

EHPA position paper on the Energy Product Omnibus

Introduction

With the present paper, the European Heat Pump Association (EHPA) aims to further contribute to the European Commission's Call for Evidence on the Energy Product Omnibus initiative.

The present paper builds on EHPA's January 2026 feedback¹ by refining earlier recommendations and introducing additional proposals for consideration.

The overarching objective of EHPA is to support the Commission's work to improve energy efficiency legislation for energy-efficient products and, therefore for heat pumps. EHPA sees the Energy Product Omnibus initiative as an opportunity to further improve the existing legislative framework by adapting it to market realities and reducing unnecessary administrative burdens on manufacturers.

In particular, EHPA proposals are made with the belief that such improvements would (i) support cost efficiencies for the heat pump industry and (ii) reduce regulatory ambiguity while maintaining high standards for product energy performance and by protecting the consumer information.

EHPA believes that these adjustments can contribute to accelerating the roll-out of heat pumps across Europe, which is essential for strengthening energy security and reinforcing the competitiveness of the European clean technology sector.

This paper is structured as follows:

- The first chapter suggests targeted amendments **to improve the ecodesign and energy labelling legislation for heat pumps, aligning our comments to support the scope of the call for evidence on the Energy Product Omnibus.**
- The second chapter presents broader, horizontal recommendations to improve the overall coherence and functioning of legislation affecting heat pumps.

¹ EHPA position paper on the simplification of heat pump-related product legislation is available here: https://ehpa.org/wp-content/uploads/2026/01/EHPA-Product-Omnibus_January-2026.pdf

Chapter 1: EHPA targeted proposals to improve the Ecodesign and energy labelling legislation for heat pumps

1. *Introduce the digital energy label to avoid paper waste and cost*

EHPA calls for the **option to use fully digital energy labels** as an **alternative** to printed ones. Today, a printed colour label must accompany every heating or cooling unit sold in the EU, yet most of these labels are never seen by consumers and are immediately discarded. Retailers typically display one physical label per model; the printed label rarely influences the buying decision.

This requirement has become a **source of unnecessary paper waste and cost**. The average label costs €0.20 to produce, and with around 100 million units placed on the EU market annually, this represents over **€20 million in avoidable costs** for the sector, not to mention the environmental impact of millions of unused printed sheets.

EHPA therefore proposes to **amend Article 3(1) of the Energy Labelling Framework Regulation (EU) 2017/1369** to explicitly allow suppliers to provide **digital energy labels and product information sheets** through EPREL, **with printed versions available on request**.

The amendments are suggested in red as indicated below:

“1.1. The supplier shall ensure that products that are placed on the market are accompanied, for each individual unit, free of charge, with accurate printed labels and with product information sheets in accordance with this Regulation and the relevant delegated acts. As an alternative to supplying **the label and** the product information sheet with the product, delegated acts referred to in point (h) of Article 16(3) may provide that it is sufficient for the supplier to enter the parameters of such **label and** product information sheet into the product database. In such a case, the supplier shall provide **the label and/or** the product information sheet in printed form to the dealer on request.

~~Delegated acts may provide that the label is printed on the packaging of the product.~~

2. The supplier shall deliver printed labels, including rescaled labels, in accordance with Article 11(13), and product information sheets, to the dealer free of charge, promptly and in any event within five working days upon the dealer's request.”

2. *Remove the obligation to include both existing and upcoming rescaled labels for the existing model already placed on the market during 4 months before the entry into force*

The obligations laid down in Article 11(13)(a) of the Energy Labelling Framework Regulation – in particular the requirement for suppliers to provide both the existing label and the rescaled label for models placed on the market during the four months preceding the date for starting the display of the rescaled label – impose significant administrative and logistical burdens, without delivering commensurate benefits for consumers or for market surveillance.

EHPA therefore suggests **either removing this obligation** altogether **or amending the relevant provisions to allow the supplier to voluntarily display the rescaled label during the four months preceding its date of application**.

3. Simplify EPREL

The current structure of the EPREL database makes it difficult to update performance information without changing the model identifier for example in case cases of errors or evolving testing method. What happen is that If updates are made resulting in the need to change the model identifier, the old model identifier currently remains visible on the public website even though this is no longer the relevant information for consumers.

Therefore, it should be considered how to improve this since this approach has several negative consequences for manufacturers, as it increases the administrative and compliance burden, along with the associated costs.

4. Extend the transitional period under the Ecodesign for Sustainable Products Regulation (ESPR) from 31 December 2026 to 31 December 2028

Article 79 of Regulation (EU) 2024/1781 (ESPR) repeals Directive 2009/125/EC as of 18 July 2024, while allowing certain provisions and implementing measures in force on 17 July 2024 to continue to apply during a transitional period. In particular, Article 79(1)(a)(i) maintains the applicability of existing ecodesign requirements for energy-related products — including space and combination heaters, water heaters, air conditioners (including air-to-air heat pumps), ventilation units and other heating and cooling products — until 31 December 2026.

In practice, this deadline is unlikely to be met. The Commission is managing a substantial backlog of ecodesign and energy labelling files and, at the time of writing, key measures covered by the transitional regime (e.g., the ecodesign revisions for air conditioners, air heating and cooling products, high-temperature process chillers and fan coil units) are still under development.

EHPA therefore considers the Energy Product Omnibus as an opportunity to provide the additional time needed to complete these ongoing revisions. Without an extension, the preparatory studies and all the technical work already carried out by the Commission under the previous Ecodesign and Energy labelling Working Plan risk becoming obsolete, and will require duplicative efforts under the ESPR framework.

EHPA therefore supports and recommend extending the transitional period until 31 December 2028. This would allow the current work already pursued by the Commission on the different product group to be finalised.

5. On the common layout of the ESPR label article 16 (5)

EHPA recommends deleting Article 16(5) of Regulation (EU) 2024/1781, which requires the Commission to adopt implementing acts establishing common requirements for the layout of the ESPR labels.

A horizontal, one-size-fits-all ESPR label layout could be not appropriate especially considering that the range of products covered by the ESPR are highly diverse and require different parameters, metrics and presentation formats to convey meaningful information to consumers.

Therefore, EHPA suggests deleting only the para (5) of the Article 16 ESPR and leave to the product-specific delegated act any decisions on the content and layout of the ESPR

Should the proper removal not be possible, we would recommend delaying the adoption of this implementing act under Article 16(5) until a sufficient number of delegated acts are published to ensure that the common design and layout are consistent with the information and methodology identified by product delegated acts.

6. Make use of the existing database and avoid reporting the same data on different databases

EHPA recommends that the EU legislation ensure harmonisation and interoperability between the databases through which manufacturers are required to report product information. This is increasingly urgent given the coexistence of EU-level systems (notably the Digital Product Passport (DPP) and EPREL) together with national databases established for energy labelling, market surveillance or product compliance purposes.

The EU framework should ensure that identical information is submitted only once and subsequently reused across systems. This should be achieved either through a single reporting interface at EU level or through full interoperability and automated data exchange between databases, or also by aligned reporting templates

In this context, the Smart Energy Expert Group for Data for Energy initiative under the Action Plan for the Digitalisation of the Energy System, which is exploring data-sharing tools such as a “flexibility passport” for connected devices, should build on existing infrastructures rather than create parallel schemes. Relevant information on connectivity and demand-response capabilities could be integrated into EPREL, while the Code of Conduct on Energy Smart Appliances can serve as a technical reference for enabling demand-side flexibility and secure smart-grid interaction.

7. Place the requirements at the level of the finished product (heat pump) rather than its individual components.

Often, both finished products and their components are regulated by Ecodesign (for example, for heat pumps, parts such as motors and fans). However, introducing separate efficiency obligations for components that are purpose-built for integration into regulated appliances does not deliver additional environmental benefits. On the contrary, it leads to a burden on manufacturers and increase the costs of the final product.

Existing EU legislation already recognises this system-based logic: for example, Regulation (EU) 2019/2021 on electronic displays excludes components and subassemblies of products covered by Ecodesign implementing measures (Article 1(2)(g)). Therefore, extending a similar principle across product groups would improve regulatory coherence and prevent overlapping obligations under Ecodesign and the Ecodesign for Sustainable Products Regulation (ESPR).

EHPA propose to amend the existing legislation (the ESPR and the Energy labelling Framework Regulation (EU) 2017/1369) accordingly.

Proposed amendments

1) Amend Article 4 of ESPR (EU)2024/1781 by introducing a similar wording: *“in the delegated acts adopted pursuant to paragraph 1, the Commission shall, where applicable, avoid double regulation and prioritise ecodesign requirements for finished products over requirements placed on raw materials or components/subassemblies used in these products, also when placed on the market as spare parts. Such exemptions shall be placed in each delegated act for products with the potential to be integrated in other products”*.

2) Amend Article 16 of the Energy Labelling Framework (EU)2017/1369 by introducing a similar wording: *“In the delegated acts adopted pursuant to Article 17, the Commission shall, where applicable, avoid double regulation and prioritise energy labelling requirements for finished products over requirements placed on raw materials or components/subassemblies used in these products, also when placed on the market as spare parts. Such exemptions shall be placed in each delegated act for products with the potential to be integrated in other products.”*

To ensure that this is also feasible from a Market Surveillance Authority perspective, the Market surveillance Regulation 2019/1020 should be amended accordingly.

Proposed amendment

1) Introduce a **new Article 4bis** to the Market surveillance Regulation 2019/1020 whose **title** could read as follow: *“Tasks of economic operators regarding components integrated into final product subject to certain Union harmonisation legislation”*, and whose main **content could refer to this:** *“Components compliant with harmonised standards or EU type-C declaration shall be deemed compliant within assemblies provided that component Declaration of conformity is referenced in the assembly of the Declaration of conformity of the final product”*.

Chapter 2: EHPA recommendations to strengthen regulatory coherence across heat pump related legislation

1) Coordinate the heat pumps-related legislation

Requirements affecting heat pumps are currently spread across several EU legal frameworks (such as Ecodesign and Energy Labelling rules, the F-gas Regulation, digitalisation initiatives, such as the Network Code on Demand Connection), each with its own review cycle, entry-into-force dates and technical requirements.

In practice, this means manufacturers must repeatedly redesign products, repeat testing procedures and update technical documentation as new requirements enter into force at different moments: refrigerant transitions driven by F-gas rules, forthcoming performance and testing changes under Ecodesign and Energy Labelling, and potential grid-interaction specifications stemming from network codes. This situation could be improved by harmonising as long as possible entry into force and revision timeline across different relation pattern creates avoidable costs, absorbs engineering capacity and could potentially undermine heat pump roll out – a strategic key clean technology for the European market.

Given their strategic role in strengthening energy security and accelerating the electrification of heating, EHPA invites the Commission to ensure structured coordination of EU legislation affecting product groups subject to multiple regulatory frameworks.

In particular, future revisions of key legislative instruments affecting heat pumps should be better synchronised, including:

- alignment of entry-into-force dates with the relevant legislation,
- coordination of review timelines;
- consideration of interactions between requirements across legislative acts.

To achieve this aim, EHPA would like to propose some actions that can concretely achieve this objective:

1. Amend the New Legislative Framework (NLF) Decision No 768/2008/EC by introducing within its Annex I (dedicated to the '*reference provision for community harmonization legislation for product*') a dedicated chapter which could read as follows:

“Coordination of Union legislation applicable to the same product group”.

“1. Where appropriate, the Commission shall ensure alignment of application dates and transitional periods to avoid unnecessary redesign cycles, duplicate testing, or administrative burden for economic operators.

2. Review clauses shall take into account existing or planned revisions of other Union acts affecting the same product group, to ensure coordinated regulatory updates.”

The NLF could be the right framework to realise such harmonisation since it sets provisions to harmonize the product legislation: indeed according to its Recital (2) and Article 2 *“this Decision sets out the common framework of general principles and reference provisions for the drawing up of Community legislation harmonising the conditions for the marketing of products (Community harmonisation legislation).”*

2. **Include in every impact assessment revising legislation that significantly affects heat pumps a dedicated section or chapter mapping other relevant regulatory requirements, assessing cumulative impacts and interactions with related legislation, and proposing options to synchronise implementation and revision timelines.** This approach is consistent with the Better Regulation Guidelines (SWD 2021) and the Better Regulation Toolbox, which emphasise:
 - a. coherence and regulatory fitness, including the identification of overlaps, inconsistencies and simplification opportunities across the acquis (Guidelines Ch. I, Sections 1–3.3; Toolbox Tools #1, #2, #5 and #11);
 - b. the systematic assessment of cumulative impacts and interactions at sector level (Guidelines Ch. I, 3.3; Toolbox Tool #57, Box 4);
 - c. early consideration of implementation and enforcement aspects, including implementation strategies and compliance calendars, to avoid overlaps, gaps and unnecessary burden (Guidelines Ch. I, 3.6 and Ch. V, Section 2; Toolbox Tools #38 and #40).

3. Establish a **Heat Pump Task Force (or Working Group)** composed by different civil servants by relevant DGs involved in drafting legislations related to heat pumps (such as DG GROW, DG ENER, DG ENVI, DG CLIMA), **convening at least twice per year** to discuss how the different requirements spread across legislations interact and harmonise their interactions and entry into force. EHPA stands ready to support these discussions by developing a clear visual overview of the entry-into-force timelines of legislative requirements applicable to heat pumps and by contributing technical input to facilitate coordination across services.

2) Harmonise the EU legislation, also with the national legislations

Ensuring harmonisation across EU legislations and between EU and national legislative frameworks is essential to provide legal certainty to EU manufacturers. However, the current regulatory landscape is still slow in achieving these objectives, and two examples show how the lack of harmonisation across the EU and national legislatures could undermine a sector that it is so strategic for economic security.

1. The example of Refrigerants

The interaction between the F-gas Regulation and the prospective PFAS restriction illustrates how insufficient coordination between EU legislative initiatives can generate legal and investment uncertainty for a sector central to decarbonisation and energy security. While the F-gas framework is designed to reduce the climate impact of refrigerants through the phasedown of high-GWP substances, the PFAS initiative pursues the elimination of highly persistent chemicals and may capture certain fluorinated refrigerants irrespective of their climate performance. In practice, this creates the risk of cumulative restrictions, whereby refrigerants compliant with F-gas requirements could later be limited under PFAS criteria, narrowing the range of viable options for heat pump manufacturers.

The current uncertainty regarding scope, exemptions and timing — including whether certain HFOs could fall within the PFAS definition absent application-specific derogations — complicates product development and discourages investment in both current and next-generation refrigerants. As noted during the ongoing consultations, including by ECHA's Socio-Economic Analysis Committee, the applicable regulatory pathway remains unclear for

some applications, making long-term design and investment decisions increasingly driven by risk avoidance rather than optimal technological performance.

To support predictability, regulatory coherence and the effective delivery of EU climate and environmental objectives, the Commission should work together with the relevant agency to clarify how the two frameworks will interact and provide implementation guidance once the PFAS scope is finalised, considering socio-economic analysis, existing product assessments and the granularity of current heat pump models. Such coordination would avoid unintended technology lockouts, preserve innovation pathways and ensure that environmental objectives are achieved without undermining market uptake or industrial competitiveness.

2. The example of digital and grid-connected heat pumps

A second example concerns digital and grid-connected heat pumps, where limited coordination between energy system rules at EU and national level are creating new barriers to market entry and, as a consequence, weakening the European internal market.

Initiatives supporting **grid stability and energy system digitalisation** (such as data-sharing frameworks and network codes governing demand connection (i.e., rules determining how heat pump should interact with the grids before a potential blackout) **are often developed outside product legislation and may inadvertently introduce product-level obligations that function as additional entry-to-market conditions.**

In the context of the ongoing revision of network codes for demand connection, any requirement for grid functionalities should therefore be carefully assessed in light of impacts on product design, certification timelines and overall costs, as such obligations could delay deployment and increase prices for consumers. Grid responsiveness and emergency demand response can be achieved more efficiently through system-level solutions such as smart meters and home energy management systems, which enable coordinated control across multiple appliances and provide a future-proof, technology-neutral approach without imposing additional hardware or conformity burdens on individual products.

Another issue is the diverging national approaches to **flexibility participation**, aggregation and electricity tariff design illustrate the broader lack of harmonisation: because these frameworks remain largely defined at Member State level, identical heat pumps can generate very different economic benefits depending on where they are installed. **A voluntary harmonised EU framework enabling participation in demand response and access to dynamic tariffs would improve legal certainty, ensure consistent consumer benefits and strengthen investment conditions, thereby supporting electrification and reinforcing the role of heat pumps as a strategic technology for Europe's economic security.**

3) Stick to the revision timeline given to ensure predictability of the product requirements.

The heat pump sector has faced years of uncertainty, particularly because one of its key files (the Ecodesign and Energy Labelling regulation for space and water heaters) has been delayed for years – with the review study began in 2017 and the final public consultation

published only in 2025. At the same time, unpredictability has also arisen in the opposite direction, as illustrated by the revision of the F-gas Regulation, where requirements became more stringent than initially signalled and were introduced over a compressed timeframe, forcing rapid redesigns of certain heat pump categories, including units below 12 kW. Both delayed and unexpectedly accelerated regulatory changes undermine investment planning and increase implementation risks. To avoid repeating these situations, the Commission should adhere strictly to announced revision timelines and publish the revised acts on schedule. Any new requirements or outstanding issues that risk delaying the process should be deferred to the next revision cycle, rather than holding up the entire regulatory update. This is essential for providing industry with the stable planning environment it needs to invest and innovate.

4) Ensure legislative requirements support, not slow down, the uptake of heat pumps.

Heat pumps are subject to a wide and growing set of legislative requirements across several regulatory frameworks. Taken together, these requirements create additional technical, administrative and compliance burdens for manufacturers at a time when rapid deployment and large-scale implementation of heat pumps are urgently needed. Therefore, to **accelerate the shift to sustainable heating, all new requirements for heat pumps should be assessed together for their benefits, costs and effects on market uptake. Additionally, the Commission should not provide more obligation requirements for heat pumps than those foreseen for other competing heating technology.**

Therefore, additional regulatory burdens must be based on:

- (i) **measurable societal and industrial benefits.**
- (ii) contribution to **decarbonization and energy efficiency.**
- (iii) demonstrated **technological readiness and proportionality**; and
- (iv) clear **global competitiveness considerations**, meaning that **legislations that significantly impact EU products as opposed to global norms without clear benefit should be avoided as this can undermine the European competitiveness.**

5) Implement and refrain from reopening legislation.

The EU has adopted a comprehensive set of provisions relevant to the decarbonisation of heating and cooling, particularly in the Energy Performance of Buildings Directive (EPBD), the Energy Efficiency Directive (EED), the Renewable Energy Directive (RED), the Electricity Market Directive (EMD), Emission Trading Scheme 2 (ETS2) and the Social Climate Fund (SCF). Many of these measures are still in the process of transposition at national level. Therefore, these should be properly implemented, and the Commission should refrain from reopening them to ensure predictability. Before reopening any of these in the framework of the future legislative framework after 2030, the Commission should evaluate their impact on climate neutrality goals (e.g. emission reductions, decarbonization of buildings rates...) and on the EU economy (consequences for the different sectors involved like the heating and the building sector)).

3. Conclusion

EHPA expresses its full support for the Commission's Energy-related Products Omnibus initiative.

EHPA believes that simplification should not be interpreted as a reduction in ambition or a rollback of existing legislation. Rather, it should improve the functioning of the current framework by ensuring full use of existing rules, strengthening harmonisation across legislative instruments, clarifying requirements, and amending provisions where implementation has revealed shortcomings.

Therefore, a well-designed Omnibus proposal should reduce unnecessary costs and administrative burdens for the heat pump sector while preserving high performance and environmental standards. Increased clarity and alignment across legislative instruments would enable companies to scale production and deployment more efficiently, benefiting consumers and supporting the EU's climate and energy objectives.

With this in mind, EHPA remains fully committed to supporting the Commission in developing a proposal capable of achieving these objectives.

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The European Heat Pump Association (EHPA) represents the European heat pump sector. Our over 230 members include heat pump and component manufacturers, research institutes, universities, testing labs and energy agencies. EHPA advocates, communicates and provides policy, technical and economic expertise to European, national and local authorities, and to our members.

Our vision for is to be the leading authority and trusted partner in the path to fully enable the decarbonisation of buildings and industry in Europe.

Our mission over the next five years is to ensure sustainable, stable growth in the domestic, commercial and industrial heat pump market in order to make heat pumps the number one heating and cooling technology in Europe and achieve a competitive, resilient European sector.