



Ms Paula Pinho
Director for Just Transition, Consumers, Energy
Efficiency and Innovation in DG ENER (ENER B)
Rue Demot 24
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Mr Stefan Moser
Head of Unit of the Buildings and Products Unit in
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Rue Demot 24
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Brussels 17 October 2022,

Subject: Request for additional consultation for the review of the ecodesign and energy labelling regulations for space and water heaters

Dear Ms Paula Pinho, dear Mr Moser,

The undersigned associations are writing you concerning the reviews of the ecodesign and energy labelling regulations for space and water heaters¹ and more generally concerning the Inter Service Consultation phase for all ecodesign and energy labelling regulations.

The review of the ecodesign and energy labelling regulations for space and water heaters started in 2017. After a long preparation phase the European Commission presented draft working documents during a Consultation Forum (CF) meeting that took place in September 2021. At that stage, the working documents were not yet at the level we normally would expect during a Consultation Forum meeting. In addition, this consultation took place prior to the start of the ongoing energy crisis and the REPowerEU plan, which will impact the European Heating Industry heavily.

¹ Regulations (EU) No 811/2013, 812/2013, 813/2013 and 814/2013

As such, we urge the Commission to organise an additional consultation opportunity for the working documents, without delaying the process, to provide feedback to the open issues as well as changes brought in by the REPowerEU plan. This step would not delay the process, since the meeting can be organised prior to the start or during the initial phases of the Inter Service Consultation and seems to be aligned with the timing foreseen in the REPowerEU Save Energy communication.

In 2020, the Commission Services decided to stop sharing draft ecodesign and energy labelling regulations with external stakeholders during Inter Service Consultation. Although we understand that in the past the Commission Services shared such drafts during this phase as a courtesy to the ecodesign community (industry, NGOs and Members States representatives), we would greatly appreciate maintaining this best practice, because of the complexity of ecodesign and energy labelling regulations.

Indeed, even with the additional consultation during Inter Service Consultation, ecodesign and energy labelling regulations are prone to mistakes². These mistakes can have a big impact on the industry and in case of a need for an amendment also on the workload of the Commission Services and other involved stakeholders. As such, to avoid the need of regular omnibus amendments, all opportunities to avoid these should be seized. Therefore, we would like to ask the Commission Services to reconsider their decision not to share the Inter Service Consultation Documents with the ecodesign community.

Yours sincerely,



Paolo Falconi
Director General, APPLiA



Rein Gelten
Secretary General, CEFACD



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Secretary General, European Heating Industry



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Secretary General, European Heat Pump Association



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Folker Franz
Secretary General, European Partnership for Energy and the Environment

² An example of this can be found in 2019, after publication of the package of ecodesign and energy labelling regulations, a number of mistakes were found; an omnibus amendment was needed to amend these mistakes.



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