



European Commission  
DG ENER  
Energy Efficiency: Buildings and Products (ENER.C.4)  
Ms Inge Bernaerts, Head of Sector  
Mr. Robert Nuij, Team leader

Brussels, Thursday, 02 April 2020

Dear Ms Bernaerts, Dear Mr. Nuij,

I am writing to you on behalf of the industry associations APPLiA, EHI, EHPA, EPEE, Eurovent and JBCE. Our industry supports the measures governments are taking to guarantee the immediate safety and wellbeing of our communities and contain the spread of the COVID-19 virus.

During this unprecedented crisis, COVID-19 is impacting our production sites, R&D teams and support teams, slowing down internal processes and consequently our ability to provide input to the on-going process related to several Ecodesign Lots (such as for example Lot 1&2, Lot 38, Lot 39 etc).

In addition, our experts feel strongly that complex Stakeholder meetings (such as the Working Group meetings in the context of the Lot 1&2 revision) should be held in person, because they are not suited for remote participation and because they are becoming more difficult to attend even in remote, due to saturation of networks and software.

Furthermore, we strongly believe that the complexity of the discussions requires physical presence as online meetings do not provide a setting for effective debates. Since the results of the meetings affect heavily our industry, it is highly important to be able to address each other in person. We understand that it is difficult to predict the possible future dates, but the meetings could be postponed to a later date and then reassessed closer to the set timing.

In light of the situation, we would like to ask the European Commission to allow for some flexibility and extensions for different current processes as some companies and associations



have reduced their work or stopped working all together. We firmly believe everyone should have the opportunity to contribute while in this current crisis the quality of the virtual meetings and the involuntary lack of participation does not allow to reach this goal. Likewise, we would kindly ask you to consider the postponement of the Ecodesign 2020-2024 Working Plan and the revision of the Methodology for Ecodesign of Energy-related Products (MEErP) in order to ensure the participation of the stakeholders in these greatly impactful processes.

We thank you in advance for your understanding and remain at your disposal for any questions.

Sincerely,

Paolo Falcioni,  
APPLiA Director General

Federica Sabbati,  
EHI Secretary General

Thomas Nowak,  
EHPA Secretary General

Andrea Voigt,  
EPEE Director General

Felix Van Eyken,  
Eurovent Secretary General

Toyokazu Nagamune  
JBCE Secretary General

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## ABOUT APPLiA

APPLiA - Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of EUR 50 billion, investing over EUR 1.4 billion in R&D activities and creating nearly 1 million jobs.

## About EHI

The European heating industry brings together companies that are leaders in the production of efficient heating systems. Our engineers develop the heating solution for every building need, from boilers to solar thermal systems, from heat pumps to fuel cells, from radiators to underfloor heating. Whether it is a cottage in Sweden, a skyscraper in Frankfurt or a guesthouse in Sicily, we make it work. For tomorrow's changed energy system, our members are innovating in hybrid and digital solutions. They develop high-efficiency and renewable-based systems. These innovations will improve Europe's homes and our environment. Please visit our website ([www.ehi.eu](http://www.ehi.eu)) for further information.

## About EHPA

The European Heat Pump Association (EHPA) is a Brussels based industry association which aims at promoting awareness and proper deployment of heat pump technology in the European marketplace for residential, commercial and industrial applications.

EHPA provides technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production.

EHPA coordinates quality initiatives: including the HP KEYMARK, a Quality label for heat pumps and Certification standards for heat pump installers. The association compiles the annual heat pump statistics and organizes a number of events, among them an annual heat pump conference.



## ABOUT EPEE

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of over 50 member companies as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment. Please see our website (<http://www.epeeglobal.org>) for further information.

## About Eurovent

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 organisations, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn Euros, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

### **Our Member Associations**

Our Member Associations are major national sector associations from Europe that represent manufacturers in the area of Indoor Climate (HVAC), Process Cooling, Food Cold Chain, and Industrial Ventilation technologies.

The more than 1.000 manufacturers within our network (Eurovent 'Affiliated Manufacturers' and 'Corresponding Members') are represented in Eurovent activities in a democratic and transparent manner. For in-depth information and a list of all our members, visit [www.eurovent.eu](http://www.eurovent.eu)



## About JBCE

Created in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of 89 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, railway, textiles and glass products. Building a new era of cooperation between the European Union (EU) and Japan is the core of our activities, which we perform under several committees focusing on: Corporate Policy, Corporate Social Responsibility, Digital Innovation, Environment & Energy, Standards and Conformity, and Trade.