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Joint Statement on the Merging of the Energy Labels of Lot 10 and Lot 20

Brussels, 18 November 2022

The European Commission proposes gathering all heating and cooling appliances with the same main local functionality under one merged energy label. The scope of a new Regulation will include local space heaters and air conditioners (previously under two separate regulations), along with comfort fans and electric heaters, which will be regulated by the EU for the first time.

EHPA, EPEE, ECOS, and EEB support the Commission's proposal and believe that this step will contribute significantly to achieving the decarbonization of heating and cooling in EU buildings. A common label will effectively guide consumers to the most energy-efficient appliances and steer the market toward technology development, unlocking the highest energy and GHG savings for these product categories. The proposal to merge the energy labelling scales for heating between ENER Lot 10 and ENER Lot 20 products and between splits and portable (SD/DD) in cooling is fully aligned with the EU's Green Deal objectives, particularly the Energy Efficiency First principle, and will contribute to delivering energy security under the REPowerEU Initiative.

Merging the energy labels for cooling between ENER Lot 10 technologies and in heating across ENER Lot 10 and 20 products will increase energy savings

All product groups under both regulations have heating as a function, and the use of heating options that are the most efficient should therefore be further elaborated. Air-to-air heat pumps (ENER Lot 10) are increasingly used as a heating system to replace electric (Joule-effect) space heaters in a number of countries. Similarly, portable and double duct air conditioners are often considered and marketed as an equivalent solution to a split air conditioner. For these reasons, the consumers should be made fully aware of the significant efficiency gap between these technologies.

A merged energy label will enable consumers to make informed choices

We strongly believe that one merged energy label for all heating products and one merged energy label for all cooling products help consumers choose the most efficient technologies to heat or cool their home by ensuring direct comparability across different solutions. This principle has been confirmed in practice by the European Commission's *'Study on consumer understanding of the energy label for space heaters and air conditioners'*. The consumer survey showed that almost half of consumers consider several technologies before choosing a local heater. EHPA, EPEE, ECOS and EEB fully endorse the consumer study's conclusion that merging the labels will help consumers to select the most efficient heating and cooling solutions.

The principle of merging energy labels of comparable product groups providing the same function has already been applied for the existing energy label for heat pumps and boilers (ENER Lot 1), meaning that the proposed approach for ENER Lots 10 and 20 is fully coherent and in the same spirit as existing legislation.

In summary, we welcome solutions that foster simplicity and easy-to-read energy labels. The merger, emphasizing one scale when comparing different technologies that deliver the same function, improves the provision of information to consumers, enabling them to make the most efficient heating/cooling decision, which helps delivering the European Green Deal.

We, therefore, call for the support of the Member States to further encourage the merging of the energy label for all local space heaters, air conditioners, and comfort fans; meaning one merged label for heating, one merged label for cooling, and one merged label for comfort fans.

Yours sincerely,

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