

Mr. Stephan Kolb  
DG Energy and Transport  
European Commission - Energy Efficiency - TREN D 3  
B-1049 Brussels

Brussels, 20 March 2009

**Copy:** Mr Brisaer, Mr Kemna, Ms Lichtenvort

**Topic:** EUP – lot1&2 – follow up comments based on meeting of 03/11/2008

Dear Mr Kolb,

EPEE ([www.epeeglobal.org](http://www.epeeglobal.org)) has been informed that from now on you are taking on the responsibilities for lots 1 and 2, and that the actions towards these lots will be accelerated.

EPEE has been working on this issue since the study phase, and welcomes the fact that the work will be progressed on both lots 1 and 2. This work is considered a big step forward in achieving the goals by the Commission, and as such EPEE wants to support this work as much as possible.

During the consultation stages for both lot 1 and lot 2, we have made our comments and suggestions to enhance the proposals, and reached/developed the practical implementing measures that are ensuring that the set goals are achieved.

In order to provide you with a smooth transfer into this work, we would like to discuss with you our comments on the present proposals including legal annexes for calculation and testing.

Main issues of concern raised in previous position papers are:

1. The present implementing measures are not ready for **new technologies**, as such provisions have to be made to allow these technologies to be certified by the appropriate methods acknowledged by competent bodies, but differing from present calculation and testing requirements.
2. Efficiency calculation does not take into account the **differentiation for floor heating**, which is a highly efficient application for heat pumps.
3. Inclusion of testing requirements and efficiency calculations in **legislative annexes** hamper flexibility in introducing new technologies and revising for improvement. As such, provisions have to be set up in the implementing measure that the application of harmonised standards is a possible alternative for presumption of conformity equal to the legislative annex.
4. The **process for setting up the calculation annex** is not transparent and is lacking the involvement of users of this calculation.
5. **Testing requirements for waterheaters** should allow flexibility, not all systems within the scope of lot 2 are designed to achieve 55°C tapping temperatures and as such, provisions have to be made to assure that these products can be tested as well.
6. We advocate to have **1 minimum requirement and 1 energy label for combi-systems**. This to simplify the minimum requirements and to simplify the energy label towards the consumer.
7. Calculation of energy efficiency according to the latest tool presented by VHK (february 2009) contains errors and general misconceptions that need to be modified in order to address the calculations properly, and the general use of the tool needs to be clarified.
8. **3<sup>rd</sup> party certification** is not in place for heat pumps at the moment, as this aspect requires further consideration in order to assure that the systems set in place accommodate demand. For the time being, there are not enough labs to cope with such a demand.
9. The **GWP values** need to be correctly referred to in the legislation, EPEE suggests to refer to Annex I of regulation EC No 842/2006.

**EPEE**

14A, rue du Luxembourg, 1000 Brussels, Belgium  
Tel : +32-2 732 70 40 / Fax : +32-2 732 71 76  
E-Mail : [Secretariat@epeeglobal.org](mailto:Secretariat@epeeglobal.org) / [www.epeeglobal.org](http://www.epeeglobal.org)

10. Where possible, **an energy label** that can compare all technologies used in space heating and water heating should be used.

Of course this is merely a summary, and for some issues we would be pleased to give you a more elaborate explanation. EPEE proposes to have a meeting around the 15 April 2009, to further discuss these comments, and will contact you to fix a date.

Yours sincerely,



Friedrich P Busch  
Director General - EPEE

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