



## **Executive Summary**

*Recommendations  
regarding the  
implementation of the  
“package label”*

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## *Executive Summary*

### **Recommendations regarding the implementation of the “package label”**

The Labelpack A+ project consortium carried out an analysis of experiences, across the countries covered by this project<sup>1</sup>, that could highlight strong and weak points of package label implementation. Based on difficulties encountered during each national implementation<sup>2</sup>, proposals for the improvements of the package label from the point of view of different stakeholders, such as consumers, installers & dealers, manufacturers (& distributors) and public authorities (market surveillance and energy agencies) are pointed out.

The main purpose of this process carried out within the project is to inform the European Commission and national authorities involved in the energy labelling process about the state of the art of label implementation (especially package label), providing consequently suggestions about how it could be improved.

A large number of inputs are listed in the main report. Based on these, the Labelpack A+ partners have chosen to highlight some options, that according to their experience of three years implementing the referred project, are considered as the most relevant and practicable.

#### *Include expected energy consumption*

*This is a positive measure in terms of consumer information, enhancing the consumer ability to assess different options. In particular in the case of a comparison between a water heating package and a water heating product, such measure would facilitate the consumer decision process. This proposal is not without caveats. Clear information on load profiles is necessary, in order to avoid comparisons between solutions addressing different load profiles. Furthermore, it should be clear to consumers and not had complexity to the label. On the other hand, such measure should not bring added efforts in testing by manufacturers, regarding products already in the market.*

#### *Review scale of energy efficiency classes system*

*The definition of the classes is critical for the adequate information of consumers. It is considered that the current classes can be improved, in order to offer a better understanding of performance differences. Lower classes have smaller intervals, which can be seen as benefitting less efficient products. On the other hand, more efficient systems using also renewables, are in upper energy efficiency classes. These classes (above A) have very large intervals, which render performance gains harder to be perceived by consumers, i.e., they are not so likely to lead to a change in energy efficiency class. Still, the revision of the classes requires caution on the process, considering the impact it can have in the market, on consumer choices and even on the confidence about the energy label.*

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<sup>1</sup> Austria, France, Germany, Italy, Portugal, United Kingdom

<sup>2</sup> For more information, see two other Labelpack A+ reports: [Package Label implementation assessment report \(D4.1\)](#) & [“Analysis of the implementation of the “package label” in several European countries \(D4.6\)](#)

Namely, an impact assessment and consultation process should be carried out, taking also into account consumer perception and understanding regarding such changes.

#### Include different energy classes according to the system location

The different requirements and conditions in the three climatic regions lead to variations in the performance of products and systems. Nevertheless, these are always labelled according to the average region, even if more information is available regarding performance in other regions. This could be done by including different energy classes for the three climatic regions, for solar water heaters and heat pumps in particular. It would bring added value to consumers if they could identify immediately the energy efficiency class applicable to a product for the region where it is acquired. The process should be simple and allow for products to be sold all over Europe. One possible option would be to have three classes in the label, one per region. Such possibility exists already for other products (air-conditioning). As for systems, this process could be implemented by allowing the package label to be calculated and the label issued based on the location of the package. As the package label is more directly related to the system (combination of components) acquired by the consumer, the implementation of this measure would be much simpler.

#### Introducing labelling for existing boilers

The current regulation does not prevent procedures regarding indicative labelling of existing boilers to be introduced, as happened in Germany. Such initiatives are important to increase awareness among consumers regarding the efficiency of their boiler and the eventual necessity of changing or planning a change. Most replacements are classified as urgent replacements, due to break-down or malfunctioning of the space and/or water heater. Planned replacements are beneficial for introducing solutions different to the previous one installed, as it allows time for considering different options, considering benefits and costs, or even make necessary adjustments in the building.

#### Indicative labelling for new solar thermal systems

The retrofitting of existing space and water heaters with other components is not covered by the package label, under the current framework, even if the required information on the existing heater would be available. A package label applies to the installation of a number of components done simultaneously. This means that, for instance, an installer that adds solar thermal to an existing boiler cannot issue a package label. In several countries most of the solar thermal installations are retrofits, i.e., are installed in addition to an existing space or water heater. As the package label cannot be issued, its potential impact is not felt in such cases. Nevertheless, having the possibility to issue or update a package label could encourage consumers with more recent systems, unwilling to make a full change, to consider adding components that would improve the entire system.

#### Connecting Energy Labelling to Energy Performance of Buildings

The Energy Labelling Directive and the Energy Performance of Buildings are two pieces of regulations with similar goals but quite different application. There would be benefits in combining Energy Labelling to Energy Performance of Buildings, introducing common performance requirements mechanisms. While one addresses space and water heaters, either as products or systems, the other covers buildings as complex systems. Considering the relevance of heating in the total consumption of buildings, facilitating synergies between the two

*regulations would help consumers understand the impact of their choices of space and water heating systems in the overall performance of their buildings. The main caveat of this proposal is the complexity of its implementation, considering that the two regulations are technically complex and the implementation of the EPBD varies significantly from one members state to the next.*

The following proposal was considered relevant to be addressed, though the group could not reach a joint position.

#### Connecting labelling to support mechanisms

*It is understood that defining the energy label for space and water heaters as a requirement for support schemes would promote strongly the use of the package label. In fact, it is already being introduced in some countries. Nevertheless, there have been difficulties in its application, indicating that more awareness and training about the labelling process is an important step. On the other hand, several concerns were brought up, arisen by the possibility that such measure might unbalance the market in favour of large manufactures and against small solar specialists. The main reason is the fact that is system suppliers are in a privileged situation, in comparison to specialists regarding the issuing of the package label, related to their range of solutions, their access to installers networks and their outreach capacity.*

The last proposal is **not** recommended by the group. Even if that was the case, it was considered relevant to highlight why it is not recommended, based on its prominence among the several recommendations, though its implementation is not advisable.

#### Introduce data on economic benefit

*The possibility to introduce data on the potential economic benefit that could derive from the choice of high efficiency classes system was considered relevant as an important facilitator of the consumer decision process. Nevertheless, it was not considered practicable, the main reason being the difficulty of having adequate and fair data applied at European level. Such difficulties are already felt by other products subject to energy labelling, such as “white goods”, where the differences in electricity price and changes over time make it hard, if not impossible, to provide clear information to consumers. Knowing that heating products and systems are much more complex, such task would be even harder. If some options were to be applied to ease the decision process, these could be based on online tools.*

As referred above, the discussion summarised above referred only to a part of the inputs collected. A broader overview is included in the chapters “Perceptions of energy labelling for space heating and water heating systems” and “Practical suggestions”, included in the full report:

[Label Pack A+ “Report: Recommendation regarding the implementation of the “package label”](#)

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#### About the Labelpack A+ Project

*The 'Label Pack A+' project aims at supporting the implementation of the energy labelling of heating appliances while boosting its impact, the focus being on the "package label" and its potential to push for the uptake or renewable technologies, in particular solar thermal, in combination with more efficient conventional technologies.*

*The project addresses one of the main challenges related to this particular energy labelling process in relation to other Energy-related Products : the issuing of the package label by installers. This challenge involves the preparation of the industry, retailers and installers for this process, including the communication to the final consumer.*

More information at:  
[www.label-pack-a-plus.eu](http://www.label-pack-a-plus.eu)

