



Mr Carl Huijbregts  
Chair  
**Administrative  
Cooperation  
Group (AdCo)  
ENERLAB**

Brussels, 08 March 2021

**Re: EU Product Database for Energy Labelling (EPREL) Implementation**

Dear Mr Carl Huijbregts,

We represent industries that are directly affected by the EU Product Registry for Energy Labelling (EPREL) requirements. We had reached out to the ADCO at the time of the entry into force of the database, to flag some delays in its implementation.

As you are probably aware, the Database is again facing some important delays and challenges in its implementation. We would like to ask to regularly liaise with the European Commission on this topic to find a quick and acceptable solution to the current situation, and to keep our industries informed of your discussions.

According to the information given on the EPREL Workspace, the system does not allow yet the full registration of products on time with the legal deadlines of March 1<sup>st</sup> and May 1<sup>st</sup> set by the 2019 Energy Labelling product Regulations.

Moreover, the system now needs to be updated again with the changes introduced by the recent Omnibus amendments published in the Official Journal and entered into force on the 1<sup>st</sup> of March. A large number of already registered models are accordingly affected and need to be updated in advance of the legal deadline of May 1<sup>st</sup> and September 1<sup>st</sup>. To perform this complex update, suppliers need to have the revised EPREL data exchange model at least few months ahead of the set legal deadline.

From the perspective of the public database, retailers are already facing issues in explaining to consumers that the platform is not yet fully operational (e.g., links to models not working, product information sheets only available in English). The search

functions that could allow the download of both the energy label and the product information sheet are not yet ready either.

It is therefore urgent a very prompt and incisive intervention on this platform also in order to satisfy as soon as possible all stakeholders' needs and expectations.

We understand that no ADCO ENERLAB meetings are scheduled for the coming weeks but believe this topic would deserve a detailed discussion among authorities and possibly with the Commission as soon as possible.

With the urgency of legal requirements already applicable, our industries would highly appreciate your proactive approach in dealing with current difficulties and shortcomings of the system and being kept informed about possible discussions of this very relevant topic for suppliers.

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,



Paolo Falcioni, Director General  
APPLiA



Thomas Nowak, Secretary General  
EHPA



Andrea Voigt, Director General  
EPEE



Davide Giulio Rossi, Secretary General  
EuCER



Klaus - Dieter Axt, Head of Office  
EUnited



Felix van Eyken, Secretary General  
Eurovent



Russell Patten, Secretary General  
EVIA



Ourania Georgoutsakou, Secretary-General  
LightingEurope

### **About the Signatories**

**About APPLiA:** APPLiA - Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of EUR 53 billion, investing over EUR 1.6 billion in R&D activities and creating nearly 1 million jobs.

**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 over 50 member companies as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, 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

**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 EuCER Council:** The European Consumer Electronics Retail Council (EuCER) is a non-profit association representing European Retail Groups and Chains which are active in the sale of Technical Consumer Goods, such as Major Domestic Appliances, Computers, Smartphones, Healthcare Products, and Audio and Video Devices

**About EUnited:** EUnited provides a channel for companies to communicate with the European Institutions and partner organisations and to articulate the role of equipment suppliers in technical standards development, policy formulation, trade issues and legislation. Within a single European association, member companies are organised in four sectors which are Cleaning, Municipal Equipment, Robotics and Vehicle Cleaning

**About Eurovent:** Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe 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 EUR, 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

**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 45 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. EVIA aims to promote highly energy efficient ventilation applications across Europe, with high consideration for health and comfort aspects. Fresh and good indoor air quality is a critical element of comfort and contributes to keeping people healthy in buildings

**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