



Brussels, 8 March 2019

Comments on the “Proposal for combining the Ecodesign and Energy Labelling regulations for local space heaters and for air conditioners ≤ 12 kW”

In general terms, we support the idea to compare the heating functions of local space heaters and air conditioners below 12kW, by combining their labels. This could enable consumers to compare different technologies serving the same purpose (air heating).

However, the current proposal has an important loophole: **electric local space heaters, the most commonly sold type of heaters** (expected combined sale of above 18 million units in 2020)¹ **are not covered by any labelling scheme**. Electric heaters are the main alternative to air-air heat pumps, since electricity is the energy source for both technologies, but the higher efficiency of heat pumps compared to electric heaters is not be apparent to consumers since the latter category does not have an energy labelling requirement. **Should electric local space heaters remain out of the scope of Regulation (EU) 2015/1186, introducing the same energy efficiency classes for local space heaters and air conditioners <12kW would not enable consumers to properly compare different technologies.**

We find the limits of the label classes adequate. However, with the inclusion of electric heaters in the scope, we propose to lower the threshold for the G-class to 46.5%, ensuring that the best electric heaters would fall in the F-class.

The proposed ranges of efficiencies in the 7 classes are very wide: for example, class C covers the efficiency range of 136 – 230%, encompassing most of the current air-air heat pumps, with large differences in efficiencies. **Indicating the efficiency of the model on the label** would enable consumers to select the most efficient products within one label class.

What is more, specifically on class A, experience shows that when regulation is in place, products tend to quickly catch up with the best energy class. Therefore, we call for a **specific (and ambitious) timeline to be set for heat pumps** to be able to populate class A only after X years after the entry into force of the regulation. This would enhance innovation and boost competition for more efficient products and will also ensure that the revised energy classes will have a real impact on the market during the decade of their implementation.

¹ Final report, preparatory study for local space heaters (ENER Lot 20), p.102 <https://drive.google.com/file/d/1B8v04vnjaukRI-AlzSED14-AbD23WSqB/view>

Moreover, should this proposal be carried out, we would welcome the opportunity to provide **specific comments on the additional information of the label**, notably regarding noise which is an issue especially for air-air heat pumps, and refrigerants.

We insist that legal certainty regarding the scope of this proposal is ensured: when revising the Ecodesign and Energy Labelling requirements for air conditioners ≤ 12 kW the following issue arose: *Ventilation exhaust air-to-air heat pumps and air conditioners ≤ 12 kW are not explicitly in the scope of regulation No 206/2012, nor are they clearly excluded, as the type of indoor air used in the definition of air conditioners is unspecified ("a device capable of cooling or heating, or both, indoor air").*

In this sense, we call on the Commission to conduct a proper assessment to move towards a single label also for all air-conditioners and coolers under Regulation (EU) 626/2011, which we have advocated for in the past. The existing labels are different for split, double-duct and single-duct products and are based on different measurements and scaling. This impedes end-users to accurately compare products upon purchase. As it stands, consumers are unable to understand through the energy labels on air conditioners that, for instance, a class A for single-/double-ducts correspond to class F of split-room air conditioners – 50% less efficient.

Contact:

ECOS – European Environmental Citizens' Organisation for Standardisation

Mélissa Zill, melissa.zill@ecostandard.org