Dear MEP of the ENVI Committee,

The EHPA welcomes the efforts of the European Commission to reduce greenhouse gas emissions to the atmosphere. Considering the on-going debate on the revision of the F-Gas regulation, we are however concerned about the way heat pumps are considered. Heat pumps are deemed to be the most energy efficient technology for heating, and among the best for hot water heating (Ecodesign, Lots 1, 2 & 10). They are one of the few technologies that can provide heating and cooling with a super-proportional share of renewable energy (even 100% is possible with electricity from green sources). In addition, heat pump systems provide peak shaving opportunities that are essential for the current shift towards a greening of electricity production.

Targets on renewable energy, greenhouse gas emission reductions and energy efficiency cannot be reached without a significant increase in heat pump dissemination in the market place.

Any measure taken in the current revision of the F-Gas regulation should take this into consideration and should avoid limiting the cost efficiency and the development potential of heat pump technology.

This is even more important, as the "Ökorecherche report" which is part of the scientific foundation of the currently proposed revision gives very clear guidance on those use cases where F-Gas can be avoided in the most cost efficient manner.

Contrary to many product groups analysed, replacing F-Gases in heat pumps has one of the highest abatement costs found in the study. The report states that product groups with abatement cost >>50 Euro/kg CO$_2$equ. should not be considered [p. 270]. In other words the use of HFCs should be allowed in the future for three sectors: heat pumps, spray foam and rail vehicle air conditioning.

We call on you to take these facts into consideration and address the following concerns:

1. technologies considered must be properly defined in order to avoid any misinterpretation. The definition for heat pumps should include reversible units, which are used to provide heating
2. technical details such as the definition of hermetically sealed systems should be defined precisely, ideally with a reference to current standards.
3. the ban for pre-charged equipment should be deleted, as it seems inappropriate to achieve the given targets. Instead both importers and exporters of HFCs and of equipment containing them should be included in the reporting and quota scheme.

We would appreciate your consideration and welcome a meeting to discuss this further. Please do not hesitate to contact us for any questions or amendment proposals.

Best regards,

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