



ehi  
association of the  
European Heating Industry



Ms Ditte Juul-Jørgensen  
Director-General of DG ENER  
Demotstraat 24  
B-1040 Brussels

Brussels, 8 February 2022

**Subject: recommendation to maintain split between the energy labelling classes under ENER Lot 10 (air-to-air heat pumps) and ENER Lot 20 (local space heaters)**

Dear Ms Juul-Jørgensen,

The undersigned associations, representing the European heating appliance manufacturing sectors and their installers, support the EU energy labelling policies and agree with the need to keep this legislation up-to-date and in line with the latest technological developments. Energy labelling is a tool that has delivered considerable energy efficiency savings across Europe by assisting consumers in selecting the most environmentally friendly products. It has also proven to be an effective tool to push the industry to produce more efficient products.

As such, we welcome the publication of the report on the study concerning consumer understanding of the energy label for local space heaters (LSH) and air-to-air heat pumps.<sup>1</sup> Based on this report, the Commission is evaluating the possibility of merging the energy labels for  $\leq 12$  kW air-to-air heat pumps (ENER Lot 10) and  $\leq 50$  kW LSH (ENER Lot 20), in an attempt to remove end-user confusion about which product type is more energy consuming on the basis of the energy label classes alone.

Nonetheless, we have strong concerns regarding the option to merge the energy labelling classes for both product groups, as merging the energy labelling classes will not contribute to meeting the energy labelling's objectives. In this letter, we explain that 1) LSH and air-to-air heat pumps are not comparable, 2) merging different energy labels will not help improving the effectiveness of the

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<sup>1</sup> This report was published on 30 March 2021, distributed to stakeholders on 16 June 2021, and subsequently presented at the Consultation Forum on Ecodesign and Energy Labelling of Tuesday 6 July 2021.

energy label, and that 3) the consumer study itself does not univocally support the merger of the energy labelling scales.

First of all, need for separate energy labelling scales for LSH was already in Recital 5 of Regulation (EU) No 2015/1186, as the typical use and energy consumption of LSH is different from other space heating products. The technologies of LSH are not comparable to other space heating technologies and placing them under a joint energy labelling class with air-to-air heat pumps would lead to the false impression that these products are interchangeable. Both product groups differ in their functionalities (i.e., purposes), have highly different heating capacity ranges, impose different installation requirements, have different distribution and installation outlets, and bear different costs.

The current energy labelling classes for different heating categories already allow customers to choose the most energy efficient product within the product groups that are most suitable for their specific purposes. On the contrary, merging the energy labelling classes will lead to consumers obtaining less information of what the best appliance is for a specific application and within their specific budget. At best, this will confuse the consumer even more, as they may be misguided into believing that different heating technologies are interchangeable. We believe that this will limit the incentive to invest in improving the energy performance of heating.

The earlier-mentioned consumer study concludes that combining the energy labels of different product groups could better inform consumers in choosing the least energy-consuming technology, and that is exactly the issue with comparing incomparable product groups. The optimal space areas and different usage times in which different heating technologies are the most energy efficient choice means that granularity is needed. This differentiation between LSH and air-to-air heat pumps is necessary to allow for the most optimal choices for specific purposes.

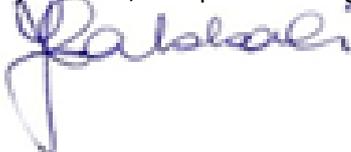
As such, the products covered in ENER Lot 20 cannot be subject to a combined energy labelling class with products covered under ENER Lot 10. We would appreciate the Commission taking these views into consideration. We could provide further explanation in a meeting that is set at a time of your best convenience.

Yours sincerely,

**Jean-Marc Jossart**  
Secretary General, Bioenergy Europe



**Federica Sabbati**  
Secretary General, European Heating Industry



**Rein Gelten**  
Secretary General, CEFACD



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## **About the undersigned organisations**

### **About Bioenergy Europe**

Bioenergy Europe is the voice of European bioenergy. It aims to develop a sustainable bioenergy market based on fair business conditions. Founded in 1990, Bioenergy Europe is a non-profit, Brussels-based international organisation bringing together 42 associations and 135 companies, as well as academia and research institutes from across Europe.

### **About CEFACD**

The Comité Européen des Fabricants d'Appareils de Chauffage et de Cuisine Domestique (CEFACD) represents the European manufacturers of individual heating and cooking appliances. We represent over 300 local companies generating € 5 billion in sales volume. Our members have a strong European footprint and contribute to wellbeing by providing local heating appliances to European households. More information: <https://www.cefacd.eu/>

### **About Équilibre des Énergies (EdEn)**

EdEn (Équilibre des Énergies) is a cross-sectional association gathering companies from the energy, building and mobility sectors. EdEn makes concrete recommendations for the reduction of GHG emissions in the European Union and in France. We aim at facilitating the uptake of low-carbon energy sources, the development of new technologies that contribute to the energy transition and the development of energy efficient processes.

### **About the European Heating Industry (EHI)**

EHI represents 90% of the European market for heat and hot water generation, heating controls and heat emitters, 80% of biomass central heating, as well as 75% of the hydronic heat pump and solar thermal markets. Our 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 160.000 people in Europe and invest more than 700 million euro a year in energy efficiency.

### **About the European Infrared Heating Alliance (EIHA)**

The EIHA is a network of European infrared heating manufacturers that provides interested parties with objective, well-founded information, and works to establish and promote infrared heating in the market. In addition, the EIHA represents the interests of the infrared heating industry towards the EU institutions to support the development of policy and legislation aimed at facilitating the uptake of energy efficient and comfortable heating. See also: [www.ig-infrared.com](http://www.ig-infrared.com).

### **About the Electric Underfloor Heating Alliance (EUHA)**

The EUHA is a formal group of manufacturers united to promote the interests of the product sector within a new electrified smart grid infrastructure. The group promotes the adoption of higher efficiency electric underfloor heating systems, providing primary and secondary comfort heating in low energy demand buildings. See also: [www.euha-alliance.eu](http://www.euha-alliance.eu).

### **About EuropeOn**

EuropeOn is the European voice of the electrical contracting industry since 1954. With 1.8 million professionals in over 300.000 businesses and with a turnover of over 200 billion euros, electrical contractors provide electrical installations for buildings and infrastructure, enabling cities and citizens to take part in the Energy Transition. EuropeOn addresses energy, climate, mobility, building

and skills policies. The association is campaigning in favour of #Skills4Climate and #EUGreenRecovery and is part of the Electrification Alliance, Construction 2050, the Platform for E-mobility, and the Forum for European Electrical Domestic Safety. [www.europe-on.org](http://www.europe-on.org)

#### **About AIEL**

AIEL is the Italian association representing the stakeholders of the wood-energy sector. Since 2011 it has worked to promote the sustainable energy valorization of woody biofuels ([www.aielenergia.it](http://www.aielenergia.it)). The association represents 500 stakeholders of the sector, around 70% of the Italian and European domestic appliances and boilers manufacturers (around 700 M€ of turnover). For what concern solid biofuel, AIEL represents 150 producers of woody biofuels and woodchips and 60 Italian companies producing and distributing pellets. AIEL founded and manages in Italy three certification systems: ENplus® (pellet), Biomassplus® (wood logs, wood chips and briquettes) and ariaPulita® (local space heaters and boilers).

#### **About AVEBIOM**

Founded in 2004, the Spanish Biomass Association (AVEBIOM) has 160 full members representing the whole biomass supply and value chain. AVEBIOM promotes the increased, efficient and sustainable use of biomass. Most of the activities conducted are communication and networking actions and events (seminars, magazines, newsletters, EXPOBIOMASA fair, etc.).

#### **About BVF**

The Federal Association of Surface Heating and Surface Cooling e.V. (BVF) is the neutral, competent and established partner for companies in the field of surface heating and surface cooling in Germany.

Founded in 1971, the BVF has been committed to establishing standards in technology and quality in more than 50 years of association history. It represents over 60 companies from the system and component construction and cooperates with research institutes, associations and companies from related areas.

Underfloor heating, wall heating systems as well as ceiling heating and cooling and both water-based and electrical systems are on an equal footing and are presented in a product-neutral manner.

#### **About BVIR**

The aim of the Federal Association of Infrared Heating e.V. (BVIR) is to validate the many advantages of infrared heating. The BVIR is actively involved in the area of standardization, legislative procedures and scientific research projects and thus offers members and interested parties a platform for active participation and company-neutral information about the development and application of infrared heating. The aim of the BVIR is also to take into account the technological advantages of infrared heaters in the area of energetic evaluation and comfort in the recognized rules of technology.

#### **About Nelfo**

Nelfo is a trade association for electro, it, ecom, system integrators and lift companies in Norway. Nelfo has more than 1.820 companies, with 30.500 employees and an annual turnover of approximately 5,7 billion Euros. <https://www.nelfo.no/in-english/>

#### **About Pelletsförbundet**

The Swedish Pellets Association has 59 member companies, mainly producers of wood pellets. The organisation also engages installers of pellets equipment in households and industries. The Swedish

pellets market today has strong focus on industrial applications, balancing heat production in district heating, and small-scale use in homes with stoves and boilers. The total pellets market is around 1.5 million tons/year, of which 0.5 million tons in single homes.

#### **About STUL**

STUL – The Electrical Contractors' Association of Finland, Est 1933. The main activities of STUL are lobbying the interests of the member companies, developing the branch and producing & providing information. STUL works in wide network. Our association has representatives in numerous organizations and working groups. STUL co-operates with government officials as well as other organizations of the building and construction branch. The Electrical Contractors' Association of Finland – STUL – has altogether ca 2800 member companies (December 2020).

<https://www.stul.fi/in-english/>

#### **About Svebio**

Swedish Bioenergy Association was founded in 1980 and is a non-profit organization with 250 member companies in the whole bioenergy supply chain, from feedstock supply to final use in households, heat and power plants, industries and transport. The aim of the organization is to promote increased use of bioenergy in an economically and environmentally optimal way. In Sweden, bioenergy accounts for 37% of final energy use.