

European Heating Controls Alliance

EHCA incorporates the following organisations:

- **EuroACE** (European Alliance of Companies for Energy Efficiency in Buildings)
- **eu.bac** (European Building Automation and Controls Association),
- **TACMA** (UK Association of Controls Manufacturers),
- **VDMA - Armaturen** (The Valve Sector of the German Machinery and Industrial Equipment Manufacturers Association),
- **VDMA - AMG** (The Building Automation & Controls Sector of the German Machinery and Industrial Equipment Manufacturers Association),
- **Vereniging Huis en Klimaat** (Dutch Home and Climate Association)
- **ACR** (Automatismes du génie Climatique et de la Régulation), the French controls manufacturers association,
- **FIREG** (Fabricants et Importateurs de REGulation) Belgian manufacturers and importers of controls,
- **OpenTherm** (European alliance promoting non-manufacturer-dependent systems of communication between modulating heating appliances and room thermostats),
- **ANIE - CSI** (Installation systems and components sector of Italian Federation of Electrotechnical and Electronic Industries)

Comments on CONSULTATION DOCUMENT on the revision of the Energy Labelling Directive 92/75/EEC of 22 September 1992 on the indication by labelling and standard product information of the consumption of energy and other resources by household appliances.

- (1) How do you suggest the Commission could best ensure coherent product policy?

Avoid proliferation of legislative measures applying to the same products. All measures taken should be based on Art 95 of the Treaty to avoid national and /or regional measures (that would undermine single market).

- (2) Do you agree to the general principle of reinforcing the use of energy labelling in order to more vigorously contribute to the Union's objectives on climate mitigation, competitiveness and sustainable product policy?

A single measure contributing to the objectives (climate mitigation, competitiveness and sustainable product policy) is to be preferred. Integration of labelling into eco-design measures would make sense. An appropriate user friendly labelling system integrated into eco-design measures will assist the consumer to make the correct choice and achieve the desired objectives. It should be easy to understand by the consumer. A single measure allows for easy monitoring.

- (3) For energy using products, would you favour the use of an energy label focusing on the energy consumption at use or of an 'eco-design label', (near to the Eco-label showing the 'best') giving the global environmental performance of the product throughout its life-cycle?

We would be in favour of an energy label focusing on the energy consumption at use.

- (4) Are you in favour of adding CO₂ on the energy label? How could reliable information be assured in the light of different energy mixes in the 27 Member States?

CO₂ depends on the energy mixes in the member states. It would be difficult to add this to a single European label. The Commission should ensure that national CO₂ labelling schemes do not disturb the single market.

- (5) Are you in favour of adding annual running costs on the energy label? How could reliable information be assured in the light of different energy prices in the 27 Member States?

Energy prices depend on the pricing in the member states. It would be difficult to add this to a single European label.

- (6) Would you like to add other products to the scope of the labelling Directive than those covered at present (household appliances only)? If yes, which products would you suggest (non-household or non energy-using products, 'energy-relevant' product, services such as holiday packages or other)?

We strongly recommend adding Heating Controls to the scope of the Labelling Directive. Space and water heating accounts for almost 25% of EU-15 greenhouse gas emissions. Heating controls installed in new houses and more significantly as a retrofit in existing buildings are the most cost effective way to achieve significant carbon emission reductions, achieving immediate results and with payback periods of 1-2 years. The saving potential is typically between 5-10% equating to 30-60 Mt CO₂ per annum. It is understood that 40-50% of the installed radiator stock in the EU does not have thermostatic control using Thermostatic Radiator Valves (TRV). This amounts to in excess of 500M upgrade opportunities. It is further understood that 50% of central heating systems in households are only equipped with mechanical room thermostats (80-100M Units), all of which could be upgraded for more accurate and responsive electronic thermostats resulting in significant increased carbon reductions of 5-10%. In addition an estimated 10-20% of gas and oil fired boilers are only equipped with appliance safety thermostats, and are not equipped with energy efficiency controls. Other advanced heating control options are either available on the EU market, or are in development that can lead to increased carbon emission reductions.

An appropriate user friendly labelling system covering heating controls, integrated into eco-design measures will assist the consumer to make appropriate choices for systems upgrades, and will allow regulatory authorities to design minimum requirements for controls based on a common and auditable systems. A labelling systems designed and used in this way would significantly help to achieve the desired objectives of carbon emission reductions from households in the EU.

- (7) In view of dynamic labelling, which approach would you suggest for the transition from an existing labelling scheme to a new labelling classification in order to cause minimum distortions?

This question does not apply to heating boilers and controls, as they are not subject to any existing scheme.

- (8) Do you want to propose an alternative route beyond the considerations in this document?

no comment