The European Heat Pump Association welcomes the continued efforts of the European Commission towards a final version of the Energylabel and the Ecodesign measure.

With regards to the working document on the energy label, we appreciate that one single label is maintained for all heat generators.

We would like to stress that we see the introduction of the A+++ only six years after the start of the measure as a compromise; albeit acceptable it creates severe issues for the marketability of highly efficient products. Already today there are heat pumps on the market, that comply with the requirements of the A+++ - class. With the current approach, these products are deprived the option to show their superior performance in the market place, as to the consumer, all products in one class seem equally good. (See Annex I for a visualization of the large differences between label classes). This may also reduce the attractiveness for industry to continue to develop these high quality products (most of which from European origin!).

We thus reiterate the need of additional information on the label to allow a further differentiation of heat pump technology within the given labelling classes and ask the commission to accommodate to industry's need.

This could simply be achieved by adding the energy efficiency (eta s) to the label (See annex II for a visualisation).

We are convinced that this added information will make the label stronger and increase its impact in the market place thus supporting highly efficient products and honouring industry research and development activity.

We hope that this information is helpful and are available for further discussion.
Annex I: uneven width of label classes

[Diagram showing uneven width of label classes]

Eta needed on the label to:
- distinguish best performing products
- justify higher investment

Annex II
Adding of the efficiency value for all climate zones:
Example of the energy label for heat pump boilers