

Ms. Stefania Ministrini  
ISPRA  
Supervisor of the study  
Via Curtatone, 3  
Rome - Italy

Brussels, 30 April 2009

**Copy:** Ms. Laura Cutaia, Mr Benjamin Caspar, Ms. R. Balzekaite

**Topic:** EUEB – Eco-label for Buildings – follow up comments based on meeting of 26/03/2009

Dear Ms. Ministrini,

The **European Partnership for Energy and the Environment** – EPEE ([www.epeeglobal.org](http://www.epeeglobal.org)) - was set-up in September 2000 to represent the interests of the air-conditioning, heat pump and refrigeration industry. EPEE is composed of members who produce, design and install heating, cooling and refrigeration technologies.

**EPEE's mission** is to promote a better understanding of our industry in the EU and to contribute to the development of effective European policies to reduce the environmental impact of our products.

EPEE's priorities for the coming years are: "**Promoting Energy Efficiency**" in the HVACR sector and supporting EU policies designed to encourage the use of more efficient products (e.g. Eco-design, Eco-label, EPBD); and, "**Handling refrigerants responsibly**", i.e. ensuring that the F-gas Regulation effectively reduces HFCs emissions.

EPEE has been an active and co-operative stakeholder over the last years, regularly attending EUEB meetings and giving input along the process and debates.

The study is considered a big step forward in achieving a complete set of criteria, and as such EPEE wants to support this work as much as possible.

During the last meeting in Rome, we have made our comments and suggestions to improve the study, especially the development of criteria.

In order to provide you with a clear idea of EPEE's position, we would like to sum up our comments on the present second background report.

Main issues of concern raised during the meeting in Rome are:

1. **Feasible and realistic criteria:** EPEE calls on ISPRA to come up with measurable and objective criteria to avoid confusion and misinterpretation, in view of an efficient application by stakeholders and a good implementation by Member States;
2. **Consistency with EU legislation:** EPEE invites ISPRA to always look at existing EU legislation when developing criteria to avoid overlapping and work towards a common set of criteria;
3. **A BAT approach:** when developing criteria for equipment, ISPRA should always adopt a BAT approach in order to reach the next energy performance of buildings.

### **EPEE's involvement in the EUEB**

EPEE has been an active and co-operative stakeholder over the last years, regularly attending EUEB meetings and giving input along the process and debates. EPEE has been particularly active on the development of criteria for an Eco-label for heat pumps and will closely follow the revision of these criteria.

EPEE sees a real opportunity in the Eco-label for buildings to promote energy efficiency through alternative technologies, such as heat pumps, in order to improve the global energy performance of buildings and hence reduce their impact on the environment.

Aware that buildings account for more than 40% of energy consumption in the EU, EPEE is committed to collaborate actively to the development of an Eco-label for buildings in view of helping the EU to reach its ambitious 2020 green targets.

### **General comment**

EPEE congratulates ISPRA for the work done so far and reasserts its will to be a pro-active and co-operative stakeholder along the process. EPEE fully supports efforts to improve the environmental performance and sustainability of buildings.

An ambitious and coherent set of criteria through this Eco-label can lead to:

- Promote efficient and intelligent buildings for citizens throughout the EU;
- Reduce the global impact of buildings on the environment;
- Create new jobs and new business opportunities to industry.

For these objectives to be reached, the Eco-label for buildings has to:

- Contain a set of feasible and realistic criteria;
- Look at EU existing legislation in order to be consistent;
- Foster BAT technologies.

### **Feasible and realistic criteria**

EPEE calls on ISPRA to develop:

- Criteria for application for the Eco-label must be clear and exhaustive so that stakeholders know exactly who can or cannot apply for it (e.g. new buildings, when buying or renovating a building, etc).
- The criteria defining the layout of the Eco-label must be clear and complete: what should it look like? Should the hand out date be mentioned on it to be able to check the validity? etc.
- Measurable and objective criteria to avoid confusion and misinterpretation, e.g. reliability or aesthetics notions are subjective and difficult to measure.
- Non-variable criteria which can alter frequently in the future, such as personel training, should not be taken up. E.g. the knowledge of maintenance personel is hard to judge when handing out the Eco-label, as the personel cannot be seen as a constant in the future.
- EPEE wants to avoid dealing with issues already regulated, e.g the ODS Regulation. No need for criteria setting limits or banning certain substances already regulated by EU legislation.

**→ EPEE reminds the importance of developing strong criteria in view of an efficient application by stakeholders and a good implementation by Member States.**

### **Consistency with EU legislation**

**EPEE invites ISPRA to always look at existing EU legislation when developing criteria to avoid overlapping and work towards a common set of measures.**

Existing EU legislation related to the building sector:

- The Energy Performance of Buildings Directive (EPBD);

- The Construction Product Regulation;
- The Eco-design Directive;
- The Energy Labelling Directive;
- The Green Public Procurement initiative;
- The Eco-label for Buildings.

### A BAT approach

**When developing criteria for equipment, ISPRA should always adopt a BAT approach in order to reach the best energy performance of buildings.**

For specific criteria to be developed for heating and cooling systems, EPEE calls on ISPRA to:

- **Look at alternative technologies**, such as heat pumps and reversible heat pumps which have a great potential of energy-savings by using renewable energy sources (aerothermal, geothermal and hydrothermal);
- **Consider combined systems**, such as solar panels with a heat pumps, for boilers and water heaters;
- **Be consistent with existing EU legislation** especially when setting minimum requirements for equipment, i.e. the Eco-design Directive.

Of course this is merely a summary, and for some issues we would be pleased to give you a more elaborate explanation if you need so.

We reassure you that EPEE will continue to follow closely the development of criteria for the Eco-label and will be an active stakeholder by inputting when needed.

Yours sincerely,



Friedrich P Busch  
Director General - EPEE

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