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**Ref: 13-04**

Kortenberg, 22 September 2013.

## **Comments of the AIE on draft eco-design requirements for local space heaters**

The AIE – the European Association of electrical contracting companies - represents through its 20 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.

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.

The AIE acknowledges the proposals and requirements made in the framework of the ecodesign and labelling directive for local space heaters.

We raise however severe concerns on the text presented by the Commission when it comes to the proposed mandatory product information on electric space heaters, which has to be written in the instruction manual, on the free-access websites, the packaging and on stickers on the product.

**3 (b) ii) 'This product is not suitable for use as your main source of heating due to its high energy consumption and costs (equivalent to energy labelling class G)!'**

This proposed text and information for electric space heaters is highly discriminatory and contrary to the facts. Indeed electric space heaters are cheap to purchase, install and maintain. Control equipment is also cheap and can operate with great precision.

Moreover, in countries where the infrastructure for natural gas distribution or district heating is lacking or not well developed, electric space heaters often appears as the most affordable also in terms of annual operating costs. Last but not least, in some Member States electricity is clearly less expensive than fuel for heating. How can such a statement be justified towards the customer?

- Electrical heaters in certain circumstances may be the most cost effective, most ecological or most viable way of producing heat energy, eg in passive houses, or in combination with heat pumps, or in remote locations, where electrical supply is the only available source of energy, etc, and as
- There have been remarkable progresses in the electrical heating technology, like infra red heating, etc.

**We urge the decision makers to carefully re-consider this sentence as this will certainly mislead the customer, distort the market and hence create the opposite effect resulting of the ecodesign requirements rather than increase its potential and objectives.**

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Schellekens', with a horizontal line extending to the left.

Evelyne Schellekens,  
General Secretary.