EXECUTIVE SUMMARY

The European Partnership the Energy and the Environment (EPEE), the Japan Business Council in Europe (JBCE), the Association of the European Heating Industry (EHI) and the European Heat Pump Association (EHPA) welcome the initiative of the European Commission to harmonise definitions and requirements related to measured and declared values and their upload in the EPREL database.

While it is necessary to develop such harmonised understanding, EPEE, JBCE, EHI and EHPA emphasise that any parameters to be included in EPREL need to be defined on a product by product group basis. Therefore, EPEE, JBCE, EHI and EHPA’s answers to the EC’s questions relate specifically to the on-going revision of (EU) No 626/2011 (lot 10) and (EU) No 811/2013 (lot 1).

1. **Do you agree that the ‘measured technical parameters’ as referred to in Article 12(5)(d) and (e) of the energy labelling framework Regulation have corresponding ‘values’ in the technical documentation as per the product-specific Regulations?**

   EPEE, JBCE, EHI and EHPA consider that a ‘measured technical parameter’ refers to a parameter that can either be measured (or simulated or interpolated or calculated). These values are the basis for the declared values. The declared values are either equal to the measured values or less favourable.

2. **Do you agree with the Commission services’ interpretation that for each measured parameter at least a ‘declared value’ should be included in the technical documentation and uploaded in EPREL?**

   EPEE, JBCE, EHI and EHPA consider that not all measured (or simulated or interpolated or calculated) parameters have corresponding declared values in the technical documentation that need to be uploaded on EPREL. Therefore, EPEE, JBCE, EHI and EHPA consider it to be necessary to define by product group what measured (or simulated or interpolated or calculated) parameters need to be declared in the technical documentation for upload.

3. **Should verification tolerances apply only for the values published on the label or in the product information sheet or also for intermediate values that are included in the technical documentation? If so, how should the ‘accumulation’ of tolerances be dealt with?**

   EPEE, JBCE, EHI and EHPA consider that the verification tolerance applies to the relevant declared values. Any tolerances for intermediate values should either be specified in the
regulation or, if that is not the case, the uncertainties of measurement as specified by the relevant standards should be applied as these are product specific and based on technical data.

4. *Should the Regulations be amended to ensure a consistent approach for all product groups and if so in what way?*

Where possible, EPEE, JBCE, EHI and EHPA support a consistent approach for product groups offering a similar function (such as for example heating and cooling) and for all future measures while taking into account the specific aspects of the different product groups. Clarifying definitions on measured, declared and published values would therefore be helpful.

***

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

Toyokazu NAGAMUNE
Secretary-General of the Japan Business Council in Europe (JBCE)

Thomas Nowak, Carnot Consulting
Secretary General of the European Heat Pump Association (EHPA)
About the Signatories

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 over 50 member companies, national and international associations from three continents (Europe, North America, Asia).

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.

As part of the activities EPEE and its members are undertaking to raise awareness on sustainable cooling, EPEE will launch a broader #CountOnCooling campaign. The EPEE White Paper “Count on Cooling: A five-step approach to deliver sustainable cooling” examines the crucial role of cooling in the 21st century.

For more information please see our websites www.epeeglobal.org and www.countoncooling.eu.

About JBCE:

Created in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of 88 multinational companies of Japanese parentage active in Europe.

Our members operate across a wide range of sectors including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, railway, textiles and glass products.

Building a new era of cooperation between the European Union (EU) and Japan is at the core of our activities, organised under several committees focusing on: Corporate Policy, Corporate Social Responsibility, Digital Innovation, Environment & Energy, Standards and Conformity, and Trade.

For more information please see our website www.jbce.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, 75% of the hydronic heat pump market, 80% of the biomass central heating market (pellets, wood) and 70% of the solar thermal market.

EHI 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 125.000 people in Europe and invest more than 1 billion euros a year in energy efficiency.

For more information please see our website www.ehi.eu.
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.

For more information please see our website www.ehpa.org.