# DG GROW & JRC: MEErP Revision

| Organization: | Name: | Date: |
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| European Heat Pump Association (EHPA) | Thomas Nowak | 25/07/2022 |

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.

EHPA would like to thank the European Commission for the work already carried out and appreciates the opportunity given to comment on the second draft report. Please find below EHPA's comments.

Please note that as EHPA, we have answered the questionnaire from the heat pump industry perspective.

## General Statement

The Methodology for the Ecodesign of Energy-related Products (MEErP) has been updated to include more material efficiency aspects and broader environmental aspects. However, in parallel, sustainability requirements will be included via the Ecodesign for Sustainable Products Regulation. While the European Commission stated that the MEErP will continue to apply to energy-related products even after the implementation of the Ecodesign for Sustainable Products Regulation, we are still wondering how these two initiatives will interact? How will the sustainability requirements be introduced, via MEErP or another horizontal methodology?

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| 1 | General | Impact categories | Should the impact categories be changed, the impact categories from the Product Environmental Footprint methodology are to be used in the Ecoreport Tool in order to avoid misalignment with existing datasets and will better facilitate future updates and follow-up. | |
| 1 | 7 | Impact categories | We question how the impact category for human toxicity will be taken up in the assessment and would like to have a better understanding on this. | |
| 2 | General | More systematic inclusion of material efficiency aspects and of environmental footprint/ecological profile aspects in the design options and LLCC curve | EHPA understands the importance of material efficiency and understands that such aspects are taken up in the revision of the MEErP. However, the current Task 2 report only gives an overview of the theoretical approach proposed without going into detail or providing concrete examples as to how it will work in practice. As such, we would very much welcome a more detailed explanation of how the expected lifetime will be calculated. As long as this is not clarified, we cannot properly assess the impact of the proposals or give concrete feedback on the draft report.<br><br>Any future methodology developed should follow certain considerations: a product-by-product approach (what is valid for one product may not be adequate for heat pumps and vice versa, also considering the wide variety of heat pumps) , measurable, enforceable, repeatable and verifiable by market surveillances. | |

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| 2 | 20-20 | Estimation of expected lifetime | The calculation of the total lifetime is now based on a scoring approach where the original lifetime is added up with the additional lifetime due to repair/upgrade.<br><br>Based on our understanding, it seems that when the product complies with 'level 1' criteria, the longest lifetime can be achieved. However, caution is needed as to which design features are introduced to assess this. For example, for products where professional repair is required (e.g., related to compliance with the F-Gas Regulation), the total lifetime of these types of products would consequently be lower than if no professional repair is needed. Such unfair situations should be avoided and the criteria should be developed taking into account the characteristics of each specific product group. heat pumps are subject to checks on a regular basis by professionals, those interventions support the longevity, reliability and efficiency of the system over its lifetime. In this sense, the methodology should reward this type of maintenance actions that are beneficial to the equipment and not penalise it.<br><br>As such, EHPA fully supports the statement made during the first stakeholder meeting that the specifics should be detailed by the consultants of the preparatory study. | |
| 2 | 22 | Estimation of expected lifetime | It is unclear how the different features provided on pages 22-23 will be assessed and how they are linked to the additional lifetime. For example, the link between the disassembly depth and the added lifetime is not clear. It cannot be argued that because more time was needed to disassemble a product, the lifetime after repair will be shorter.<br><br>In general, easy repair does not mean longer lifetime. It will depend from product to product group as to whether that has an impact on the choice to repair yes or no. | |

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| 2 | 24 | Estimation of expected lifetime | It is assumed in Task 2 that each critical component will be repaired or upgraded only once. We question this assumption since many factors will have an influence on the choice to repair or replace a product. Furthermore, it is unclear whether the assumption of only one repair/upgrade is for the total product or for each critical component? This should be clarified. Based on the graph and the explanation thereafter, it would seem that after one repair (no matter how small), the lifetime of the product is assumed not be extended anymore. Overall, more granularity is needed. | |
| 2 | 24 - 44 | Estimation of expected lifetime | In the example provided for washing machines on page 44, the assumption is taken that labour costs would reduce by 40% if a 'higher level' washing machine is chosen. From our point of view, a more expensive washing machine will also require more expensive parts and therefore more expensive repair. Further clarification on this would be appreciated. | |
| 2 | 24 - 44 | Estimation of expected lifetime | We are wondering how maintenance is considered. Is it included under the definition of reliability? We assume maintenance is not a repair, as this would lead to end-of-life of the product. | |
| 2 | 28 | Estimation of expected lifetime - recyclability | The features currently defined in the report to assess the recyclability of the product need to be carefully checked against the possible trade-offs. Reducing the number of different materials used within one assembly could have a negative impact on the quality of the product and could lead to a shorter lifetime. | |
| 3 | 47 | Inclusion of societal life cycle costs | Task 3 is not yet included in the report that was provided. We are wondering if it will be sent at a later stage. | |
| 5 | 53 | Systematic Updates | EHPA supports that the Primary Energy Factor is periodically updated according to the latest publication of the EED. However, we would also stress that in the study phase, the evolution of the PEF should be considered when assessing future scenarios (task 7). It should be taken into account that over time, the PEF will reduce. | |