

Paul Hodson
Head of Unit
DG ENER - C.3.
European Commission
Rue De Mot 24
1040 Brussels

Brussels, Wednesday 16 May 2018

Re: EU Product Database for Energy Labelling (EPREL) Implementing Act

Dear Mr Hodson,

The EU Product Database for Energy Labelling (EPREL) needs to meet the objectives stated in Regulation 2017/1369. It has to be set up so that the burden for suppliers is minimised (Art 12.7a), data security is ensured (Art 12.9), terms and conditions - including the scope - are known in advance, and a fair and level playing field is safeguarded by identifying free-riders (Recital 6). In addition, it has to ensure that it is fit for purpose for all product groups and it takes into account their various characteristics.

The industries concerned by the product groups to be registered in the EPREL Database would like to reiterate their concerns regarding the setup of the Database and the need to ensure operational and technical certainty for industry.

As we already mentioned in the Joint Industry position papers of November 2017 and February 2018, the deadline for the Database to be operational, while meeting its objectives of security and practicality, is short.

Running the Database according to the legal requirements from January 2019 onwards, is a major technical challenge. It needs the agreed definition of an interface between suppliers (the data source) and the Commission (responsible for the Database and its operational details). This interface definition includes several operational aspects, including the "data exchange model" (currently called EPREL 1.01), the transfer protocol, the encryption standard, the registration process, etc. We have been actively working to support the Commission experts on the development of these activities.

Due to the mass of models and data involved, it is not feasible for most producers to handle the data upload manually (this database is not similar to the e.g. EU F-gas portal in that respect). Producers need to set up and change their IT systems, which takes time and resources. Thus, many operational issues need to be fixed as soon as possible, pilot testing and practice may show that minor technical adaptations might be necessary, possibly even after November 2018.

In this tight timescale situation, industry fears that the envisaged Implementing Act¹ endangers the functioning of the Database, particularly if the Act is scheduled for publication already in November 2018.

¹ The Framework Regulation 2017/1369 stipulates in Art 12.12: *The Commission shall be empowered to specify, by means of implementing acts, the operational details of the product database. After consulting the Consultation Forum provided for in Article 14, those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 18(2).*

Keeping in mind that the framework legislation 2017/1369 does not specify that the Implementing Act enters into force before the Database is operational, industry calls for the Commission to focus on operational and technical certainty and therefore proposes, to ensure the effectiveness of any Implementing Act, that it is delayed until the Database is running sufficiently.

Industry would appreciate if these calls for operations and technical certainty are taken into account and if the respective timing issues are clarified soon. All sectors are committed to work together with the Commission to have EPREL working with the necessary practicality and security level by the end of 2018. In the same token, we are committed to have, at a later stage, an Implementing Act that will really bring additional benefits to the process. We would like to emphasise that close collaboration and open information exchange is a necessary precondition to meet this objective.

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,



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APPLiA – Home Appliance Europe



Dr. Peter Hug, Managing Director
EUnited Cleaning



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Felix Van Eyken, Secretary General
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Thomas Nowak, Secretary General
European Heat Pump Association (EHPA)



Ourania Georgoutsakou, Secretary-General
Lighting Europe



Andrea Voigt, Director General
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and the Environment (EPEE)

About the Signatories

About APPLiA: APPLiA represents the home appliance industry in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Groupe Atlantic, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. APPLiA's member Associations cover the following countries: Austria, Baltics, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom. www.applia-europe.eu

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 in total 35,000 ICT Companies in Europe represented by 61 corporate members and 39 national trade associations from across Europe. Our website provides further information on our recent news and activities: www.digitaleurope.org

About EHI: EHI, the Association of the European Heating Industry, represents 90% of the European market for heat and hot water generation, heating controls and heat emitters, as well as 75% of the hydronic heat pump market. Our Members produce advanced technologies for heating in buildings, including: heating systems, burners, boilers, heat pumps, components and system integrators, radiators, surface heating & cooling and renewable energy systems. In doing so, we employ directly more than 120.000 people in Europe and invest more than half a billion euro a year in energy efficiency. www.ehi.eu

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. www.epeeglobal.org

About EHPA

The European Heat Pump Association (EHPA) is a Brussels based industry association which aims at promoting awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. EHPA provides technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production. EHPA coordinates quality initiatives: including the HP KEYMARK, a Quality label for heat pumps and Certification standards for heat pump installers. The association compiles the annual heat pump statistics and organizes a number of events, among them an annual heat pump conference.

About EUUnited Cleaning: The Association of European cleaning machines manufacturers - EUUnited Cleaning - represents the leading producers of floor cleaning machines and high-pressure cleaners for commercial and

industrial use. The association of European cleaning machines manufacturers - EUnited Cleaning - represents the leading producers of floor cleaning machines and high-pressure cleaners for commercial and industrial use. Members are: Columbus, Comac, Diversey, Electrostar, FIMAP, Ghibli, Hako, Kärcher, Nilfisk, Numatic, RCM, RUWAC, Schwaborn, Starmix, Stihl, Stolzenberg, Tennant, Truvox, TTS Cleantech, Wetrok. www.eu-nited.net

About Eurovent: Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe, the Middle East and Africa represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn Euros, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level-playing field for the entire industry independent from organisation sizes or membership fees. www.eurovent.eu

About EVIA: The European Ventilation Industry Association (EVIA) was established in Brussels in July 2010. EVIA's mission is to represent the views and interests of the ventilation industry and serve as a platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States. Our membership is composed of more than 35 member companies and 6 national associations across Europe, realising an annual turnover of over 7 billion euros and employing more than 45,000 people in Europe. www.evia.eu

About LightingEurope: LightingEurope is the industry association that represents the lighting industry in Europe. We are the voice of more than 1,000 lighting companies that employ more than 100,000 Europeans and create an annual European turnover of over € 20 billion. Our daily mission is to advocate and defend the lighting industry in Brussels, while reconciling it with ongoing EU policy aims. In doing so, we are dedicated to promoting efficient lighting practices for the benefit of the global environment, human comfort, and the health and safety of consumers. www.lightingeurope.org