



POSITION BY EHPA, EPEE and Eurovent

on

ErP ENER Lot 1 – Ecodesign requirements for space heaters and combi-heaters: EC draft Regulation

June 2012

Dear Sir/Madam,

EHPA, EPEE and Eurovent welcome the new documents and appreciate the efforts of the Commission to consolidate all the comments received during the consultations.

This measure should be approved as soon as possible so that we are finally able to achieve the targets to reduce energy consumption in Europe.

We welcome the fact that the main issues of concern for our industry have been addressed in the proposal.

In order to support the process further, we have evaluated the documents and still have one outstanding concern:

The second tier requirements on heat pumps should be postponed. The tier 1 requirements prove to have a sufficient level of ambition to accommodate RES requirements, whilst still allowing a healthy level of competition with other technologies. The current requirements in annex VII of the RES Directive only consider heat pumps as a renewable energy source if the seasonal performance factor (SPF) is more than 115%. The SPF factor is higher compared to the seasonal space heating efficiency (η_s) Our investigations have shown that for medium temperature (MT) applications there is a difference of 14-19% while for low temperature (LT) applications, a difference of 22-26% has been recorded. As such, this implies that tier 1 is a correct measure for MT applications, while for LT applications, the level is too ambitious in relation to RES, as it seems that 93% would be sufficient to achieve the RES requirement ($115\% - 22\% = 93\%$) (see the annex for detailed analysis). As such, postponing tier 2 until after the revision, and maintaining tier 1 seems the most pragmatic solution between achieving a level playing field and having a certain level of ambition vis-à-vis RES requirements. Higher ecodesign requirements (than tier 1) will be detrimental for these products and consequently for the objective of sustainable energy and better climate protection, as the consumer will be forced due to affordability, to buy the lower efficient products, In other word Tier 1 is promoting better efficiencies. Tier 2 could bring back the consumer to select less efficient solutions. Furthermore, tier 2 is too close to the review period, and the absorption of the effects of these requirements into the market will never be correctly observed.

The ecodesign requirements for sound power should be limited to 12kW. In general the boundary where heat pumps are applied in residential applications. For heat pumps beyond 12kW, efficiency prevails over sound power and national noise regulations are there to define requirements on site; noise requirements are sufficiently available to inform the consumer with regard to acceptable sound power levels on site. In general, Machinery directive applies to these light-commercial and non-residential heat pumps, and local mandatory sound power/sound pressure indications must be applied.

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