

Brussels, Thursday 31 May 2018

Dear President,
Dear Vice-Presidents,
Dear Commissioners,

Our industry organisations, representing the heating, cooling, refrigeration, household appliance, commercial cleaning appliance and lighting sectors, strongly support Ecodesign and Energy Labelling which, for a number of product groups, have proven very successful and contributed to the EU's energy and climate goals by pushing and pulling the market towards more energy efficient products.

The European Parliament recently adopted an own-initiative report on the implementation of the Ecodesign Directive, while the European Commission is now more than halfway through the 2016-2019 Ecodesign Work Plan. We would like to outline on this occasion key areas that could be improved to ensure that the Ecodesign framework remains a powerful tool to promote energy efficiency at consumer level.

- **Ensure regulatory certainty and sufficient lead-time for manufacturers:** In the past years, delays in the publication in the Official Journal of already voted Ecodesign measures created unmanageable situations for industry, including SMEs. Companies need to know which requirements will apply when and rely on legal certainty to plan and carry out the considerable resource investment to re-design and improve the energy efficiency of products to comply with the new requirements. We appreciate that the European Commission wishes to release new Ecodesign measures in “packages” in order to optimise communication to EU citizens but ask that already approved individual Ecodesign measures are published without delay. In addition, a lead-time of at least two years should be granted between the publication of an Ecodesign or Energy labelling Regulation and the application of the requirements. In case of a transition to completely new technologies, a realistic implementation timetable should be adopted for the Regulation to come into force.
- **Ensure regulations account for income inequality:** EU regulations should promote the most efficient products whilst allowing consumers to choose from a range of appliances that deliver savings in their home – according to their needs – and significantly contribute to achieving the 2050 target. They should be accompanied by measures allowing citizens to access efficient services and products, including when they have a low level of income or they come from countries with lower average incomes.
- **Promote a transparent, robust and product-specific approach:** Ecodesign measures have been effective because they have regulated measurable, verifiable parameters of the product on the basis of a clear and transparent methodology. This approach needs to be maintained to transform the market in line with the energy efficiency first and better regulation principles as it takes into account the specificities of the various product groups – in terms of the nature of the requirements, their level and their timing. For instance, resource efficiency criteria should be specified for each product group and defined in a clear and objective manner, while being easily measurable and achievable at a proportionate cost, in order to ensure that the Ecodesign directive remains implementable. In addition, the European Commission should always carry out a proper assessment of the impact on the environment, consumers and manufacturers of the proposed Ecodesign requirements and ensure appropriate consultation throughout the process (e.g. during Inter-Service Consultation).
- **Avoid unnecessary duplication leading to over-regulation:** Establishing requirements for final products, as opposed to setting Ecodesign requirements for components (e.g. fans, motors, circulators) integrated into products, delivers benefits to consumers and the environment, and allows suppliers to adopt innovative solutions within products. Therefore, internal Regulations should not set requirements for components integrated into products that are already themselves covered by Ecodesign measures, i.e.: double regulation

should be avoided. Imposing the use of specific components would draw on resources that producers could use to invest in other innovative and more energy efficient technical solutions.

- **Ensure correct implementation and enforcement:** Finally, the current Ecodesign and Energy Labelling policies should be complemented with measures to support the market uptake of efficient products and strengthen Market Surveillance so that policy goals such as climate and energy efficiency objectives can be met in reality.

Cost-effective Ecodesign requirements have contributed to substantial energy savings because they are based on important key principles: simplicity, affordability, measurability and transparency. To keep the effectiveness of the Ecodesign framework these fundamental principles must be respected and implemented swiftly. In addition, these principles need to be complemented with appropriate measures to promote energy-efficient products and ensure a better enforcement of Ecodesign Regulations.

We remain at your disposal should you have any questions, and would like to request a meeting to discuss this issue further at your convenience.

Yours sincerely,



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APPLiA – Home Appliance Europe



Federica Sabbati, Secretary General
European Heating Industry (EHI)



Thomas Nowak, Secretary General
European Heat Pump Association (EHPA)



Andrea Voigt, Director General
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Dr. Peter Hug, Managing Director
EUnited Cleaning



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About the Signatories

About APPLiA: APPLiA represents the home appliance industry in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Groupe Atlantic, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. APPLiA's member Associations cover the following countries: Austria, Baltics, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom. www.applia-europe.eu

About EHI: EHI, the Association of the European Heating Industry, represents 90% of the European market for heat and hot water generation, heating controls and heat emitters, as well as 75% of the hydronic heat pump market. 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 120.000 people in Europe and invest more than half a billion euro a year in energy efficiency. www.ehi.eu

About EPEE: The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies, national and international associations. 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. EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market. As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. www.epeeglobal.org

About 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 market place 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 EUUnited Cleaning: The Association of European cleaning machines manufacturers - EUUnited Cleaning - represents the leading producers of floor cleaning machines and high-pressure cleaners for commercial and industrial use. The association of European cleaning machines manufacturers - EUUnited Cleaning - represents the leading producers of floor cleaning machines and high-pressure cleaners for commercial and industrial use. Members are: Columbus, Comac, Diversey, Electrostar, FIMAP, Ghibli, Hako, Kärcher, Nilfisk, Numatic, RCM, RUWAC, Schwaborn, Starmix, Stihl, Stolzenberg, Tennant, Truvox, TTS Cleantech, Wetrok. www.eu-nited.net

About LightingEurope: LightingEurope is the industry association that represents the lighting industry in Europe. We are the voice of more than 1,000 lighting companies that employ more than 100,000 Europeans and create an annual European turnover of over € 20 billion. Our daily mission is to advocate and defend the lighting industry in Brussels, while reconciling it with ongoing EU policy aims. In doing so, we are dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort, and the health and safety of consumers. www.lightingeurope.org