The European Heat Pump Association (EHPA) has been an active supporter in the development of the Ecodesign implementing measures and the related Energy label. EHPA believes that these tools – if well implemented – have a high potential to speed-up Europe’s transition towards a green, efficient and low-carbon economy.

The current policy framework on space and water heating products - that entered into force in September 2015 - makes the energy label a strong tool to govern consumer choice towards most efficient and thus reduced environmental impact of the heating and cooling sector. Its strength lays in enabling consumers to directly compare the energy efficiency of functionally equivalent products. We are confident that it will have a positive impact on the European heating and cooling markets.

EHPA welcomes the ambition of the European Commission (supported by the Council and getting favourable echo’s in the European Parliament) when reviewing the current Directive to further increase the effectiveness of the Energy label.

EHPA understands the logic behind a cross-product reform but urges policy-makers to be cautious about the effects of a heavily regulated horizontal approach on the very genuine heating sector, genuine with respect to its considerable impact on Europe’s climate and energy targets, with respect to the role of the consumer who is rarely alone in deciding on the purchase of a thermal appliance, and with respect to the low level of maturity of sectorial regulation (the current framework has just been implemented and its effectiveness could consequently not have been assessed).

For all these reason, EHPA considers that, as far as provisions applying to the heating sector are concerned, the new Energy Label Regulation should reflect the following 3 major priorities, fully inline with the Commission’s ambition to increase the role of the consumer, allowing him or her to make the best informed choice with respect to energy efficiency:

- There should be only one label for functionally equivalent products (no split label per technology);
- The energy classes must have a meaningful width after each rescaling exercise;
- The top class must always be populated.

The new Regulation needs further to ensure that re-scaling is based on technological and market evolutions and that no producers of environmentally-friendly appliances face unnecessary burden, but more importantly, as mentioned before, it should mainly refer to dedicated product regulations for further specifications on the Energy Label and its functioning.