For this reason, EHPA voices the following requests:

Integration Strategy

from

The revision of the

Find more quick facts about heat

The contribution of heat

and up to 70% in 2050. Moreover, latest IEA report also suggests that heat pumps could even satisfy 90% of all heating needs at the global level.

The Energy System Integration Strategy also states that the revision of the Renewable Energy Directive should result in more specific measures for the use of renewables in heating and cooling by building on its sectoral targets (article 7).

The contribution of heat pumps to renewable energy targets are considerable:

- heat pump technologies use renewable thermal energy from air, water, ground or sewage water for both heating and cooling;
- heat pump technologies expand the benefits of growing shares of renewables in the European energy mix;
- they also contribute to the stabilisation of electrical grids increasingly powered by energy from fluctuating renewable sources.

Find more quick facts about heat pump technologies below of this reply.

The revision of the RED II is an important opportunity to further expand the renewable energy contribution from heat pumps, as well as to support their large-scale deployment in accordance with the Energy System Integration Strategy.

For this reason, EHPA voices the following requests:

1) RES accounting from heat pumps – updating then reviewing!

For the purpose of fulfilling their obligations under the Energy Union Regulation on NECPs, Member States are using the calculation methodology in Commission Decision 2013/114/EU (in application of RED II art.7 and ANNEX VII) to determine the share of renewable energy that can be reported from heat pumps. This decision is both outdated with regard to the current market, legal and technical realities (seasonal performance values, nothing on industrial and hybrid heat pumps, etc.). This situation generates confusion at national level and consequently some Member States do no report the whole renewable energy contribution from heat pumps. Given the importance to strengthen the deployment of heat pumps, this obsolescence needs to be tackled before any due revision of the RED II.

Therefore, EHPA recommends that the EC urgently proposes an updated version of Commission Decision 2013/114/EU that better reflects the current market and the legal and technical realities of the heat pump market as a transitional measure before the formal revision of the RED II has taken place.

2) Getting more ambitious and more specific on renewable heating and cooling for buildings

In application of RED II art.23: “Member State shall endeavor to increase the share of renewable energy in that sector by an indicative 1,3 percentage points as an annual average calculated for the periods 2021 to 2025 and 2026 to 2030”.

In application of RED II art15.6.: “With respect to their building regulations and codes, Member States shall promote the use of renewable heating and cooling systems and equipment that achieve a significant reduction of energy consumption. To that end, Member States shall use energy or eco-labels or other appropriate certificates or standards developed at national or Union level, where these exist, and ensure the provision of adequate information and advice on renewable, highly energy efficient alternatives as well as eventual financial instruments and incentives available in the case of replacement, with a view to promoting an increased replacement rate of old heating systems and an increased switch to solutions
Based on renewable energy in accordance with Directive 2010/31/EU."

This provision – although it is binding for Member States – does not provide enough sectoral guidance to Member States.

Instead, EHPA suggests a more targeted approach, offering better consistency between the requirements arising from different EU laws.

Therefore, EHPA recommends that the RED II sets new or refers to more specific sectoral targets, such as yearly replacement rates of to replace inefficient heating and cooling systems with more efficient systems that can be used to decarbonise buildings and industrial processes, such as heat pump technologies. This should be in full consistency with sectoral measures arising from the implementation of the national “Comprehensive assessments” on heating and cooling (currently EED art. 14 and ANNEX VIII).

3) Increasing the interest in renewable training and certification for installers

In application of RED II art.18. 3: Member States shall ensure that certification schemes or equivalent qualification schemes are available for installers of small-scale biomass boilers and, solar photovoltaic and solar thermal systems, shallow geothermal systems and heat pumps. However, in practice, several of these certification schemes have failed or been mothballed due to a lack of interest from installers for the certification and training. Acquiring training and certification should be an opportunity for installers whilst not increasing costs and thus further increasing the price gap between renewables and fossil energy.

Therefore, EHPA recommends that the EC further investigates effective measures to increase interest amongst installers for acquiring the training and certification measures set out in art. 18. The interest may increase thanks to certain benefits and increased business opportunities for certified or trained installers such as linking the training and certification to subsidy schemes or public procurements.

Finally, EHPA draws attention to the fact that the deployment of heat pumps will also be affected by other barriers and measures than those covered by the RED II. A very concrete barrier that should be addressed is the taxation of energy carriers that needs to be balanced. As the EU Energy System Integration Strategy points out, the consistency of non-energy price components across energy carriers should be ensured by addressing the high charges and levies borne by electricity. External costs of heating and cooling should be internalised as well as the cost of “no(sufficient) action”, for instance through CO2 price signals.

Quick facts about heat-pump technologies:

- Heat pumps offer already today a variety of solutions for heating, cooling, and domestic hot water production, which are ready-to-use for the large majority of the residential and commercial building stock in Europe, as well as for industrial processes. Heat pumps use renewable thermal energy from air, water, ground or sewage water. They apply circular economy principles when recovering energy and waste heat. They create “circular energy”.

- Heat pumps are mature technologies, among the most efficient way to provide heating and cooling while reducing total CO2 emissions. They also contribute to indoor and outdoor air quality.

- When using electricity, heat pumps can provide heating and cooling, even in parallel, so, heat pumps are not only among the most efficient solutions, but they also embed the “efficiency first” principle by allowing for “dual thermal generation”. They expand the benefits of growing shares of decarbonised electricity in the European energy mix.

- Heat pumps also make very efficient use of gas through thermally driven systems (gas heat pumps). Hybrid systems using renewable and low-carbon gases during peak demand of electricity contribute to system efficiency.

- Industrial and commercial heat pumps improve the energy efficiency and contribute to the decarbonisation of district heating, and cooling systems and industrial processes.

- Heat pumps are part of new business models and digital systems that boost the use of electric vehicles, renewable electricity and smart home appliances. They facilitate sector integration and thermal storage.

- Heat pumps contribute to the stabilisation of electrical grids increasingly powered by energy from fluctuating renewable sources.

- The heat-pump industry is growing every year (by more than 10%) across Europe and is creating dozens of thousands of jobs.

- To ensure perfect competition, policy makers should provide perfect information to investors on the multiple benefits of heat pumps and their potential to fulfilling several EU climate and energy targets. They should assess technologies based on all their merits.