



The European Association of Electrical Contractors

## AIE position on the common energy labelling for air-to-air heat pumps and local space heaters

AIE, the European Association of Electrical Contractors, represents over 100.000 electro-technical businesses and over 1.000.000 professionals.

AIE welcomes the opportunity to provide feedback and its members' expertise ahead of the Commission's stakeholder meeting on the potential merger of energy labelling for air-to-air heat pumps and local space heaters.

While AIE and its members support initiatives helping consumers to make environmentally conscious choices, we believe that it **would not be advisable** to offer a common energy label for both air-to-air heat pumps  $\leq 12$  kW and local space heaters  $\leq 50$  kW.

### A common label could be misleading for consumers

An energy label covering both heating systems will have a strong bias towards heat pumps as they are inherently more efficient to a degree that local space heaters will never be able to match, no matter how much R&D. With a combined label, all heat pumps will be in the top brackets of the label while all local space heater will be in the bottom. In this scenario, the label will only provide information on which system is the most efficient without providing clear information about which specific heat pump or local space heater the consumer should buy.

Heat pumps and local space heaters are not interchangeable, both in terms of consumer preference (as mentioned in the discussion paper) and purpose and should be ranked separately. Indeed, the impetus behind this discussion builds on the premise that these two systems serve the same purpose. However, they show differences that will impact consumer choice before even considering and independent of energy efficiency:

- Air-to-air heat pumps are a secondary heating system in buildings and are used to complement a primary heating system, which can be, among others, a local space heater. While both supplying heating, these two systems can address different consumer needs and are not necessarily interchangeable in the solutions they offer.
- Local space heaters are intended to be used for heating while air-to-air heat pumps are also intended for cooling, showing stark differences in their purpose.

Having specific labels for each system will empower consumers to choose the right local space heater or heat pump according to environmental criteria, as they will most likely already have decided on which of the two systems they wish to install.

Finally, separate labelling will incentivize manufacturers to differentiate themselves from competitors manufacturing the same product. As they will be spread along the label's classes, they will increase the efficiency of their products as a means to stand out from the competition.

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### About AIE

Since 1954, our mission has been to promote high-quality and safe electrical installations in Europe. Covering both private and public sectors, we represent over 1.000.000 professionals in over 100.000 businesses and a turnover of over 100 billion Euro. From energy efficiency, energy services and standardization, ICT, smart and new digital technologies, renewable energy, electromobility, and training and education - AIE makes sure that the key strategies and main priorities for the modern electrical contractor as a solution provider in Europe are well represented.

As climate action becomes more pressing, the EU has set ambitious climate goals and has adopted energy efficiency measures to reach them. We know that skilled electrical contractors are central to these objectives as they are needed to install and maintain the low-carbon solutions necessary to mitigate our environmental impact. Without them and their newly acquired skills, the EU will not be able to move towards a carbon-neutral economy. And with their unique position as trusted in-home advisors, they empower the citizens to contribute to the energy transition.

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