

## General Statement

REHVA, the Federation of European HVAC associations appreciates the work and impact of the EU Ecodesign and energy labeling regulations that helped to increase the energy efficiency of HVAC components. REHVA strongly supports transparent and comprehensive Ecodesign and energy labelling requirements that should further improve energy efficiency of HVAC products available on the EU market by covering all existing technologies and fostering innovative, low-carbon technological solutions with high efficiency.

## Scope of the labels

REHVA welcomes the harmonization of energy labels of all heating and cooling technologies to allow for the transparent comparison of efficiencies. Therefore, REHVA supports both the merger of energy labels for local (space) heaters (ENER Lot 20) and air conditioners (ENER Lot 10) as well as the inclusion of electric heaters in the scope of the energy labelling.

REHVA agrees with the scope of the energy labelling regulation proposed in the draft Working document *Proposal for LABELLING of room heaters, room air conditioners and comfort fans*.

## Definition of efficiency ranges of heat pumps

Regarding the efficiency ranges of air source heat pumps, REHVA proposes considering seasonal efficiency, as heat pump performance depends on the climatic zone while other technologies (like electric heaters) don't. The Work document proposed one average climate condition, which may result in the disadvantage of the highly efficient and low-carbon heat pump technologies compared to other technologies. REHVA proposes reporting all 3 seasonal efficiency factors as used in the EN standard EN 14825:2018

## Labeling scale and complementary information

The scale and information displayed on the labels should be meaningful and easy to understand for consumers. Beside the energy class as major indicator, we support the display of numerical efficiency values to ease the comparison of different heating and cooling technologies by consumers. At the same time, we recommend considering eventual rescaling of the energy classes and the minimum efficiency performance requirements for the different product groups covered by the merged label.

Regarding the labeling of biomass stoves, REHVA proposes to continue the use of the biomass label factor (BLF) in the calculation, as well as displayed in the label, to allow for a distinction between biomass and fossil fuel stoves, so that the former can eventually get a better label if a distinction between renewable and non-renewable energy source use is made. At the same time, REHVA strongly supports adding with supplementary information regarding the air pollutant emissions of solid fuel space heaters as well as the GWG impact of refrigerants used in air-to-air heat pumps to the merged label.

Current BLF factor of 1.45 can be seen as a practical way (=energy policy factor) to promote the use of renewable energy sources. Because renewable and fossil energy sources are distinguished in all European strategies and directives such as EED, RED, EPBD, RePowerEU, and there are targets to increase renewable energy use in buildings, also the labelling of products used in the buildings should be in line with this common principle.