be available at the latest in mid-July, which is in line with the planning published at the occasion of the EPREL consultation forum of 12/03/2018.

There have been already delays in intermediate development steps of EPREL, which we understand are due to dependencies outside of your responsibility. If the S2S upload was delayed further beyond mid-July, our experts fear that the remaining time would not be sufficient to secure that the S2S interface works soundly and in a sufficiently secure way in advance of the final deadline for product registration (according to the functional requirements of Article 12, paragraph 7-10 in Regulation 2017/1369).

To step forward in this difficult situation we would like to highlight to you the industry timing constraints. We have therefore collected companies’ needs for preparation time. It is crucial for the project that suppliers receive:

- **No later than 15 July 2018:**
 - o XSD files for system-to-system upload for all product groups;
 - o a web interface to upload data via User Interface and to allow for file upload via web interface, as mentioned in the latest version of the Assumptions document.
- **No later than 31 August 2018:**
 - o the finalised version of the EPREL exchange model;
 - o a functioning pilot for the system to system upload.

Nevertheless, suppliers share their strong concern on the time available to fulfil the task, even if the abovementioned schedule is met.

We would very much appreciate to discuss with you and identify solution to handle the timeline outlined above.

We remain at your disposal should you have any questions.

Yours sincerely,



Paolo Falcioni, Director General
APPLiA – Home Appliance Europe



Dr. Peter Hug, Managing Director
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Thomas Nowak, Secretary General
European Heat Pump Association (EHPA)



Ourania Georgoutsakou, Secretary-General
Lighting Europe



Andrea Voigt, Director General
European Partnership for Energy
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About the Signatories

About APPLiA: APPLiA represents the home appliance industry in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Groupe Atlantic, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. APPLiA's member Associations cover the following countries: Austria, Baltics, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom. www.applia-europe.eu

About DIGITALEUROPE : DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include in total 25,000 ICT Companies in Europe represented by 61 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: www.digitaleurope.org

About EHI: EHI, the Association of the European Heating Industry, represents 90% of the European market for heat and hot water generation, heating controls and heat emitters, as well as 75% of the hydronic heat pump market. 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 120.000 people in Europe and invest more than half a billion euro a year in energy efficiency. www.ehi.eu

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 40 member companies, national and international associations. 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. 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. www.epeeglobal.org

About EHPA

The European Heat Pump Association (EHPA) is a Brussels based industry association which aims at promoting awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. EHPA provides technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production. EHPA coordinates quality initiatives: including the HP KEYMARK, a Quality label for heat pumps and Certification standards for heat pump installers. The association compiles the annual heat pump statistics and organizes a number of events, among them an annual heat pump conference.

About EUnited Cleaning: The Association of European cleaning machines manufacturers - EUnited Cleaning - represents the leading producers of floor cleaning machines and high-pressure cleaners for commercial and industrial use. www.eu-nited.net

About Eurovent: Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe, the Middle East and Africa represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn Euros, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level-playing field for the entire industry independent from organisation sizes or membership fees. www.eurovent.eu

About EVIA: The European Ventilation Industry Association (EVIA) was established in Brussels in July 2010. EVIA's mission is to represent the views and interests of the ventilation industry and serve as platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States. Our membership is composed of more than 40 member companies and 6 national associations across Europe realising an annual turnover of over 7 billion euros and employing more than 45,000 people in Europe. EVIA aims to promote highly energy efficient ventilation applications across Europe, with high consideration for health and comfort aspects. Fresh and good indoor air quality is a critical element of comfort and contributes to keeping people healthy in buildings. www.evia.eu

About LightingEurope: LightingEurope is the industry association that represents the lighting industry in Europe. We are the voice of more than 1,000 lighting companies that employ more than 100,000 Europeans and create an annual European turnover of over € 20 billion. Our daily mission is to advocate and defend the lighting industry in Brussels, while reconciling it with ongoing EU policy aims. In doing so, we are dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort, and the health and safety of consumers. www.lightingeurope.org