

Energy-efficient product legislation – Omnibus simplification

The European Infrared Heating Alliance ([EIHA](#)), welcomes the Commission's initiative to simplify energy-efficient product legislation. Europe must reduce unnecessary administrative burdens while preserving effective consumer information and market surveillance. A clear, proportionate and stable regulatory framework is essential to allow manufacturers to invest, innovate and contribute to the electrification and decarbonisation of heating.

As EIHA already [highlighted](#), greater digitalisation, streamlined EPREL processes and the need to avoid disproportionate administrative obligations are major opportunities. In this matter, EIHA welcomes the Commission's intention to address the cumulative burden associated with printed labels and product information and to make better use of EPREL.

Reducing paper information and digitalising product information and instructions must be the default option. Manufacturers should be able to provide multilingual instructions and other appropriate product documentation through a machine-readable data carrier (e.g., QR codes), to ensure information remains easily and permanently accessible to consumers and market surveillance authorities. This would already anticipate the future establishment of Digital Product Passports while reducing unnecessary waste. Similarly, duplication of work can be avoided by allowing the re-use of information already in EPREL or in other official EU databases. This would deliver an immediate reduction in printing, translation, document-management and distribution costs, particularly for SMEs operating across several Member States.

The same principle should apply more broadly to duplicative regulatory requirements. EIHA encourages the Commission to map information, testing, documentation and conformity requirements across Energy Labelling, Ecodesign and the ESPR and remove cases where the same information or evidence is required more than once. Likewise, where compliance with an applicable harmonised standard already provides the necessary evidence for a regulatory requirement, additional or overlapping testing and compliance mechanisms should be avoided unless necessary. This need for proportionality is particularly visible in product Energy Labelling, where overlapping or poorly aligned requirements can create confusion between regulatory frameworks and impose additional compliance costs without necessarily improving consumer information. Where several regulatory instruments apply to the same product, the Commission should ensure that their respective roles are clear and that the same performance aspects are not regulated or demonstrated more than once.

The sector also requires regulatory stability. Frequent changes to product-information and compliance requirements create uncertainty for manufacturers and consumers and can require costly changes to documentation, IT systems, product packaging and production processes. This is particularly relevant as the Commission considers greater use of EPREL: while EIHA supports making better use of the database, adapting systems and processes to new EPREL-related requirements also requires investment by manufacturers. These costs should therefore be taken into account when designing

transitional arrangements. Where an existing requirement is due to be replaced, manufacturers should not be required to invest in an interim compliance solution only to adapt their systems or processes again shortly afterwards. The Commission should provide clear transition periods towards final requirements and minimise periods in which old and new compliance systems must be maintained in parallel. This would help ensure that simplification results in a genuine reduction in administrative costs rather than shifting or recreating them elsewhere.

Providing consumers with clear and useful information must be done in a way that accurately reflects the reality of technologies. The Commission itself notes that certain product-specific labels, particularly for heating and cooling, are not used to their full extent to inform purchasing decisions. This is particularly relevant when considering the simplification or possible consolidation of requirements applying to different categories of heating products.

For system-integrated infrared heating, however, the individual product forms part of a wider building solution in which energy performance depends on factors such as system design, controls, the building envelope and the interaction with other installations. In such cases, assessing the heating product in isolation may provide limited information about actual energy performance while creating additional administrative burden. EIHA therefore encourages the Commission to consider whether, for such applications, performance can be more meaningfully assessed at system or building level rather than through a standalone product label.

These distinctions should be preserved when Energy Labelling requirements are simplified or consolidated. Administrative simplification should not result in fundamentally different heating principles or applications being placed under a common methodology where this would obscure relevant differences or produce misleading comparisons. Where necessary, differentiated parameters or assessment approaches should therefore be retained.

More broadly, EIHA cautions that overregulation or regulatory requirements that are not sufficiently adapted to the characteristics of different technologies can also create market distortions. If a methodology does not appropriately reflect how a technology operates and is used, it may influence consumer choices and competitive conditions on the basis of the regulatory framework rather than meaningful differences in real-world performance. At the same time, overlapping testing, documentation or compliance requirements can impose disproportionate costs on manufacturers, particularly SMEs. The Omnibus should seek not only to reduce the number of administrative obligations, but also to ensure that those retained are necessary, proportionate and technically appropriate for the products concerned.