

Brussels, Monday, October 24, 2016

Dear President,
Dear Vice-Presidents,
Dear Commissioners,

We understand that you will discuss in the coming weeks the future of the Ecodesign Framework. Our industry organisations, representing the heating, cooling, refrigeration, ventilation, household appliance and ICT & consumer electronics sectors, strongly support Ecodesign and Energy Labelling which, for several product groups, have proven very successful and contributed to the EU's energy and climate goals by pushing and pulling the market towards more energy efficient products.

However, to ensure that this success story continues, we would like to emphasize some key points which, in our view, require urgent attention:

- ✓ First, we urge you to publish without delay already voted Ecodesign measures, such as Lot 21 and omnibus Regulation on tolerances, at the very latest with the Winter Package. Indeed, the delay in publication in the Official Journal of already voted Ecodesign measures creates an unmanageable situation for industry, including SMEs, which invests considerable resources to improve the energy efficiency of products and needs legal certainty to re-design them and comply with the new requirements.
- ✓ Second, complement the current Ecodesign and Energy Labelling policies with measures to support the market uptake of efficient products. For example, raise consumer awareness about the benefits of energy efficiency and help them make investments; in the EPBD revision, promote inspections of installed appliances which can lead to planned replacements.
- ✓ Finally, Ecodesign measures have been effective because they have regulated measurable, verifiable parameters of the whole system, such as the energy consumption in use on the basis of a clear and transparent methodology. This approach needs to be maintained to transform the market in line with the energy efficiency first principle, without regulating components included in products which are already covered by Ecodesign requirements.

Cost-effective Ecodesign requirements have contributed to substantial energy savings because they are based on some key principles: simplicity, measurability and transparency. The Ecodesign framework can continue to benefit citizens and businesses if these fundamental principles are respected and implemented swiftly and if they are complemented with appropriate measures to promote energy-efficient products.

We remain at your disposal should you have any questions, and would like to request a meeting to discuss this issue further at your convenience.

Yours sincerely,

Claude Blanc, President, ASERCOM
Paolo Falcioni, Director General, CECED
John Higgins, Director General, Digital Europe
Federica Sabbati, Secretary General, EHI
Thomas Nowak, Secretary General, EHPA
Andrea Voigt, Director General, EPEE
Adrian Joyce, Secretary General, EuroACE
Paul Voss, Managing Director, Euroheat & Power



About ASERCOM

ASERCOM, the Association of European Component Manufacturers is the platform for dealing with scientific and technical topics and their challenges, promoting standards for performance rating, methods of testing and product safety, focusing on improved environmental protection, serving the refrigeration and air conditioning industry and its customers.

About CECED

CECED represents the household appliance industry in Europe. The total annual turnover of the industry in Europe is €50bn. Total employment is approximately 1 million jobs. The sector contributes €1.4bn to research and development activities in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Indesit Company, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. CECED's member Associations cover the following countries: Austria, Baltic countries, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom.

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ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 62 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

About EHI, the Association of the European Heating Industry

EHI represents 90% of the European market for heat and hot water generation, heating controls and heat emitters, 80% of biomass central heating, as well as more than 70% of the hydronic heat pump and solar thermal markets. Our Members are the market leaders in the production of energy efficient and renewable energy technologies to affordably heat buildings. In doing so, they employ directly more than 120.000 people in Europe and invest more than half a billion euro a year in research and innovation.

For more information on our membership go to www.ehi.eu.

About the European Heat Pump Association

The Brussels based European Heat Pump Association (EHPA) represents the majority of the European heat pump industry. It has currently 110 members from all parts of the industry's value chain: heat pump and component manufacturers, research institutes, universities, testing labs and energy agencies. Its key goal is to promote awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial application. EHPA coordinates the European Quality label for heat pumps and the EUCERT education and training scheme for heat pump installers. It compiles the annual sales statistics and market outlook. For more information, please visit: www.ehpa.org.



About EPEE

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies, national and international associations.

EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment.

EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. Please see our website (www.epeeglobal.org) for further information.

About EuroACE

EuroAce represents Europe's leading companies involved with the manufacture, distribution and installation of energy savings goods and services for buildings. With a total turnover of 140 billion euros and employing 328,000 people, the EuroACE mission is to help Europe move towards a more sustainable pattern of energy use in buildings.

About Euroheat & Power

Euroheat & Power is the international network for district energy, promoting sustainable heating and cooling in Europe and beyond. We are a non-for-profit association headquartered in Brussels, Belgium, which unites the district energy sector. Our members come from over thirty countries around the globe and include national district heating and cooling associations, utilities operating district energy systems, industrial associations and companies, manufacturers, universities, research institutes and consultancies active in the sector.