



Mr Niels Ladefoged
Demotstraat 24
B-1040 Brussels

Brussels, 1 March 2022

Subject: Commission proposal for a Compliance Support Facility

Dear Mr Ladefoged,

The undersigned associations, representing European manufacturing sectors within the scope of Ecodesign and Energy Labelling, support the EU Ecodesign and Energy Labelling Framework. These tools have delivered considerable energy savings across Europe and have led to higher efficiency products for European consumers. Further advancements in the benefits for consumers cannot be achieved without compliance and appropriate market surveillance and enforcement, and it is therefore indispensable that further advancements are made in those fields.

It is evident for the undersigned associations that market surveillance, enforcement, and compliance deserve more attention and resources in order to fully utilise the potential of the Ecodesign and energy acquis and to ensure that manufacturers operate on a level playing field in the EU market. Nonetheless, we have concerns with the Commission proposal for a Compliance Support Facility, about which we have been informed through partner industry associations.

With this letter, we would like to support the message that you have received from APPLiA, EHI, Eurovent, and LightingEurope on 28 January 2022. Although we appreciate the Commission's efforts to improve compliance with Ecodesign and Energy Labelling rules, the undersigned associations do not believe that the current proposal is appropriate for the objectives it intends to achieve.

Our concerns are centred around the following aspects:

- The Compliance Support Facility envisages that private industry associations, on behalf of the Commission, will have to provide interpretation on rules on which they have a vested interest.
- The Compliance Support Facility is also envisaged to develop interpretation and answers to questions in alignment with all the participants to the Compliance Support Facility. As the topics raised can be highly complex and have a competitively sensitive nature, it may be difficult to agree within the Facility and it may also not be appropriate for the group members to deal with certain types of information and questions.
- Industry associations, but also consumer organisations and NGOs, do not have the legal structure and are not entitled to carry the liability that flows from the proposed Compliance Support Facility. We strongly believe that industry associations can make FAQs and guidelines for their own membership or specific industry, but that it is the Commission who should provide such tools for the whole market within the scope of Ecodesign and Energy Labelling.

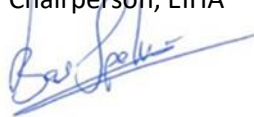
We recommend the Commission to refrain from moving forward with this initiative. Compliance, market surveillance, and enforcement are important subjects that need to be addressed and improved, and we are available to discuss alternative initiatives on how to move forward.

Yours sincerely,

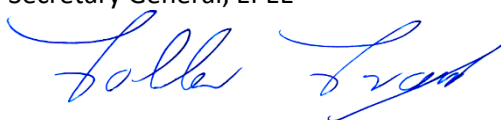
Thomas Nowak
Secretary General, EHPA




Bas Spekrijse
Chairperson, EIHA



Folker Franz
Secretary General, EPEE



Lars-Gösta Alsterberg
Chairperson, EUHA



Russell Patten
Secretary General, EVIA



About the signatories

About the European Heat Pump Association (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.

About the European Infrared Heating Alliance (EIHA)

The European Infrared Heating Alliance (EIHA) is a network of national associations representing infrared heating manufacturers with a strong European footprint. We are committed to developing environmentally friendly heating that is powered with renewables. Our products are fully repairable and sustainable in terms of material efficiency, whilst improving comfort and wellbeing of their end-users. More information: www.ig-infrared.com/en/home.htm

About EPEE

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 as well as national

and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, 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. Please see our website (<http://www.epeeglobal.org>) for further information.

About the Electric Underfloor Heating Alliance (EUHA)

The Electric Underfloor Heating Alliance (EUHA) represents European manufacturers of electrical underfloor heating and their immediate supply chain. Our members are committed to fostering energy savings through the adoption of an electrified smart grid infrastructure powered by renewables, while continuously improving the comfort and wellbeing of end-users. See also: www.euha-alliance.eu.

About the European Ventilation Industry Association (EVIA)

The European Ventilation Industry Association ([EVIA](http://www.eviamembers.com)) 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 40 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.

EVIA aims to promote highly energy efficient ventilation applications across Europe, with high consideration for health and comfort aspects. Fresh and good indoor air quality is a critical element of comfort and contributes to keeping people healthy in buildings.