



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 corner stone 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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