

EHPA Feedback

Energy Labelling requirements for air conditioning appliances – Review ENER Lot 10

EHPA would like to thank the European Commission and the study team for the work already carried out and welcomes the opportunity given to send feedback on the call for evidence for the impact assessment on the energy labelling requirements for air-to-air conditioners, air-to-air heat pumps and comfort fans.

Energy Label

EHPA believes that we should maintain the label as simple, clear, and understandable as possible for the end-user. All information on the label should be understandable by the consumers. Consequently, we recommend that all symbols should be described so that they are clearly understood. EHPA also believe that too much information could water down the value of the label for end-users. The QR code is a very easy bridge for customers to retrieve more detailed data when needed.

EHPA would like to highlight that the current approach on printed labels should be maintained. Only one combination of indoor and outdoor units at capacity ratio 1 should be provided as a printed label, information on other combinations can be provided on a free access website or EPREL. This to avoid a proliferation of labels in the packaging of the unit.

Rescaling

EHPA is supportive to the current process of re-designing the energy label. Within this process, we ask the European Commission and Member States to take into consideration the administrative and operative consequences which this procedure and changes create for the industry, market surveillance authorities and consumers.

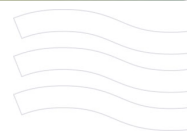
We would like to flag that it is necessary to inform the manufacturers of the foreseen measures as early as possible and to provide a full 2-year transition period between the entry into force and the applicability of the new label.

Merging of local space heaters and air conditioners labelling scales

EHPA welcomes the merging of the local space heating products labelling scales and air conditioners labelling scales. The conclusion of the study shows that the consumer can benefit more from a combined label. Indeed, granularity can be an issue, but further investigation and study can be conducted as suggested by the consumer study.

We believe that the display information should be easily understood by the consumers. We suggest the use of efficiency as a possible solution instead of the consumption as it may help

improve granularity. Furthermore, if the heating capacity is shown, it should be clearly indicated that it is the heating capacity to avoid misunderstandings.



Product Information Sheet

EHPA would like to remind that the design of the product information sheet should be up to the manufacturer.

Timing and implementation:

EHPA recommends that there should be a period of at least two years between the publication and the implementation of the new rules. Keeping in mind that an implementation either in the beginning or in the end of the year is more appropriate due to AC market seasonality.

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 marketplace 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.