

# Public consultation on the possible revision of Commission Delegated Regulation (EU) 2015 /1186 ('the Energy Labelling Regulation') with regard to the energy labelling of local space heaters

Fields marked with \* are mandatory.

## Introduction

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### Context

[EU energy labelling and ecodesign legislation](#) helps improve the energy efficiency of products on the EU market. Ecodesign sets common EU-wide minimum standards to remove the least performing products from the market. Energy labels provide a clear and simple indication of the energy efficiency and other key features of products at the point of purchase. This makes it easier for consumers to save money on their household energy bills and helps reduce greenhouse gas emissions across the EU.

### What is the purpose of this initiative?

The Commission is tasked with reviewing the current energy label for local space heaters (gas-fired, oil-fired and solid fuel fired stoves and fireplaces). This initiative is divided in two parts. The first part is the evaluation of the [Energy Labelling Regulation](#) and the second is the impact assessment of a potential revision of it.

The first part assesses the coherence, relevance and EU added value of the Energy Labelling Regulation. The second part analyses various options to improve the Energy Labelling Regulation. The main options include extending the scope of the current local space heater energy label to electric heaters and air-to-air heat pumps (AAHPs)[1]. AAHPs are currently labelled separately on a specific energy label scale laid down in a regulation that also addresses air conditioners. Such an extension and merger would allow consumers to compare different heating products with large differences in efficiency. Other measures include adding other environmental information to the energy label, such as air pollution (for combustion local space heaters) and the global warming potential of the refrigerant used for AAHPs.

### What is the purpose of the consultation?

This questionnaire seeks to gather views from the general public; manufacturers, business communities and industry; EU countries and their public authorities; local, economic and social partners, including non-governmental organisations; financial institutions, academia and research institutes; as well as other energy stakeholders. It is divided into two sections:

Evaluation of the Energy Labelling Regulation as regards coherence, relevance and EU added value.

Effectiveness and efficiency evaluations are not part of this questionnaire as they rely mainly on quantitative estimates. Policy options to address potential problems with the Regulation.

You are free to answer only some of the questions, or all of them.

### How can I participate?

You have 12 weeks from the date of publication to complete this questionnaire. Please use the button at the end of it to upload feedback in other document formats.

The Commission will publish a synopsis report of this public consultation, as well as a summary of all consultation results, at the end of the consultation period.

[1] Space heaters that use a water circuit and radiators to deliver heat (such as boilers) are not part of this initiative. The scope is limited to local and direct air heating solutions.

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

### \* I am giving my contribution as

- Academic/research institution

- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

\* First name

Melanie

\* Surname

Auvray

\* Email (this won't be published)

melanie.auvray@ehpa.org

\* Organisation name

*255 character(s) maximum*

European Heat Pump Association (EHPA). For more information about our vision and mission, you may visit our website [www.ehpa.org](http://www.ehpa.org)

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

23643001178-02

## \* Country of origin

Please add your country of origin, or that of your organisation.

*This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.*

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka

- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena  
Ascension and  
Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United Arab Emirates
- United Kingdom
- United States
- United States  
Minor Outlying  
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

### \* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

About you (additional questions)

## About you (additional questions)

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Which heating technology/industry segment do you use/work with/represent?  
(multiple choice – more than one answer possible)

- a) Local space heater – electric
- b) Local space heater – gas/oil
- c) Local space heater – solid fuel
- d) Air-to-air heat pump (< 12 kW)
- e) Related appliances (space heater, air conditioner)
- f) Other

## Part 1 – Evaluation of the Energy Labelling Regulation (Questions on relevance, coherence and EU added value)

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The heaters referred to in this section are **local space heaters**, intended to heat a single room or space by direct heat emission **using gas, oil or solid fuels only**. This evaluation does not cover measures that apply to electric local space heaters, air-to-air heat pumps, central heating systems or other forms of room /space heating.

### Relevance

This section addresses the objectives of the Regulation.

**Question 1 – Are the objectives of the Energy Labelling Regulation still relevant for local space heaters (LSHs)?**

Give your opinion on the following statements: [only one answer per row]	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Don't know
The energy labels for LSHs have helped make consumers more aware of the energy efficiency of LSHs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The energy labels for LSHs have helped consumers select more energy-efficient products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy labels for LSHs are useful in principle, but in practice are often not displayed/available or very visible at points/times of purchase	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy labels for LSHs are the best way to make consumers aware of the possible impact of their purchasing decisions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Coherence**

This section refers to the relationship between the Regulation and other European/national legislation in the same area.

**Question 2a – Would an indication of air pollutant emissions on the energy label of local space heaters affect the product choice?**

Give your opinion on the following statements: <b>'When choosing an LSH....'</b> [only one answer per column]	Energy efficiency is more important than the air pollutant emissions of LSHs	Energy efficiency and air pollutant emissions are equally important	Emissions are more important than energy efficiency
For gas-fired LSHs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**Question 2b – Would an indication of air pollutant emissions on the energy label of local space heaters affect the product choice?**



Give your opinion on the following statements: <b>'When choosing an LSH....'</b> [only one answer per <b>column</b> ]	Energy efficiency is more important than the air pollutant emissions of LSHs	Energy efficiency and air pollutant emissions are equally important	Emissions are more important than energy efficiency
For oil-fired LSHs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**Question 2c** – Would an indication of air pollutant emissions on the energy label of local space heaters affect the product choice?

Give your opinion on the following statements: <b>'When choosing an LSH....'</b> [only one answer per <b>column</b> ]	Energy efficiency is more important than the air pollutant emissions of LSHs	Energy efficiency and air pollutant emissions are equally important	Emissions are more important than energy efficiency
For solid fuel-fired LSHs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**Question 3** – Should information on air pollutant emissions of local space heaters appear on the EU energy label ? (For now, information on air pollutant only appears on a few national labels like NF (France), Blauer Engel (Germany))

Give your opinion on the following statements for solid fuel fired local space heaters	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Don't know
The EU energy labels for solid fuel LSHs should show the most important air pollutant emissions of combustion LSHs (such as particulate emissions, carbon monoxide, etc.) besides energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**EU added value**

This section refers to the need for EU action to avoid or induce an action by EU countries.

**Question 4** – Added value of the current energy label

Give your opinion on the following statements: [only one answer per <b>row</b> ]	Strongly agree	Agree	Neither agree or disagree	Disagree	Strongly disagree	Don't know

The EU energy labels for LSHs made it easier for suppliers to sell products across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The energy labels for LSHs reduced the need for (a multitude of) national (environmental) labels for LSHs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
It is easy/straightforward for suppliers to register LSHs in the European Product Registry for Energy Labelling (EPREL) database <i>[question for EU countries and product suppliers only]</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The registration of LSHs in the EPREL database makes it easier for market surveillance authorities to check compliance <i>[question for EU countries and product suppliers only]</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

## Other comments

**Question 5** – Please add any other comments you may have on the Energy Labelling Regulation for local space heaters [Text box – 200 character limit]

*200 character(s) maximum*

## Part 2 – Consultation on selected policy options

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### Policy option A

Policy option A is a ‘simple rescaling’, meaning no further EU action except for mandatory rescaling following Regulation (EU) 2017/1369, but otherwise keeping the existing scope, definitions, measurement and calculation methods etc. as far as possible.

Gas, oil and solid fuel local space heaters (LSHs) on the one hand, and air-to-air heat pumps (AAHPs) on the other, will continue to carry separate energy labels (after rescaling with just 7 classes, ‘A-G’), but with more stringent class limits putting the best available technology out of label class A as required under Regulation (EU) 2017/1369. This policy option continues to exclude electric LSHs (e.g. simple electric radiators) from energy labelling.

**Question 6** - Do you expect the energy efficiency of most AAHPs to improve within the next 10 years?

- Yes
- No

- No opinion

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

The AAHP will continue to innovate to increase the energy efficiency although the uncertainties of the regulatory framework in particular F-gas could limit this improvement potential.

**Question 7** - Do you expect the energy efficiency of gas, oil and solid fuel LSHs to improve within the next 10 years?

- Yes
- No
- No opinion

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

**Question 8** - Electric LSHs currently don't have an energy label. Is there a need to compare their efficiency with that of other LSHs?

- Yes
- No
- No opinion

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

The AAHPs are more and more used as a heating system to replace electric space heaters. the consumers should be made fully aware of the significant efficiency gap between these technologies.

### **Policy option B**

Policy option B proposes the use of a single energy label for LSHs, electric LSHs, as well as AAHPs (including cooling efficiency where relevant for reversible AAHPs).

A single energy label would provide a single reference for consumers for appliances with the same function. Although the appliances in scope target various audiences and price ranges (and are not always relevant in every specific situation/room/home), a single label would offer consumers the possibility to consider other product types that may be more energy-efficient and to compare energy efficiency across different product types.

To create a single energy label scale, a calculation method is needed to encompass all products covered. This will allow the same energy efficiency index to be used for all product types. As the energy efficiencies of these products are expected to occupy a wide efficiency range, ensuring “granularity” / differentiation within technologies on the label may prove to be a challenge.

**Question 9** - Do you think it's worthwhile merging the energy labels for LSHs and AAHPs into a single energy label??

- Yes
- No
- No opinion

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

The merger of labels between all relevant technologies will drive consumer choices towards the most efficient and renewable technologies and is in line with the energy efficiency first principle.

**Question 10** - How important is the level of detail about energy efficiency if the energy labels for LSHs and AAHPs are merged into a single energy label?

- Very important
- Somewhat important
- Not important
- It depends on the product type in the scope
- No opinion

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

The display information should be easily understood. Although the energy class remains the first indicator, the display of efficiency value helped improve granularity and facilitate comparability.

**Question 11** - If the energy labels for LSHs and AAHPs are merged into a single energy label and there is enough level of detail about energy efficiency on the energy label, using a single label for all local heating products provides more opportunities for improvement. Do you agree?

- Yes
- No
- It depends on the product type in the scope
- No opinion

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

EHPA has several recommendations on the layout and information present on the merged label for LSHs and AAHPs, we invite you to read our paper: <https://www.ehpa.org/policy/recent-positions/2022/>

### Supplementary label information

Energy labels can include supplementary information about the appliance. This could be information that consumers are searching for, or it could make them more aware about certain aspects, e.g. the environmental impact of the product.

**Question 12** - For gas, oil and solid fuel LSHs, would you like to see air pollutant emissions on the energy label?

- Yes
- No
- No opinion

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

**Question 13** - For AAHPs, would you like to see the global warming impact of refrigerant fluids on the energy label?

- Yes
- No
- No opinion

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

The label should focus on energy efficiency, display of the GWP will not be understood by consumers, it is already covered in the Fgas regulation.

**Question 14** - Besides information about noise, pollutant emissions and the global warming impact of refrigerant fluids, what other environmental information would you include on the energy label of appliances?

Please specify [Text box – 200 character limit]

*200 character(s) maximum*

The label should focus on energy efficiency.

### Contact

[Contact Form](#)

