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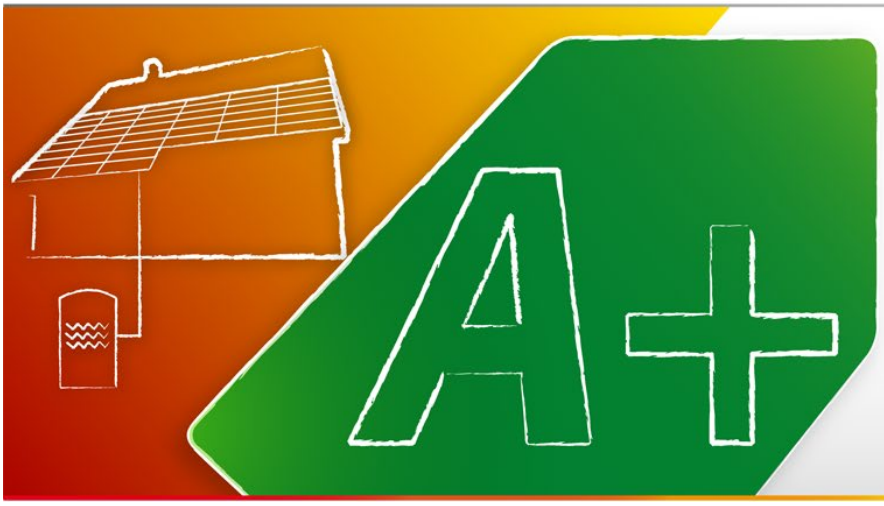
LabelPack A+



Analysis

Opposing scenarios for the Package Label for Space and Water Heaters

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LabelPack A+

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1 Executive Summary

This document presents an analysis of different options that can be considered when discussing the future of the package label. Considering the poor roll-out of this solution in the market and the ongoing review of the regulations related to space and water heaters (Lot1 and Lot2), it is important to consider what could be the impact of different options.

Originally, this report intended to look into the potential impact of two main opposing scenarios:
- Full public support for the implementation of the package label
- Withdrawing the package label from Lot 1 & Lot 2.

The first option considers a scenario where member states are fully committed to a successful implementation of the package label, looking into push and pull measures that could be put into place in order to "force" the roll-out of this mechanism in the market. This could be done for instance with measures such as awareness raising campaigns, including package label in regulations and support schemes, market surveillance measures, among other.

This scenario will in fact be broken into different scenarios, as the impact of strong public support and uptake measures will depend greatly on such measures being taken under the current (or lightly revised) regulations or under revised regulations. Therefore, in the course of the assessment these different options were also included.

Another relevant analysis looks at a scenario where the package label would be withdrawn completely. It considers the impact of such measures in the market, from different perspectives: consumers and manufacturers, both specialists and system suppliers.

The main point of this analysis is to investigate different perspectives. No decision is innocuous, as they only generate a consequence. Furthermore, several hypothetical options had to be considered, as it is not possible, at this stage, to identify the most likely changes to the regulations.

As such, this document aims at assisting in a reflection process about the potential impact of different alternatives, rather than being a thorough impact assessment of such changes.

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2 Introduction

The application of the Ecodesign and Energy Labelling framework to space and water heaters (Regulated Acts No.811 and 812/2013) brought an innovative aspect with the introduction of a new concept in the energy labelling requirements, the package labelling, meant for the labelling of heating systems composed by more than one appliance, in an overall system evaluation perspective.

This new package label brings some additional complexity in its application, involving an understanding and a commitment with its application by stakeholders such as installers. It can be an important tool to communicate to consumers, by means of the information provided in the package label, namely the energy class but also with additional elements included in the label. Therefore, it is also a tool for installers, manufacturers, distributors or other market players to influence consumers decision.

It can have a strong impact in the market, as it can contribute for consumers to choose products that use renewable energy and/or are more energy efficient, therefore reducing emissions and contributing to more sustainable choices, with an impact over the large number of years that such systems operate before needing to be replaced.

Nevertheless, there is a problem with the roll-out of the package label in the market. The reasons are not the main topic of analysis here, as thorough analysis can be found in other documents prepared by the Labelpack A+ project [1]. Likewise, which solutions are the most appropriate is not analysed here. The main point of this analysis is to understand what the impact of different avenues can potentially be.

The European Commission has launched a consultation process on the revision of Lot1 & Lot2. This constitutes an opportunity to improve the current regulation. According to the review clauses in the regulations, one of the topics to be addressed is: *the appropriateness of the package fiches and labels (811 &812).*

This is a vague definition that can leave room for all kind of considerations, from withdrawing the package label to stepping up measures supporting market surveillance.

Therefore, it would be interesting to reflect on:

- What would be the implications in the market of an unchanged package label framework for space and water heaters?
- Which changes to the package label framework would bring the most relevant benefits for consumers?
- Which changes to the package label framework would bring added value for manufacturers of space and water heating appliances or package components?
- What would be the main implications in the market if the package label is withdrawn from the space and water heater regulations (Lot1 and Lot2)?

To assist in this reflection, two consultation meetings were organised in Brussels, on the 30th November 2017 and 21st February 2018. The views collected by the consortium, including those from the consultation process are reflected in the analysis presented in this report.

References to the reports developed by the Labelpack A+ consortium which supported this analysis will also be included, indicating the reference (ex: LPA-D4.1, 2018). Likewise, some external references will also be included.

[1] *Vide: LPA+ (2017, D4.1); LPA+ (2018, D4.3); LPA+ (2018, D4.6); LPA+ (2018, D4.7)*

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3 Framework

Reducing greenhouse gas emissions is one of the main challenges the European Union is trying to address in relation to its energy, health, transport and climate policies. Together with other measures, one of the goals is to encourage lower energy consumption by placing better performing products on the market. Two complementary ways for reducing the energy consumed by products are: setting energy efficiency requirements for products at the design stage (Ecodesign) and raising consumer awareness about the energy efficiency of such products (energy labelling). This combination of Ecodesign and energy labelling is considered as one of the most effective policy tools in the area of energy efficiency.

The Ecodesign Directive sets a framework for performance criteria, which manufacturers must meet to legally place their product on the market. The Energy Labelling Directive aims at providing better information to consumers about different products by using energy labels, so that they have the energy and environmental information to help them choose between products on the market.

Requirements for energy labelling of products are adopted alongside Ecodesign implementing measures. These are introduced by the European Commission following a discussion process with key stakeholders, including detailed actions. Manufacturers who begin marketing an energy-related product covered by an implementing measure in the EU area must ensure that it conforms to the energy and environmental standards set out by the measure.

3.1 Regulations

The delegated regulations set for space, water and combination heaters were published in 2013. These regulations cover both the energy labelling and the Ecodesign requirements for two groups of products, identified as Lot1 (space and combination heaters) and Lot2 (water heaters).

	Regulations	
	Energy Labelling Directive 2010/30/EU	Ecodesign Directive 2009/125/EC
Lot 1	811/2013 space heaters, combination heaters, packages of space heater, temperature control and solar device and packages of combination heater, temperature control and solar device	813/2013 space heaters and combination heaters
Lot 2	812/2013 water heaters, hot water storage tanks and packages of water heater and solar device	814/2013 water heaters and hot water storage tanks

More concretely, these regulations are:

- Commission Delegated Regulation (EU) **No 811/2013** of 18 February 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the **energy labelling of space heaters, combination heaters, packages of space heater, temperature control and solar device and packages of combination heater, temperature control and solar device**[2]
- Commission Delegated Regulation (EU) **No 812/2013** of 18 February 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the **energy labelling of water heaters, hot water storage tanks and packages of water heater and solar device**[3]**.**
- Commission Regulation (EU) **No 813/2013** of 2 August 2013 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to Ecodesign requirements for space heaters and combination heaters [4]
- Commission Regulation (EU) **No 814/2013** of 2 August 2013 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to Ecodesign requirements for water heaters and hot water storage tanks[5]

The most relevant and innovative aspect introduced by these regulations lies on the introduction of a new concept in the energy labelling requirements, **the package labelling**, meant for the labelling of **heating systems composed by more than one equipment**, in an overall system evaluation perspective. This results from the perspective that a heating system can be improved by the efficient combination of different equipment. For instance, a system (package) composed of a gas boiler in combination with a solar device (solar thermal system) will perform better than a gas boiler (product) alone. In general, the class of systems in combination is better than the class of a space and/or water heating product alone.

An important aspect of related to the introduction of the package label is that those placing the product in the EU market, defined in the regulation as dealers, are responsible for issuing the package label. In most cases the dealer is the installer of a heating system[6].

This changes substantially the approach when compared to the product label. Furthermore, it also raises new challenges regarding market surveillance. While the market surveillance regarding the energy labelling of products is carried out at the point of sale (for instance, wholesalers) for a package the situation is entirely different, as the system may be set up downstream of the conventional point of sale.

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[2] *CDR-EU 811/2013*
[3] *CDR-EU 812/2013*
[4] *CDR-EU 813/2013*
[5] *CDR-EU 814/2013*
[6] *A manufacturer can provide full packages for installation, being in this case the "dealer". Nevertheless the most common case in the market is than an installer will combine different elements (equipment) in the system, which would then qualify as a "new" system.*

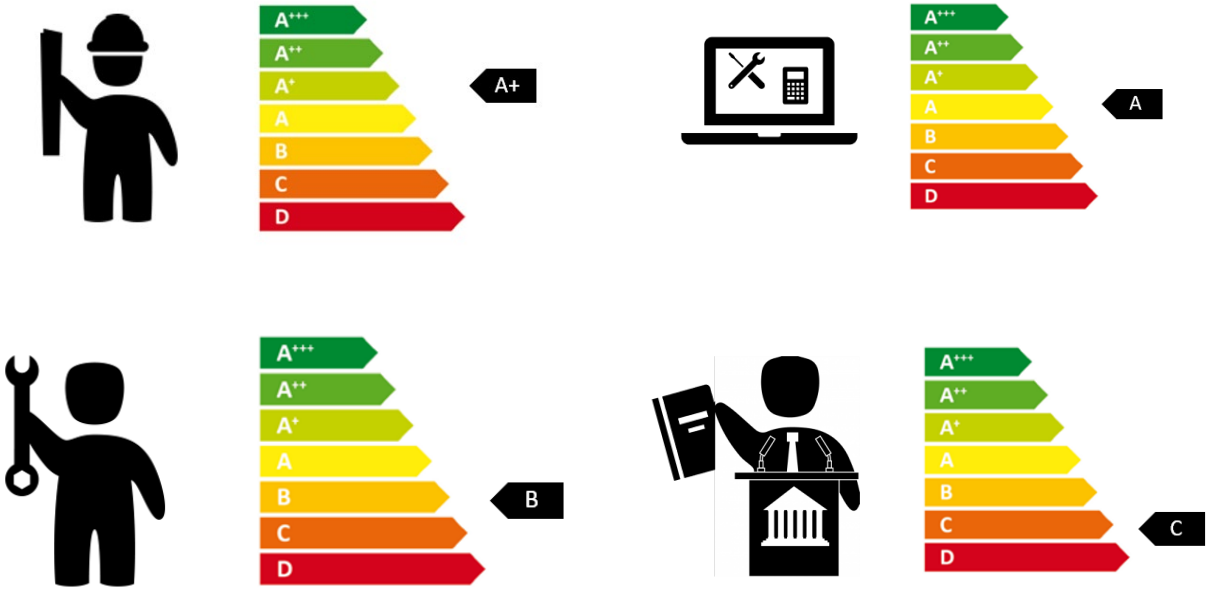
3.2 Starting point

As referred above, a more thorough assessment of the situation regarding the implementation of the package label is provided within several reports published by the Labelpack A+ consortium. In this section a more summarised overview of such assessment is provided but it takes into account the findings in such reports.

An easier assessment of the starting point it is easier to start from as assessments based on four critical enablers:

- Manufacturers;
- Tools
- Installers and designers
- Public Authorities

The table below allows for an energy labelling 'thematic approach' to the implementation of the package label so far, considering the referred enablers



3.2.1 Manufacturers

Regarding the current situation of the implementation of the package label, we can consider that, from the manufacturers point of view, the preparation for the implementation of the product and package label was effective.

In general, by the date of entry into force and in some cases a couple of months later manufacturers were prepared. The preparation regarding the Ecodesign requirements was demanding and implied, in many cases, new testing. Training for relevant staff and other stakeholders also represented an important aspect of the preparation.

> ***Manufacturers comply with the Energy Labelling regulation. As they have anyway to manufacture according to Ecodesign, labelling is not a big additional effort."*** *[LPA+ (2018, D4.3)]*

While the assessment regarding the preparation from manufacturers is positive, the roll-out in the market was below expectation.

The overall views are nevertheless mixed. Some are relatively indifferent to this fact, regretting the efforts required but considering that the package label was not supporting their market. This was common among solar thermal manufacturers. In several aspects, the poor uptake was a preferred outcome. Other manufacturers counted on the regulation to bring a new dynamism in the market, with push and pull measures accelerating the replacement rate of old space and water heating systems.

> ***The package label shows the improvement in the system in comparison to the primary heater, as the primary heater energy class is still acknowledged in the label.*** *[LPA+ (2018, D4.3)]*

Most manufacturers converge on the opinion that the reasons of poor implementation are related to the complexity of the package label, the lack of market surveillance and the installers "inertia", the later as a result of the two previous reasons.

> ***Three quarters answered that manufacturers lost interest in labelling due to the installer's negative feedback.*** *[LPA+ (2018, D4.3)]*

3.2.2 Tools

The package label was developed taking into consideration that the calculation process should be simple to do, and the information required should be easily accessible.

These two assumptions were not so obvious during implementation. As expected, many installers were reluctant is doing the calculation. On the other hand, information was not always available for pre-sale calculations.

The calculation tools available on the market are either open and brand neutral, as LabelPack A+ and the Heizungs Label, or brand specific from system suppliers, some requiring registration.

Since the label is widely perceived by the installer as an additional burden and added responsibility, manufacturers try to facilitate this process by providing calculation tools and/or pre-assembled packages. *[LPA+ (2018, D4.3)]*

Several manufacturers, in particular the larger ones, covering a broad range of space and water heaters, started developing their own tools, developed for their distributors and installers network and covering their own product portfolio.

Other initiatives, such as Labelpack A+ and 'Heizungs Label' in Germany developed brand-neutral tools that could provide a calculation for the package when combining components from different brands. These tools were available in September 2015, when the regulation came into force. Nonetheless, for both these tools, a clear trend has been noted, with a decreased in use over time.

The main reasons identified relate to the lack of interest on the package label by installers and consumers. Difficulties in the use of the tool have also been referred, though these were likely to be overcome if there was a stronger need and interest in the refereed tools. Another reason, secondary though sill interesting, is related to the fact that installers are likely to re-use labels calculated before, as they usually have a preferred set of combinations of components in an installation, meaning that they have a set of packages for which they had already calculated and generated the label.

Difficulties in compiling required data may drive installers to one-stop shops. *[LPA+ (2018, D4.3)]*

The other important aspect is linked to the access to information. While the information required for the product fiche was in most cases available, distributed with the product, the information online was not so easy to access. Hence pre-sales efforts, such as preparing a proposal comparing different system options could be more complex.

In order to facilitate the access to information required for the calculation, the 'Heizungs Label' provides a database of products (uploaded by manufacturers into their system). The access to this facility is only available for those companies subscribing to the 'Heizungs Label' system (service fee required). Labelpack A+ provides a user area, where installers can save their preferred products. This is a free option, though, in this case, users need the required data to save into the system.

3.2.3 Installers

The installers are an essential element regarding the implementation of the package label, as explained earlier.

The installers of space and water heaters had different perceptions on the introduction of the product label or the package label. From their point of view, there is an overall positive feedback on product label, which is considered simple to use and to show to consumers in order to compare products. This is also related to the fact that the consumers are, in large extent, used to the product label in other product categories.

Nonetheless, a more negative opinion on package label prevails. The perceived complexity of the calculation, considered to be an additional (and unwelcomed) administrative burden, are behind the scepticism about this process. The responsibility regarding the correct calculation is also a factor adding to the negative feelings towards the package label requirements. And finally, the lack of information (and interest) from consumers, as reduced the interest in using the package label as a commercial tool.

> ***It is always preferable to offer a package standardised by the manufacturer, for warranty, compatibility of regulations, etc.*** *[LPA+ (2018, D4.3)]*

While in the beginning of the process, the curiosity or the concerns regarding the legal obligations lead installers to use more the available tools, a few months after the coming into force of the regulation it was already evident that the use was decreasing.

> ***Suppliers are the main source for information for installers*** *[EEPLIANT (2011, D4.1)]*

Installers generally prefer using ready-made options, where package labels already available, thus avoiding the calculation and the related responsibility. Such preference constitutes an advantage for 'system suppliers', manufacturers with a large range of space and water heating products, that can provide one-brand packages.

> ***A lot of installers rely on their supplier (manufacturer) to have the label (D4.1)***

On the other hand, 'specialists', i.e., manufacturers specialised in one or few products (e.g.: solar thermal, storage tanks) required multi-brand packages and are more dependent on the available brand-neutral tools and on the willingness of the installer to perform the required calculation.

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3.2.4 Public authorities

The introduction of the space and water heating regulations for energy labelling and Ecodesign were also challenging for market surveillance authorities.

In most countries these authorities are faced with increasing responsibilities in terms of market surveillance (a large part emanating from EU regulations), while struggling with limited financial and human resources that would allow to cope with such responsibilities.

The implementation of the labelling for space and water heaters added to such responsibilities. But while for the product label the market surveillance procedures were clear and similar to other product groups, in the case of the package label it was unclear how the market surveillance process could take place.

> ***Several EU-Funded projects by now have proven that market surveillance is absolutely vital to implement the goal of the energy labels. It is even more so for the package label; whose evidence is not immediate since it is not displayed in the shops.*** *[LPA+ (2018, D4.3)]*

Besides market surveillance, public authorities have at their disposal other mechanisms that can facilitate the uptake of the package label. On one hand, they can play a strong role on consumer awareness, via information campaigns. Nevertheless, such campaigns, to be effective, require substantial resources.

> ***While there is no quantitative data on use of the package label, there is a widespread understanding that the package label is not being applied by installers, and is not covered by market surveillance due to the difficulties of assessing this at point of installation.*** *[eu.bac (2018)]*

Other measures include establishing the package label as a requirement to access some support schemes. Such dealings, requiring changes to support schemes, take time to implement, also because they require some level of preparation of the market for the introduction of such requirement. Examples of such measures have been implemented in Portugal and the Netherlands, while with quite different approaches.

> ***If the activity of surveillance and consumer protection agencies can be reinforced, installers would feel more pressure to comply with labelling requirements.*** *[LPA+ (2018, D4.3)]*

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4 Scenarios

4.1 Variables

The options to improve the uptake of the package label in the market are not limited to changes in the regulation. As seen before, other measures can play an important role, first and foremost from the side of public authorities, though the role of other stakeholders, such as manufacturers and installers, cannot be underestimated.

Still, considering that there is a review process of the existing regulations in progress, it is an important opportunity to consider improvements to the regulation. According to the review clauses in the regulations, one of the topics to be addressed is: *the appropriateness of the package fiches and labels (811 &812).*

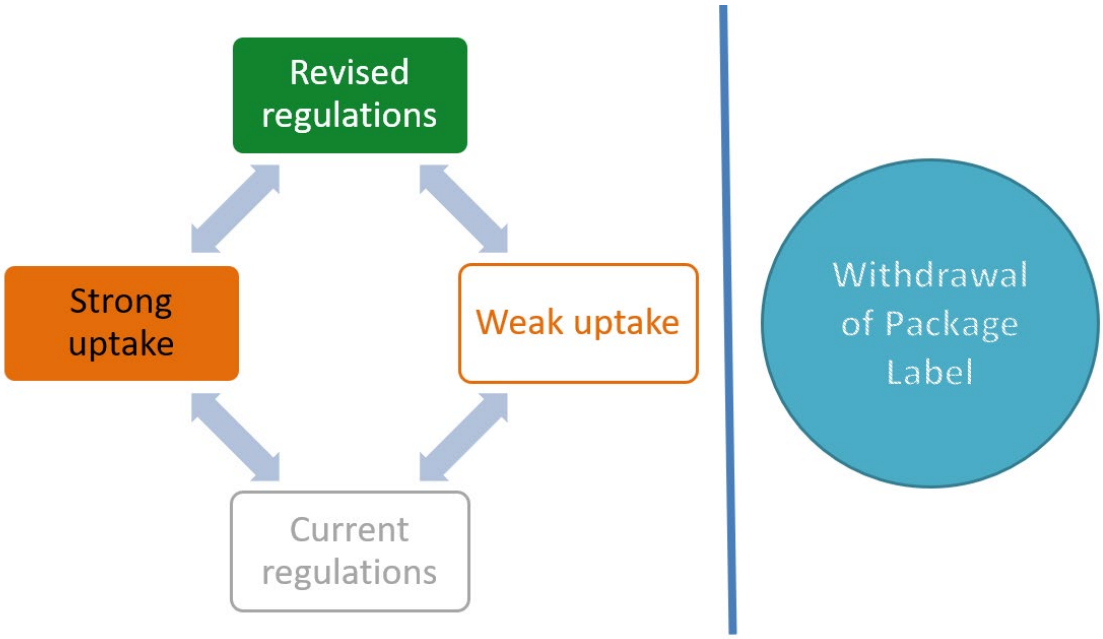
The concepts appropriateness leaves a large room of manoeuvre. In order to facilitate the analysis, the Labelpack A+ consortium focused on the following questions:

- What would be the implications in the market of an unchanged package label framework for space and water heaters?
- Which changes to the package label framework would bring the most relevant benefits for consumers?
- Which changes to the package label framework would bring added value for manufacturers of space and water heating appliances or package components?
- What would be the main implications in the market if the package label is withdrawn from the space and water heater regulations (Lot1 and Lot2)?

These questions reflect some of the relevant considerations within different possible options. When considering possible scenarios for the future of the package label, the variables are:

	Unchanged	Changed
Regulations	Keeping the current regulation	Revising the current regulation
Public authorities' action	Current uptake measures and market surveillance	Stronger uptake measures and market surveillance
Package label concept	Keeping the whole system in place	Withdrawing the package label

Still, these options can be mixed into different combinations, such as implementing strong uptake measures with the current regulations or revise the regulation without actions, in the regulations or as flanking measures, that would improve the uptake in the market.



4.1.1 Strong vs weak uptake

We can characterise the weak uptake as the current situation. On the other hand, in order to improve the uptake measures, several actions could be foreseen, such as:

- Strong Communication, both from Public Authorities and from Industry
- Improved Market Surveillance, with simpler procedures, reinforced measures, and greater media impact
- Flanking measures, such as links to support schemes, or to other regulations

4.1.2 Revised regulations vs current regulations

In order to improve the current regulation, several measures could be foreseen as well:

- Procedures for the package label, be it on the calculation of package, the components of package or the reference to standards & methods
- Implementation in the market, reinforcing market surveillance procedures, and interconnections with other regulations (EPBD).
- For both product and package label, better information & communication, such as the availability of information (products/components), as well as clarifications on packages/products/components, and primary heater / secondary heater / components.

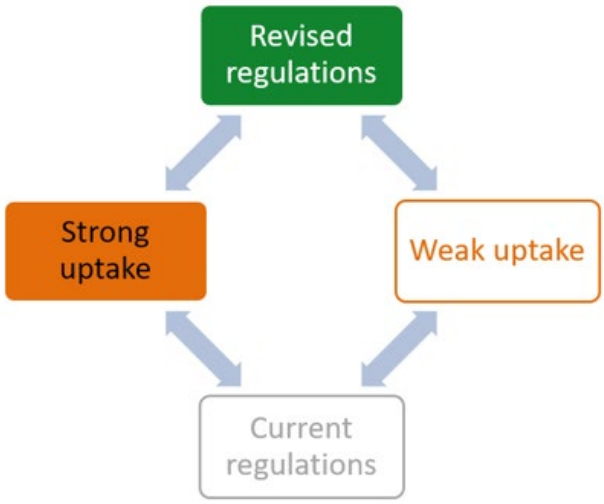
4.2 Full public support

4.2.1 Overview

As referred, one of the main scenarios to be addressed included:

- Full public support for the implementation of the package label

Considering the different scenario variables presented before, we should try to summarize the combination between the strong and weak uptake with maintaining the current or opting for revised regulations.



The combination of current regulations and weak uptake is deemed as the status quo, i.e., the current situation. In this case, a lack of commitment from installers and limited information by consumers would continue to limit the impact of the package label, even if some gradual but slow increase in notoriety can be expected the longer the regulations are in place.

In case the current regulations remain largely unchanged but stronger uptake measures are put in place, mainly by public authorities, the impacts will be likely felt in different ways by different sectors and manufacturers. Strong uptake measures would enhance the impact of the current advantages or disadvantages of the package label for different players and different solutions. Even if the access to information is improved, which is Likely to happen as a result of the introduction off the EU product database, installers are still likely to opt for the most comfortable solutions, adopting predefined packages by system suppliers, which would be disadvantageous for specialist manufactures.

The analysis, when it comes to the revision of the regulation, is more complex, taking into account that, as presented in 4.1.2), the revision of the regulations can take different directions. therefore , the assessment focuses on the concepts of a revised regulation at large and not on specific measures that the revision could entail.

In the scenario with revised regulations, the relevance of stronger uptake measures increases. The main reason being that these are important to make sure that these changes are well and swiftly implemented by the main actors (industry and installers). such swift implementation is essential to ensure that the consumer is protected from potential misuses or misinformation, resulting from the changes between the current and the new regulation. other more concrete effects would depend on the measures taken and should be addressed further on.

The following table provides an overview of the different options and potential impacts, taking into account what the several combinations between 'strong vs weak uptake' and 'revised regulations vs current regulations' could imply for relevance stake holders, such as consumers, installers and manufacturers.

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Potential impact	Strong uptake measures	Weak uptake measures
Current regulations	• Enhancing effect of regulations, as they are currently, potentiating its characteristics. If beneficial or prejudicial for a given technology or solution, that effect will be stronger. • Risk of installers opting for ready packages in order to reduce burden and responsibility related to calculation of package label.' • 'System suppliers' are likely to benefit from the possibility to provide pre-defined packages to the market with their own products. These manufacturers are in general, preferring such approach. • Specialist manufacturers (solar, storage tanks, controls) may become more vulnerable in relation to system suppliers, limiting channels to market. • Solar thermal specialists likely to focus on retrofitting existing systems, considering that for new systems they might be further affected, as methods are considered to underestimate solar contribution, privileging other options.	• Similar to current situation, with some improvements in uptake, resulting from more implementation time. • Installers mostly not committed to implement package label. • Consumers mostly unaware of package label.
Revised regulations	• Some potential for confusion between frameworks (previous/new regulations). • Stakeholders committed to implementing changes ("carrot" & "stick" effect) • Impact on market depending on effect of changes on the contributions/comparison between different technologies. • Consumers gradually more aware of package label, leading to a steady increase in relevance as decision factor.	• Strong potential for confusion between frameworks (previous/new regulations). • Changes in procedures poorly implemented by manufacturers and installers, considering some disillusion with enactment during the 'first" stage. • Consumers remain mostly unaware about the package label and might be more vulnerable to misinformation.

4.2.1 Regulation changes and stakeholders

This section will look more specifically into the potential impact of some of the measures for different stakeholder groups. As referred before, this is a more complex exercise and more speculative at this stage, it is not clear which changes are more likely to be implemented .

The choice of measures indicated below is mainly based on the analysis and consultations done by the Labelpack A+ consortium, in particular regarding the assessment of a number of potential measures [LPA+ (2018, D4.3)]

The assessment focuses on the following options:

1) Procedures & Calculations
    a. Class range
    b. Technology performance
    c. Ponderation of factors
2) Information quality and availability
    a. Third party certification
    b. Quality assurance
    c. Available data (EU product database)
3) Market surveillance measures
    a. Reporting obligations (installers)
    b. Connection with regulations and support schemes

Procedures & calculations are related to the method to estimate the package label and how the process shall be implemented. In this context, changes in class range could allow for a better distinction between different products [LPA+ (2018, D4.3], considering that the current ranges are quite different in size [LPA+ (2018, D4.7]. This would change consumer perception and the analysis of different solutions. The ponderation of factors and the technology performance can also affect the final result of the calculation, potentially creating a more level playing field.

Information quality and availability would affect how installers and consumers access information. Options such as third-party certification and the EU product database would facilitate the access to reliable and clear data, facilitating the use of the package label as a sales argument.

Changes in market surveillance measures are the most complex to assess. Their proper implementation would benefit the uptake of the package label, though they can also create administrative burdens and affect behaviours (installers opting for pre-defined packages). Combining market surveillance with information requirements for support schemed could create a positive effect and interesting synergies, depending on changes to the current regulations.

As indicated previously, the impact for manufacturers might be felt differently depending on these being system suppliers (generalists), meaning companies that produce a large range of space in water heating products , and specialist manufacturers, meaning companies that are specialized in one or two technologies, such as thermal storages, controls or solar thermal systems. Therefore, considering that the impact of concrete changes in regulation can affect these two groups of manufactures differently, these have been separated in the following analysis .

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Potential impact of regulation changes?	Consumers	Installers	Manufacturers : Generalists	Manufacturers : Specialists	Public Authorities
Procedures & Calculations - Class range - Technology performance - Ponderation of factors	Any change always requires adaptation and can create some confusion. Changes can also help consumers to better understand the impact of opting between different products. Current ranges are not homogeneous and may misguide consumers. Such change, could bring more clarity to consumers.	Changes require adaptation; hence it depends on the added value. For instance, some procedural changes could contribute to ease the calculation of the label for installers.	Changes require adaptation and can imply costs (training, testing, printing). Ultimately it always depends on the type of changes.	Changes require adaptation and can imply costs (training, testing, printing). Ultimately it always depends on the type of changes.	Any change implies an adaptation effort, requiring information to consumers or other actors. But changes can also crate unfair situations in the market (incorrect procedures) that need to be properly surveyed.
Information quality and availability - Third party certification - Quality assurance - Available data (EU product database)	This is clearly positive for the consumer, as it allows for better information and better assurance of quality (potentially compensating for lack of market surveillance).	Installers can also benefit from better information and quality assurance measures. Their choice of products might be limited but the gain in confidence (of installer and consumer) is clearly a plus.	Such requirements require additional costs in testing, certifying, adapting to a new reality. Having more products in their catalogues, this increases the difficulty.	Costs of such new measures can be very cumbersome for smaller companies. On the other hand, it promotes a fairer market, compensating for poor market surveillance measures.	Providing quality assurance and fair competition, without burdening themselves with costs on market surveillance.
Market surveillance measures - Reporting obligations (installers) - Connection with regulations and support schemes	Positive for the consumer, as it allows for better assurance of product quality.	Market surveillance can also apply to the obligations of the installers. Hence would be positive for those that are lawful in their activity.	Positive measures, providing fair competition in the market.	Positive measures, providing fair competition in the market.	Requires additional effort and commitment, in terms of resources.

4.3 Withdrawal of the package label

This scenario is the most controversial. The process of implementing the current regulations for energy labelling and Ecodesign of space and water heaters took a long time and effort from public authorities, industry and other stakeholders.

It should be noted that these regulations are not focused only on the package label. In fact, it is arguable if the package label is the main element in the regulations. Though it is an innovative element, that was requested by different market actors, such as solar thermal or control manufacturers.

> ***The package label should either be improved and add value to customer and installer, or it should be abolished.*** *[LPA+ (2018, D4.3)]*

Different stakeholders have different views on the matter. Among the solar thermal manufactures (specialists) there is a strong discontentment by the way the package label works, feeling that it is underestimating the contribution of the technology and that the its implementation affects the inclusion of solar thermal as an option for new systems being installed in the market. These concerns are extended to the fact that stronger uptake measures would enhance the impact of those shortcomings in the current regulation.

> ***A key aspect for having a dealer and a producer package label was to ensure that manufacturers of controls placed separately onto the market would not be negatively affected as a consequence of market distortion.*** *[eu.bac (2018)]*

Taking into account that new changes to the regulation are difficult to foresee, namely if these would address some of the concerns of the solar thermal sector, a relevant number of players in this sector would prefer to see the package label withdrawn completely.

On the other hand, 'system suppliers' are strongly supportive of the package label and of continuing its implementation with no or limited changes [EHI (2018)]. In their perspective, this is a new method, that required intense preparation and investment in order to assure an adequate implementation and compliance with the regulations. In their view, being an innovative approach, it needs time to establish in the market and consolidate.

From the consumer perspective, there is clearly the need for more information. Considering the limited impact of the package label so far, the withdrawal of the package label could be largely unnoticed, taking into account that the product label would still be in place. Nevertheless, this would also depend on other factors, such as media coverage and attention to this fact. This aspect will be addressed hereunder.

From the perspective of public authorities, an important effort has been put in place for the implementation of the regulation, in its different components, products and packages. The main challenge is related to the market surveillance of the package label, though also in this case, some new ideas have been put forward [LPA+ (2018, D4.3)], such as linking the package label to support schemes or in the Energy Performance Certificates of Buildings.

> ***Nevertheless, we should take into account that making changes at such an early stage can undermine the label´s credibility in the eyes of the manufacturers… and that can be a problem with future labels.*** *[LPA+ (2018, D4.3)]*

In this regard, the political aspect also needs to be taken into account, as well as the impact in the public opinion. One of the aspects referred, also form the side of environmental NGOs, is the impact of the withdrawal of the package label on the EU energy labelling and energy efficiency policies. Energy labelling being a vital instrument to reduce energy consumption, as nonetheless been faced with strong opposition at times. Hence the impact of taking a step back also needs to be considered.

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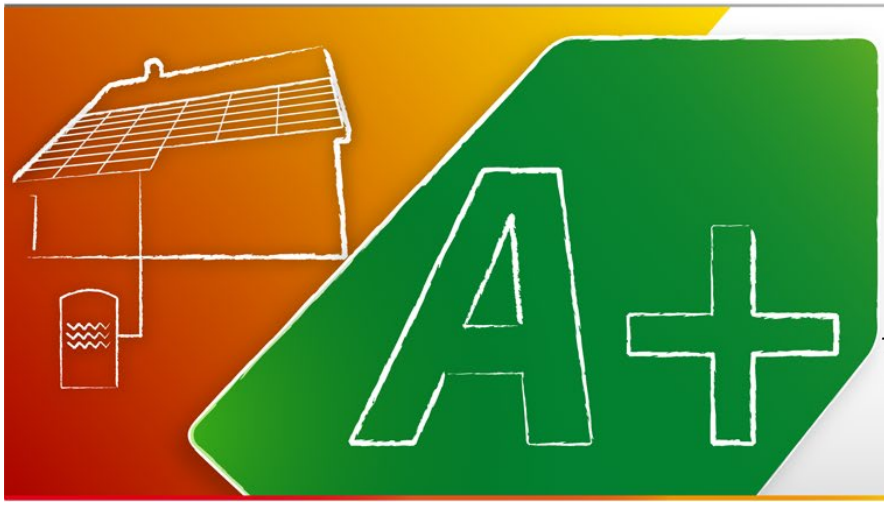

About the Labelpack A+ Project

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