



*The Voice of European Air-Conditioning, Refrigeration and Heat Pumps Contractors*

14 March 2017

## **AREA position on the Clean Energy Package**

AREA ([www.area-eur.be](http://www.area-eur.be)) is the European organisation of refrigeration, air-conditioning and heat pump (RACHP) contractors. AREA members are key stakeholders in the cooling sector since they are the architects of RACHP systems, which they design, install and maintain, thereby also acting as essential intermediaries between equipment manufacturers and users.

AREA members presently represent more than 9,000 companies across Europe, a workforce of 125,000 and a turnover approaching €20 billion. Our members are very small businesses with the average company employing 13 people and generating €2.2 million turnover.

AREA actively participated<sup>1</sup> in the preparation of an EU Heating & Cooling Strategy<sup>2</sup>, notably to stress key principles, such as the importance of energy efficiency in equipment choice, the central role played by contractors and the necessity of a neutral approach towards technologies in heating and cooling. Overall, we supported a framework for integrating efficient heating and cooling into EU energy policies. The Clean Energy Package certainly reflects this approach in that it integrates - in most of its proposals - provisions generally aimed at fostering efficient heating & cooling in the EU.

We would like to comment on specific elements, relevant to the RACHP contracting sector, in the proposals for a revision of the Renewable Energy Sources (RES) Directive, the Energy Performance of Buildings Directive (EPBD) and the Energy Efficiency Directive (EED).

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### **Renewable Energy Sources Directive 2009/28/EC (RES)**

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AREA supports the objectives of the RES Directive and more particularly those related to heat pumps. Heat pumps have indeed become a major type of heating & cooling equipment. As a result, energy production from heat pumps steadily increased from 1.8 Mtoe in 2004 to 9.7 Mtoe in 2015<sup>3</sup>, i.e. a more than five-fold increase. Such a volume should continue to grow in support of the EU's ambitious renewable energy objectives.

AREA therefore welcomes the introduction of an article aimed at developing the use of renewable energy in heating and cooling. The non-binding objective assigned to Member States of increasing the share of renewables in heating and cooling by at least 1% per year is supported, though it could have been more ambitious. However, we do not believe it is necessary to be prescriptive as to the options that Member States can make use of to achieve this goal. On the contrary, Member States

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<sup>1</sup> [AREA Views on an EU Heating & Cooling Strategy](#)

<sup>2</sup> [An EU Strategy on Heating and Cooling](#)

<sup>3</sup> [European Commission's progress report on renewable energy](#)

should be free to take the measures that are most adapted to the characteristics of their country and market, in the respect of technological neutrality. Finally, it is indeed important to closely and regularly monitor the effect of the measures taken to achieve this objective. We would recommend involving relevant national stakeholders in this process, and notably representatives of the RACHP contracting sector.

As far as the reference to district heating and cooling is concerned, we would like to stress that district heating & cooling is only one solution among many others and it should therefore not be given any preferential focus.

#### **AREA standpoints**

- Member States should be free to take the measures that are most adapted to reach their non-binding target
- Relevant national stakeholders should be involved in the monitoring process
- District heating and cooling, as one solution among others, should not be given any preferential focus

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#### **Energy Performance of Buildings Directive 2010/31/EU (EPBD)**

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AREA welcomes the fact that, contrary to what had been suggested before the proposal was tabled, the proposal maintains the provisions on periodic inspections of heating and cooling systems. Such inspections are indeed necessary to ensure the efficient functioning of the system.

However, AREA is rather concerned by the enormous increase of the thresholds under which no periodic inspection is necessary. Indeed, many countries still have a minimum threshold of 12kW. Increasing it to 100kW would simply result in taking the majority of residential buildings out of the periodic inspection requirement. This, in turn, will necessarily impact on the energy efficiency of these cooling systems. Moreover, companies that undertake such inspections have invested in people, training and equipment, and these investments would be lost together with the jobs they have generated.

AREA therefore believes that the current rated output thresholds should be kept for both residential and non-residential buildings.

In addition, AREA sees no reason for allowing a potential automatic replacement of periodic inspections by the installation of building automation and control systems. We do agree that such systems indeed impact on the frequency and content of the inspections (as acknowledged by the current EPBD) but they do not make these inspections redundant. Moreover, these systems are costly and their installation must be justified in order not to impose disproportionate financial burdens on users.

We therefore suggest keeping the current framework on building automation and control systems and periodic inspections.

As far as the content of the inspections is concerned, it is important to bear in mind that nowadays systems are more and more integrated. Inspections should therefore involve not just heating & cooling but also ventilation. In this spirit, indoor air quality should also be included on the basis of minimum air quality requirements to be set by Member States. Finally, and in order to ensure consistency across the EU, the content and frequency of the inspections should be harmonised to a certain extent. This could be done by means of implementing legislation.

Finally, for the sake of consistency and to avoid a costly accumulation of inspections, AREA believes it is necessary to reintegrate the reference to the necessary coherence with inspections required under Regulation EU n°517/2014 on fluorinated greenhouse gases.

**AREA standpoints**

- Current rated output thresholds for periodic inspections should be kept for both residential and non-residential buildings
- The current framework on building automation and control systems and periodic inspections should be kept, rather than making it possible to replace the latter by the former
- Inspections should include ventilation and air quality checks on the basis of national air quality requirements
- The content and frequency of the inspections should be harmonised by means of an implementing act
- It is necessary to reintegrate the reference to the necessary coherence with inspections required under Regulation EU n°517/2014 on fluorinated greenhouse gases

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**Energy Efficiency Directive 2012/27/EU (EED)**

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AREA would like to express its support for the proposals related to metering to enable better control of the energy consumption for heating and cooling. This would indeed substantially raise consumer awareness and positively impact on energy consumption.