Dear ITRE members of the European Parliament,

RE: REDII – Heating & Cooling – Crucial points for heat pumps and climate (Art. 2&7)

Our organisations represent the heat-pump industry in Europe. We would like to draw your attention to an issue that will heavily affect the future deployment of heat pumping technologies.

AM 1283, tabled by MEP Salini, changes the calculation methodology to determine the share of renewable energy to be accounted for from heat pumps (articles 7 and ANNEX VIIa). We appreciate that it does not seem to be a suggested CA as, if it were accepted, it would affect the growth potential of heat pumping technology and harm Europe’s ability to achieve its climate and energy targets.

The amendment is inconsistent with the fundamental principles of the RES Directive, EU efficiency policies AND gives a very bad political signal:

1) Unjustified inconsistency within the RES Directive and beyond:

a. The RES directive is based on final energy (article 5 point 6). By unduly mixing final and primary energy in the calculation this principle is violated... and only for heat pumps!

b. The amendment is also inconsistent with the systematics and calculation methods of a clear and transparent statistical system as maintained by Eurostat;

c. The amendment makes the renewable character of only one source (ambient energy) dependent on another source (the share of renewable electricity in an energy mix).

d. The current calculation has a physical meaning because it calculates the energy extracted from a RES by the heat pump. This energy depends only on the equipment, therefore it makes the calculation completely unrelated to any physical value;

e. With the new suggested calculation, losses are counted double in total energy balance: once in generation of electricity and twice in use by heat pumps;

f. The amendment aims to strengthen the efficiency conditions for heat pumps. This is unnecessary and in conflict with the specific Ecodesign and the Energy label regulations for heaters, combination heaters and hot water heaters that ensure that only products with a positive impact on primary and final energy use are allowed in the market place. Under their provisions, the efficiency requirements of the present Directive have even been exceeded.

g. This AM is not backed by a justification and not in line with several definitions.

2) A questionable political signal to Member States and the market:

The EU’s climate and energy goals require the urgent deployment of best available technologies in heating and cooling. There is growing consent that heat pumping technologies will have to be a cornerstone of a future energy system in which energy demand is reduced and energy cycles are closed. The proposed calculation formula will reduce the contribution of heat pumps to the RES targets (without affecting their actual needed contribution). As governments and investors base their decisions on the measured input, choosing heat pumps will be disincentivised. This would be very detrimental for a trajectory towards a decarbonised economy and building stock.
Thus, **EHPA and EPEE believe that the amendment should not be supported and that the calculation methods concerning the generation of renewable energy from heat pumps should not be modified.**

In the context of the current discussion, we would also like to share our view on the other articles affecting heat pumps that require attention to maintain a positive future for the technologies growth.

- ‘Ambient heat/energy’ definition (Article 2) should mention ‘heat pumps’ for the purpose of clarity;
- **Calculation methods on heat pumps and ‘cooling’ (Article 7 and Annex VII) should be addressed at technical level at a later stage, if needed.**

Please find more information enclosed.

We are available for further discussion on these issues in a personal meeting or by phone and look forward to your reply.

Sincerely,

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