

EHPA Feedback

Public Consultation on the Sustainable Consumption of Goods

EHPA would like to thank the European Commission 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 Sustainable Consumption of Goods.

Before going into details, EHPA would like to stress that heating products are not the focus of this newly plan legislation because they are completely different products which we will further explain below. Furthermore, heat pumps are already performing well and an example when it comes to long-lasting products, availability of spare parts, repair and maintenance.

Reparability and Durability

We would like to highlight that heat pumps¹ are products that are parts of technical building systems, and which cannot be compared to non-ErP goods or consumer-level products like mobile phones. As such, their sustainability and information requirements are peculiar and may not be the same of other products. There is no one-size-fits-all solution.

Heat pumps are key for Europe's decarbonization. They are long lasting products, with a life of 20+ years, that are repairable and are most of the time repaired rather than replaced. For safety and quality insurance reasons, only partner companies, duly trained and qualified and certified, have the capability to maintain and repair heat pumps (F-gas Regulation, recital 6). In several European countries, national legislation makes it compulsory to be a duly qualified professional to service or maintain electrical appliances like heat pumps (e.g., Denmark, Sweden, Norway, Finland, Germany, Austria ...). It is of the utmost importance that heat pumps remain installed and maintained by duly qualified personnel, because a wrong intervention on heat pump can lead to safety risks, reduced performance of the system, leaks of refrigerants from the circuit, reduced comfort for consumers etc.

Secondly, if the Sustainable Consumption of Good Initiative refers to the material resource efficiency aspects, then EHPA call upon EU legislators to assess first the impact on ongoing and future already discussed measures before adding additional obligations on a sector that is already performing well and an example when it comes to long-lasting products, availability of spare parts, repair and maintenance. For our sector, there is a need for harmonization and a risk of multiplication, double and contradictory legislations covering very similar aspects. Material resource efficiency features are being considered in several pieces of legislation, e.g., the MEERp review, the Ecodesign and Energy Labelling Work Plan 2020-2024, and the Sustainable Products Initiative. These requirements are also being introduced at the product level in the revision of

¹ EHPA Heat Pump White Paper:
https://www.ehpa.org/fileadmin/user_upload/White_Paper_Heat_pumps.pdf

existing Regulations (e.g., Lot 1 & 2 on space and water heaters and Lot 10 on air conditioning appliances). You may find our position on material resource efficiency requirements on EHPA website².

Second-hand/refurbished goods

We cannot agree to suggestions like providing incentives to buy and use secondhand goods due to concerns regarding safety and efficiency this proposition is not applicable for heating products. We would like to highlight again the importance of applying a product-by-product approach in your analysis.

Regarding the guaranteed aspects, we also advise to find a product-based approach. There is no one-size-fits-all solution. All our products need to be maintained and serviced over years. For our products we do not speak only about just repair, we also have a maintaining repair. Therefore, we do not accept any suggestion of re-starting the legal guarantee after “repair”. This example shows clearly that only a product-based approach is acceptable.

Conclusion

In conclusion, EHPA believes that this initiative is more relevant for movable goods. Goods installed by professionals only should be left out of the scope. If the European Commission decides to include all products in the scope, then EHPA recommends that the definition and selection of any future requirements involving heat pumps should entail: a product-by-product approach to take into account the specificities of heat pump technologies (variety, installation, runtime, maintenance and servicing, end of life); requirements should be measurable, enforceable, repeatable, and verifiable.

Please note that EHPA co-signed a Joint Industry Position on the Sustainable Consumption of Goods Initiative supported by five other associations: CEFACD, EHI, EPEE, EVIA and EIHA.³

We remain at your disposal to discuss this matter with you in greater details.

² EHPA position on Lot 1 space heaters (November 2021):

https://www.ehpa.org/fileadmin/user_upload/20211115_EHPA_written_comments_on_Lot_1.pdf

³ Joint Industry Position on the Sustainable Consumption of Goods Initiative (4 April 2022):

https://www.ehpa.org/fileadmin/user_upload/20220404_Joint_Industry_Position_Paper_on_SCGI.pdf