

EPEE – EHPA – AREA Position on the Energy Efficiency Directive

16 March 2012

EPEE, EHPA and AREA represent the refrigeration, air-conditioning and heat pump industry in Europe. Our members are convinced that improving energy efficiency is necessary. They thus support EU policies designed to encourage

- the use of more efficient products (e.g. eco-design, energy and eco-label measures),
- the use of a larger share of renewable energy sources, and
- the improvement of energy efficient buildings (energy performance of buildings).

The European industries provide high quality products for heating, cooling and hot water production and are committed to constantly increasing their energy efficiency. This is often influenced by the related services (design, installation, maintenance and repair). As such we appreciate a strong legislative framework to ensure the continuation of energy efficiency policies in the future.

We are convinced that the forthcoming Energy Efficiency Directive can only benefit from a broad and technology-neutral approach. **Taking infrastructure, different kinds of buildings and different climate zones into consideration, those technologies which provide the highest savings per Euro invested should be supported.**

In order to reap the full potential of energy efficiency from all technologies, two aspects need to be considered in particular:

- 1. Article 10:** The potential contribution of efficient small-scale heating solutions needs to be explicitly addressed.
- 2. Annex IV (3):** The potential contribution to energy efficiency must be acknowledged based on technical facts. For electric heat pumps the efficiency increase of the auxiliary energy needs to be acknowledged. Thus a flexible Primary Energy Factor (PEF) is needed.

We encourage the Council of the European Union to acknowledge these points in the upcoming trilogue negotiations.

Art. 10 - Promotion of efficiency in heating and cooling

- **All efficient technologies should be included in national heating and cooling plans/ measures/ assessments**

EPEE / EHPA / AREA therefore recommend amending Article 10 as follows:

1. By 1 January 2014, MS shall establish and notify to the Commission a national heating and cooling plan for developing the **full potential of high energy efficient technologies**, containing the information set out in Annex VII. The plans, **which must take account of the measures prescribed in Directive 2009/28/EC and the minimum requirements prescribed in Directive 2009/125/EC**, shall be updated and notified to the Commission every five years. MS shall ensure by means of their regulatory framework that national heating and cooling plans are taken into account in local and regional development plans, including urban and rural spatial plans, and fulfil the design criteria in Annex VII.
2. **delete**

Justification

Increasing efficiency in heating and cooling provides benefits, independent of the size of the installation. Small-scale efficient heating and cooling technologies (capacities of up to 400kW thermal output, e.g. heat pumps, recognised as a renewable energy source according to Directive 2009/28/EC) are subject to Ecodesign measures. The result is a market push towards larger markets of products with much-improved efficiency. As small decentralized heating systems can be more efficient than large centralized heating systems and are more adaptable to the buildings space heating demand, no preference should be given.

Annex IV (3) - Energy content of selected fuels for end use

- **The primary energy factor should be made flexible, replacing the factor of 2,5 with a variable, to be re-calculated annually, based on EUROSTAT data.**

EPEE / EHPA / AREA therefore recommend amending Annex IV (3) as follows:

- [3] Applicable when energy savings are calculated in primary energy terms using a bottom-up approach based on final energy consumption. **For savings in kWh electricity Member States shall apply a default primary energy factor defined as $1/\eta$ ($1/\text{eta}$). η (eta) is the ratio between total gross production of electricity and the primary energy consumption for electricity production and shall be calculated as an EU average based on Eurostat data. The eta value shall be re-calculated on an annual basis by EUROSTAT.**

Justification

The primary energy input needed to produce 1 kWh of electricity (Primary Energy Factor) is forecast to decrease. Higher efficiency of electricity production in combination with an increasing use of renewable sources leads to lower emissions. This could be acknowledged by replacing the fixed Primary Energy Factor of 2,5, to be recalculated annually, based on EUROSTAT data. Such an approach has been taken up in the RES Directive, where eta ($\text{eta} = 1/\text{PEF}$) is recalculated annually. Using the most current EUROSTAT data reveals an eta of 45,2% (2009). This results in a PEF of 2,21, an approximately 12% improvement over the suggested value of 2,5.



European Partnership for Energy
and the Environment



european
heat pump association



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 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.

About AREA:

AREA 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. For more information please visit: www.area-eur.be.