Re: EU Product Database for Energy Labelling (EPREL) Implementing Act

Dear Ms Butler,

As you are probably aware, the EU Product Database for Energy Labelling (EPREL) introduced by Regulation (EU) 2017/1369, due to be operational on 1st January 2019, is facing some delay in its implementation.

According to the information given on the EPREL Consultation Forum for Suppliers on 16th October, suppliers will eventually be able to start registering the models for 19 out of 23 product groups into the operational parts of the system as of mid-December. An automated version (system-to-system) will be available from February 2019 and the data will be accessible to the Market Surveillance authorities and the public not earlier than 1st April 2019.

We understand that at the occasion of the next ADCO ENERLAB meeting in mid-November, this issue will be on the agenda.

With the updated timing in mind and being strongly affected by EPREL, our industries would highly appreciate being kept informed about the outcome of this very relevant topic for suppliers in order to be confident in fulfilling their legal obligations while they continue getting used to the new system.

We remain at your disposal should you have any questions and would like to request a meeting to discuss this issue further at your convenience.

Yours sincerely,

Paolo Falcioni, Director General
APPLiA – Home Appliance Europe

Cecilia Bonefeld-Dahl, Director General
DIGITALEUROPE
Federica Sabbati, Secretary General
European Heating Industry (EHI)

Thomas Nowak, Secretary General
European Heat Pump Association (EHPA)

Andrea Voigt, Director General
European Partnership for Energy and the Environment (EPEE)

Dr. Peter Hug
EUUnited Cleaning

Felix Van Eyken, Secretary General
Eurovent

Russell Patten, Secretary General
European Ventilation Industry Association (EVIA)

Ourania Georgoutsakou, Secretary-General
Lighting Europe
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](http://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 35,000 ICT Companies in Europe represented by 61 corporate members and 39 national trade associations from across Europe. Our website provides further information on our recent news and activities: [www.digitaleurope.org](http://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](http://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](http://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. 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. Members are: Columbus, Comac, Diversey, Electrostar, FIMAP, Ghibli, Hako, Kärcher, Nilfisk, Numatic, RCM, RUWAC, Schwamborn, Starmix, Stihl, Stolzenberg, Tennant, Truvox, TTS Cleantech, Wetrok. 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 a 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 35 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. 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