

To the attention of:

Ms Ursula von der Leyen, President of European Commission

Mr Frans Timmermans, Executive Vice-President for the European Green Deal

Ms Kadri Simson, Commissioner for Energy

Mr Thierry Breton, Commissioner for Internal Market

11th April 2022

Enhancing the role of Ecodesign and Energy Labelling of heating products to deliver the heat pump rollout and the objectives of REPowerEU

Dear President von der Leyden,

Dear Vice-President Timmermans,

Dear Commissioner Simson,

Dear Commissioner Breton,

With the Russian invasion of Ukraine and the recent publication of the REPowerEU communication and following the action plan, the EU has committed to drastically accelerating the clean energy transition and increasing Europe's energy independence from fossil fuel imports. To do so, it is now more vital than ever that the heavily gas-reliant heating sector moves away from fossil gas.

A strengthened Ecodesign regulation and Energy Label for heating appliances is an immediate opportunity for the European Commission to take decisive action to facilitate and accelerate consumer access to heating options that do not rely on fossil fuel. Maintaining the existing level of ambition of the draft proposals means locking consumers in purchasing fossil fuels from Russia, indirectly funding the military aggression in Ukraine if they want to heat their homes. The Commission holds the levers to ensure a sustainable diversification away from Russian energy imports, and accelerate the European clean energy transition, while structurally securing energy supplies and lowering energy demand.

We urge the European Commission to take bold action through the revised Ecodesign and Energy Labelling regulations for heating appliances. The legislative tools are already in place; they simply need sufficient strengthening:

- **Non-hybrid gas-based boilers should be phased out with no delay.** In order for the EU to meet its climate objectives, inefficient and fossil-fuel-operated appliances, including gas boilers, must be phased out no later than 2025, resulting in 30Mt of annual CO₂ saving by 2030, as suggested, inter alia, by the results of the latest JRC study on this subject. Setting a minimum Ecodesign requirement for seasonal space heating energy efficiency at 110% for space and combination heaters is an absolute necessity. Likewise, the proposed Energy Label should be adopted and enter into force as soon as possible.

- **Heat pumps deployment should be intensified with targeted measures.** The proposed plan to REPowerEU risks becoming a missed opportunity to reduce fossil gas dependency quickly and cheaply, leaving EU dependent of 24 bcm of fossil gas imports from Russia. In the long-term, a large uptake of heat pumps would be cost-competitive, decrease air pollution, and constitute a faster solution than relying on biomethane and renewable hydrogen production for heating.

Yours sincerely,



Justin Wilkes ECOS Executive Director

