



eu.bac
european
building
automation
controls
association



Brussels, 19th July 2022

Dear President Von Der Leyen,
Dear Commissioner Simson,
Dear Director-General Jorgensen,

We express our gratitude for the opportunity to attend the U.S.-EU Energy Security Task Force meeting on the 30th of June. We are pleased to see this joint initiative to fast-track energy efficiency measures and reduce Europe's reliance on fossil fuel imports from Russia. Nevertheless, we wish to emphasize the need to ensure a level playing field for all relevant products and manufacturers. Furthermore, we call for concrete next steps to provide necessary signals to the producers.

First, the EU industry has the capacity to speed up manufacturing to meet the goals set out by the task force. The EU market for thermostats currently is in excess of 6 million units annually¹. The envisaged short-term increase in the number of 1.5 million smart thermostats does not cause an issue for EU manufacturers. Most companies are already ramping up production for the upcoming heating season in autumn having anticipated higher demand. US-origin companies constitute an integral part of this industry. These manufacturers have been a part of the open EU market for decades and are active eu.bac members. It is therefore essential to guarantee a level EU playing field, making sure that there is no preference for companies of certain geographical origin.

Additionally, it is necessary to clarify which products should be covered by this initiative. Self-regulating devices for individual room temperature control have been defined and mandated by EU legislation². Different devices (e.g. Thermostatic Radiator Valves and connected TRVs) have different applications and should all be kept in the scope. Furthermore, the application should not be limited to heating control and must include cooling as Europe continues to experience ever-increasing heat waves. EU Member States must focus on the ambitious implementation of the existing EU measures to facilitate the uptake of these technologies.

Finally, it is essential to consider that smart thermostats are only one part of an integrated system. Other smart and cost-effective interventions already mandated by the EU have the capability to deliver substantial savings. These interventions are key to unlocking the full savings potential in the technical building systems. For instance, the Building Automation and Control System (BACS) requirements set out in the existing Energy Performance of Buildings Directive (EPBD) alone, could lead to significant annual savings. They can trigger €36 billion in energy bill savings, 14% of the total building primary energy consumption. The energy-saving value would be nine times higher than the initial investment³. We, therefore, invite the EU together with the Member States to accelerate an ambitious implementation of these measures as well as consider the increase in the scope of buildings covered to generate further energy savings.

The industry calls for a clear and EU-wide road map to anticipate the required increase in manufacturing and installation capacities. Decisive steps by the policymakers are necessary to safeguard comfortable and warm buildings without gas shortages in the winters to come. eu.bac stands ready to provide further guidance and engage in discussions with the EU and the Member States on how to best facilitate this initiative.

Yours sincerely,

Dr. Peter Hug
Managing Director

Hans Smid
President

Simone Alessandri
Deputy Managing Director

¹ According to the [Impact Assessment Assistance to the European Commission Draft Interim Report on Central Hydronic Space Heaters \(2020\)](#)

² Art.8 of [Directive \(EU\) 2018/844 of the European Parliament and of the Council of 30 May 2018](#)

³ According to the [Waide Study on the Impact of the Revision of the EPBD on energy savings from the use of building automation and controls](#)