



Brussels, 23 September 2025

Commissioner Dan Jørgensen  
Rue de la Loi 200  
1049, Brussels

Cc: Ditte Juul Jørgensen  
Director General for Energy, European Commission  
Rue de Mot 24  
1040, Brussels

Cc: Peter Van Kemseke  
Cabinet President Ursula von der Leyen  
Rue de la Loi 200  
1049, Brussels

Cc: Rosalinde van der Vlies  
Director for Just Transition, Consumers, Efficiency and Innovation (ENER.B)

Cc: Robert Nuj  
Head of Unit for Building and Products (ENER B.3)

**Subject: Request to reinstate distribution of draft Commission proposals prior to Ecodesign Forum meetings**

Dear Commissioner Dan Jørgensen,

We are writing to respectfully urge the Commission to reinstate the practice of distributing Ecodesign and Energy Label draft Commission proposals well in advance of the Ecodesign and Consultation Forum meetings.

This approach has long been a cornerstone of transparent and effective policy development within the EU legislative process. Timely access to these documents enables industry experts, NGOs, Member State representatives and other stakeholders to prepare thoroughly and provide informed and constructive input during the meetings. The resulting dialogue has avoided errors, improved the quality of proposed measures and avoided additional delays in the process. Additionally, it helped avoid unnecessary discussions during meetings.

Without the early availability of such documents, the Commission risks undermining the transparency of the process and missing out on crucial feedback that could otherwise lead to more robust and effective legislation. The delay or absence of such documents also hampers meaningful participation, weakening stakeholder trust and the legitimacy of the outcomes.

Moreover, this choice would deviate from the standard practice in other dossiers, where stakeholders participate in preparing Commission proposals from the very early stages, leading to less contentious discussions during Ecodesign Forum meetings.

While summaries or explanatory notes can offer a general overview, they often omit the nuanced legal language that determines how a regulation will be interpreted and implemented in practice. The specific wording used in a legal act can significantly affect the scope, applicability, and compliance requirements of a law.

Without access to the actual drafts, stakeholders risk misunderstanding key provisions or overlooking critical implications. This can lead to feedback that is incomplete, misaligned, or even counterproductive.

We believe that sharing draft Commission proposals is essential for ensuring a sound, inclusive, and democratic legislative process under the Ecodesign and Energy Labelling framework.

We thank you in advance for your attention to this matter and remain at your disposal for any further discussion.

Yours sincerely,

### **Signatories**

**APPLiA - Home Appliance Europe:** <https://www.applia-europe.eu/>

**CCIA Europe - Computer & Communications Industry Association:**  
<https://www.ccianet.org/>

**DIGITALEUROPE:** <https://www.digitaleurope.org/>

**ECOS - Environmental Coalition on Standards:** <https://ecostandard.org/>

**EEB - European Environmental Bureau:** <https://eeb.org/>

**EHI - Association of the European Heating Industry:** <https://www.ehi.eu/>  
**EHPA - European Heat Pump Association:** <https://www.ehpa.org/>  
**EIHA - European Industrial Hemp Association:** <https://www.eiha.org/>  
**EPEE - European Partnership for Energy and the Environment:** [www.epee-global.org](http://www.epee-global.org)  
**EUHA - The Electric Underfloor Heating Alliance:** <https://www.euha-alliance.eu/>  
**EuroCommerce:** <https://www.eurocommerce.eu/>  
**Eurovent:** <https://www.eurovent.eu/>  
**EVIA - European Ventilation Industry Association:** <https://www.evia.eu/>  
**FESI - Federation of the European Sporting Goods Industry:**  
<https://www.fesi-sport.org>  
**KEA - Korea Electronics Association:** <https://www.gokea.org/>  
**JBCE - Japan Business Council in Europe:** <https://www.jbce.org/en/>  
**LightingEurope:** <https://www.lightingeurope.org/>  
**Orgalim - Europe's technology industries:** <https://www.orgalim.eu>  
**RREUSE:** <https://www.rreuse.org/>