

Brussels, 6 March 2023

Subject: Request for support to maintain the split among the energy labelling classes for air-to-air heat pumps and local space heaters

To the Member State Experts on Ecodesign and Energy Labelling,

Would you compromise on the matter of energy efficiency?

The new proposal from the European Commission plans to merge the energy classification of Air-to-Air Heat Pumps (AAHP) and Local Space Heaters (LSH) fuelled by electric, gas, oil, coal and bioenergy into a single label. The result will be a classification in which every heating product type (e.g. pellet stoves) will on average only occupy two classes as compared to the seven classes of the label. It will be virtually impossible for a European consumer to make an informed choice within the product type. If the consumer cannot make decisions based on energy efficiency, manufacturers will no longer invest in research and development of more efficient products and the effect of the merger will be the opposite of what is intended by Energy Labelling.

Should we compare products that are not interchangeable?

It should also be noted that LSH and AAHP are often not interchangeable for technical and economic reasons. Placing them under a joint energy labelling scale would confuse consumers, as they may be led to believe that different heating technologies are interchangeable. In reality, both product groups differ in their functionalities, have highly different heating capacity ranges, installation requirements, distribution and installation outlets and costs.

AAHPs and LSHs often work together to achieve the desired results in buildings. This is similar to the symbiosis in other sectors: for example, laptops and mobile phones are complementary as ICT devices used for communication, with different applications and purposes.

Should the European Commission influence choices that are meant to be taken locally?

The best appliance to heat a building depends on the type of building, the climate, the energy price as well as efficiency. By reducing the comparison between different, incomparable products, based only on electrical efficiency, the risk of distorting the market is introduced. Energy labels are meant to compare products from the same class, allowing the consumer to meaningfully evaluate their efficiency.

Can we afford to discard energy security and energy prices?

The current energy crisis is also an 'affordable energy' crisis, driving more and more Europeans into energy poverty. During a harsh European winter, it is essential for human health and wellbeing to have appropriate, reliable and affordable heating while ensuring security of supply. Wood logs and pellets purchased in Europe generally originate from the internal market and equipment manufacturers are nearly all EU-based, also exporting all over the world. That makes the sector a reliable option for providing renewable and accessible heating in rural areas.

JOINT LETTER

Merging incomparable products will lead to an overreliance on AAHP, making the public more dependent on electricity, which is largely generated by fossil fuels, for their heating. This would damage a strategic European asset in the energy mix and a key sector for the EU energy independence.

Therefore, we believe that LSHs should not be subject to a combined energy labelling scale together with AAHPs. We hope decision-makers take these views into consideration – and we ask for your support in this important matter. Should you require any additional information, we would gladly provide further explanation in a meeting at your earliest convenience.

Sincerely,

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Cadel srl
Czech Pellets Cluster
Euro Energies
Fachverband Holzenergie im BBE
Finnish Bioenergy Association (Bioenergia ry)
French Renewable Energy Trade Association (SER)
German BioEnergy Association (BBE)
Hellenic Biomass Association (HellaBiom)
Italian Agroforestry Energy Association (AIEL)
Latvian Biomass Association (LATbio)
Lithuanian Biomass Energy Association (LITBIOMA)
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Swedish Bioenergy Association (SVEBIO)
Vrije Universiteit Brussel (VUB)
World Bioenergy Association

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JOINT LETTER

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