

Preparatory study on the Review of Ecodesign Regulation No 206/2012 and Energy Labelling  
Regulation No 626/2011 on air conditioners and comfort fans

<b>Organization</b> European Heat Pump Association	<b>Name</b>	<b>Date</b> 12.02.2018
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#	Task No.	Section	Page	Comment	Proposed change	Reply from study team
1	7	7.1.4.1	13-14	<p><b>Ecodesign requirements</b></p> <p>The proposed minimum requirements for heating (SCOP and SEER) are too high (especially in TIER 2) compared to the other heating products with which they compete on the market, and even more so with conventional technologies such as fossil fuel boilers. While heat pumps are more efficient, they are also more expensive. Thus, if the price gap becomes too wide, the intake on the market of heat pumps will be hampered and consequently the use of renewable energy</p>	<p><b>Ecodesign requirements</b></p> <p>EHPA suggests reducing the heating minimum requirements in line with ENER Lot 1 on space heating applications.</p>	

Stakeholder comments form

				and the reduction of GHG emissions.		
2	7			<p><b>Use of <math>\eta_s</math> and primary energy factor (PEF)</b></p> <p>The report does not take into consideration the necessity of applying primary seasonal space heating and cooling efficiency (<math>\eta_{s,h}</math> and <math>\eta_{s,c}</math>) and the primary energy factor (PEF).</p>	<p><b>Use of <math>\eta_s</math> and primary energy factor (PEF)</b></p> <p>EHPA suggests aligning Lot 10 with the other Lots to facilitate the comparison of different technologies in heating applications and introducing the primary seasonal efficiency. EHPA also supports the use of a conversion coefficient value (PEF) of 2.0.</p>	