

EPEE AREA EHPA position on the Commission's Proposal for an Energy Efficiency Directive

October 2011

The European Partnership for Energy and the Environment (EPEE), the European association of refrigeration, air conditioning and heat pump contractors (AREA) and the European Heat Pump Association (EHPA) represent the refrigeration, air-conditioning and heat pump industry and contractors in Europe.

EPEE, AREA and EHPA in general welcome the European Commission's [proposal](#) for an Energy Efficiency Directive, which recognises that Europe should seriously improve its energy efficiency performance. Our members are committed to constantly increasing the energy efficiency of their products and attached services (design, installation, maintenance and repair). Our associations support EU policies designed to encourage the use of more efficient products (for example eco-design, energy and eco-labels, and renewable energy sources) and to make buildings in Europe more efficient in terms of energy use (energy performance of buildings).

The European Commission's proposal for an Energy Efficiency Directive comes at a critical moment as Europe is still far from being on track to reach its energy efficiency and energy reduction objectives. This Directive will be an important push for Member States and industry to reach the **energy efficiency targets** and falls within the Commission's policy to improve resource efficiency as well. Moreover, our members welcome other positive effects that this Directive will have on **the environment, energy security and employment**.

More specifically, our members greatly welcome the establishment of the **minimum refurbishment target of 3% of the total floor of public buildings**, which is an indispensable move to ensure that public buildings are leading the way for energy efficiency.

Even if we appreciate these aims as outlined in the current proposal, our members wish to call upon the Members of the European Parliament to acknowledge the following elements in their upcoming report:

- **Favouring district energy could block other highly energy efficient solutions:** by choosing certain means (district heating and district cooling) instead of setting overall clear saving targets, the Directive risks to block other energy efficient solutions such as heat pumps, heat recovery or combined local heating/cooling solutions. In addition, it would establish a *de facto* monopoly in favour of local energy companies and their district energy solutions as the only "legal" solution for households and industries. Indeed, providers of individual alternative will be deterred by the financial effort implied to prove that their solution is technically and/or financially superior to district energy in every single case.
- **Heat pumps are vital in the promotion of heating and cooling:** Heat pumps have been recognised as a renewable energy technology in the [Renewable Energy Sources Directive](#) and play a vital role in improving the energy efficiency of buildings and in achieving the overall energy efficiency targets. They should be an integral part of the national heating and cooling plans that will need to be established and therefore should be included in the scope of the Directive.
- **The setting of renovation targets will lead to more employment:** Increasing renovation activities will lead to the creation of well-paid and sustainable jobs in Europe. Furthermore Europe needs to remain at the forefront of innovation of efficient technologies in order to be able to compete with third countries. By setting up national

Roadmaps for the renovation of commercial and private buildings, Member States will get incentives to improve energy efficiency of buildings.

- **Energy efficiency improves energy security:** Energy efficiency and the resulting energy savings will improve Europe's energy security and will decrease its dependency on oil and gas supplies from outside the EU. In this regard, and in order to achieve Europe's primary energy savings targets by 2020, the National Reform Programmes should refer to progress made in terms of energy efficiency.
- **Barrier-reducing guidelines:** the European Commission should issue guidelines to the Member States on how they can reduce barriers and on how to overcome the owner-tenant problem.
- **Alignment with other EU legislation:** of course, the Energy Efficiency Directive should be aligned with all other existing European legislation, such as Eco-design and the Energy Performance of Buildings Directive (EPBD). Moreover, the Directive should not ignore the effect that these Directives have on a reduced energy demand in the build environment and the use of more renewable energy sources.

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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 40 member companies and national associations across Europe realising a turnover of over 30 billion Euros and employing more than 200,000 people in Europe. As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. For more information please visit: www.epeeglobal.org

About AREA

AREA (www.area-eur.be) is the European organisation of refrigeration, air-conditioning and heat pump contractors. Established in 1988, AREA voices the interests of 21 national members from 19 European countries, representing more than 9,000 companies across Europe (mainly small to medium sized enterprises), employing some 125,000 people.

About EHPA:

The European Heat Pump Association (EHPA) represents the majority of the European heat pump industry. Its members comprise of heat pump and component manufacturers, research institutes, universities, testing labs and energy agencies. Its key goal is to promote awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. For more information, please visit: www.ehpa.org.