



Brussels, 19 September 2024

From the European Heat Pump Association (EHPA), the European Committee for Standardisation (CEN), the Heat Pump KEYMARK Certification Secretariat, and the KEYMARK Management Organisation (KMO).

Subject: Obstruction of the free movement of goods within the European Union - Poland's refusal to recognise and adopt the European CEN Heat Pump KEYMARK Certification programme –

We would like to ask you for support in addressing a very worrying situation in **Poland** which is obstructing the European single market and already negatively impacting a key net zero European sector as well as Polish consumers.

**Poland has decided to stop allowing heat pumps certified through the KEYMARK label to be eligible for subsidies.**

KEYMARK is a voluntary European quality label for products and services, which certifies compliance with European standards. It provides real added value for consumers, because it represents tested and certified compliance with harmonised European standards, confirmed by an independent third party.

Today, the Heat Pump KEYMARK certification programme covers the vast majority of the heat pump industry sector and has more than 9 300 heat pump models certified representing more than 150 brands.

However, the Polish authorities decided that as of 1 January 2025, KEYMARK certified heat pumps would no longer be eligible for their subsidy scheme (ZUM list). This went against the opinions of the European Heat Pump Association (EHPA), KEYMARK and PORT PC (Polish Heat Pump Technology Development Organisation). Instead, the Polish authorities ask for full testing of heat pumps and do not allow any deviation in between the tested performance and the performance declared in the EPREL database, whereas both Ecodesign regulation 813/2013 and labelling regulation 811/2013 allow 8% tolerance.

The impact on the heat pump industry, already battered, is significant. Tens of thousands of heat pump units, although duly certified by the Heat Pump KEYMARK certification - and for years - will suddenly be declared unmarketable in Poland!

In the interest of harmonising European quality requirements, access via a single Pan-European certification, KEYMARK is a voluntary European quality label for products and services, which certifies compliance with European standards. It was developed thanks to the efforts and belongs to the European standardisation bodies CEN and CENELEC. The certification is issued by authorised accredited certification bodies.

KEYMARK represents real added value for consumers, because it represents tested and certified compliance with harmonised European standards, confirmed by an independent third party. KEYMARK also complements the CE marking for products for which it is a legal requirement, thus helping to strengthen consumer confidence throughout Europe.

Today, the Heat Pump KEYMARK certification program covers the vast majority of the heat pump industry sector and has more than 9 300 heat pump models certified representing more than 150 brands.

For its robustness, mainly linked to its periodic and continuous laboratory testing and inspections of production sites, the KEYMARK label is used throughout Europe as a reference in subsidy and aid programmes to support consumers as they consider investing in a heat pump.

As a European association, as representatives of a European certification programme, we, the undersigned, wish to strongly protest against the decision of the Polish authorities, which clearly goes against European policy, and on several points:

1. Hindering the proper circulation and marketing of goods in Europe
2. Hindering the decarbonisation of buildings and an energy transition as decreed by Europe
3. Rejecting of European harmonisation of the heat pump sector achieved through the Heat Pump KEYMARK certification (owned by the European Committee for Standardisation).

The European Heat Pump Association and the Heat pump KEYMARK Secretariat have sent several letters on the subject to the Polish authorities in the last few months and met with them in Warsaw in August 2024.

All the parties present at the meeting agreed on the following points:

1. The interest of a Europe-wide certification scheme is clearly recognised.
2. The Heat Pump KEYMARK certification now serves as a reference for the eligibility of products for the Polish ZUM list allowing access to subsidies.
3. In the future, an alternative option will be proposed to access the ZUM list. The process set up by the competent Polish authorities should provide an alternative option, without necessarily having to refer to existing certification schemes.
4. Beyond January 2025, for eligibility for the ZUM list, a Polish national process and the Heat Pump KEYMARK certification program will coexist.

Unfortunately, after more than three months, despite all explanatory, clarification and communication efforts made, despite the letters sent to the Polish Ministry of the Environment,

the Polish Environment Agency and our meeting in Warsaw, we have not received any response from these same authorities confirming the recognition continuity of the Heat Pump KEYMARK certification as a reference for access to Polish subsidies.

We therefore call for your support and especially your firm intervention with the Polish authorities so that:

- 1- The barrier is lifted, and the marketing of heat pumps certified according to the Heat Pump KEYMARK certification is facilitated beyond 31 December 2024 without limitation in duration.
- 2- The documents issued by the Heat Pump KEYMARK certification program are recognised, without special conditions or requirements, when using one of the EU languages.
- 3- The decision is to be communicated publicly and as quickly as possible by the Polish authorities, in order to dispel all doubts about the use of heat pumps and their effectiveness. The effective contribution of heat pumps, *of certified performance and quality*, to a decarbonisation and support to a sustainable energy transition.

We naturally remain at your disposal for additional information and ask, according to your availability, for a meeting to discuss this key topic in person or by videoconference with your services and your teams.

Thanking you in advance for your attention to this letter, please accept our sincere greetings.

Signatories

Paul Kenny, Director General European Heat Pump Association (EHPA)  
Patrick Crombez, Chairman of the Board of Directors (EHPA)  
Johannes Brugmann, Chair Heat Pump KEYMARK Scheme  
Ina Foerster, Vice-Chair Heat Pump KEYMARK Scheme  
Laure Meljac, Chair Heat Pump KEYMARK Steering Committee  
Tarik Bellahcene, Head of Heat Pump KEYMARK Secretariat  
Thomas Göttermann (DIN CERTCO) - Head of Product Management (KEYMARK Management Organisation on behalf of CEN)

Attached documents

Copy of the following correspondence addressed to:

The Polish Ministry of Climate and Environment

National Fund for Environmental Protection and Water Management

Sent by:

European Heat Pump Association (EHPA)

CEN Heat Pump KEYMARK Secretariat

CEN Heat Pump KEYMARK Secretariat (follow up letter)

CEN Heat Pump KEYMARK Testing Laboratories Peer Group