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**EHPA comments on documents 5 & 6 to the
EuP Lot 1 implementing measure**

13.08.09

Copy to: Mr. André Brisaer, Ms. Kerstin Lichtenvort, Mr. Wilhelmus de Wilt, Mr. Rene Kemna

Dear Dr Kolb,

the EHPA appreciates the opportunity to contribute to the fine-tuning process of the EuP implementing measure on Lot 1 and to provide additional technical comments on documents 5 and 6.

The heat pump industry acknowledges the work already done and supports the efforts towards more efficient heating systems. The association strongly believes in the effect of the implementing measure on the market. While we largely supports the achieved status, we would like to stress the need for further modifications in order to maintain the usability and understandability of the measure including the proposed tool, the yet to be announced efficiency label and the proposed ABC-webkit.

With regard to the documents 5 & 6, the EHPA sees the need for adjustments in three fields!

1. In order to reflect the performance potential of heat pumps, the association finds it an absolute necessity to enhance the tool by an option for low temperature floor heating systems.

Justification

a. Omission of floor heating systems ignores reality. A growing share of buildings is equipped with floor/wall heating systems or at least low temperature radiators. Consumers that plan to use such heating systems will

not find data on the label, that reflects their systems choice. A label with the intention to guide consumers towards more efficient solutions shall essentially present these and not leave the consumer guessing on the correct interpretation of data provided.

b. The omission of floor/wall heating systems as an option punishes heat pump based systems that are used in low energy houses and may lead to consumer decisions towards second or third best technology options.

c. Current reality for the installation of efficient heat pump systems is characterized by the recommendation of low temperature systems (floor or wall heating systems). State of the art industry practise requires low temperature heating distribution as part of efficient heat pump systems. The use of heat pumps in buildings that require a high temperature heating system (>55°C) is not efficient and is as such not supported.

Suggestion for implementation

a. An additional option for low temperature floor/wall heating systems should be added to the tool.

b. The efficiency label should be modified to accommodate not only climate information but also accommodate three different heat distribution systems (floor heating / low temp. radiators / high temp. radiators).

c. The EHPA supports the suggestions made by the SVEP position to the visual modification of the efficiency label brought forward in SVEP's comment dated 19.6.2009.

d. (as a general remark) The commission should maintain the possibility to label multi-fuel products in new complete systems and in the renovation market. As such EHPA would like to re-emphasize the need to carefully assess the correct system boundaries of the label as stated in our position dated 18.6.09.

2. Brine temperature should be fixed at 0°C.

The tool implementing measure should be based on existing standards to the largest possible extent. A brine temperature of 0°C is in line with the EN 14511 (today's reference).

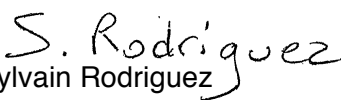
3. Ground water temperature should be fixed at 10°C.


The tool implementing measure should be based on existing standards to the largest possible extent. A ground water temperature of 10°C is consistent with the EN 14511 (today's reference).

In conjunction with the above made comments, the EHPA is also convinced that the proposed load classes (XS to XXL) are counter-effective to the approach and should be replaced by the nominal capacity. Such an approach would be in line with current industry practise and would also allow for the consumer to compare offers for different systems to be installed in a given building.

Finally the EHPA would like to re-state the **question whether the standard EN 15316 has been strictly followed in the calculation model.** From the associations perspective a strict adherence to this standard is necessary to avoid further complexity/confusion for heat pump manufacturers, system designers and installing contractors.

We trust that these comments are of value and would appreciate their consideration. EHPA is looking forward to further participate in the refining of the implementing measure.


Sylvain Rodriguez
Chair of TC Norms & Standardization


Thomas Nowak
Secretary General

The European Heat Pump Association

The EHPA was established in the year 2000 as a European Economic Interest Group to promote awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. The EHPA today has 73 members representing the majority of actors in the European Heat Pump Industry. The association aims to provide technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production.

The EHPA coordinates the Quality label for heat pumps (EHPA-Q) and the European certified heat pump installer program (EUCERT). EHPA-Q and EUCERT are geared towards high product and high installation process quality. The EHPA does also compile the annual heat pump statistics for selected European countries.