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Eurovent comments on the draft proposals for space, combination and water heaters (Aka ENER LOT 1-2)

In a nutshell

The Eurovent positions are summarised below for ease of reading.

- **Avoid contradictory measures: Do not hinder heat pump deployment with incoherent provisions**
- **Definitions: Confirm that P_{design} and P_{rated} are identical, and ensure consistency**
- **TPCA is not supported**
- **Self-monitoring: While the scope is supported, the required parameters and data storage burdens are excessive**
- **Compensation Method: Supported for units up to 70 kW, careful attention should be paid to the application date, since the method and the standards are not yet ready**
- **Requirements for material resource efficiency: the list of spare parts is too broad; the proposal of 2023 was supported. The safety of technicians should be considered carefully.**
- **Product information requirements: 65°C regime is not supported, "F-Gas free refrigerant" should be removed, providing seasonal performance data for all eco and low-noise modes is disproportionate to its added value**
- **The lower thresholds of the B, C and D classes for the MT and LT regimes are too ambitious**
- **The simplified look of the proposed label is supported. 'F-Gas free refrigerant' should be removed**

Background

The members of the Eurovent product group 'Liquid Chilling Packages and Heat Pumps' have carefully assessed the proposed Ecodesign and Energy Labelling draft measures and would like to provide detailed comments on the major proposed measures in the following paragraphs.

Before entering the details of the single provisions, Eurovent wishes to share a horizontal consideration on the Regulation in its entirety.

The intention of the draft measures to promote the most efficient technologies, such as heat pumps, is recognised and greatly appreciated. Many draft provisions move in this direction. Regrettably, however, others are likely to lead to the opposite outcome. At this critical moment, where the heat pump industry is expected to deliver profound technological innovation, it is essential that regulatory measures do not create unnecessary burdens.

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Eurovent comments on the Ecodesign draft text and annexes

Scope (Article 1)

Eurovent position:

Eurovent supports the new scope of the Regulation.

Definitions (Article 2)

Eurovent position:

Standard rated heat output is to be identical to Pdesign. Any reference to Prated should be replaced by Pdesign. Eurovent suggests including a new definition for Double Duct heat pump heaters.

Standard rated heat output ($P_{design,h}$ – definition 10)

Eurovent understands the standard rated heat output to be identical to P_{design}. This alignment ensures consistency between current and future capacity definitions for heat pumps.

Eurovent welcomes and supports this approach. Should this interpretation differ from the Commission's intent, it's important to emphasise that maintaining consistency between these definitions is of strategic importance.
In fact, changing the definition will change the boundaries of the applicable measures for some units as well as the impact of the scope of the product bans established by Regulation (EU) 2024/573 on fluorinated greenhouse gases.

The Energy Labelling Annexes still refer to P_{rated}; Eurovent recommends an alignment between the Regulations.

A dedicated definition for double duct heat pump heaters

Although the scope of the Regulations already covers these products, Eurovent suggests that a dedicated definition be developed to clearly define the technology and recognise its intrinsic advantages and limitations.

Double Duct Heat Pump heater (with air passage sections up to 700 cm2):

'means a heater, placed wholly inside the building, that has a heat generator with a heat pump cycle to capture ambient energy and/or waste heat for heat generation, in which the evaporator intake air is introduced from the outdoor environment to the unit by a duct and rejected to the outdoor environment by a second duct, both with a cross-sectional area of less than 700 cm2; it can include a backup heater.

Ecodesign requirements (Article 3 and Annex II)

Eurovent position:

Eurovent recommends 115% for the 'others' category.

The minimum energy performance standards are being lowered, while the energy label is extremely ambitious. This inconsistency is too contradictory.

It has to be considered that the 100% threshold alone will not impact the affordability of heat pumps significantly, because other factors, like electricity prices, must be revised to help end users in both initial and operating costs.

The EU competitiveness is at risk when lowering the threshold to 100% because the market will be opened to non-EU manufacturers that previously were not able to meet the previous minimum efficiency requirements.

Eurovent therefore recommends reconsidering the minimum energy efficiency threshold of 115%, which would represent a reasonable and balanced approach and ensure better alignment with the Renewable Energy Directive.

Conformity assessment procedures for space and combination heaters (Article 4 and Annex VII)

Eurovent position:

Eurovent does not support the introduction of any Third-Party Conformity Assessment for heat pumps and asks to maintain the status quo.

The proposed introduction of a Third-Party Conformity Assessment (TPCA) imposes an administrative and financial burden that is disproportionate to its intended benefits. This even increases for those products which are personalised to the customers' needs and therefore each of which would constitute a different type under the proposed definition.

In general, Eurovent (representing the vast majority of the European heat pump industry) strongly supports the EU's ambition to improve product quality, performance, and consumer confidence. These goals are essential to ensuring that heat pumps play their full role in achieving Europe's climate and energy objectives. However, the Third-Party Conformity Assessment poses significant risks to innovation, market dynamics, and regulatory feasibility.

The proposed testing burden is excessively high and would lead to a major increase in both costs and testing time for manufacturers compared to the current self-declaration approach.

This runs directly counter to the to the EU's objectives on simplification and competitiveness. In practice, a single unit could require more than one month of continuous testing due to the number and complexity of test points (see the section "An additional number of tests imposed on companies").

With more than 40.000 heat pump models declared under EPREL (<70kW), almost all of which declare both LT and MT applications and the three climate conditions, the proposed extended testing requirements are unworkable.

Such an approach would act as a clear barrier to the introduction of new innovative products, undermining the timely deployment of new heat pump models and advanced technologies across the EU, particularly in the context of the ongoing introduction of new refrigerants.

The structure and number of test points required under the TPCA may create a regulatory loophole that incentivises manufacturers to narrow the range of declared applications, climates, and operating conditions.

To avoid long testing cycles (lasting even a month), manufacturers could be forced to limit declarations, for example, by excluding certain climate zones or high-temperature and low-temperature operating conditions. This would lead to less detailed product declarations and reduced comparability between technologies. Consumers and installers would receive poorer-quality information, and the market would offer fewer tailored solutions for specific climates or heating system configurations. Paradoxically, a regulation intended to enhance transparency would risk producing the opposite effect.

An additional number of tests imposed on companies

The comparison below of the minimum number of tests requested by the proposed different modules for two existing companies (representing the average of the market) participating in the related Eurovent Certification programme, **provides a clear understanding of the number of tests which will be required according to the draft TPCA proposal, as in our understanding as the number of tests and testing points requested is not clear in the proposed text.**

Table 1: Assessment of the number of tests required by the proposed different modules – units with a heating capacity equal to or below 400 kW

Heating capacity up to 400 kW					
Manufacturer	# of BMG ~ # of types*	Module B: # of tests (once)	Module C2: # of tests (per year)	Module D: # of tests (per 3 years)	Module D: # of tests (per year)
A	317	63,4	31,7	63,4	21,239
B	319	63,8	31,9	63,8	21,373

* best case assumption (the ECC BMGs are way wider than the proposed types)

Table 2: Assessment of the number of tests required by the proposed different modules – units with a heating capacity equal to or below 70 kW

Heating capacity up to 70 kW					
Manufacturer	# of BMG ~ # of types*	Module B: # of tests (once)	Module C2: # of tests (per year)	Module D: # of tests (per 3 years)	Module D: # of tests (per year)
A	96	19,2	9,6	19,2	6,432
B	117	23,4	11,7	23,4	7,839

* best case assumption (the ECC BMGs are way wider than the proposed types)

Comparison with the Keymark scheme

To our knowledge, the Commission's rationale for introducing the Third-Party Conformity Assessment partly relied on the belief that the proposed product sampling would be lighter than that used in the HP Keymark certification scheme.

It is also to be underlined that the HP Keymark certification scheme, differently than the proposed TPCA, is a voluntary (non-certify all) third-party certification scheme ranging up to 400 kW, but in practice used only up to 20-30 kW.

Eurovent compared the two schemes; the outcome of this comparison is presented in the following.

Module B vs HP Keymark periodic approach

Table 3: Module B compared with the HP Keymark admission scheme "periodic approach"

Scheme (1000 types)	# Model tested per year	# of tested points per year
Module B	200	2400
HP Keymark periodic approach (1 test every 5 sub-types)	200	1400

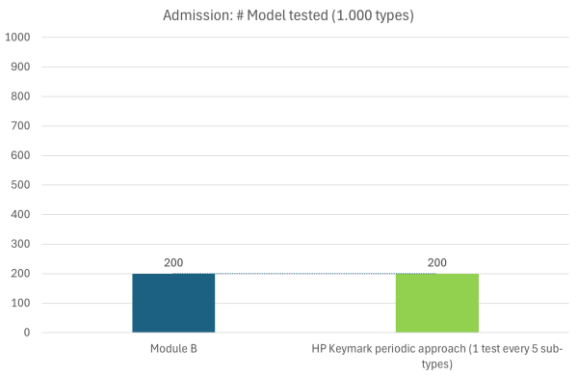

Figure 1: Comparison among the number of models tested

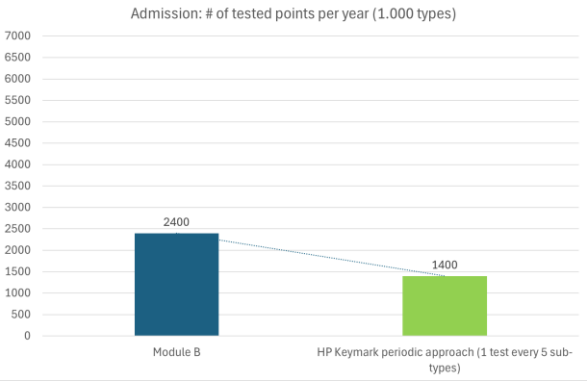

Figure 2: Comparison of the number of tested points

Module C2 and D vs Keymark surveillance

Table 4: Module C2 and D compared with the HP Keymark periodic surveillance requirements

Scheme (1000 types)	# Model tested per year	# of tested points per year
Module C2	100	1200
Module D	66,67	800
HP Keymark periodic surveillance (12 months) - min. requirement -	1	7

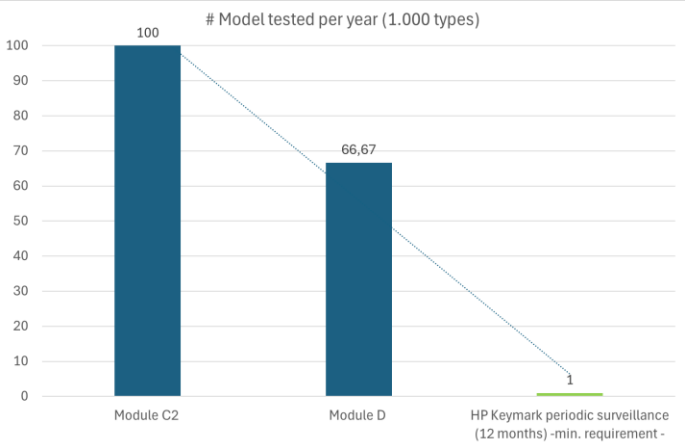

Figure 3: Comparison among the number of models tested

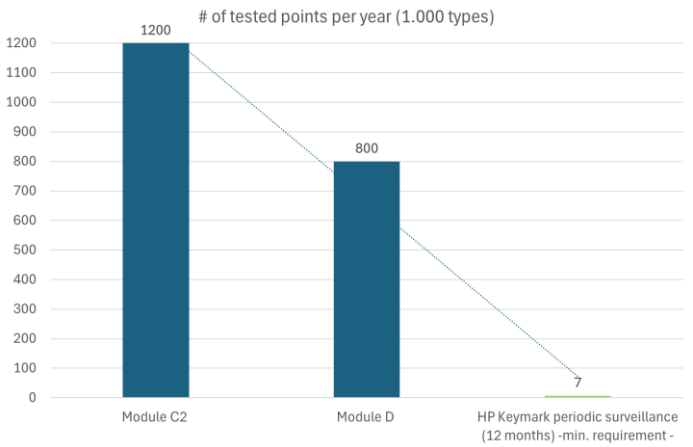

Figure 4: Comparison of the number of tested points

The figures and graphs above clearly demonstrate that the proposed TPCA requirements would impose an overwhelming burden on the manufacturers, far exceeding any potential benefits or the original objectives of the measure.

Readiness of external notified bodies and laboratories

The proposed reliance on external notified bodies within four years of the legislation's publication is far from realistic. No such notified bodies currently exist for these proposed specific requirements (in

addition, it also needs to be considered/assessed within the framework of the newly introduced testing methodology proposed).

Establishing, accrediting, and ensuring the operational readiness of these bodies will take significantly longer than foreseen. At the same time, the European test laboratory capacity is already insufficient for today's regulatory requirements, particularly for larger heat pumps (above 50kW), where only a limited number of testing facility does exist. The introduction of the TPCA would simply multiply existing bottlenecks dramatically, creating long queues for testing, certification delays, and substantial administrative burden for both industry and future notified bodies. **As a result, manufacturers may face major obstacles in placing compliant products on the market in a timely manner, slowing the roll-out of heat pumps exactly when Europe needs them most**.

Additional concerns on TPCA

The added value of the TPCA appears limited when considered alongside existing regulatory tools and the very low MEPS proposed. These mechanisms are well understood, widely implemented, and increasingly effective at ensuring product performance and compliance across the EU. Adding another layer of regulatory testing, especially one as resource-intensive as the TPCA, creates duplication without delivering proportional benefits. Such overlap risks diverting resources away from innovation and scaling, especially at a time when the EU aims to accelerate heat pump deployment dramatically.

In addition, one major advantage presented was the acceptance of TPCA data at the national level for building performance data and subsidy schemes. However, looking at the current trends, Member States are increasingly requiring additional points for national calculations, EPDs or new location certification requirements mandatorily relying on third-party certifications. Thus, it is clear that TPCA data will not be sufficient, and third-party certifications will remain necessary, adding a double burden, time constraints and costs on manufacturers without benefits for end consumers and heat pump deployment.

The heat pump sector remains committed to delivering high-quality, transparent, and efficient technologies to European consumers. However, the TPCA in its current form threatens to slow market development, reduce consumer choice, and impose disproportionate burdens without commensurate benefits. A more proportionate, phased, and infrastructure-aware approach would help preserve innovation, ensure regulatory coherence, and support the rapid heat pump deployment needed to meet Europe's climate and energy goals.

Eurovent position:

Eurovent does not support the introduction of any Third-Party Conformity Assessment for heat pumps and asks to maintain the status quo.

Sound power measurement (Article 11 and Annexes II, III)

Article 11 – Transitional provisions

In order to have proper consistency in the regulatory text, Eurovent recommends rewriting the article to clarify better that the sound power measurement applies up to 70 kW, as written in Annex II.

Annex III – point 7.1

Eurovent position:

Eurovent welcomes the proposed procedure for units equal to or below 70 kW. In order to clearly define how to perform such measurements, Eurovent asks the Commission to further define the measurement procedure.

Today, the compressor frequency, fan speed, etc., that are used for sound power testing are those that are used for performance testing at part-load condition C (7°C). In the future, the new Regulation will introduce new testing conditions, asking manufacturers to test the Sound Power Level with settings of part-load condition B (2°C), with outdoor temperatures ranging from 7°C down to 2°C allowed.

At the same time, the new sound power testing method will be applied alongside the compensation method for performance testing. This approach eliminates the need to fix test settings for performance tests, as the unit will run in free operation, while they are required for the sound test.

This raises uncertainty as to how to define the compressor frequency and fan speed for sound power testing. During compensation testing, the manufacturer could, in principle, know the frequency/speed applied at that condition, but they may fluctuate during the test, making it unclear which frequency should be declared for sound power testing.

Should the manufacturers then take an average with the risk that the average leads to a frequency not available in the software?

Additionally, if Market Surveillance Authorities want to verify the declarations, they may not come to the same settings the manufacturer applied, potentially leading to discrepancies in sound power results.

Self-monitoring requirements (Article 12 and Annex II)

Eurovent position:

Eurovent recommends leaving it up to the manufacturer to determine which values are to be measured and which are to be calculated. In order to reduce the amount of data to be stored, Eurovent suggests carefully reconsidering the timespan, level of detail and number of parameters.

Measured and determined values (Annex II, point 10.2)

Eurovent understands that calculations are generally allowed; however, Annex II, point 10.2(b) states that the thermal energy output shall be measured.

Eurovent recommends leaving it up to the manufacturer to determine which values are to be measured and which are to be calculated.

Eurovent holds that energy efficiency (at least instantaneous efficiency) and the number of on/off cycles are not relevant for consumers and should therefore be excluded from the requirement.

In light of the above, Eurovent recommends modifying the text as follows:

Depending on its type, the heater shall determine, store and display:

(a) the energy input to the heater (electricity, gaseous or liquid fuels); in case several types of energy sources are used by the unit, energy input for each and all energy sources shall be determined;

(b) the thermal energy output, meaning space heating for all heaters and also space cooling for reversible heaters; ~~the thermal energy output shall be measured~~;

(c) for cogeneration heaters and cogeneration heater with backup boiler, electrical energy output;

~~(d) the energy efficiency (the ratio of thermal energy output and electrical energy output to energy input); in order to calculate it, electricity must be converted to primary energy with a CC equal to 1,9 for consumed electricity and a coefficient of 2,65 for cogenerated electricity and using fuel gross calorific value (GCV).~~

~~(e) number of on/off cycles (number of periods for which the heater has been stopped by the thermostat) and~~

(f) for combination heaters, whether the heater is used for space heating or sanitary water heating.

Requirements related to data storage (point 10.4)

As it is proposed, the requirement could imply a huge amount of data to be stored.

In order to reduce such an amount of data to be stored, Eurovent suggests carefully reconsidering the timespan, level of detail and number of parameters.

To avoid confusion, Eurovent also recommends modifying the sentence of point 10.4, paragraph 3 as follows: "Data stored in accordance with this point shall be accessible to end-user or third parties by means of a standard interface, such as for example USB port, SD-card or Wi-Fi connection, in machine-readable format (such as for example a csv or xml file), ~~without undue delay~~."

Alternatively, undue delay must be clarified.

In the very same sentence, the term "**third parties**" is quite generic. This requirement must be in line with the EU Data Act and Cyber Resilience Act, which indicate that, in order to guarantee the cybersecurity of the system, it is better to have access as low as possible. For this reason, Eurovent recommends restricting the mandatory access for third parties to Market Surveillance Authorities only, or better clarifying that only end-users can grant access to other third parties.

Compensation Method (Article 12 and Annex II)

Eurovent position:

Eurovent welcomes the scope of application to units equal to or below 70 kW and which are not single-speed heat pumps. To avoid an unfair comparison, Eurovent suggests that a single date of application be proposed for all the units below 70 kW, which must consider the lack of official rules or standards. Therefore, 72 months after the entry into force is an appropriate time span.

Eurovent welcomes the Commission's commitment to ensure that the industry has appropriate preparation time for the implementation of the compensation method, as stated in the recital (34) of the "Whereas" introductory section. Eurovent also welcomes the scope of application to units equal to or below 70 kW and which are not single-speed heat pumps.

It's important to emphasise that, although several positive steps have been taken to improve this testing methodology, there are still grey areas and uncertainties that need to be investigated and addressed through further planned Round Robin Tests (for example, for staged capacity units without inverters that are still modulating and therefore within this methodology), such as the Horizon Project 'Heat Pump Testing (HPT)'.
After this step, Eurovent understands that a standard will need to be published, harmonised and cited in the Official Journal of the European Union.
Moreover, sufficient time must be given to the industry to implement it and to notified bodies to get accredited for the TPCA procedure, in the unintended, unforeseen, and not supported case it remains in the final regulation text (please refer to "Conformity assessment procedures for space and combination heaters (Article 4 and Annex VII)" for the detailed Eurovent position on TPCA).

Therefore, **Eurovent proposes the inclusion of a safeguard clause** to ensure that if the official rules or standards for the Compensation Method are not published at least two years before its application, the deadline is either deferred accordingly, or the European Commission submits a formal proposal to amend the application date.

An equal time of application for all

Given the current proposal from the European Commission, there will be a period of time in which some products will be tested according to the current methodology, while others will be tested with the compensation method.

To avoid an unfair comparison, Eurovent suggests that a single date of application be proposed for all the units below 70 kW.

Taking also into account the finalisation of the method and the development of the standard described in the paragraph above, **Eurovent considers that 72 months after the entry into force is an appropriate time for the application of the compensation method.**

Requirements for material resource efficiency (Annex II)

Eurovent position:

Eurovent welcomes the applicability of the requirement to units equal to or below 70 kW and the 15 days allowed for delivery. The proposed list is too wide, therefore Eurovent recommends adopting the list proposed in 2023. The prices should not be available on the free access websites, and manufacturers should maintain the right to authorise specific technical personnel for specialised tasks.

5.2. Availability of spare parts

The proposed list of spare parts is too wide. Many of these items—such as gaskets, seals, buttons, and knobs—are non-critical to the unit's operation. Mandating that such parts are delivered within 15 working days and remain in stock for 10 years is disproportionate and could lead to unnecessary waste if unused.

In this sense, Eurovent recommends excluding parts that are not critical for the functioning of the units, and the list proposed in 2023 seems more appropriate. Therefore, the paragraph can be modified as follows:

- (a) the circulator and its parts (including flow rate control),
- (b) ignition spark plugs,
- (c) sensors (including thermostats, pressure gauge, control sensors, other sensors for temperature or pressure),
- (d) electric fuses (separately or bundled together),
- ~~(e) proprietary seals and connection means (including special bolts, nuts, washers, and clamps),~~
- (f) fans or fan assemblies (including fan motors and fan wheels),
- (g) compressors and their parts,
- (h) burners,
- ~~(i) flow meters,~~
- (j) printed circuit boards,
- (k) valves and actuators, (including electrically operated valves, 3-way valve, and gas valves),
- ~~(l) the heater housing and its parts,~~
- ~~(m) heat generators and their parts,~~
- (n) heat exchangers,
- ~~(o) piping,~~
- ~~(p) gaskets and seals,~~
- ~~(q) buttons, switches, and knobs,~~
- ~~(r) impellers,~~
- ~~(s) cables and plugs,~~
- ~~(t) displays and status indicators,~~
- (u) software and firmware, including reset software;

Paragraph 5.2 point 10

Eurovent suggests modifying the following sentence: "*To ensure such availability for the entire minimum period, manufacturers, their authorised representatives or importers shall provide a list of spare parts indicative pre-tax prices, at least in euro, for all spare parts listed in points 1 and 2 of the*

present section, including the indicative pre-tax price of fasteners and tools, if supplied with the spare part, and the instructions for ordering them and on the **free access** *website of* ***the*** *manufacturer, authorised representative or importer*".

Proposal: "*To ensure such availability for the entire minimum period, manufacturers, their authorised representatives or importers shall provide a list of spare parts indicative pre-tax prices, at least in euro, for all spare parts listed in points 1 and 2 of the present section, including the indicative pre-tax price of fasteners and tools, if supplied with the spare part, and the instructions for ordering them and on the ~~free access~~ website of* ***a*** *manufacturer, authorised representative or importer*".

The information on the price should not be published on the free-access websites of manufacturers, while the word "a" instead of "the" allows more flexibility in case a company owns different sub-companies.

Safety of technicians

Eurovent agrees with the proposed requirements to ensure that repair and maintenance information is available to all relevant parties, but believes that the manufacturer should maintain the right to authorise specific technical personnel for specialised tasks. Consequently, access to certain critical components—particularly those within the refrigerant circuit—should be restricted to qualified professionals to ensure safety. This is especially critical for systems utilising flammable refrigerants.

For this reason, Eurovent proposes adding the following paragraph to Annex II point 5.2 and/or 5.4:

Manufacturers retain the right to select the technical personnel authorised to perform repair or maintenance on the equipment, and where relevant, limit access to certain spare parts. Manufacturers may therefore impose additional technical, safety, or qualification requirements beyond those specified in this legal text.

Product information requirements (Annex II)

Eurovent position:

Eurovent supports the alignment between Ecodesign and Energy labelling information requirements. It is important that all part-load information is also available on EPREL, to support data availability in view of the EPBD implementation.

65°C optional regime

Eurovent, in the previous position papers, **considered the proposed regime as a potential source of misleading information for installers and end users**. Therefore, Eurovent would like to remind that this regime goes against the promotion of low temperature heat emitters and, more in general, a better insulation of houses/buildings to allow for lower temperatures. The reduction of the energy demand must always be pursued before the installation of a new heating system.

F-gas free refrigerant

Eurovent recommends removing the 'F-gas free refrigerant' indication, since companies will comply with the Regulation (EU) 2024/573 on fluorinated greenhouse gases. Furthermore, the proposed requirement is inconsistent with the aforementioned Regulation (which uses a GWP threshold of 150) and fails to provide meaningful information to the consumer.

Alternatively, a requirement on the type of refrigerant and GWP level can be introduced.

Point 7 - specific operating modes

In the Eurovent opinion, adding the information on the impact on heating output (or cooling output or electric output), energy consumption and seasonal space heating (and possibly water heating and/or cooling) energy efficiency, of the specific operating modes such as "eco mode" or "low noise mode" **is disproportionate to its added value**.
Heat pumps can have multiple 'low noise' modes. Having to declare the seasonal performance for each of them would increase the burden of testing significantly.

Therefore, **Eurovent recommends removing the requirement**.

Specific conditions for water-source products

The specific conditions for water-source products have been removed and merged with brine temperature conditions, which will adversely affect system performance. Water-source solutions are increasingly popular in multi-family homes and should not be penalised by changes to the test criteria in view of simplification.

Maintaining this flexibility could also support better valuation of the product in the energy performance for buildings calculation EN15316-4-2, as one test point limits the possibilities of extrapolation.

Eurovent recommends maintaining the water-source conditions of the current Regulation (W10):

Table 3

Standard rating conditions for heat pump space heaters and heat pump combination heaters

Heat source	Outdoor heat exchanger	Indoor heat exchanger			
	Inlet dry bulb (wet bulb) temperature	Heat pump space heaters and heat pump combination heaters, except low-temperature heat pumps		Low-temperature heat pumps	
		Inlet temperature	Outlet temperature	Inlet temperature	Outlet temperature
Outdoor air	+ 7 °C (+ 6 °C)	+ 47 °C	+ 55 °C	+ 30 °C	+ 35 °C
Exhaust air	+ 20 °C (+ 12 °C)				
	Inlet/outlet temperature				
Water	+ 10 °C/+ 7 °C				
Brine	0 °C/– 3 °C				

Decimals

As the scope of regulation is enlarged up to 1000 kW, the heat capacities have to be expressed in a way compatible with the uncertainties of measurement. So, in the tables 6, 7, 8, 9, 10, 11 & 12, all capacities such as "heat output", "backup", "Ph", "Pdh", "Padd", "$Input_{add}$", "Pc", "Pdc", etc should request values with decimals only where appropriate (for example, below 100 kW).

Mean Temperature (Annex III)

Eurovent position:

Eurovent recommends mandating CEN to adapt the current standards to the test method to the mean logarithmic temperature difference. It should be clarified in the legal text that this procedure is only applicable to CO2 heat pumps.

Eurovent is concerned by the introduction of the mean logarithmic temperature difference as defined in Table 3 of Annex III for the Part-load test conditions. This approach is new and has never been

assessed by CEN TC 113 WG7 and WG8. Further, this topic is not planned in the Horizon project in charge of developing the new compensation method. Before introducing the mean logarithmic temperature difference in the test method, many tests and procedures must be created and validated to define the limits and avoid loopholes.

Eurovent comments on the Energy Labelling draft text and annexes

Energy-efficiency classes and acoustic airborne-noise-emission classes (Annex II)

Energy label classes for medium-temperature heaters

The lower threshold of the B and C classes is too ambitious. The current Best Available Technology for air source heat pumps would not be able to reach B class and is still far from it. Most heat pumps would fall in class D. **Eurovent suggests lowering the B, C and D thresholds** slightly to keep a better balance and granularity for heat pump technology, as presented below.

Seasonal space-heating energy-efficiency classes of space heaters and packages for medium-temperature heating applications

Seasonal space-heating energy-efficiency class	Seasonal space-heating efficiency $\eta_{s,h}$, in %
A	300
B	~~235~~ 200
C	~~185~~ 165
D	~~145~~ 135
E	115
F	90
G	< 90

Energy label classes for low-temperature heaters

The proposed thresholds for classes B, C and D are too high. Currently, no air-source heat pump is able to achieve class B. Eurovent suggests allowing the Best Available Technology for air source heat pumps to enter the class B, and to promote granularity for the different kinds of heat pumps as proposed below.

Seasonal space-heating energy-efficiency classes of heaters and packages, for low-temperature heating applications

Seasonal space-heating energy-efficiency class	Seasonal space-heating energy efficiency $\eta_{s,h}$, in %
A	360
B	~~285~~ 250
C	~~220~~ 200
D	~~175~~ 160
E	135
F	110
G	< 110

Label (Annex III)

Eurovent welcomes the simplified look of the proposed label. Information on Low Temperature application and water heating performance, as well as cold and warm climates, can easily be retrieved by the QR code on top.

While in general the proposed symbols are acceptable, a question about the need to introduce a label for 'F-Gas free refrigerant' arises.
As stated in the previous paragraphs, it does not reflect the EU F-Gas Regulation, which sets limits on the use of refrigerants with a GWP above 150.

Furthermore, it is not correctly mentioned in the text as the symbol is described as "XV. indication of a heat pump having a refrigerant fluid with a low global-warming potential". This is not coherent.

Eurovent therefore suggests removing the symbol.

Alternatively, rather than adding this symbol, an information requirement on the type of refrigerant and GWP level can be introduced (in the Product Information Sheet). This will be more useful to have available in the EPREL database.

About Eurovent

Eurovent is the voice of the European Heating, Ventilation, Air Conditioning and Refrigeration (HVACR) industry, representing over 100 companies directly and more than 1.000 indirectly through our 16 national associations. The majority are small and medium-sized companies that manufacture indoor climate, process cooling, and cold chain technologies across more than 350 manufacturing sites in Europe. They generate a combined annual turnover of more than 30 billion EUR and employ over 150.000 Europeans in good quality tech jobs.

Mission

Eurovent's mission is to bring together HVACR technology providers to collaborate with policymakers and other stakeholders towards conditions that foster fair competition, innovation, and sustainable growth for the European HVACR industry.

Vision

Eurovent's vision is an innovative and competitive European HVACR industry that enables sustainable development in Europe and globally, which works for people, businesses, and the environment.

→ For in-depth information and a list of all our members, visit www.eurovent.eu

Who is behind this position?

Eurovent uses fair and transparent decision-making procedures. Every member is given a chance to voice their opinion, and reasonable efforts are made towards compromise and the accommodation of disagreements. Votes are only held as a last resort.

1. Who receives which number of votes?

At Eurovent, the number of votes is never determined by organisation size or membership fee level. Whether SME or large multinational, each member receives the same number of votes.

2. Who has the final decision-making power?

Eurovent Working Groups decide on matters within their remit. They are open to all members. Eurovent's committee of national associations is tasked with mediating in case of conflicts.

3. How European is the association?

Eurovent members manufacture across more than 350 sites in Europe, generate a combined annual turnover of more than 30 billion EUR, and employ over 150.000 Europeans in good quality tech jobs.

4. How representative is the organisation?

Eurovent represents over 100 companies directly, covering well over 80% of the market in most segments, and more than 1.000 companies indirectly through our 16 national associations.

Check on us in the European Union Transparency Register under identification no. 89424237848-89.