



Brussels, 30 April 2020

Dear President von der Leyen,

We are writing to you on behalf of manufacturers and retailers of electrical and electronic equipment and HVAC appliances in Europe who are subject to Ecodesign and Energy Labelling Regulations.

Our industries support the measures that the Commission and governments are taking to guarantee the immediate safety and wellbeing of our communities and to contain the spread of the COVID-19 virus. Unfortunately, as a result of these measures our sector is witnessing a dramatic crisis due to a shutdown of activities, including manufacturing, offline retail, after sales services, logistics, laboratories and R&D. In some cases closures have been decided by Member States, while in other cases it is due to the lack of supply, cross-border workers or simply the lack of demand.

In the current health emergency conditions it has been impossible for many industry experts to work on ensuring the provision of input to ongoing Ecodesign and Energy Label processes at European and National level.

To help us cope with this crisis, limit further damage to the sector and to ensure that resources are available for a recovery in due time, we call on the European Commission to urgently take a number of concrete actions:

- **Delay by four months** the 1 November 2020 date set in the current Energy Labelling delegated Regulations to 1 March 2021 to enable placing on the market products bearing only the current label until 28 February 2021; **delay by four months** the 1 March 2021 date in the current Energy Labelling Regulations to 1 July 2021 to postpone the mandatory provision of the new energy label. **However**, manufacturers should be able to place products on the market bearing only the new label as of 1 March 2021, as originally required, and point of sales (online and offline) must display the new label starting from 1 March 2021 as soon as the new label is available with the product;
- In line with the delay mentioned above, an equivalent postponement should be granted to retailers. The term set by Art. 11 (13) (b) of Regulation (EU) 2017/1369 should be calculated from **1 March 2021**;
- Postpone to a later stage stakeholder meetings with regard to the ongoing Ecodesign and Energy Label review. The complexity of these discussions **requires physical presence** as online meetings do not provide a setting for effective debate. We firmly believe everyone should have the opportunity to contribute;

- Delay by 6 months the second tier of requirements for air heating, cooling products and high temperature process chillers – **Ecodesign Regulation 2016/2281**.

Our calls aim to ensure that the important discussion on, and implementation of Ecodesign and Energy Label rules continue, within a time schedule that allows for the full involvement in the process of all relevant stakeholders.

At this stage it is not only impossible to evaluate the number of business closures, job losses and overall financial impact of this crisis on our sector, but also impossible to make predictions about the process, costs and time needed for recovery.

We are at your disposal to discuss the concerns expressed in this letter.

We thank you in advance for your consideration and look forward to hearing from you.

With kind regards,



Paolo Falcioni,
APPLiA Director General



Felix Van Eyken,
EUROVENT Secretary General



Davide Rossi,
EuCER Council Secretary General



Christian Verschuere,
EuroCommerce Director-General



Else Groen,
IRE Director General