



Raising standards for consumers

The Consumer Voice in Europe



Ms Paula Pinho
Director
Directorate-General for Energy
European Commission
Rue de la Loi 200
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Brussels, 26 November 2021

Subject: Consumers need a simple and clear energy efficiency label to easily identify the most efficient space and water heating appliance

Dear Ms Pinho,

We are writing to you on behalf of European consumers organisations (BEUC and ANEC) and European environmental organisations (EEB and ECOS), in relation to the ongoing revision of the Energy Labelling implementing Regulation for Space/Combination Heaters.

We understand some stakeholders are arguing in favour of separate energy labelling scales for this product group, based on the energy carrier of each technology. We strongly oppose this idea. The introduction of separate energy efficiency scales specific to each energy carrier would unnecessarily complicate the energy label and mislead consumers into thinking that fossil fuels technologies can be as efficient as heat pumps, for instance.

There should be a single energy efficiency scale for all technologies.

We urge you to resist the attempts to weaken the clarity and effectiveness of the energy label, which should remain a useful and transparent tool for consumers to compare products on the market, while also pulling them to more energy efficient heating technologies and effectively contribute to the clean energy transition.

Such a change would harm the current proposal for a single energy efficiency scale covering every technology, where fossil fuels boilers would fall under the lower energy efficiency classes F and G. The main justification used by its proponents for having separate efficiency scales seems to be that consumers do not use the energy label to switch to more efficient technologies. Rather, it has been argued that the energy label should inform consumers about the most efficient appliance among the same range of technologies.

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Consumers must be able to easily identify the most efficient appliance on the market.

Consumers are not interested about the specific technology of the product (e.g. fossil fuels boiler vs. heat pumps). They are looking for the most energy-efficient, best value for money option and increasingly for the most sustainable choice. Most of them expect to be able to compare the energy efficiency classes of two appliances using different technologies.¹ Adding a separate energy efficiency scale for fossil fuels boilers would contradict each of these needs and risk hindering the credibility and usefulness of the energy label. It is crucial that the energy label transparently reflects that some technologies are more energy-guzzling than others. Consumers must be able to easily compare information about the energy performance of products and clearly understand what the most efficient option is.

We must not confuse consumers about what the energy label is about.

As it was the case for electronic displays,² the energy label should not erroneously promote appliances over others through a separate energy efficiency scale, based on the appliances' size, mass or energy carrier. This would lead to a situation where the label becomes completely incomprehensible for most people. Instead, the energy label should have a "pulling effect" towards overall greater energy efficiency on the market. Besides, a separate energy efficiency scale for fossil fuels boilers runs counter ongoing parallel efforts to group more products under the same energy label, as it is the case for split air conditioners and portable ones, and heat pumps and local space heaters.

Financial incentives are needed to enable consumers to switch to more efficient heating options.

We also must avoid that the energy label becomes a means to incentivise inefficient technologies. We recognise that price may be a potential barrier for switching to more efficient heating options, especially for less affluent consumers. Nonetheless, this argument should not be used to justify the need for separate energy efficiency scales. Rather, the focus should be on facilitating the access to heat pumps, through massification of the production and targeted public incentive. The total cost of ownership of heat pumps is falling dramatically compared to gas boilers, especially considering the expected costs of Hydrogen for the final user, should this option be introduced in the market. Authorities should financially support consumers to make the switch to the most efficient technology on the market.

Consumers need to have easy access to professional advice when changing heating appliances.

Finally, we want to stress that consumers tend to follow professional advice when selecting a complex heating device. It is therefore key that installers are adequately trained for this task, and that the energy label remains as clear as possible for consumers to be able to verify this information.

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¹ This was also the outcome of a European Commission study on consumer understanding of the energy label for space heaters and air conditioners, which is part of the preparatory work for Ecodesign and Energy Labelling Regulations for space heaters and air conditioners.

² In the case of TVs, we similarly argued that larger appliances, consuming more energy, should not be promoted through separate energy efficiency and Ecodesign requirements. If these appliances are more energy-guzzling, the label must reflect this transparently. https://www.beuc.eu/publications/beuc-x-2017-112_mai_anec_beuc_position_electronic_displays_2017.pdf

We therefore ask you to maintain the current proposal for a single energy efficiency scale for all technologies, and to safeguard the role of the energy label in enabling consumers to compare products on the market and easily recognise the more energy efficient ones.

We remain at your disposal to discuss this issue further and provide any information you may need.

Yours sincerely,

Stephen Russell
ANEC Secretary General

Monique Goyens
BEUC Director General

Justin Wilkes
ECOS Executive Director

Jeremy Wates
EEB Secretary General