

## EPEE – EHPA – AREA

### Letter of recommendations on the Energy Efficiency Directive vote in the ITRE Committee on 28 February 2012

27 February 2012

EPEE, EHPA and AREA represent the refrigeration, air-conditioning and heat pump industry in Europe. Our members are convinced that improving energy efficiency in Europe is necessary and support the action on EU level.

We believe the forthcoming Directive must maintain neutrality towards efficient technologies – an underlying principle in EU action on energy policy initiatives. Taking infrastructure, building and climate differences into consideration, those technologies that provide the biggest savings per Euro invested should be supported.

In particular, the contribution potential of efficient small-scale heating solution should be considered more explicitly. With regard to heat pump technology, the use of a flexible Primary Energy Factor (PEF) is needed. We thus encourage the members of the ITRE to **acknowledge the following elements in the upcoming Committee vote and for the future debate:**

#### Art. 10 - Promotion of efficiency in heating and cooling

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

##### **Rationale**

*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.*

- Therefore **Compromise Amendment 11 should be rejected.**

#### 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.**

##### **Rationale**

*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 (eta = 1/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.*

- Therefore **Compromise Amendment 7 should be rejected.**

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European Partnership for Energy  
and the Environment



#### **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](http://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](http://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](http://www.area-eur.be).