



16 October 2025

(25-6656)

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Committee on Technical Barriers to Trade

Original: English

NOTIFICATION

The following notification is being circulated in accordance with Article 10.6

1. Notifying Member: NEW ZEALAND

If applicable, name of local government involved (Articles 3.2 and 7.2):

2. Agency responsible:

Energy Efficiency and Conservation Authority
P.O. Box: 388
Wellington, New Zealand
Phone: +64 4 470 2200
Email: star@eeeca.govt.nz
Web: <http://www.eeca.govt.nz>

3. Notified under Article 2.9.2 [X], 2.10.1 [], 5.6.2 [], 5.7.1 [], 3.2 [], 7.2 [], Other:

4. Products covered (HS codes or national tariff lines. ICS numbers may be provided in addition, where applicable): HS 8516.10: Electric Instantaneous Or Storage Water Heaters And Immersion Heaters

HS 8418.61.00: Heat pumps other than air conditioning machines of heading 84.15

HS 8415.81.00: Air Conditioning Machines Others, Incorporating A Refrigerating Unit And Valve For Reversal Of The Cooling/Heat Cycle (reversible Heat Pumps)

HS 8418.99: Parts Of Refrigeration Or Freezing Equipment And Heat Pumps, Others

5. Details of notified document(s) (title, number of pages and languages, means of access): Regulation Impact Statement for Consultation: Energy Efficiency Policy Options for Heat Pump Water Heaters HPWHs (September 2025, 110 pages).

Link to notified document(s) and/or contact details for agency or authority which can provide copies upon request:

<https://www.eeca.govt.nz/assets/EECA-Resources/Consultation-Papers/Heat-pump-water-heaters-consultation.pdf>

6. Description of content: The notified consultation document presents the following policy options:

1. Business as Usual option involves no change to the current situation i.e. no specification of minimum energy performance standards or the implementation of any requirement for voluntary or mandatory provision of information on the operation and performance of HPWHs.
2. Develop minimum energy performance standards (MEPS) to be set at the equivalent of the current minimum requirements for Small-scale Technology Certificates in Australia (equivalent to 60% energy savings in Zone 3) and a voluntary information provision.

3. MEPS (as per option 2) and mandatory information provision requiring heat pump water heaters (HPWH) suppliers to provide information on the performance of their products displayed either via a mandatory product label and the use of mandatory requirements to include performance information in all product marketing provided by the supplier for the unit.

In addition to the policy options, the Regulation Impact Statement for Consultation (CRIS) examines technical considerations such as test methods, standards, and the information that could be required to be displayed that impact the options.

New Zealand's preferred option at this stage is Option 3, which combines minimum energy performance standards with mandatory information provision to ensure consumer confidence and support emissions reduction goals.

7. Objective and rationale, including the nature of urgent problems where applicable: The proposed policy options for HPWHs for supply (sale, lease, hire, or hire-purchase) will ensure that New Zealand consumers have an energy efficient, alternative consideration for domestic potable hot water supply. In New Zealand, water heating accounts for the second largest segment of household energy use (after space heating) of around 1/3rd.

Heat pump water heaters can offer substantial energy efficiency improvements over traditional water heaters (electric element storage water heaters, and gas water heaters) that can significantly reduce household energy use for hot water, by 50% or more, leading to a 17% reduction in household energy use.

To enable significant uptake of this technology in New Zealand, consumers need to have confidence that making the move to a HPWH will deliver the expected long-term energy and cost savings compared to traditional electric or gas systems. Installers also must have confidence in performance of HPWH to make the recommendation to the consumer to move to a HPWH.

The current lack of publicly accessible, comparative and verified information is impeding consumers' ability to make well-informed decisions for water heater purchases and slowing the uptake of HPWH.

This proposal is a part of the Trans-Tasman initiative under the Equipment Energy Efficiency (E3) Programme. New Zealand and Australia are consulting to ensure consistency across both markets.

The proposed measures contribute to the New Zealand Government's key actions and policies for energy under the second Emissions Reduction Plan to "Enabling energy efficiency and a smarter electricity system" and will support achievement of emissions targets under the Climate Change Response Act 2002 including net zero 2050. It also aligns with the New Zealand's commitment at COP28 to join global efforts to double energy efficiency by 2030.; Protection of the environment; Cost saving and productivity enhancement

8. Relevant documents:

Regulation Impact Statement for Consultation: Energy Efficiency Policy Options for Heat Pump Water Heaters (September 2025, 110 pages) available for download at: [Consultation - Heat pump water heaters | EECA](#)

The Energy Efficiency (Energy Using Products) Regulations 2002 (the Regulations) are available at: <https://www.legislation.govt.nz/regulation/public/2002/0009/latest/DLM108730.html>

Standards will be available from the Standards New Zealand website at: <https://www.standards.govt.nz/>

9. Proposed date of adoption: The proposed policy option (if progressed) will be incorporated into New Zealand Regulation no earlier than 1 January 2026.

Proposed date of entry into force: The proposed policy option (if progressed) will come into force in New Zealand Regulation no earlier than 1 January 2028.

10. Provision of comments

Final date for comments: 15 December 2025

[X] 60 days from notification

Contact details of agency or authority designated to handle comments regarding the notification:

TBT Enquiry Point of New Zealand
Ministry of Business, Innovation and Employment
wto@standards.co.nz
www.mbie.govt.nz