

Energy-product Omnibus – call for evidence

CEFACD supports the Commission's objective to simplify the regulatory framework under the Energy Product Omnibus. The Ecodesign and Energy Labelling frameworks have delivered measurable gains in efficiency, emissions reduction and consumer transparency. Their success is rooted in technical coherence and functional comparability.

Simplification must preserve these principles. It is not about deregulation, but rather legal coherence and methodological consistency. Regulatory reform should not weaken scientific consistency, distort market signals or undermine industrial incentives. Decarbonisation and competitiveness depend on credible metrics.

1. Granularity helps protect consumers while protecting the industry

The European heating appliance sector is largely composed of SMEs, with production anchored in Europe. The EU's unique rules on energy labelling and on design of products have made European production more energy efficient than anywhere else in the world. However, at a time where 9.2%¹ of the EU population struggle to heat their home, and where resilience and competitiveness is at the centre of the European Commission's agenda², it is essential for the EU to ensure its citizens have access to affordable, flexible and local heating solutions.

From a competitiveness perspective, reform must ensure predictable investment conditions, preserve technology neutrality and support continued innovation. Regulatory simplification should reinforce Europe's manufacturing base, not weaken it. The proposed merger of the Energy labels for Local Space Heaters (LSH) and air-to-air heat pumps risks producing the opposite effect. First, it may mislead consumers by failing to reflect the specific performance characteristics of each technology. It is inappropriate and misleading to compare products using different efficiency calculation methods. Second, by placing LSH products predominantly in the lowest classes of a merged scale, it would remove meaningful differentiation between best and worst performers within the specific product categories (e.g., gas or solid fuels LSHs) category. This would weaken incentives to innovate, discourage replacement and put some LSH technology manufacturers at a structural competitive disadvantage due to incorrect comparisons. Therefore CEFACD proposes that those technologies whose efficiencies are measured on a thermal measure basis (gas, oil and solid fuel LSHs) have their own label.

Energy labelling has historically created a pull effect, driving efficiency improvements across technologies – with each technology having its own label. Given the socio-economic implication of such changes, they should not be adopted solely through comitology procedures. Instead, the matter should be addressed through the ordinary legislative procedure, ensuring full

¹ [9.2% of EU population struggled to keep their home warm - News articles - Eurostat](#)

² [European Commission Competitiveness Compass](#)



scrutiny and debate by the European Parliament and the Council. **CEFACD** requests **the European Commission to open the debate to the European Parliament and to the Member States**. It is essential that regulatory simplification reduces compliance friction without destabilising industrial ecosystems.

2. Energy labels must reflect functional reality

LSH³ under ENER Lot 20 and air-to-air heat pumps and air conditioners⁴ under ENER Lot 10 are not competing products. They differ in thermodynamic operation, heating capacity, installation requirements and use cases. They function in complementary ways within buildings.

While CEFACD agrees with the importance of promoting the most energy-efficient products to end-consumers, it would like to warn deeply about the artificial comparability between technologies that are not interchangeable. Many existing buildings cannot switch between these systems due to structure or economic constraints. Consumers therefore choose within a given product category, not between fundamentally different technologies.

As these systems are often complementary rather than substitutable, merging their energy labels would not meaningfully support consumer choice. Instead, it risks creating confusion by suggesting a level of direct comparability that does not reflect market realities.

Moreover, under the current efficiency calculation (which embeds the Primary Energy Factor) a merged label would create a flawed framework, where LSH automatically fall into the lowest ranking categories, without good from bad products. By removing these separate scales, the energy label loses its practical value for consumers and installers and amplifies distortion.

CEFACD therefore requests that the European Commission to **undertake a comprehensive revision of the Primary Energy Factors before any cross-technology comparison**. It also **asks the European Commission for the impact assessment**.

3. Align and optimise Digital Product Passports with the EPREL database

Protecting consumers and giving them transparency on what they buy is a priority the industry agrees on. The concept of the Digital Product Passport⁵ (DPP) as such, if implemented correctly, is an excellent mean to achieve this objective. Not only it should serve as a depository of important data and useful information for the consumer and market surveillance, it is also an opportunity to easily and quickly update information on a product which cannot be

³ [Commission Delegated Regulation \(EU\) 2015/1186](#)

⁴ [Commission Delegated Regulation \(EU\) No 626/2011](#); [Consolidated text: Commission Delegated Regulation \(EU\) No 626/2011](#)

⁵ [EU's Digital Product Passport](#)



done with printed information. However, this DPP must not duplicate or overlap with the existing tools such as the EPREL database.

Indeed, EPREL already serves as a centralised product registry for energy-related products. It ensures compliance verification and market surveillance and already provides consumer-facing transparency, all which are already in the scope of the DPP. Creating parallel data reporting obligations risks increasing administrative costs for manufacturers, creating legal uncertainty over data consistency, fragmenting compliance systems, and reducing clarity for authorities and consumers. It is therefore essential for simplification to streamline reporting channels, not multiplying them.

CEFACD therefore suggest that the European Commission to make EPREL the main database for the DPPs, and allow manufacturers to use it as such.

4. Completion of Regulatory updates under “old Ecodesign Framework”

CEFACD also supports the completion of regulatory revisions under the “old Ecodesign Framework” (Directive 2009/125/EC), specifically the development of a progressive and achievable Ecodesign Regulation for solid fuel local space heaters.

Conclusion

CEFACD supports the Commission’s effort to rationalise and modernise product legislation.

Effective simplification enhances clarity and competitiveness. Structural simplification without methodological alignment risks regulatory incoherence, market distortion and consumer confusion. CEFACD stands ready to contribute technical expertise to ensure that simplification strengthens, rather than weakens, Europe’s evidence-based product framework.