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 Date
 2021-11-11

Position Paper

In a nutshell

With this paper, Eurovent provides its feedback following the online Consultation Forum for the revision of the Ecodesign and Energy Labelling Regulations on hydronic space heaters and combination heaters held by DG ENERGY on 27 and 28 September 2021.

Background

With the Position Papers dated 2019-05-28, 2020-05-13, and 2021-02-22, Eurovent has already provided a set of input to the revision of the Commission Regulations (EU) No 811/2013, 812/2017, 813/2013 and 814/2013. The comments at these Position Papers remain.

Assessment of the draft legal texts presented at the last CF meetings on 27-28 September 2021

Eurovent has carefully assessed the draft legal texts proposal presented by the EC during the online meetings on 27-28 September January 2021.

The Eurovent major comments/position are reported below.

Scope

While at the online meeting on 28 January 2021 the EC consultant has presented a proposal including heating-only heat pumps and reversible heat pumps in the range of 400 kW to 1 MW in the scope of the revised regulation, this surprisingly changed at the last CF meeting on 27 September 2021.

Indeed, at the last CF meeting the proposed scope changed as below:

Air-to-water and water /brine-to-water heat pumps		Scope
Heating only	<= 400kW	LOT 1
	>400kW (up to 1 MW)	
Reversible	<= 400kW	LOT 1
	> 400 kW	LOT 21 (ED requirements in cooling mode)

One has to note that the market would be extremely confused by having heat pumps <= 400 kW and up to 1 MW covered by heating requirements and the very same reversible products below 400 kW covered by heating requirements and above 400kW covered by cooling requirements.

It is very hard to find the rationale behind the presented proposal.

It is also to be stressed that in the framework of the EU 'Fit-for-55' Climate law as well as the European Green deal, reversible heat pumps must be the best-in-class in heating mode. This would best allow in meeting the EU decarbonisation goals.

Furthermore, according to the EN 14825, it is to be noted that the SEER calculation is based on 600 hours within the BIN considered. SCOP is based on 1400 hours. So, SCOP covers more energy consumption than SEER.

Thus, Eurovent does not support the proposed LOT1 scope and would like to re-iterate its position as in the PP-2021-02-22, and specifically:

Heating only heat pumps up to 1 MW as well as reversible heat pumps below and above 400kW (up to 1MW) covered by the scope of LOT 1.

Ecodesign limits space heating seasonal efficiency

As a general consideration, Eurovent would like to confirm its support to the introduction of the proposed PEF correction for the minimum limits.

Concerning the proposed minimum limits for hybrid electric heat pump & fuel boiler (MT), it is to be stressed that as most of the heating is done by the heat pump (if TOL is -7°C or lower) Eurovent holds that **the minimum limits for hybrid electric heat pump & fuel boiler (MT) should be the same as the ones for electric heat pump (MT) ($\eta_s = 130\%$).**

It is also to be considered that the introduction of minimum limits for **hybrid electric heat pump & fuel boiler (MT) at 110% would result in a market populated by extremely poor performing heat pumps.**

Hybrids

Eurovent supports the proposed introduction of the hybrid category and asks to stay consistent with the present standard (EN 14825).

We keep asking the current definition as in the EN 14825 and allow both combined and separate method (it is to be re-stressed that many laboratories are not able to test boilers and heat pumps together).

Test methods

The very last EC proposal is to introduce the compensation method and to leave up to the manufacturer to choose whether to test according to the compensation method or the current method.

One has to consider that proper results of the ongoing RRT have not been presented nor circulated until now.

According to the CF meeting presentation, it seems that results are available for only 1 air-to-water heat pump and 1 water-to-water heat pump.

During the CF meeting, promising results in terms of repeatability have been mentioned but not presented nor commented.

Furthermore, during the CF meeting the EC invited stakeholders to express their willingness to participate in a dedicated technical meeting that can be held by the Commission services on this subject after the CF. Eurovent confirms its willingness to attend this meeting and supports the EC in defining the most appropriate test methods, but also would like to stress that this should have been done before the CF meeting and not after it.

It is also to be reminded that the compensation method was supposed to apply to units up to 70 kW only and not to the full set of units in the scope of the current review. We would like to know which is the capacity of the units currently tested, and which is the reported behaviour (a clear split capacity by capacity would be much welcome). We do suggest sharing also this kind of information at the proposed technical meeting.

Eurovent would also like to question whether the proposed minimum ecodesign requirements, as well as the proposed energy label, would be affected/impacted by the manufacturers' voluntary selection of the test method (current test method or compensation method) and whether the EC has considered it in its proposal.

It is also to be stressed that, within the ongoing review of the ecodesign and energy Labelling Regulations on air-to-air conditioners and heat pumps, the compensation method has been regarded as not mature/reliable/stable enough and thus dropped out.

Eurovent believes that the compensation method is not mature enough for being introduced in the current review and thus asks keeping the current test method.

Transitional methods

Eurovent would like to stress that any new test method shall not be included in the legal text of the regulation and shall be covered by a dedicated standardisation mandate toward CEN/CENELEC.

This would only result in a lot of confusion, would not help the harmonisation among testing methods and would not help the activity of MSAs.

It is also to be stressed that the proposed detailed descriptions of test conditions and methods in Annex III should be left to the standard to avoid any kind of misinterpretation. Just as an example, the proposed description of the combined test method for hybrids refers to the compensation method and is therefore not in line with the method described in EN14825.

Thus, Eurovent asks deleting the proposed Annex IIIa.

Temperature regime heat pumps

In view of the implementation of the Directive (EU) 2018/844 on the Energy Performance of Buildings Directive (EPBD), insulation of buildings will be significantly improved. To that end, the EPBD has mandated individual room or zone thermostatic controls in new buildings when installing the heat generator. EPBD's higher energy efficiency targets will lead to better insulated buildings, which in turn will also require lower-temperature heating systems.

High temperature heat pumps able to supply 65°C water temperature can be found on the market; however, these products are dedicated to a niche market and do not represent the vast majority of systems and applications. It is also to be considered data at 65°C could result in a misleading message toward installers and final users. Installers and final users might think that there is no need to adapt houses/buildings to allow for lower temperatures.

Thus, Eurovent does not support the introduction of any indication of performance and seasonal efficiency at High Temperature regime also as an optional part of the product information and we recommend keeping the Medium Temperature regime testing at rated T_{supply} 55°C.

Energy label rescaling

Eurovent welcomes and supports the EC proposal of rescaling the energy label to A-G as well as the introduction of the η_s value on the label.

We also would like to provide comments on the proposed energy label.

Medium Temperature

The B class should be expanded to ensure that multiple heat pump technologies (including air source heat pumps) can reach the B class. **We suggest changing the B lower class limit from 180% to 166%, as it was in the original proposal from VHK.**

Low Temperature

The proposed thresholds for LT have increased drastically in comparison to MT, this leads to heat pumps achieving C class for MT application and only D class for LT application. This would result into misleading messages, so **we suggest keeping the difference between MT and LT as is today (25 percentage points difference).**

Resources efficiency

Eurovent welcomes the proposal of the EC on resources efficiency requirements, at the same time we do want to share some of our concerns.

Products to be covered by resource efficiency requirements

The presented proposal applies to all the products in the scope of the current review.

We do think that resource efficiency requirements should follow the same approach as the energy label one and not apply to large capacity heat pumps.

In this respect Eurovent asks that only heat pumps below 70 kW are to be covered by specific resources efficiency requirements.

Availability of the necessary spare parts

The working document considers that all components of space, combi and water heaters should be available as spare parts for a period of 10 years.

Concerning heat pumps, Eurovent believes that spare parts should be limited to an exhaustive list of critical components to be listed in the regulation (similar to and as it is already in the draft legal text for the ecodesign and energy Labelling Regulations on air-to-air conditioners and heat pumps, and comfort fans).

Thus, Eurovent asks that only critical components should be available for a period of 10 years and specifically:

- Compressors
- Heat exchangers
- Remote controls
- Thermostats and sensors
- Fan motors
- Printed circuit boards
- Integrated circulators

Availability of the necessary spare parts of products not anymore on the market

Concerning the availability of the necessary spare parts of products not anymore on the market (due to safety issues) we do believe that these products should be exempted by any resource efficiency requirement.

Sound power requirements

It is not clear whether sound power requirements will apply (as it is in the current regulation) to heat pumps up to 70kW only or if they are supposed to apply also to units above 70 kW. As no assessment has been carried out in the course of the review project, the impact of this possible change is unknown.

Thus, Eurovent asks keeping the current approach: sound requirements applying to units up to 70 kW only.

It is to be noted that the within the draft legal text, the conditions at which the capacity limits for maximum sound power requirements apply have changed from the current P_{rated} to part load conditions C. This has not been assessed before as well as the related impact, **in this respect we asks keep the P_{rated} as the conditions at which the capacity limits for maximum sound power requirements apply.**

Monitoring

The presented working document introduces new requirements for remote monitoring and reporting for space heating appliances in the scope of the regulations. These requirements are completely new and never discussed in the extensive preparatory phase, they are not based on a feasibility study, currently there are no measurement standards, and hence no possibility to determine the accuracy of the data.

It is to be stressed that real-world data are totally different from test data and, indeed, not comparable each other nor covered by any standardised/harmonised approach. Furthermore, one has to consider that consumption and efficiency data are significantly influenced by user behaviour and the overall technical building system, in addition to appliance characteristics. The data of individual heating devices can therefore represent a wide range and thus do not offer any meaningfulness. On the contrary, the lack of significant influencing parameters leads to significant confusion.

It is not possible to currently support the EC proposal and thus Eurovent suggests reconsidering it at the next review (insert it in the review clause).

Delivery annotation

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Concerns	Consultation Forum Space and Water Heaters on 27-28 September 2021
Other comments of relevance	

Eurovent and transparency

When assessing position papers, are you aware whom you are dealing with?

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers' questions regarding our representativeness and decisions-making processes as follows:

<p>1. Who receives which number of votes?</p> <p>At Eurovent, the number of votes is never determined by organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission ('steering committee'), our national Member Associations receive two votes per country.</p>	<p>2. Who has the final decision-making power?</p> <p>The Eurovent Commission acts as the association's 'steering committee'. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two votes per country independent from its size or economic weight.</p>
<p>3. How European is the association?</p> <p>More than 90 per cent of manufacturers within Eurovent manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the secondary sector. Our structure as an umbrella enables us to consolidate manufacturers' positions across the industry, ensuring a broad and credible representation.</p>	<p>4. How representative is the organisation?</p> <p>Eurovent represents more than 1.000 companies of all sizes spread widely across 20+ European countries, which are treated equally. As each country receives the same number of votes, there is no 'leading' country. Our national Member Associations ensure a wide-ranging national outreach also to remote locations.</p>

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.

We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.