



The Voice of European Air-Conditioning, Refrigeration and Heat Pumps Contractors



European Partnership for Energy and the Environment



The voice of Efficient building engineering services

Industry position on the Energy Labelling Directive Review

Brussels, 24 March 2015

The signatories cover the refrigeration, air-conditioning and heat pump (RACHP) industry, including equipment manufacturers and contractors, but also installers of electrical, electro-technical and electronic systems as well as plumbing systems.

We would like to provide recommendations in view of the upcoming Energy Labelling Directive review. In this context, we would like to highlight the need to guarantee the effectiveness of the energy label and also outline two primary reservations on the labelling of professional equipment and the Dealer/Installer Label. ECOFYS put forward these two ideas in its recent evaluation report on the Energy Labelling and Ecodesign Directives.

1. We believe in energy efficiency and the European legislative framework

Energy efficiency is a top priority not only for all actors of our industries, but also for our customers across the EU. Our industries firmly believe in the benefits of energy efficiency. Indeed, we are fully committed to developing and installing ever more energy-efficient products and technologies, thus helping the EU to reach its energy efficiency objective.

Our industries rely on key drivers, notably energy efficiency, reliability and cost-effectiveness. Energy efficiency is a key driver in the accurate manufacturing of components and products, proper system design, professional installation as well as regular maintenance and servicing.

We fully support the EU legislative framework on enhancing energy efficiency, especially the Ecodesign and Energy Labelling Directives and their implementing measures.

2. The Energy Label is neither appropriate nor necessary for B2B products

The “plug-and-play” approach applied to products such as TVs, microwaves and washing machines should not be automatically applied to all products regulated by the Ecodesign and Energy Labelling Directives. The methodology used needs to be flexible and adaptable to products with different technicalities and operating modes, such as air conditioners, heat pumps and condensing units.

In addition, we oppose extending the Energy Label to the area of professional equipment, since this is not the most appropriate information tool for industrial products. Indeed, professional users have information needs that the Energy Label is unable to provide. The label provides information on energy consumption enabling comparison of different products on the same basis. However, energy consumption is not necessarily the most relevant indicator for professional equipment. In fact, a professional product will work differently depending on the size of the application it is used in. Placing the energy label in the product box has no added value for some products, such as heat pumps and condensing units.

RACHP systems are very complex assemblies and often tailor-made since they are designed for specific customer needs. The expertise of professional installers is necessary to properly define customers' needs and to select the most appropriate components guaranteeing efficiency and reliability. They should also ensure that the overall system is properly installed. The Energy Label could lead to an oversimplification resulting in misleading information. In addition, better targeted B2B tools already exist, including technical fiches or tendering specifications and contracts.

Therefore, we call on the Commission to carefully evaluate use of the label for professional equipment to avoid any detrimental effects.

3. The installer label should be carefully assessed before it is systematically used

We acknowledge the need to better exploit system savings. We agree that this cannot be achieved by regulating individual components of the system alone, since most savings occur in the interaction of components with one another. However, the systematic use of a Dealer/Installer label to address savings at system level raises six major concerns.

Firstly, there is a lack of practical experience. So far, this type of label is only included in measures on space and water heaters that are not yet implemented. The implementation preparation shows that installers are lacking vital information.

In addition, RACHP, heating and electrical systems are tailor-made solutions designed for specific customer needs. Consequently, many variables need to be taken into consideration. While harmonised calculation methods have been developed for water and space heating systems, they do not exist for refrigeration, air-conditioning or electrical and electronic systems.

Moreover, RACHP, heating and electrical systems are composed of installation segments from multiple manufacturers and brands. In addition to design and installation, installers provide maintenance services. The Dealer/Installer label should not restrict changes in the components when the system is repaired.

The Dealer/Installer label is likely to result in greater administrative burden, especially for SMEs. This is contrary to the main principles of the wider EU Industrial Policy.

Furthermore, there are many installers in Europe who are active in various sectors. A systematic use of this type of label would require significant efforts for Member States to be able to enforce it, whereas market surveillance is currently acknowledged as weak. In our view, any legal requirements need to be fully enforceable to guarantee a level playing field. However, the use of this label is likely to result in unfair price competition and unequal tendering.

Finally, a systematic use of the Dealer/Installer label may negatively impact innovation. Primarily, it draws attention only to energy efficiency without duly considering other aspects, such as alternative refrigerants for air-conditioning systems and the overall effectiveness of a system.

Therefore, we call for a very careful assessment of the Dealer/Installer Label, notably its implementation for space and water heaters, before systematically using such an instrument.

4. The effectiveness of the energy label needs to be guaranteed

The layout of the energy label should be designed to avoid unnecessary administrative burden throughout the supply chain. To this end, we are in favour of keeping the current energy label layout

from A+++ to D. Moreover, this scale enables differentiation between products and a comparison between different technologies.

We would like to see the energy efficiency value displayed on the energy label as it constitutes an added-value when choosing equipment, such as a heat pump, and enables consumers to compare products. It should be noted that for some products, like air-conditioners and condensing units, energy consumption is not necessarily the most relevant indicator. Such equipment will work differently depending on the size of the application in which they are used.

The information on the label should remain easy to understand. Adding information such as environmental criteria will make it more complex and may therefore be counter-productive. We therefore consider that the Energy Label should continue to focus on energy consumption and energy efficiency. For best performing products, the Ecolabel has been developed and covers a wide range of environmental criteria.

Conclusion

We reiterate our support for improving energy efficiency, which is in line with the aim of our industries to offer ever more energy-efficient and reliable solutions. Energy efficiency must be the key driver in the choice of the appropriate system and the end user should be informed of benefits in relation to energy costs. We also repeat our support for the Ecodesign and Energy Labelling Directives.

However, we have strong concerns about the extension of the Energy Label to the area of B2B equipment. Indeed, the Energy Label is not the most appropriate tool for providing information to professional users and can even be counter-productive. Moreover, we question a systematic use of the Dealer/Installer label to address energy savings at the system level. In fact, the lack of practical experience to date, uncertainties about its enforceability as well as the possible negative impact on contractors and innovation should be duly considered.

Therefore, we urge the Commission to very carefully assess the labelling of B2B products as well as the use of the Dealer/Installer label before any possible endorsement. Instead, substantial energy efficiency gains can be achieved through proper design, professional installation and regular maintenance of systems. In addition, the existing legislation (such as the EPBD and the RES Directive) should be made fully effective and harmonised.

Finally, we call on the Commission to preserve the effectiveness of the Energy Label. When reviewing it, unnecessary administrative burden should be avoided. The label should allow comparison between technologies and different energy sources. Moreover, focusing on energy consumption and energy efficiency makes the label easily and clearly understood by consumers: the core Energy Label principles should remain.

About AREA

AREA is the European organisation of refrigeration, air-conditioning and heat pump (RACHP) contractors. AREA members are the architects of RACHP systems, which they design, install and maintain.

Established in 1988, AREA voices the interests of 20 national members from 17 European countries, representing more than 13,000 companies across Europe (mainly small to medium sized enterprises), employing some 110,000 people and with an annual turnover approaching €23 billion (www.area-eur.be).

About AIE

The AIE – the European Association of electrical contracting companies - represents through its 18 national member associations about 175,000 specialist contracting companies employing about 1,000,000 workers in the EU-countries and beyond. The AIE represents companies from all sizes, the big majors and a majority of small and medium size enterprises [SME]. AIE member companies have an in-depth knowledge and high-quality expert skills to carry out all kind of electrical engineering and infrastructure works [high, medium and low voltage]. The overall turnover of the sector is approximately 75 billion Euros. Monitoring the EU agenda/Directives relevant for the electrical sector, the AIE points out the key strategies and main priorities for the modern electrical contractor. With the increasing complexity of technical installations, the private consumer and house owners are becoming more and more dependent on the knowledge and creativity of the electrical contractor. He is an expert adviser who is able to explain to the client the possibilities and advantages of new technology in a technical and environmental way. Kindly visit our website: www.aie.eu or contact us at info@aie.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. Please see our website (www.epeeglobal.org) for further information.

About GCP Europe

GCP Europe is an international non-profit association that acts as the voice of the efficient building engineering services towards the European Union institutions and the Brussels scene in general. It is an umbrella organisation consisting of 22 national member associations (mainly in the EU) whose member companies' services cover the installation of HVAC and sanitary equipment, renewable energy, the application of ICTs in the construction process, audit and performance contracting, to name a few. More information is on our website (<http://gcpeurope.eu>)