

EHPA Feedback on the “You’re your Say” for the Delegated Act on the List of Components for Heat Pumps

The European Heat Pump Association (EHPA) is the voice of the European heat pump sector in Brussels, working towards shaping EU policy that allows the heat pump sector to flourish, and heat pumps to become the number one heating and cooling choice by 2030.

EHPA warmly welcomes the opportunity to provide feedback on the European Commission’s draft Delegated Act regarding the list of components for heat pumps under the Net-Zero Industry Act (NZIA) EU 2024/1735.

1. Definition of heat pumps

The definition of "heat pump" provided in the Staff Working Document of the draft Delegated Act does not align with existing legislation. EHPA strongly recommends that the European Commission adopt the definition set out in Article 2 (18) of the 2010 Energy Performance of Buildings Directive (EPBD)¹, which states:

"Heat pump" means a machine, a device or installation that transfers heat from natural surroundings such as air, water, or ground to buildings or industrial applications by reversing the natural flow of heat such that it flows from a lower to a higher temperature. For reversible heat pumps, it may also move heat from the building to the natural surroundings.

Using this definition ensures that all types of heat pump applications (air source, water source and ground source) are considered, both for residential and for industrial and commercial units.

2. Lack of technical assessment and clarity for the current list of components

EHPA remains concerned that the components listed in the draft Annex are not sufficiently justified in the Staff Working Document and in the Annex to the draft Delegated Act. Specifically:

- The inclusion of **scroll compressors and four-way valves** lacks a clear technical justification.
- No detailed technical assessment has been included in the Staff Working Document by the European Commission to determine why these two specific components were chosen over others. There are several other components that are key for the proper functioning of a heat pump and to secure the highest rate of energy efficiency which have not been included in the list.
- The inclusion of “heat pumps” as components seems an error made by the European Commission in the drafting of the Annex. EHPA believes what was meant to be included are “heat exchangers”, thus we would strongly appreciate the list to be corrected accordingly.

EHPA asks the EC to provide a clear technical assessment and justification for the listed components, ensuring fairness and transparency in the Delegated Act. To support these points, EHPA will attach a detailed Excel sheet containing additional input from the heat pump industry on the components that

¹ <https://eur-lex.europa.eu/eli/dir/2010/31/oj/eng>

should be added to the Annex. We strongly encourage the Commission to consider this input and engage with industry stakeholders to ensure a comprehensive and technically sound Delegated Act.

3. Additional key components for industrial and commercial heat pumps.

To ensure fair treatment of all heat pump technologies, the list of components must be expanded to reflect the needs of **industrial and commercial systems**. Our members have identified several essential components used in the manufacturing of industrial and commercial heat pumps, thus EHPA suggests the addition of another column for Industrial and Commercial Heat Pumps, as suggested below:

Heat pumps and geothermal energy technologies	Heat pump technologies	<ul style="list-style-type: none"> • Heat pumps 	<ul style="list-style-type: none"> • ...
		<ul style="list-style-type: none"> • Industrial heat pumps 	<ul style="list-style-type: none"> • Centrifugal, screw and piston Compressor • Condenser • Sub-cooler • Evaporator • MVR – mechanical Vapor Recompression

These components are critical for the development of high-efficiency, industrial-scale heat pumps, which contribute to both energy efficiency and industrial decarbonization.

EHPA believes that continued dialogue between industry stakeholders and policymakers is essential to ensuring that the NZIA effectively supports European manufacturing and innovation in clean technologies.

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The European Heat Pump Association (EHPA) represents the European heat pump sector. Our over 170 members include heat pump and component manufacturers, research institutes, universities, testing labs and energy agencies.

EHPA advocates, communicates and provides policy, technical and economic expertise to European, national and local authorities, and to our members.

We organise high level events and manage or partner in multiple projects.

We work to shape EU policy that allows the heat pump sector to flourish, and to become the number one heating and cooling choice by 2030. Heat pumps will be a central part of a renewable, sustainable and smart energy system in a future decarbonised Europe.