

To Members of the European Parliament's ITRE Committee

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1047 Brussels

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Dear Member of the European Parliament,

We are writing to you as a coalition of industry associations, working in the heating and cooling sector, to **support the idea of introducing a provision on labelling the installed stock of boilers in the Energy Performance of Buildings Directive (EPBD)**, which is currently under review.

The implementation of the current EPBD has not resulted in an increased replacement rate of inefficient boilers, which have outlasted their intended technical life. This is a major problem, as 80 million of the 120 million space heaters installed in the EU's existing buildings are inefficient. The review of the EPBD offers an opportunity to develop dedicated policies to address this issue with a view to accelerating the necessary transition towards a highly efficient and carbon-emission free building stock in the EU by 2050.

The EPBD – with its focus on informing consumers about the energy performance of their buildings – lends itself perfectly to take on this challenge. One of the main obstacles to modernise heating systems remains the lack of awareness among consumers about how inefficient their current heating system is. Consumers pay their energy bills without reflecting on the potential energy savings that could be made by switching to high-efficiency and renewable heating technologies. Until their boiler breaks down ...

The European Commission's 'EU Strategy on Heating and Cooling' correctly identified the challenge that "[d]ecisions on replacing old appliances are typically made under pressure, when the heating system breaks down". In such situations, typically during a cold winter day, consumers do not have the time to compare prices, research financial incentives and inform themselves about what heating (and hot water) system and energy source is technically feasible for their home.

So, how can the EU best engage consumers about a planned switch to a more efficient and renewable heating system? In our view, the EU policies on Ecodesign and Energy Labelling have a proven track record of pushing the market to adopt the most efficient products. Member States can build on these policies, e.g. by starting to label the installed stock of old boilers. Awarding an energy label to an old boiler informs consumers in easy-to-understand language that their appliances are inefficient compared to the heating technologies that are currently on the market. In addition, information can be distributed about the – public or private – financial instruments available to deal with the upfront cost of an investment in a modernised heating system.

To be clear, the challenge is not a technological one. A wide range of heating technologies exists that can replace these inefficient boilers: solar thermal collectors, heat pumps using ambient and geothermal heat, condensing boilers, (micro-) combined heat and power, biomass boilers, fuel cells, smart home-technologies, etc. Although they vary in nature and potential, some of these technologies will always be able to fit the needs of any building in Europe. Furthermore, with the right level of integration and timely replacement cycles, they will be the essential components of a decarbonised future.

This explains why the idea of labelling the installed stock of boilers is catching on. Germany already introduced such a scheme in 2017. Italy and France are studying such a labelling scheme. The heating industry in the UK and Austria already launched such a scheme. Support from public authorities across the EU will scale up these initiatives and increase their effectiveness.

In closing, labelling the installed stock is an idea whose time has come. The review of the EPBD offers a window of opportunity that shall not be missed.



Yours sincerely,

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About AEBIOM:

AEBIOM, the European Biomass Association, is the common voice of the bioenergy sector with the aim to develop a sustainable bioenergy market based on fair business conditions. AEBIOM is a non-profit Brussels based international organisation founded in 1990 that brings together around 30 national associations and 90 companies from across Europe thus representing more than 4000 indirect members including mainly companies and research centres. For more information, please visit: www.aebiom.org

About COGEN Europe:

COGEN Europe is the European association for the promotion of cogeneration. Its principal goal is to work towards the wider use of cogeneration in Europe for a sustainable energy future. Cogeneration or Combined Heat and Power (CHP) is the most efficient way to deliver heating, cooling and electricity. COGEN Europe promotes the widespread development of cogeneration in Europe and worldwide. To achieve this goal, COGEN Europe works at the EU level and with member states to develop sustainable energy policies and remove unnecessary barriers to implementation. For more information, please visit: www.cogeneurope.eu

About EGEC:

EGEC, the European Geothermal Energy Council, is a non-profit organisation representing the geothermal sector in Europe. It brings together more than 120 members from 28 countries, including utility companies, equipment manufacturers, national associations, consultants, research centres, geological surveys, and public authorities. For more information, please visit: www.egec.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, 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 seven hundred million euros a year in research and innovation. For more information, please visit: www.ehi.eu

About EHPA:

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 ESTIF:

ESTIF is the voice of the solar thermal industry in Europe, actively promoting the use of solar thermal technology for renewable heating and cooling. With more than 60 members across 17 European countries, ESTIF represents over 90% of the industry across the value chain. For more information, please visit: www.estif.org

About Hydrogen Europe:

Hydrogen Europe is the leading industry association representing more than 110 companies and national associations, both large and SMEs, working to make hydrogen energy an everyday reality. The association partners with the European Commission and the research community in the public-private partnership Fuel Cells and Hydrogen Joint Undertaking (FCH JU) to accelerate the market introduction of these clean technologies in the energy and transport sectors. More information can be found on www.hydrogeneurope.eu