

Brussels, 20 April 2020

Comment of the European Heating Industry as input for the three European Commission F-Gas reports due in 2020 (Briefing papers prepared by Öko Research)

The European Heating Industry (EHI) is fully concerned by the European F-Gas Regulation (517/2014) and aware of the importance to drastically reduce the use of F-Gases. In fact, the respective EHI member companies are constantly developing innovative, highly energy efficient space heaters with a low carbon footprint such as heating heat pumps which are essential for the decarbonization of the building sector. Naturally, however, hydronic heating heat pumps and sanitary hot water heat pumps do use F-gases. This is the reason why EHI members invest significant amounts in the development of new efficient products using alternative or low GWP refrigerant gases to contribute to the phase down of F-gases and to finally reduce indirect emissions through their high energy efficiency.

Although the scope of the European Heating Industry does not cover the split air conditioning systems mentioned in the Öko Research paper, EHI would like to support the following points:

- Real alternative F-gases with a lower global warming potential (GWP) should ensure at least the same energy efficiency as conventional F-gases. However, the benchmark should not be the current products already on the market, but rather take into account the potential to meet the higher future energy efficiency requirements as required by the EU Ecodesign, Energy Efficiency and Energy Performance of Buildings Directives. This is particularly true for heating and sanitary hot water heat pumps, considering their high rate of functioning on a yearly basis. The Ecodesign Directive is a dynamic piece of legislation. Therefore, it is important to take into account the future energy-efficiency improvements of alternatives, as a result of the future (i.e. stricter) Ecodesign requirements.
- The transition towards lower GWP F-gases should not outweigh the objectives of reducing indirect emissions required to achieve the EU Green deal objectives, in particular because heat pumps are technologies that can support the decarbonization of the EU heating demand.
- There is a need for further updating standards for flammable refrigerants gases (A2L / A3), in particular the transposition of IEC standard 30335-2-40 into a European EN-60335-2-40 and their harmonization with European Directive (i.e Low-Voltage or Machinery Directive).



About the European Heating Industry

The European heating industry brings together companies that are leaders in the production of efficient heating systems. Our members produce advanced technologies for heating in buildings, including: heating systems, boilers, heat pumps, burners, components and system integrators, radiators, surface heating & cooling. For tomorrow's changed energy system, our members are innovating in hybrid and digital solutions. They develop high-efficiency and renewable-based systems. These innovations will improve Europe's homes and our environment. EHI members employ directly more than 125.000 people in Europe and invest over 1 billion euros a year in energy efficiency.

Please visit our website (www.ehi.eu) for further information.