



D5.5 – Final Policy Report

Gathering the produced recommendation papers summarizing the policy support activities on municipal, national and European level

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HACKS coordinator: ADEME – www.ademe.fr

European portal www.topten.eu/hacks

Project partners and websites

Austria, AEA
www.topprodukte.at

Belgium, BBL
www.topten.be

Czech Republic, SEVEn
www.usporiespotrebice.cz

France, Guide Topten
www.guidetopten.fr

Germany, co2online
www.topeffizient.de

Italy, Eliante
www.topten.it

Lithuania, LNCF
www.ecotopten.lt

Luxembourg, Oeko-Zenter
www.oekotopten.lu

Norway, Naturvernforbund
www.energismart.no

Poland, FEWE
www.topten.info.pl

Portugal, Quercus
www.topten.pt

Spain, ECODES
www.eurotopten.es

Sweden, SSNC
www.toptensverige.se

Switzerland, Bush Energie
www.topten.ch

UK, EST
www.toptenuk.org

Politecnico di Milano
www.eerg.polimi.it

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About HACKS

The objective of the Heating and Cooling Knowhow and Solutions (HACKS) project is to achieve market transformation for heating and cooling (HAC) appliances and improve comfort and health of European citizens.

Across the EU almost half of all buildings have individual boilers that were installed before 1992 with efficiency of 60% or less. The expected energy savings from a speedy replacement are immense.

To achieve this goal, 17 HACKS partners in 15 countries worked together, thanks to the financial support of the European Horizon 2020 programme.

After scanning market actors, current policies and most commonly used products in each country, starting from April 2020 the HACKS partners have implemented involvement campaigns to raise awareness of the economic and environmental benefits brought by good HAC products and solutions:

1. HACKS has motivate households equipped with old and inefficient devices – boilers, water heaters, air conditioners, certain types of boilers and stoves, etc. – to replace them with new super-efficient equipment.
2. In each country, partners have set-up dedicated on-line platforms to assist consumers in their purchasing process. The platforms propose: tools to assess households' needs and provide customised information; best product lists with technical specifications; direct links to suppliers of most efficient products; and advice on how to use and maintain equipment.
3. For those households who need to improve their situation because they feel too hot, too cold, or too humid but who cannot invest in new equipment or can avoid getting equipped, HACKS proposed simple and low costs solutions. It is possible to reduce energy consumption and energy bills while improving winter and summer comfort, air quality and health conditions through the installation of shading devices, thermostats, water saving taps and showerheads, etc.

Beyond households, HACKS has targeted all relevant stakeholders (“multipliers”) that participate in the decision-making process of consumers by setting up strategic partnerships to facilitate the purchase of energy efficient appliances. HACKS placed a strong emphasis on installers but also retailers and consumer organisations because of their proximity to consumers, their capacity to involve them and bring them guidance on energy efficient equipment.

More information on the HACKS project can be found at www.topten.eu/hacks. [Most national HACKS website will remain active after the end of the project.](#)

Executive summary

The document provides an overview of the policy recommendations provided by HACKS partners over the entire project (September 2019 – February 2023). It reports the different types of policy recommendations – from different levels of government to different types of policy instruments – carried out by each partner. The recommendations of each partner are summarized and illustrated. In the last chapter there is a short discussion about the strategies in disseminating the policy papers.

While the corona pandemic and the war in Ukraine, as well as the rising energy prices are the predominant topic in all countries, many governments are still rapidly progressing in compiling climate strategies and / or subsidy programmes to boost the economies. Most partners were able to capitalize on the situation by providing relevant policy makers with input on best available HAC technologies, efficiency criteria and expedient integration into upcoming regulations and projects. A total of 94 policy recommendations were submitted for the following four policy instruments:

1. EU level Regulations
2. National regulations and strategies
3. Financial tools: rebates, tax schemes, energy saving certificates
4. Public procurement

In order to provide decision makers with even more rounded input, HACKS partners engaged in collaborations with other environmental and civil organisations and expanded their policy recommendations to include aspects of fair financing and energy poverty, greenhouse gas and particle emissions (air pollution), energy grid development or necessary training of installers. Participation in NGO communications campaigns on European levels was successful in raising awareness not only with policy makers but also the general public.

Significant progress and momentum with regards to the review of the energy labelling for heating appliances could be made as well.

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List of acronyms

BAT: Best Available Technologies

EU: European Union

F-Gases: Fluorinated Gases

GHG: Greenhouse Gas

HAC: Heating and Cooling

HACKS: Heating and Cooling Know-How and Solutions

MEPS: Minimum Energy Performance Standards

1 Introduction

The market transforms when consumers buy and install more efficient technologies and manufacturers – e.g. based on the market demand – develop new technologies. One of the main drivers of market transformation, however, are **policy instruments**, giving consumers incentives to choose more efficient products and manufacturers incentives and obligations to develop and produce more efficient technologies.

There are a variety of different policy instruments that governments can implement – either at local, national or international levels. One of the most common ones are **energy efficiency regulations**, often consisting of Energy Labelling and Ecodesign regulations. To support trading and international manufacturers they are predominantly implemented on the European level. Energy labelling helps consumers make informed purchase decisions and gives manufacturers of efficient technologies an edge in marketing. Ecodesign requirements ban the most inefficient technologies from the market and set further minimum requirements such as emission standards and resource and reparability requirements.

At national and regional level, **regulations and strategies** can be implemented to go beyond European requirements, taking into account particular circumstances of the area. Examples are climate strategies for net zero or stricter particulate matter emission regulations in regions with high air pollution.

Another highly effective policy instrument are **financial incentives**. Those can be tax breaks for buyers of more efficient solutions, tax penalties for less effective technologies, energy saving certificates or rebate programmes. In rebate programmes, the financial sponsors – be they governments or other organisations – set product criteria and all buyers of a product that complies with the criteria are entitled to receive a subsidy on the purchase price. Energy saving certificates are tradable documents, based on savings obligations, certifying reductions in energy consumption and find application in the various sectors, especially lighting and building renovation measures.

Lastly, governments or large organisations can set **procurement guidelines** (public or private). Procurement guidelines set minimum requirements in efficiency and other requirements (such as emission levels), award extra points for most efficient technologies or combine the two options. Those guidelines can be set at different levels – European, national, regional – and are tailored to the need of the organisation. While efficiency and environmental sustainability are of increasing importance to professional buyers, the initial purchase price is still the deciding factor for many of them. Procurement guidelines that include minimum efficiency criteria exclude less efficient products from competing in the first place.

The different instruments complement and multiply each other. As such, one of the greatest impacts that can be generated from the HACKS project are policy recommendations that help policy makers use their instruments to their full potential in order to accelerate market transformation.

Each partner has identified relevant national policy makers as well as other stakeholders with aligning goals and has opened lines of communication for ongoing and future policy projects. In addition, policy recommendations on a European level were given directly to the official platforms, further supported by national dissemination of the important inputs to increase support from various sources. The policy recommendations are a continuous process – not the least because often the policy processes are time-consuming – and will continue until the end of the project.

In the following chapters, the activities of the partners during the duration of the HACKS project are described and illustrated for the different levels and instruments.

2 General overview

All partners have identified potentials for policy recommendations as well as appropriate partnerships either for technical support or communication channels. As the success of policy activities depends on audience and contacts with the right decision makers, such partnerships are often vital to make input heard.

Policy input can primarily be given where new policy instruments are being designed or existing instruments are being reviewed and updated. As such, the timing and topic of opportunities cannot normally be decided or influenced by HACKS partners. The Corona virus pandemic dominated the political landscapes, governments have reacted very differently with regards to the economy. While some have postponed previously scheduled regulations with regards to lowering energy consumption or CO₂ emissions, others have started or prolonged rebate programmes targeting efficient appliances in the hopes of giving the economy a boost while at the same time accelerating market transformation.

With the Russian Invasion of Ukraine and the war still ongoing, the resulting rise of energy prizes and looming shortage of gas supply in Europe, political agendas shifted considerably towards saving energy, especially electricity and gas. The focus of many countries was on saving energy for heating and keeping costs at a manageable level. Several subsidy programmes were started focussing on efficient heating.

Table 1: Number and type of HACKS policy recommendations per country

EU	4			1
AT		1	1	
BE		3		
CH	1	1	16	
CZ		1	2	
DE		1	1	
ES	4	3		
FR	2	3	2	1
IT	1	1		2
LT	1	2		
LU		1	1	
NO		1	5	
PL	1	2	1	
PT	8			1
SE	1	1	2	1
UK		12	1	
SUMME	23	33	32	6

In other countries, partners have often found themselves providing far more than the foreseen policy recommendations due to the multitude of policy instruments currently being employed for HACKS product categories. Table 1 shows for which policy instruments HACKS partners have submitted recommendation papers during the project.

A total of 94 policy recommendations have been provided during the project, exceeding the 32 policy recommendations originally anticipated for the entire project duration. In the first half of the project, 53 policy recommendations have already been made or were started.

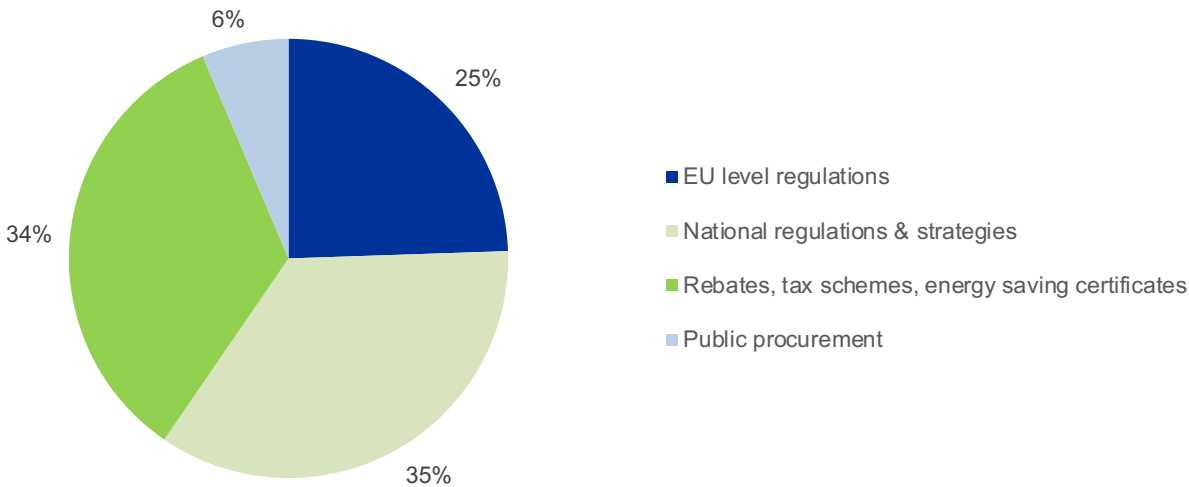
While not all recommendations are taken up into the final piece of policy regulation or other instrument by the respective decision makers, many of the already submitted recommendations were at least partially successful. For some, the policy process includes

many steps such as studies and is still ongoing; an example of this is the European f-gas regulation.

Partnerships with large European organisations such as ECOS or Coolproducts have proven advantageous as large campaigns give more weight to the issues raised, which are thus amplified for the policy makers and general public. Partners used such collaborations mainly for input to European level regulations.

How recommendations are distributed in terms of topic is of interest. The majority of recommendations focus on financial schemes, including rebates, tax schemes and energy saving certificates, which represent about 34% of the 94 policy recommendations, while input to regulations and strategies on the European or national level correspond to 25% respective 35%. This diversification of recommendations as shown in Figure 1 is a good indicator that HACKS partners aim to support policy stakeholders in accelerating market transformation through all instruments at hand.

Figure 1: Distribution of HACKS policy recommendations by type



It is expected that the input into policy activities will remain on a high level and that exchange between partners about best practice examples will amplify the impact. As many governments have initiated strategies to boost the economy in the wake of the Corona virus pandemic, this presented a unique opportunity to ask decision makers to devise the concepts in such a way that they positively influence the market towards energy efficiency and sustainability.

3 Policy recommendations submitted centrally on EU level

While partners submit their policy recommendations to national policy makers and organisations, Topten.eu as central organisation has established high credibility and reliability over the last decades to its inputs to European legislation directly to the regulatory committees and to the European Commission. Topten.eu serves as evidence on the state of the market, providing benchmarks in the form of data for best available technologies (BAT) and assessing the appropriateness of the ambition of future minimum energy performance standards (MEPS).

4 HACKS inputs were provided through Topten.eu during the project.

3.1 Comfort fans

In September 2019, the policy officer in charge of the “**Ecodesign and Energy Labelling Consultation Forum on Air Conditioners and Comfort Fans (Review)** starting on 09.09.2019” asked for information on BAT for comfort fans on the European market. The goal was to set benchmarks for the regulation.

Feedback was provided in the form of the product list of most efficient comfort fans on Topten.ch, at that time containing 111 models (with an additional 36 variant products), and the Topten selection criteria for most efficient products. The selection criteria differentiate between the five different types of comfort fans (see Table 2 below). The data of the comfort fans was declared according to Regulation (EU) No. 206/2012 with the values declared according to IEC 60879. The product list was shortly thereafter added to Topten.eu/comfortfans and continuously updated to serve as further reference to policy makers.



Figure 2: The number of comfort fans in Europe is increasing rapidly

Table 2: Topten selection criteria for comfort fans by type, setting min. efficiency index values (corresponding to service value (m³/min)/W; the higher the index the more efficient the appliances)

Tower fan	min. 0.45
Table fan	min. 0.80
Floor fan	min. 0.80
Standing fan	min. 1.00
Ceiling fan	min. 2.75

Topten.eu has raised awareness that **environmental dumping is taking place in Europe** where the comfort fans that are being exported from the manufacturing countries have a lower energy efficiency performance than the domestic minimum energy performance in place (e.g. mandatory MEPS in China and a voluntary scheme in India). With 52 million units sold in the EU in 2020 and numbers increasing dramatically, the need for the European Union to set MEPS as well as energy label for these products is made more obvious than ever. Topten.eu has **submitted abstracts** on this topic to the EEDAL and eceee conferences in 2021.

As a result of this, for the second Consultation Forum, which took place in July 2022, Topten.eu was able to show that the **proposed MEPS** were still too low compared to the Chinese MEPS, with many products already now on the market that are vastly better than the proposed MEPS. There is also a proposal for an **energy label** for comfort fans, which categorize the existing

products. Due to the nature of this Consultation Forum (combining of product groups into one regulation and label), Topten.eu developed a position paper (more details below).

Topten.eu is also involved in the third Consultation Forum which is happening just after the HACKS project will have ended. For this meeting, new MEPS have been presented in the draft. Because of the market knowledge Topten has, it is directly involved with the Commission and can provide valuable insights. This shows that even after the end of HACKS, policy work continues.

3.2 F-Gas regulation

The **European F-Gas regulation** is seen as an international example of a best practice in tackling the reduction of F-Gas. The regulation goes even further by setting a phase-down schedule until 2030 that are more ambitious than the one proposed by the Kigali Amendment¹ and this even before the Kigali amendment was agreed upon in 2016. The F-Gas regulation showed the international community that it is technically possible to move faster than what is proposed in the Kigali Amendment.

The **current review** of this European regulation affects all stationary air conditioning, making it highly relevant for HACKS in terms of GHG emissions. The **public consultation feedback period** was open from 15 September to 29 December 2020. Topten.eu provided feedback on past successes and future potentials of the regulation on the [official website](#), using the provided online template.

Recommendations focussed on scope and stringency of the regulation, promotion of training and servicing for natural refrigerants and coordinated policy making with energy efficiency.

3.3 Position paper on “Merged Energy Labelling for Local Space Heaters, Air Conditioners and Comfort Fans”

For the above-mentioned Consultation Forum in Summer 2022, Topten.eu together with other partners from the HACKS-project, worked on a position paper as an input for the European Commission. The position paper, which was spread also on many national levels, can be found [here](#). It served as a basis for further considerations for all product groups, which are now discussed again in a Consultation Forum (March 2023) where Topten.eu again can provide input for all product categories (air conditioners, comfort fans, local space heaters).

4 Policy recommendations submitted by partners

As national regulations and financial schemes are at times connected through government strategies, the activities of each partner are presented in this chapter for each country rather than typology.

4.1 Policy recommendations by Bush Energie (Switzerland)

EU LEVEL: F-GAS REGULATION, ECODESIGN & LABELLING REVIEWS

Policy Recommendation: Position paper on review of European F-Gas regulation in cooperation with EEB and ECOS: Attendance of European Commission and promotion on a national level.

Results: Ongoing

¹ The **Kigali Amendment** to the [Montreal Protocol](#) is an international agreement to gradually reduce the consumption and production of [hydrofluorocarbons](#) (HFCs)

Documentation: Emails to authorities, [official website](#)

Policy Recommendation: Position paper on review of “Merged Energy Labelling for Local Space Heaters, Air Conditioners and Comfort Fans”, attendance of European Commission and promotion on a national level.

Results: Ongoing, Attendance of next Consultation Forum in March 2023

Documentation: Emails to authorities, [Position Paper \(Collaboration\)](#)

FINANCIAL TOOLS: REBATES

Policy Recommendation: EWZ is an energy utility of the city of Zurich and is obligated by law to increase energy efficiency amongst their customers. As part of their strategy [2000-Watt-Society](#), they have commissioned Bush Energie to implement a rebate programme for them. One of the eight categories are the HAC category comfort fans. Negotiations are currently taking place about expanding the programme to include heat pump water heaters.

Results: Only the most efficient appliances that comply with the Topten criteria are eligible to receive subsidies of 20 CHF per appliance from the programme. The programme started at the end of 2019 and is open-ended. Until February 2021, it has had more than 210 participants, saving 1'100 MWh over the lifetime of the purchased products.

Documentation: Submission form on topten.ch/ewz for rebate programme

The image shows a screenshot of the EWZ rebate application website. At the top, there are two buttons: a green one for 'GESUCH FÜR Privatpersonen' and a blue one for 'GESUCH FÜR Liegenschaften und Unternehmen'. Below these are two green banners. The left banner is titled 'Förderbeitrag für energieeffiziente Geräte mit dem Topten Label' and is for 'ewz Kundinnen und Kunden der Stadt Zürich'. It features an image of a green fan and a row of five Swiss coins. The right banner is for 'Liegenschaften und Unternehmen'. Both banners include the EWZ logo and the 'topten.ch' logo.

Policy Recommendations: 13 regional or local rebate programmes for HAC products base their product selection on Topten recommendations.

Results: Many communities focus their climate strategies on promoting efficient heating technologies, subsidizing primarily heat pumps, circulation pumps and water heaters.

Documentation: Programme list on [Topten.ch](https://topten.ch) and [SIG \(Geneva utility company\) programme](#)

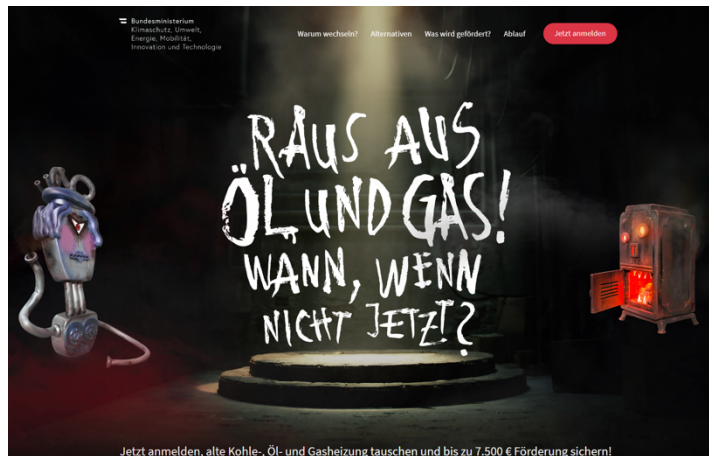


The screenshot shows the website interface for "Förderprogramme für Produkte mit Topten-Label". It includes a navigation menu at the top and a table with columns for "Kanton", "Produkt", "Förderprogramm", "Antrag", and "Anbieter". The table lists various programs across different Swiss cantons, such as "Kanton Bern" and "Kanton St. Gallen", for products like "Wärmepumpe" and "Kessel".

4.2 Policy recommendations by AEA (Austria)

NATIONAL LEVEL: EXCHANGE AND CONSULTATION

Policy Recommendation: Exchange and Inputs to the Austrian Ministry for Climate Protection (BMK, Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie). The BMK's "get out of oil" promotion campaign is an initiative launched in October 2021 that aims to accelerate the phase-out of fossil fuels such as oil for heat generation in buildings. The aim of the action is to reduce CO₂ emissions and promote the transition to renewable energy.



Results: Within the framework of the HACKS project (embedded in the klimaktiv.at / topprodukte.at platform), a specific contribution in terms of content was repeatedly made in meetings and through email enquiries.

Documentation: <https://kesseltausch.at/>

FINANCIAL TOOLS: REBATES

Policy Recommendation: Under the action “Raus aus Öl und Gas”, households and municipalities are offered financial support to replace their old oil or gas heating systems with more efficient and environmentally friendly systems such as pellet and wood chip heating, heat pumps, district heating or solar panels.

The campaign is intended to contribute to replacing all oil heating systems in Austria with alternative heating systems by 2030. In order to benefit from the promotion campaign, certain criteria must be met, such as compliance with emission limits and the use of high-quality appliances. With regard to rebate programmes, a powerful instrument has thus been created on federal level - especially as the operator of the klimaaktiv programme - with a great deal of budgetary and marketing input, in order to set effective measures for the reduction of fossil-fuelled heating systems.

Results: The landing page of the kesseltausch.at funding programme also links to topprodukte.at and promotes the topprodukte.at - lists in the biomass boiler category in particular.

Documentation: <https://kesseltausch.at/>

The screenshot shows three columns of text detailing rebates for different categories:

- Privat:** Private persons receive a rebate for replacing fossil heating systems with high-efficiency or climate-friendly alternatives. Rebates range from 7,500 to 15,000 Euro depending on the system and area. A 'Raus aus Gas' bonus is also available.
- Mehrgeschöbiger Wohnbau:** Multi-story residential buildings receive rebates for replacing fossil systems with climate-friendly alternatives. Rebates range from 4,000 to 15,000 Euro.
- Betriebe:** Companies receive rebates for replacing fossil heating systems with climate-friendly technology. Rebates range from 600 to 1,500 Euro.

4.3 Policy recommendations by BBL (Belgium)

NATIONAL LEVEL: EXCHANGE AND CONSULTATION, WORKSHOPS

Policy Recommendation: Exchange and Inputs to the Flemish government (with the communications manager of the Flemish Energy and Climate Agency)

Results: Recommendation of the Topten product sites and advisor pages by the government

Documentation:

<https://www.energywatchers.be/nl/woning/verwarming/de-warmtepomp-het-beste-alternatief>

The screenshot shows a list of recommendations for heat pumps:

- een grotere investering:** A heat pump is more expensive than a classic heating system, but it is more efficient and has lower operating costs.
- het rendement hangt af van de buitentemperatuur:** The efficiency of a heat pump depends on the outdoor temperature. It works best in warmer climates.

At the bottom, there is a logo for **topten.eu** and a link to the website: [topten.eu](https://www.topten.eu). The text below the logo says: "Op de Topten-website vind je een overzicht van de zuinigste warmtepompen en warmtepompboilers die in België verkocht worden."

Policy Recommendation: Exchange and Inputs Federal government: with the communication officer of the Federal Public Service Environment

Results: Recommendation of the Topten product sites and advisor pages by the government

Documentation:

https://www.belgium.be/nl/contactinfo_en_sites/Urls/http_www_topten_be



4.4 Policy recommendations by SEVEn (Czech Republic)

FINANCIAL TOOLS: REBATES

Rebate recommendations: The New Green Savings Programme of the Czech Ministry of the Environment is administered by the State Environmental Fund of the Czech Republic. Its subsidy programme focused on energy savings in family houses and apartment buildings: complex or partial thermal insulation, construction of houses with very low energy intensity, environmentally friendly and efficient use of energy sources and renewable sources of energy. In 2021, it is the only subsidy programme for the residential sector in the Czech Republic.

2. Návrh změny podmínek programu Nová zelená úsporám

1. Doplnění podmínky podoblasti podpory C.1 a C2 – Výměny zdrojů tepla – odst. 2.4.1.1 – doplnění o minimální účinnost oběhového čerpadla

Navrhovaný text:

Podmínkou je minimální účinnost oběhového čerpadla v systému $EEL \leq 0,18$

Vysvětlení:

Index energetické účinnosti (EEI) je označení účinnosti oběhových čerpadel, který vychází z platného nařízení 641/2009. Dnešní požadavky nařízení jsou (stručně):

- od 1. 8. 2015 min. EEI 0,23 pro samostatná oběhová čerpadla,
- od 1. 8. 2015 min. EEI 0,23 pro integrovaná oběhová čerpadla v nových produktech,
- od 1. 1. 2022 min. EEI 0,23 pro integrovaná oběhová čerpadla v produktech jako náhrada za identická čerpadla integrovaná v produktech na trhu před 1. 8. 2015.



Recommendations:

1. First minimal efficiency requirements for circulation pumps to qualify for subsidies (EEI 0.18, HACKS criteria)
2. Tightening criteria for solid fuel boilers (HACKS criteria; previously used Ecodesign criteria 1-2 years in advance)
3. Tightening criteria for solid fuel local space heaters (HACKS criteria; previously used Ecodesign criteria 1-2 years in advance)

Results: The proposed criteria set has been sent to decision maker (Mr. Nix) in December 2020, and were also handed to Mr. Vozka (responsible for ecodesign policies at the Ministry of Industry and Trade) in Mai 2022. The current version of the New Green Savings Programme (April 2022) sets the requests to the minimal efficiency A+ for solid fuel boilers and local space heaters, which is a direct success of the HACKS policy work.

Documentation: Extract from the recommendation paper

4.5 Policy recommendations by co2online (Germany)

NATIONAL LEVEL: EXCHANGE AND CONSULTATION, WORKSHOPS

Policy Recommendation: Exchange with the Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection (BMUV). co2online followed the goal to give input for a better technical and strategical dealing with heat stress and climate change adoption by the German government. This related partly to the revision of the federal subsidisation of efficient buildings (BEG) and the revision of the German Buildings Energy Act (Gebäudeenergiegesetz, GEG).

Results: Recommendations on how to deal with heat stress in communities

Documentation: Meeting protocol, March 2022

Policy Recommendation: Based on several contemporaneous campaigns, events and projects, co2online has contributed to national and regional policy projects. Furthermore, co2online works together with the association DENEFF (Deutsche Unternehmensinitiative Energieeffizienz e.V./ German initiative for energy efficient companies) to articulate political interests in form of statements and political groundwork.

Example: Discussion about regional subsidy programmes for new heating technologies at the Event “Berlin spart Energie” – involving Berlin senate administration, 11/11/2020, member event “DENEFF Live-Update” July 28th 2022 with a member of the Bundestag in the discussion.

Results: Recommendations on the dangers of usage of heating fans in the times of rising energy prices and the danger of gas shortage, legal possibilities to forbid the sale of heating fans

Documentation: Meeting Summary notes, Slides, July 2022

Policy Recommendation: co2online took action on a national level and contributed the paper including a national summary towards a stakeholder at the Federal Environment Agency (Umweltd Bundesamt), who is an important political consultant for the Federal Government in questions of the national implementation of the Ecodesign Directive and the Energy Labelling Directive. As well as a stakeholder from the Federal Institute for Materials Research and Testing (BAM) who works in the Department of Ecodesign and Energy Labeling (Referat Ökodesign und Energieverbrauchskennzeichnung)

Results: Position paper was deemed very helpful to further advance the consultation process

Documentation: Emails to the mentioned stakeholders, August 2022

4.6 Policy recommendations by ECODES (Spain)

EU LEVEL: F-GAS REGULATION, ECODESIGN & LABELLING REVIEWS

Policy Recommendation: Position paper on review of European F-Gas regulation in cooperation with EIA, EEB and ECOS: Attendance of European Commission-Public consultation (27/04/2020)

and submission of papers for Public consultation (20/04/2020), Inception Impact Assessment (07/09/2020) and Public consultation (29/12/2020).

Results: Review ongoing

Documentation: “NGO comments on Briefing Paper: HFCs and HFC alternatives in split air conditioning systems”, “Strengthening the F-Gas Regulation to Address Hydrofluorocarbons and Sulphur Hexafluoride”

Recommendation: Require Member States to ensure the establishment of EPR schemes for HFCs that meet certain minimum requirements, to be detailed in the legislation with further rules adopted via implementing or delegated acts.

Inspection and Enforcement. As in other EU legislation, Member States should carry out regular inspections on relevant market actors based on an EU risk-based targeting mechanism.²⁶ Moreover, the F-Gas Regulation suffers from a problem of insufficient market surveillance, raising the need for an EU-wide coordination policy in order to standardise procedures, rationalise costs and resources and promote timely enforcement, among other purposes.



Policy Recommendation: Open letter

Recommendations: Ecodes signs an Open Letter, with other organisations to claim Decarbonising the EU building stock with available solutions and no direct use of hydrogen with special emphasis in energy efficiency as a solution to Frans Timmerman.

Avere | Climate Action Network Europe | Efficient Appliances for People & the Planet | Climate Strategy & Partners | Danfoss | Deutscher Naturschutzring | Deutsche Umwelthilfe | ECODES tiempo de actuar | Energy Cities | EuroACE | European Alliance to Save Energy (EU-ASE) | European Council for an Energy Efficient Economy | European Environmental Citizen's Organisation for Standardisation | European Climate Foundation | European Environmental Bureau | European Geothermal Energy Council | EuroHeat & Power | European Insulation Manufacturers Association | European Solar Thermal Electricity Association | E3G | Kingspan | Knauf Insulation | Kyoto Club | National Energy Conservation Agency of Poland | Natur & Milieu | Ocean Energy Europe | PU Europe | Saint-Gobain | Schneider Electric | Signify | Rockwool | Veolia | World Wildlife Fund

Open letter

Decarbonising the EU building stock with available solutions and no direct use of hydrogen

To:

Frans Timmermans
First Executive Vice-President, European Commission

Copy to:

Kadri Simson, Commissioner for Energy
Ditte Juul Jørgensen, Director General, DG ENER
Members of the European Parliament's Committee on Industry, Research and Energy
Members of the European Parliament's Committee on Environment, Public Health and Food Safety

Brussels, 20 January 2021

Policy Recommendation: Revision of the Energy Performance of Buildings Directive

Recommendations: Ecodes provides feedback to the Revision of the Energy Performance of Buildings Directive including energy poverty issues and heating decarbonisation



Inception impact assessment – Revision of the Energy Performance of Buildings Directive

Submission by ECODES- Ecology and Development Foundation, March 2021

Policy Recommendation: Open Letter to Commission Cabinet

Recommendations: Ecodes invites the cabinet to put forward ambitious revised regulations for space heaters. “NGO call for phasing out fossil fuel space heaters through the revision of the ecodesign and energy labelling regulations for space heaters

To:

Mr Frans Timmermans, Executive Vice-President for the European Green Deal

Ms Kadri Simson, Commissioner for Energy

Mr Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries

Brussels, 22 July 2021

NGO call for phasing out fossil fuel space heaters through the revision of the ecodesign and energy labelling regulations for space heaters

Dear Vice-President Timmermans, dear Commissioner Simson, dear Commissioner Sinkevičius,

Policy Recommendation: Consultation Forum meetings on Ecodesign and Energy Labelling for space and water heaters

Recommendations: Ecodes co-signed two letters requiring higher ambition from the Commission ahead of the meeting: one on 22 July to Mr Frans Timmermans, Executive Vice-President for the European Green Deal; Ms Kadri Simson, Commissioner for Energy; and Mr Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries). And another open letter to the European Commission's Executive vice-president Frans Timmermans

Policy Recommendation: Open Letter

To:
Mr Frans Timmermans, Executive Vice-President for the European Green Deal

Brussels, 1/26/2023

Recommendations: Open Letter to Commission Cabinets to put forward ambitious revised regulations for heaters “Phasing out new fossil-fuel based boilers is vital to achieving the EU’s climate commitments”

OPEN LETTER

Phasing out new fossil-fuel based boilers is vital to achieving the EU’s climate commitments

Dear Executive Vice-President Frans Timmermans,

NATIONAL LEVEL: DECARBONISATION STRATEGY 2050

Policy Recommendation: ECODES submitted a recommendation to the Spanish Ministry of Ecology Transition and Rural Development for the public consultation on the Long-Term Decarbonisation Strategy 2050.

Recommendations:

1. Chapter 6.5.3 & Annexes C5.3 and C5.3.3 related to F-Gases
2. Accelerate phase down of high GWP and HFC refrigerants and penetration of new technologies

ecodes
tiempo de actuar

rapidez en el proceso de descarbonización del sector y a un cambio estructural a medio y largo plazo.

12. Modificación

“Los combustibles renovables serán especialmente importantes para el transporte pesado de mercancías por carretera, la aviación y la navegación. Como combustibles renovables no se incluyen biocombustibles de cultivos alimentarios/agrícolas”

13. Modificación C.2.3.3 anexo: Transporte aéreo nacional

“Sustitución de combustibles derivados del petróleo por combustibles renovables. Como combustibles renovables no se incluyen biocombustibles de cultivos alimentarios/agrícolas. En la actualidad hay experiencia en su utilización y su viabilidad técnica está probada. Las particulares especificaciones requeridas para el queroseno de aviación hacen que hasta el momento existan pocas tecnologías de fabricación que permitan obtener estos productos cumpliendo los parámetros necesarios. Como combustibles renovables no se incluyen biocombustibles de cultivos alimentarios/agrícolas”

6.3 EDIFICACIÓN SOSTENIBLE

Introducción

Results: Process ongoing

Documentation: Position paper (13 pages)

Policy Recommendation: ECODES contributed to the Climate Change Law.

Recommendations: Inputs on Energy efficiency and rehabilitation of buildings, Reduction of Energy Poverty

Results: Some of the recommendations were directly taken into the law.

Documentation: <https://ecodes.org/sala-de-prensa/notas-de-prensa/valoracion-de-ecodes-ante-la-ley-de-cambio-climatico>

Policy Recommendation: Audience at Spanish Senate on Strategic Project for Recovery and Transformation on heating and cooling (PERTE), as well as the head of IDAE, and the Secretary of State for Energy to promote the same idea. Meeting with OECC (Spanish Office for Climate Change) to discuss heating decarbonisation, f-gas in heat pumps and delays of f-gas standards.

Results: Ongoing

Documentation: Meeting notes

4.7 Policy recommendations by Guide Topten (France)

EU LEVEL: F-GAS REGULATION, ECODESIGN & LABELLING REVIEWS

Policy Recommendations: Guide Topten amplified the impact of the Topten.eu policy recommendation on the review of the European F-Gas regulation by adjusting and submitting their own paper, based on the Topten.eu submission.

Results: Review ongoing

Documentation: Submission on [official review website](#)

Policy Recommendations: Guide Topten amplified the impact of the Topten.eu policy recommendation on the review of the Position paper on “Merged Energy Labelling for Local Space Heaters, Air Conditioners and Comfort Fans” in talks and emails with DG ENER.

Results: Review ongoing

Documentation: Emails

NATIONAL LEVEL: ALIGNMENT ON ENERGY LABELLING

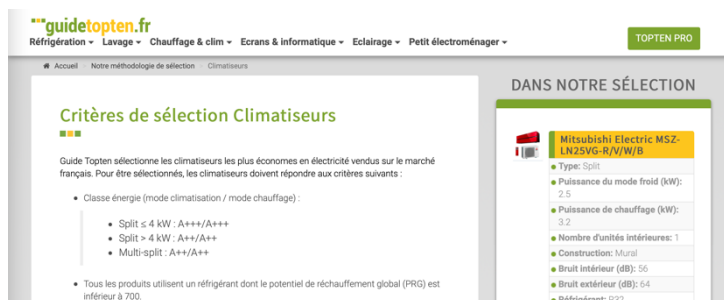
Policy Recommendations: Guide Topten was invited by ADEME (French Energy Transition Agency) to join a meeting on hot water production to share its experience on energy labelling policy (11/2020): heat-pump water heater industry and solar water heater industry were comparing results of a new measurement protocol.

Results: Oral dissemination of best practice examples

Documentation: No written policy paper was submitted

Policy Recommendations:

Meetings with ADEME, presenting and discussing the methodology for selecting best products of air conditioners and heat-pumps to reach a common understanding. Input from HACKS on the use of air conditioners for heating purposes – currently not covered by the regulation – was also presented.



The screenshot shows the website 'guidetopten.fr' with a navigation menu including 'Réfrigération', 'Lavage', 'Chauffage & clim', 'Ecrans & informatique', 'Eclairage', and 'Petit électroménager'. A 'TOPTEN PRO' button is visible in the top right. The main content area is titled 'Critères de sélection Climatiseurs' and lists selection criteria for air conditioners. A sidebar on the right, titled 'DANS NOTRE SÉLECTION', displays details for a 'Mitsubishi Electric MSZ-LN25VG-R/V/W/B' unit, including its type (Split), cooling power (2.5 kW), heating power (3.2 kW), number of indoor units (1), construction (Mural), indoor noise (56 dB), outdoor noise (64 dB), and refrigerant (R32).

Results: ADEME has a strong presence in the French context, so the alignment of the positions increases the chance that the HACKS information is disseminated by the agency.

Policy Recommendations: Meetings with Guadeloupe institutions (ADEME, EDF), presenting and discussing the best comfort fans to reach a common understanding for their rebate programme.

FINANCIAL TOOLS: ENERGY SAVING CERTIFICATES

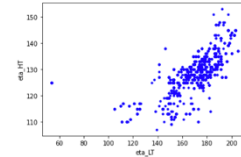
Policy Recommendations: Regarding heat-pumps, Guide Topten suggested to amend the energy saving certificates in order to subsidize models that have the best performances for both use patterns: at 55°C and at 35°C. Currently, manufacturers tend to declare the heat pump performance for only one use-pattern (the most favourable for each product) but the HACKS research - shared with ADEME - shows that there is no correlation for the performance at the two temperatures.

For air conditioners, an analogous suggestion was made that energy saving certificates be granted specifically to products providing consumption data for both cooling and heating functions to avoid subsidizing the installation of poor performing products in their heating function.

Results: Unlikely to succeed but the idea was submitted

Documentation: Data analysis presentation

PAC air/eau: Efficacités saisonnières



- Une machine performante en basse température ne l'est pas forcément en haute température

PAC air/eau: liste retenue

Condition	Nb. produits	Nb. marques
eta_LT>=190	39	14
eta_HT>=140	27	9
eta_LT>=190 ou eta_HT>=140	49	14
eta_LT>=185 ou eta_HT>=140	95	22
eta_LT>=190 ou eta_HT>=135	108	27

- Noter que la liste retenue est un peu plus courte que celle proposée dans dernière présentation, car certains doublons sont supprimés

4.8 Policy recommendations by ELIANTE (Italy)

NATIONAL LEVEL: ALIGNMENT ON ENERGY LABELLING AND ECODESIGN

Policy Recommendations: ELIANTE used the deliverable 3.7 “Heating and Cooling Knowhow and Solutions Catalogue of Key information topics” and sent it to ENEA (Italian Energy Agency). It was also recommended to use this as a starting point for drafting the “Cost-free Behavioural Measures”, foreseen in the “Piano Nazionale di contenimento dei consumi di gas naturale” (National Plan to save natural gas consumption)

Results: Review ongoing

Documentation: Emails

Policy Recommendations: ELIANTE amplified the impact of the Topten.eu policy recommendation on the review of the Position paper on “Merged Energy Labelling for Local Space Heaters, Air Conditioners and Comfort Fans” by sending it to ENEA (Italian Energy Agency) and was asking to support the position.

Documentation: Emails

PUBLIC PROCUREMENT

Policy Recommendations: The Procurement Guidelines were sent to CONSIP (the public body that manages all the public procurement of all the public entities in IT), with requesting to use and spread them.

Results: Meeting upcoming

Documentation: Pompe di calore (heating pumps) ([pdf](#)), Scaldacqua a pompa di calore (electric water heaters) ([pdf](#)), Rubinetti e soffioni doccia (taps and showerheads) ([pdf](#)), Ventilatori (fans) ([pdf](#)), Condizionatori (air conditioners) ([pdf](#))

Policy Recommendations: The Procurement Guidelines were sent to the municipalities of Lombardy (circa 1'500 municipalities) with requesting to use and spread them.

Documentation: Pompe di calore (heating pumps) ([pdf](#)), Scaldacqua a pompa di calore (electric water heaters) ([pdf](#)), Rubinetti e soffioni doccia (taps and showerheads) ([pdf](#)), Ventilatori (fans) ([pdf](#)), Condizionatori (air conditioners) ([pdf](#))

4.9 Policy recommendations by LNCf (Lithuania)

NATIONAL LEVEL: RECOVERY & RESILIENCE FACILITY PLAN, RENOVATIONS

Policy Recommendations: The Lithuanian Energy Ministry elaborates the Recovery and Resilience Facility section “Green Transformation”, which covers mainly electricity production and transport sectors, to be submitted to the EU Commission. LNCf recommended to include the following:

1. Scope: include small PV installations and PV batteries
2. Introduce the concept of combined energy systems, operated by smart control (decentralized accumulator)
3. Include strategies for modernization of public buildings & multifamily houses

LIETUVOS NACIONALINĖ VARTOTOJŲ FEDERACIJA

2021 02 10 Nr. 21/02 M-01

Energetikos ministerijai

Pastabas RRF krypčių projektui AEI elektros energetikos sektoriuje

Dėkojame už pakvietimą ir galimybę dalyvauti dokumento projekto aptarime nuotoliniu būdu vasario 9 d. Tačiau, susirinkus apie 200 dalyvių, konstruktyvi diskusija tokioje didelėje auditorijoje yra apsunkinta. Todėl teikiame papildomas pastabas ir pasiūlymus, kurių nepateikėme aptarimo metu.

4. Provide more cost-benefit assessments (regional parameters)

Results: Process ongoing

Documentation: Recommendation letter to Lithuanian Energy Ministry

Policy Recommendations: On 04/02/2020 LNCf participated in a discussion about quality of electrotechnical goods, organized by Lithuanian Justice minister E. Jankevičius. Main discussion points were concerns that the Lithuanian market of electrotechnical goods might present devices of poorer quality than those in the corresponding markets in Western Europe, including aspects of energy efficiency.

Results: It was decided to carry out a special market survey with focus on device quality and energy efficiency. LNCf and other consumer organisations were asked to assist the ministry in this study.



Roko Lukoševičiaus / 15min nuotr./Teisingumo ministerijoje vyko pasitarimas-diskusija dėl galimos dvigubos kokybės prekių

Documentation: Broadcast on main TV news channel “Panorama”, [articles with interviews](#)

Policy Recommendations: Create catalogue of measures and results for easier implementation.

Background: Since 2005, government subsidies ([Housing Energy Efficiency Agency](#)) covered 30-40% of costs for large multifamily housing renovations. The supported modernizations resulted in reducing by half the energy for heating. To date, about 3'000 multifamily houses out of 35'000 were renovated in line with this approach, only about 10% of the whole building stock in need of modernisation, as costs are still unaffordable to many. The programme is being expanded to include smaller renovations as well.

Results: HEAA mandated LNCF to create a catalogue of technical means and technologies, including HACKS criteria (created 07/-09/2020).

Documentation: Catalogue



Algirdo g. 25, Vilnius. Šildymo stovas rūsyje. Reguluojamosios armatūros nėra, todėl balansavimas neįmanomas. Stovas rakinamame sandėliuke.



Algirdo g. 25, Vilnius. Vienvaizdė šildymo sistema. Radiatorius turi tik uždaromąją armatūrą, termostatas neįrengtas. Nuo senų laikų palikęs tricreis ventilius, kurį bandyti judinti rizikinga.

2 lapas. Finansinis įvertinimas.

Kodas	Pavadinimas	Matai	Mėnesiai													
			I	II	III	IV	V	VI	VII	VIII	IX	X	XI	XII		
B	Būsto šildymo šilumos tiekimo technologijos (pagrindinės technologijos)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B	Šildymo sistema	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Investicijos + Eksploatavimas - Subsidijos (NPV)	-790,82	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Investicijos (PV)	-854,02	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Investicijos (NPV) - perkėlimas	-100,00	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Atgalinės technologijos programai	163,20	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00
C	Šildymo programai šilumos (PSC)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Šildymo šilumos tiekimo ir šilumos perdavimo (SPT) - šilumos perdavimo (SPT)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Šildymo šilumos	790,82	0	0	0	0	0	0	0	0	0	0	0	0	0	0
N	Reikšmė (nuo šilumos investicijų)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	0) Tiesioginės išlaidos	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Tiesioginės išlaidos (išlaidos)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	0) Pastovios išlaidos	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Pastovios išlaidos (išlaidos)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	0) Išlaidos investicijoms	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	Išlaidos investicijoms (išlaidos)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

4.10 Policy recommendations by Oeko-Zenter (Luxembourg)

NATIONAL LEVEL: HEATING OIL PHASE-OUT PROGRAMME

Policy Recommendations: Oeko-Zenter could meet with officials from the Ministry of Energy and Spatial Planning. The topic of the meeting was to what extent the criteria of HACKS can be used for the new government heating oil phase-out programme.

Results: The law and regulation were passed in March 2022.

Documentation: <https://legilux.public.lu/eli/etat/leg/loi/2022/04/07/a179/jo>

FINANCIAL TOOLS: REBATES

Policy Recommendations: Oeko-Zenter could meet with officials from the Ministry of Energy and Spatial Planning. The topic of the meeting was to what extent the criteria of HACKS can be used for the new government heating oil phase-out programme.

Results: Based on the meeting, the rebate programme was established

Documentation:

<https://mecdd.gouvernement.lu/fr/actualites.gouvernement%2Bfr%2Bactualites%2Btoutes-actualites%2Bcommuniqu%C3%A9s%2B2022%2B04-avril%2B01-regime-prime-house.html>

4.11 Policy recommendations by Naturvernforbundet (Norway)

NATIONAL LEVEL: FOSSIL ENERGY PHASE OUT BY 2040

Policy Recommendations: Despite the fact that Norway's power production is virtually free of oil, coal and gas, it is heavily dependent on fossil energy. This report uncovers how Norway burns about 170 TWh of fossil energy annually, which is significantly more than all Norwegian hydropower and wind power production combined. In the report "Fossil-free Norway", Naturvernforbundet shows how Norway can get rid of fossil energy by 2040. In the report, energy efficiency plays a key role in achieving the goal without jeopardizing important natural values.

Results: Report was sent to government parties, decision makers and public media as reference and discussion starter.

Documentation: Report "Fossil Free Norway" (10/2019)



FINANCIAL TOOLS: REBATES & GRID FINANCING

Policy Recommendations: As a response to the decision by Enova to phase out or cut its rebate programmes for heat pumps, balanced ventilation and electricity production in homes from 1 April 2020, Naturvernforbundet and 10 other organisations sent a letter to the Minister of Climate and Environment.

Results: The cuts were postponed until 1 July 2021. Further long-term strategies are needed: Several thousand employees are currently employed in companies that work with installing heat pumps, ventilation systems, solar energy systems and energy efficiency. These are jobs in small and large companies across the country. Because of the Covid pandemic and low electricity prices these companies are now threatened with layoffs and bankruptcy.



Documentation: Letter to Minister of Climate and Environment Sveinung Rotevatn (03/2020)

Policy Recommendations: With central consumer organisations, environmental organisations and business organisations Naturvernforbundet requests a meeting with the Minister, strongly recommending a new model for the grid rent financing system that takes utilization into account. The Norwegian Regulatory Authority for Energy has sent proposals for requirements for the design of the grid rent for consultation. The aim of the proposal is, among other things, to contribute to an efficient utilization of the power grid. The senders of the letter, however, believe that the proposal in its current version will give little motivation to the reduction in the consumption of energy and power.

Results: Unlikely to succeed. Strong opposition from grid providers and building industry who want the option of providing less complex, low-cost construction and take issue with additional training for installers.



Regjeringen svikter byggsektoren

Regjeringens forslag til statsbudsjett vil verken bidra til å fase ut bruken av fyringsolje innen 2020, eller sette i gang den store dugnaden for energisparing vi trenger.

Nyheter

Documentation: Letter to Norwegian Minister of Petroleum and Energy Tina Bru (04/2020)

Policy Recommendations: Within the scope of the changes to the grid rental structure proposed by the Energy Regulatory Authority (RME), Naturvernforbundet recommends the inclusion of incentives to reduce energy consumption and grid development. In the Norwegian Government platform, it has been decided that 10 TWh of energy reduction should be realized in buildings by 2030. In order to take into account energy poverty, Naturvernforbundet wants a low fixed price and a higher price based on energy consumption, with a pricing of power, for example through a higher price in the hours with the greatest grid loads. Naturvernforbundet were sceptical that several different models could be set up, and have argued that the model should be designed as consumer friendly as possible.

Results: Open.

Documentation: Letter to Norwegian Energy Regulatory Authority (05/2020)

4.12 Policy recommendations by FEWE (Poland)

EU LEVEL: F-GAS REGULATION

Policy Recommendations: FEWE amplified the impact of the Topten.eu policy recommendation on the review of the European F-Gas regulation by adjusting and submitting their own paper, based on the Topten.eu submission.

Results: Review ongoing

Documentation: Submission on [official review website](#)

NATIONAL LEVEL: ENERGY EFFICIENCY ACT & HYDROGEN STRATEGY

Policy Recommendations: FEWE submitted recommendation to the Polish Energy Efficiency Act and several other acts (UC41), implementing Directive 2018/2002/EU, during the public consultation on the draft amendment. Input focuses on:

1. The necessity of extending the regulations on energy efficiency improvement contracts (ESCO companies)
2. Introducing additional alternative measures (apart from energy efficiency certificates) to achieve the target set by EU regulations
3. Establishing new and verify the existing rules for assessing the level of savings achieved.

Results: Status open

Documentation: Submission to Polish Climate Ministry (10/09/2020)



Policy Recommendations: Participation in public consultations of the project "Polish Hydrogen Strategy until 2030 with a perspective until 2040". FEWE took part in the consultations as a member of the Climate Coalition. Comments were submitted to the Ministry of Climate and Environment on 10/02/2021. The assumptions of the strategy relate to the three sectors of hydrogen use - energy, transport and industry, as well as to its production, distribution and the necessary legal changes and financing.

Results: Process ongoing

Documentation: Participation in public consultation

Policy Recommendations: Common position of environmental organisations on the draft National Reconstruction Plan. The position indicates the need to adopt more ambitious goals in the National Reconstruction Plan so that it is compliant with European environmental protection standards.

Results: Process ongoing

Documentation: Participation in public consultation

Policy Recommendations: Draft amendment to the Energy Efficiency Act. Thirteen comments were submitted on a draft amendment to the law proposing changes to help develop and promote energy services. The comments included provisions to enable municipalities to obtain support for activities aimed at developing a low-carbon economy, air protection.

Results: Process ongoing

Documentation: Participation in public consultation

Policy Recommendations: Open letter to prime minister Mateusz Morawiecki On necessary actions in the field of energy efficiency of buildings. 26 organisations in Poland called for putting the topic of increasing the energy efficiency of buildings at the center of Poland's energy policy agenda aimed at becoming independent from energy imports from Russia and transforming the economy toward zero-carbon.

Documentation: Open Letter

Policy Recommendations: Open letter Protest against changes in the way of settlement of individual prosumers. The protest was over radical changes to the rules for prosumer energy being pushed by the Ministry of Climate and Environment (MoC).

Documentation: Open Letter

4.13 Policy recommendations by Quercus (Portugal)

EU LEVEL: F-GAS REGULATION & NGO GROUP CAMPAIGNS

Policy Recommendations: Quercus amplified the impact of the Topten.eu policy recommendation on the review of the European F-Gas regulation by adjusting and submitting their own paper, based on the Topten.eu submission.

Results: Review ongoing

Documentation: Submission on [official review website](#)

Policy Recommendations: Regular stakeholders opinion requests made by Directorate-General of Energy and Geology (DGEG) regarding "Ecodesign and Energy Labelling Consultation Forum on air conditioners and comfort fans (review) starting on 09/09/2019" answer sent by email on 04/09/19.

Results: No feedback available

Documentation: Submission via mail to DGEG (04/09/2019)

Policy Recommendations: Regular stakeholders opinion requests made by Directorate-General of Energy and Geology (DGEG) regarding "Ecodesign and Energy Labelling Consultation Forum on local space heaters (review) starting on 10/09/2019" answer sent by email on 04/09/19 together with document produced by ECOS/EEB/Coolproducts "Position on the energy labelling of electric heaters".

Results: No feedback available

Documentation: Submission via mail to DGEG (10/09/2019), Position paper with ECOS/EEB/Coolproducts

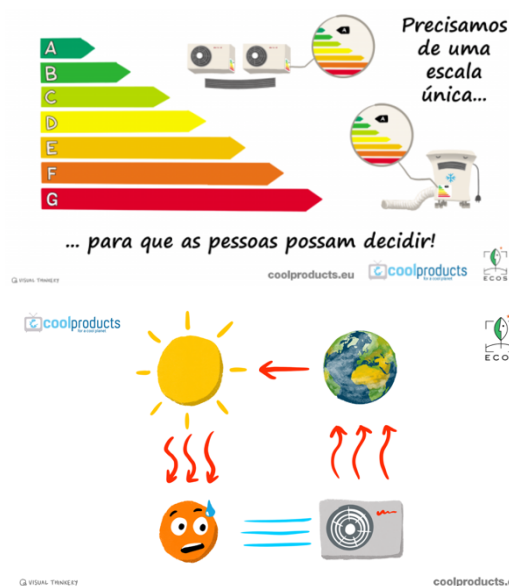
Policy Recommendations: Group campaign with Coolproducts and Right to Repair Europe "Covid-19 recovery plan calls for consumer savings and environmental commitments". NGO campaign including press releases, social media dissemination, direct report to national authorities.



Results: No feedback available

Documentation: Submission via mail to DGE (01/05/2020), article on Topten.pt

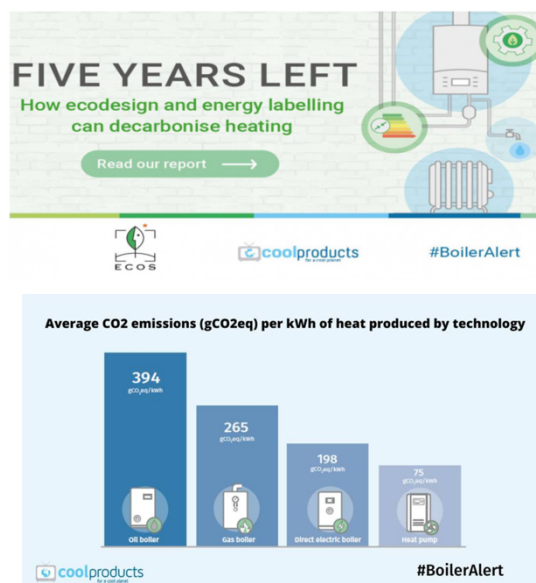
Policy Recommendations: Group campaign with Coolproducts "A common energy label for air conditioning systems". NGO campaign including press releases, social media dissemination, direct report to national authorities (DGE as responsible party for Portuguese policy position).



Results: No feedback available

Documentation: Submission via mail to DGE (09/07/2020) together with document produced by Coolproducts, article on Topten.pt

Policy Recommendations: Group campaign with ECOS/Coolproducts "Five years left - How Ecodesign and Energy Labelling can decarbonise heating ". NGO campaign including press releases, social media dissemination, direct report to national authorities (DGE as responsible party for Portuguese policy position).



Results: No feedback available

Documentation: Submission via mail to DGE (10/12/2020) together with document produced by ECOS/Coolproducts, article on Topten.pt

Policy Recommendations: ECOS and other organisations "NGO call for phasing out fossil fuel space heaters through the revision of the ecodesign and energy labelling regulations for space heaters"

Results: No feedback available

Documentation: <https://topten.pt/business/article/apelo-a-ue-para-eliminar-gradualmente-os-aparelhos-de-aquecimento-ambiente-a-combustivel-fossil-ate-2025>

Policy Recommendations: Request regarding " Ecodesign and Energy Labelling Consultation Forum revision of the space and water heaters ecodesign and energy labelling regulations starting on 27/09/2021" answer sent by email on 23/09/21

Results: No feedback available

Policy Recommendations: ECOS and 30 other organisations "Phasing out new fossil-fuel based boilers is vital to achieving the EU's climate commitments"

Results: No feedback available

Documentation: <https://quercus.pt/2021/09/23/quercus-e-mais-30-organizacoes-europeias-temem-que-uniao-europeia-possa-autorizar-a-venda-de-caldeiras-a-gas-ate-2050/>

Policy Recommendations: "Merged energy labelling for local space heaters, air conditioners and comfort fans - Position paper" sent on 19/08/22

Results: No feedback available:

PUBLIC PROCUREMENT

Policy Recommendations: Procurement guidelines were proposed to the Portuguese Environment Agency (APA)

Results Quercus procurement guidelines were displayed on the National Strategy for Green Public Procurement (ENCPE) (website) which is under the responsibility of APA

Documentation: <https://encpe.apambiente.pt/content/novos-guias-topten-para-efici%C3%A2ncia-energ%C3%A9tica-j%C3%A1-dispon%C3%ADveis>

4.14 Policy recommendations by Naturskyddsföreningen (Sweden)

EU LEVEL: F-GAS REGULATION

Policy Recommendations: Naturskyddsföreningen amplified the impact of the Topten.eu policy recommendation on the review of the European F-Gas regulation by adjusting and submitting their own paper, based on the Topten.eu submission.

Results: Review ongoing

Documentation: Submission on [official review website](#)

NATIONAL LEVEL: ASSOCIATIONS PELLETS AND WOOD STOVES

Policy Recommendations: Naturskyddsföreningen attempted to unify definitions of “energy efficient appliances” with Brasvärmeföreningen (“The Stove Heating Association”) and Pelletsförbundet (“The Pellets Association”). The recommendation aimed at coordinating in order to match the HACKS selection criteria and the associations’ definition of “most energy efficient and sustainable products” in their policy recommendations.

Results: An agreement could not be reached. Both organisations’ main objective is to advocate the use of their respective equipment/fuel altogether, and as such they are unwilling to put certain products above other, even when energy performance and emissions clearly differed.

Documentation: No written paper was submitted.

Policy Recommendations: Input on an investigation by the Swedish regarding quota obligation systems for energy efficiency, i.e. white certificates.

The purpose of the investigation was to achieve a market based and cost-efficient instrument that will increase the rate of energy efficiency in Sweden, contribute to reaching the energy and climate policy goals, as well as facilitating a quick, smart, and socioeconomically efficient electrification of Swedish society.

The Swedish Society for Nature Conservation (SSNC) represented by Jesper Peterson, was included in the expert group for the investigation. SSNC has suggested Topten as a tool for verifying and highlighting energy efficiency measures.

Results Due to the power shift in the Swedish government to the right-wing opposition after the election in September, the investigation has been terminated as of December 2022.

Documentation:

<https://www.regeringen.se/4a857e/contentassets/219a783febd343168f42e86019972afa/kommittedirektiv-2021-82-vita-certifikat>

FINANCIAL TOOLS: ENERGY SAVING CERTIFICATES

Policy Recommendations: Naturskyddsföreningen conducted a comprehensive three year study (2018-2020) called “Casablanca” to analyse whether a scheme of energy saving certificates – to date not practiced in Sweden – have the potential to contribute to additional or more ambitious energy saving measures than would be the case without subsidies. Other stakeholders were Göteborg Energi (energy company), Göteborg University, Sustainable Innovation (innovation company), Chalmers University of Technology and Profu (energy analysis company).

The study examines energy saving certificates as a complimentary method, using Topten/HACKS criteria both as an example and as an active tool for implementing energy savings in various areas, among homeowners and public and private real estate companies, as well as stricter requirements concerning the most energy efficient HAC equipment and technologies.

The results were somewhat inconclusive regarding the additional saving potential. However, they demonstrate the usefulness of energy saving certificates regarding peak demand reduction in both electricity and heat grids, balancing short-term requirements regarding usability, cost efficiency and peak demand reduction.

Results: First version was compiled by Göteborg University and delivered to Energimyndigheten (Swedish Energy Agency), final version is pending.

Documentation: Draft report of “Casablanca” project

Casablanca

Utveckling och test av ett kvotpliktssystem
för bostadssektorn med fokus på
effektreduktion



PUBLIC PROCUREMENT

Policy Recommendations: Energikontor Väst, the regional energy office of western Sweden, currently leads a project formulating electricity procurement policies for Swedish municipalities who have made “climate promises”, promising to only purchase renewable electricity. Naturskyddsföreningen recommends that municipalities should purchase not only renewable but rather specific ecolabelled electricity, having a lower impact on biological diversity as well as climate and other environmental issues.

Results: The official consultation is scheduled for March 2021. The goal is to stimulate more municipalities into making the same “climate promise” and adhering to the new recommendations.

Documentation: The recommendation paper will be submitted to the consultation in March.

4.15 Policy recommendations by EST (United Kingdom)

NATIONAL LEVEL: TARGETS AND STRATEGIES

Policy Recommendations: On 06/2020 EST published a report 'Our view of the opportunity for a green recovery post Covid-19'. This included the recommendation for the UK that a target of 3.3 million (cumulative) heat pumps by 2030 was an appropriate level of ambition.

Results: Report was sent to relevant stakeholders and published as reference and discussion starter

Documentation: [Published report](#)

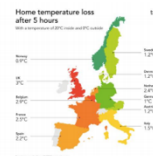
energy
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trust

The opportunity for a green recovery post COVID-19

There's a lot of talk of post-COVID green stimulus in the building sector, with everyone from Nobel winning economist Joseph Stiglitz¹, Lord Stern and Sir John Armit, Chair of the National Infrastructure Commission² highlighting home energy efficiency as a key opportunity.

There's been less discussion in the media so far about what exactly we should be looking to achieve in the next decade and the new jobs that could result. At the Energy Saving Trust we have over 25 years of delivering home energy improvement – so we are well placed to provide the detail.

Homes account for just under 30 percent of energy use and around 20 percent of greenhouse gas emissions in the UK - and yet two thirds are currently below an adequate level of efficiency. This visual from Tado³ (a smart thermostat manufacturer), clearly illustrates the problem. Tado's analysis of 80 000 homes across Europe suggests that British⁴ homes are losing heat up to three times faster.



Policy Recommendations: In 07/2020 EST posted a blog about "Future Heat", including their evaluation and suggestions on current UK energy policy and targets. This included statements about the new grants available from the UK government.

Results: Published as reference and discussion starter for stakeholder meetings.

Documentation: [Blog post](#) and [announcement](#)

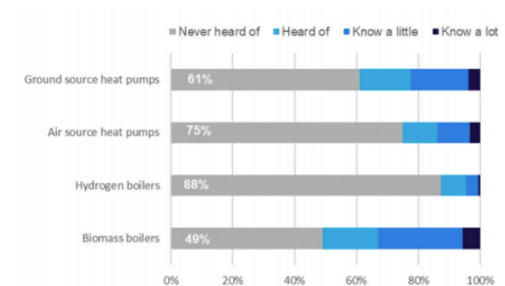


Policy Recommendations: In 09/2020 EST UK government put out a 'Call for Evidence' requesting that key stakeholder provide feedback with available evidence where relevant on the implementation of Ecodesign legislation and standards on a number of product categories including several heating products. EST responded to this focussing on BAT products, saving potential and the current market situation.

Results: Process ongoing

Documentation: Policy paper (09/2020, 40 pages)

Figure 3: Levels of awareness and knowledge of low-carbon heating technologies



Base: British population aged 18+ (Biomass boilers (2,906); Hydrogen boilers (2,907); Air source heat pumps (2,906); Ground source heat pumps (2,905))

Figure 2 - source: BEIS SEE COMPLETE DOCUMENT PROVIDED VIA EMAIL

Hybrid Heating Systems can combine the efficiency of a heat pump alongside an existing boiler installation, and as such provide a useful bridging technology towards low-carbon heating for consumers who are familiar with gas boilers, and may desire a less disruptive installation. The heat pump component can often provide the majority of heating needs, particularly space heating, before a gas boiler component would need to be called upon.

Low/zero-carbon fuels: Use of hydrogen in the gas grid would have an advantage of reducing the need for significant infrastructure changes, but currently hydrogen cannot be considered a zero carbon fuel, as the majority is produced from fossil based sources (Friends of

Policy Recommendations: Consultation on improving the energy performance of the private rented sector: input on technologies, efficient solutions, fair distribution of costs and alignment with overall government strategy.

Results: No feedback available

Documentation: Policy paper (12/2020, 16 pages)

Chart 1: Percentage of properties reaching EPC C (EER C) at each cost cap by starting Band, BEIS modelling

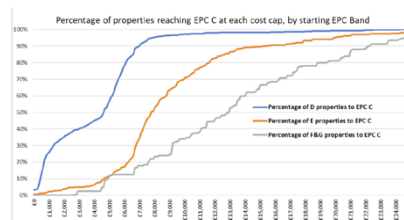


Table 12: Estimated average costs and benefits to landlords from amending the Regulations (2018 prices)¹¹

Average (mean) cost per property with measures installed	£5,000	£10,000	£15,000	£15,000 CC
Average capital cost for those achieving the required standards or above	£2,200	£4,400	£4,900	£5,300
Average cost for those making as much progress as possible towards the required standard	£2,500	£5,800	£7,400	£9,700
Average landlord hidden cost per property	£170	£240	£260	£290
Average property value differential	£3,100	£5,400	£6,100	£5,600
Increase in rent received in 2028 (low)	£0	£0	£0	£0
Increase in rent received in 2028 (central)	£110	£220	£260	£230
Increase in rent received in 2028 (high)	£230	£390	£410	£410

Policy Recommendations: Environmental Audit Committee technological innovations inquiry into heat pumps: input on policy strategies, technologies and efficient solutions. Targets of deployment are recommended and analysed.

Results: No feedback available

Documentation: Policy paper (11/2020, 11 pages)

Building the supply chain whilst reducing reliance on subsidy

The Heat Pump Association (HPA) suggests¹² the following deployment trajectory to build up to one million units per year. This trajectory results in about 3.3 million cumulative units by 2030 (in line with the CCC's 'Further Ambition' scenario in their Fifth Carbon Budget¹³).

Fig. 2: HPA deployment trajectory scaling to 1 million units per year by 2030 (HPA, 2020)



This could be achieved by focussing on the following areas:

- A. **New build:** Heat pumps in new-build have a lower capital cost as the lower heat demand means a smaller, lower cost unit is sufficient and other changes often required in retrofit (resizing the heat emitters, changing pipework) can be avoided.

Policy Recommendations: UK government inquiry into decarbonising heat in homes: input on affordability (energy poverty), targets and best available technologies.

Results: No feedback available

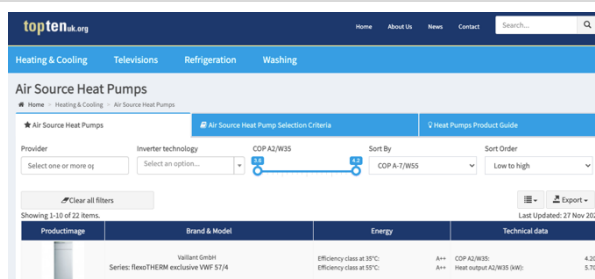
Documentation: Policy paper

Policy Recommendations: For the UK Treasury interim consultation on how to pay for "net zero" (CO₂), EST outlines the importance of heat pumps. A further focus point are policy costs sitting on electricity (the environmental and social levy programme that funds the decarbonisation of power and ECO, other things are financed almost exclusively through the electricity bill which adds around 20% to the unit cost); EST recommends:

1. No new costs should be added to energy bills
2. Current levy programme should ideally be shifted to general taxation (as a fairer way to finance change)

Results: No feedback available

Documentation: Policy paper (01/2021, 10 pages)



Net Zero Review: Interim Report
Energy Saving Trust submission (January 2021)

1. Summary

Energy Saving Trust is the leading, impartial, sustainable energy organisation working closely with UK Government and all three devolved administrations. The focus of our work is achieving net zero carbon emissions in homes, communities and transport.

We welcome this opportunity to comment how the costs of delivering net zero can be fairly allocated across the economy. Our response focusses on the decarbonisation of homes.

Our key point builds on the new finding by the Climate Change Committee (CCC) that if the approach to net zero in homes starts with improving energy efficiency and incorporates a high degree of electrification of heat, then it can deliver lower household energy bills. We therefore strongly support an overarching policy goal of delivering lower consumer bills alongside net zero emissions.

To approaching this, we think there are two key areas of consideration:

- A) **How the overall investment can be reduced by:**
 - i) A pathway based on reducing energy demand by improving fabric standards
 - ii) Proving policy certainty to investors and markets
 - iii) Regulating to deliver net zero outcomes faster
- B) **A fair transition – how costs and benefits can be distributed fairly by using:**
 - i) Homeowner self-funding
 - ii) Energy bill levies
 - iii) General taxation
 - iv) Carbon pricing
 - v) New borrowing

Policy recommendation: On 12/01/2023 EST published a report outlining their response to the UK government's Department of Business, Energy and Industrial Strategy consultation 'A market-based mechanisms for low-carbon heat'. EST welcomed the proposal but only as part of a set of policies aimed at increasing the proportion of heat pumps sold in the UK. They made recommendations based around the need for both further details and further policies/commitments are needed to decarbonise heat in the UK.

Results: UK government considered all the responses and intends to proceed with developing plans

Documentation: [BEIS consultation](#), [ESTs response report](#), [Summary of responses](#)

Policy recommendation: In January 2022 EST released their policy response in the form of the report 'Phasing out fossil fuel heating in homes off the gas grid consultation'. EST supported the actions and principles proposed in the consultation, including the UK governments commitment to phase out the installation of fossil fuel heating in homes off the grid (by 2026). EST also supported the idea of a "heat pump first" approach but made recommendations for how this would effectively work, and several considerations that should take place if so.

Results: No results yet, analysing feedback is taking place

Documentation: https://energysavingtrust.org.uk/wp-content/uploads/2022/01/Domestic-consultation-response_for-website.pdf Same but public buildings and business https://energysavingtrust.org.uk/wp-content/uploads/2022/01/Non-domestic-consultation-response_for-website.pdf

Policy recommendation: In July 2022, EST released their response to the Scottish Governments call for evidence on onshore conventional oil and gas. EST gave their view on this topic which was to say that Scotland should be in a position of 'no support'. EST advised that exploration and development in this topic would a mistake and would cause issues including but not limited to causing damage to the integrity of the Scottish Government and undercutting their climate change targets. Instead focus should be on clean energy sources.

Results: No results yet, analysis report to be created

Documentation: https://energysavingtrust.org.uk/wp-content/uploads/2022/08/Final_onshore-conventional-oil-and-gas-response_for-website_22Aug22.pdf

Policy recommendation: In April 2022, EST responded to the Welsh Government's consultation on the future version of the Warm Homes Programme (fuel poverty support programme in Wales). ESTs position was that further support is needed and gave recommendations for programme improvements that would help reach more households, including the utilisation of heat pumps.

Results: No results yet, responses are currently under review

Documentation: https://energysavingtrust.org.uk/wp-content/uploads/2022/08/Final-response-to-WHP-consultation_Energy-Saving-Trust.pdf

Policy recommendation: In January 2022, EST released their response to Ofgem's consultation which looked to gather views on the proposed administration of the Boiler Upgrade Scheme. EST responded to say they generally agree with the approach but also provided some suggestions including the use of eligibility checklists and use of MCS databases and standards.

Results: Ofgem have released their report summarising the stakeholder views, responding to feedback and outlining their proposed approach

Documentation: https://energysavingtrust.org.uk/wp-content/uploads/2022/03/Final_Ofgem_BUS-admin_for-website_09Mar22.pdf

Policy recommendation: In July 2021, EST responded to the Northern Ireland Department for the Economy's consultation on policy options for the Energy Strategy. The related area that EST

focused their response on where included low carbon heat (including the priority in the roll out/use of heat pumps).

Results: Consultation closed in 2021, and the new Energy Strategy was published at the end of 2021

Documentation: <https://energysavingtrust.org.uk/wp-content/uploads/2021/07/Response-to-NI-Energy-Strategy.pdf>, [Blog post](#) which mentions Topten UK responding to the consultation

5 Discussion and Conclusions

As in most countries, more policy processes are currently underway than previously anticipated, the partners were extending much effort to provide policy recommendations in support of policy makers on all levels. Since the product lists of BAT models for multiple HAC categories are published on each country website, based on clear efficiency criteria, the data is freely available and ready to be adjusted in the form of recommendation papers.

The mutual support of HACKS partners and environmental and civil organisations has proven very effective in lending consequence and attention to important issues. Their technical expertise on broader subjects contribute to providing more rounded, comprehensive policy recommendations. Input in the form of expertise in the areas of energy poverty or air pollution is of increasing importance as the topics gain prominence in policy considerations.

To reach climate neutrality by 2050, climate strategies must be implemented as soon as possible on all levels of government – from municipal to regional, national and EU levels. The Strategic Plan 2020-2024 by DG ENER lists “Clean, affordable and secure energy” and “Buildings and renovations with the Energy Efficiency First principle” as two of their top three objectives in the European Green Deal. HACKS partners will continue to support this process, especially with focus on the upcoming review of the energy labelling for heating products.

In conclusion, HACKS partners can offer a unique service to policy makers in the form of BAT technologies on each national market along with ready efficiency criteria, supported by a sound overview over European issues though continuous exchange with each other. After the conclusion of the HACKS project, partners will continue to support all types of policy instruments.