

Position on market surveillance tolerances in Annex IX of ENER Lot 10 (A2A HP, AC, comfort fans)

30 September 2022

EXECUTIVE SUMMARY AND RECOMMENDATIONS

EHPA and EPEE are a strong supporter of the Commission proposal and believes that a merger of the energy labelling scales will provide benefits to the environment, consumers, and European business. This document contains recommendations on how to further optimise the energy savings and implementability of the Commission proposal, especially concerning Annex IX of the proposal.

Verification Tolerances for Market Surveillance

EHPA and EPEE propose two options to modify Annex IX on a verification procedure for market surveillance. We suggest the following amendments to Table 17 (p. 95) of the working document.

Option 1

Modify the text on page 94 and Table 17 (page 95) as follows:

1. Indent (2))c):

- c) when the Member State authorities test the unit of the model, the difference between the determined values (the values of the relevant parameters **listed in Table 17** as measured in testing and the values calculated from these measurements) and the declared values shall be within the respective verification tolerances as given in Table 17.

2. Last paragraph and Table 17 as follows:

The Member State authorities shall only apply the verification tolerances set out in Table 17 for parameters listed in table 17 and shall only use the procedure described **in** this Annex. ~~No other tolerances, such as those set out in harmonised standards or in any other measurement method, shall be applied.~~ **For parameters not listed in Table 17, those specified in harmonised standards shall be applied.**

Table 17: Verification tolerances for measured parameters

Parameter	Product	Verification tolerances ^a
seasonal efficiency for heating (η_{rh}), (%)	Room heat pumps with $P_{rated} < 2$ kW	The determined value shall not be more than 8 % higher lower than the declared value.
	Room heat pumps with $P_{rated} \geq 2$ kW and < 6 kW	The determined value shall not be more than 7% higher than the declared value.
seasonal coefficient of performance (SCOP), (-)	Room heat pumps with $P_{rated} \geq 6$ kW	The determined value shall not be more than 6% higher than the declared value.
	fuel fired room heaters	The determined value shall not be more than 8 % higher lower than the declared value.
	electric room heaters	The determined value shall not be more than 2 % higher lower than the declared value.
seasonal efficiency for cooling (η_{rc}) (%)	Room air conditioners with $P_{rated} < 2$ kW	The determined value shall not be more than 8 % higher lower than the declared value.
	Room air conditioners with $P_{rated} \geq 2$ kW and < 6 kW	The determined value shall not be more than 6% higher than the declared value.
seasonal energy efficiency ratio (SEER), (-)	Room air conditioners with $P_{rated} \geq 6$ kW	The determined value shall not be more than 4% higher than the declared value.
	Sound power	The determined value shall not be more than 2dB(A) higher than the declared value.
Service value	Comfort fans	The determined value shall not be more than 10% higher than the declared value.

^a) In the case of three additional units tested as prescribed in point 4, the determined value means the arithmetical mean of the values determined for these three additional units.

Option 2

Modify the text on page 94 and Table 17 (page 95) as follows:

1. Indent (2))c):

- c) when the Member State authorities test the unit of the model, the difference between the determined values (the values of the relevant parameters **listed in Table 17** as measured in testing and the values calculated from these measurements) and the declared values shall be within the respective verification tolerances as given in Table 17.

2. Last paragraph and Table 17 as follows:

The Member State authorities shall only apply the verification tolerances set out in Table 17 for parameters listed in table 17 and shall only use the procedure described **in** this Annex. No other tolerances, such as those set out in harmonised standards or in any other measurement method, shall be applied.

Table 17: Verification tolerances for measured parameters

Parameter	Product	Verification tolerances ^a
seasonal efficiency for heating (η_{rh}), (%)	Room heat pumps with $P_{rated} < 2 \text{ kW}$	The determined value shall not be more than 8 % higher lower than the declared value.
	Room heat pumps with $P_{rated} \geq 2 \text{ kW and } < 6 \text{ kW}$	The determined value shall not be more than 7% higher than the declared value.
seasonal coefficient of performance (SCOP), (-)	Room heat pumps with $P_{rated} \geq 6 \text{ kW}$	The determined value shall not be more than 6% higher than the declared value.
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seasonal efficiency for cooling (η_{rc}) (%)	Room air conditioners with $P_{rated} < 2 \text{ kW}$	The determined value shall not be more than 8 % higher lower than the declared value.
	Room air conditioners with $P_{rated} \geq 2 \text{ kW and } < 6 \text{ kW}$	The determined value shall not be more than 6% higher than the declared value.
seasonal energy efficiency ratio (SEER), (-)	Room air conditioners with $P_{rated} \geq 6 \text{ kW}$	The determined value shall not be more than 4% higher than the declared value.
	Sound power	The determined value shall not be more than 2dB(A) higher than the declared value.
Service value	Comfort fans	The determined value shall not be more than 10% higher than the declared value.

^a) In the case of three additional units tested as prescribed in point 4, the determined value means the arithmetical mean of the values determined for these three additional units.

About the European Heat Pump Association (EHPA)

The European Heat Pump Association (EHPA) is a Brussels based industry association which aims at promoting awareness and proper deployment of heat pump technology in the European marketplace for residential, commercial and industrial applications.

EHPA provides 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.

EHPA coordinates quality initiatives: including the HP KEYMARK, a Quality label for heat pumps and Certification standards for heat pump installers. The association compiles the annual heat pump statistics and organizes a number of events, among them an annual heat pump conference.

About EPEE

EPEE represents the Refrigeration, Air-Conditioning and Heat Pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of over 50 member companies as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment. Please see our website (<https://www.epeeglobal.org/>) for further information.