



## **Domestic RHI Consultation**

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## **Stage 2 consultation on MCS equivalence for the domestic RHI**

The European heat pump association, EHPA, appreciates the possibility to comment on the proposed assessment procedure and requirements for MCS equivalence. Quality assurance through certification of products and installers may reduce the risk of product failure and bad reputation if introduced in a sensible way. Several Member States are already defining national performance and quality requirements on renewable heating. These requirements can not be mandatory requirements for bringing products to the EU internal market, but they can be and they often are connected to subsidy schemes that might exist. While not mandatory, by law, the requirements achieve the status of being essential in the logic of the market. The MCS that includes both a product- and an installer certification scheme is one, however not the only, example of this in Europe.

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Contrary to the idea of a simplified exchange of goods in a single European market, the ongoing development to create national product requirements connected to subsidies has become a cumbersome market barrier. It not only limits the exchange of goods, but also increases development cost and time to market, thus slowing down innovation. We would like to point out, that so far, no evidence can be provided that this approach leads to significantly improved product quality.

In this perspective we appreciate the current effort of the U.K. Government and Ofgem to define criteria that may allow other schemes than MCS to be equivalently recognised.

Unfortunately, the consultation paper immediately limits itself again by suggesting the need for equivalent schemes to consist of two parts: certification of products and the certification of companies that install the products.

These two aspects need to be clearly separated as product certification and certification of companies and persons are essentially different. Products aimed for the European consumer market are manufactured in large series and marketed all over the European Union, whereas companies installing domestic heating systems typically offer their services locally. The standards governing the requirements for product certification are different from the ones controlling certification of companies and persons. It seems appropriate to allow applicants to apply for an equivalent assessment for, either product certification or installer certification, or both of them.

The current proposal may allow this distinction, we would however suggest a clarification of this point

### Question 1: The scheme requirements

- 1.a. In your opinion, are the proposed scheme requirements [outlined in section 5] sufficient to ensure that an equivalent scheme is set up appropriately? If not, please explain your answer.

**Answer:**

The requirements on scheme structure, governance and operation are sound and justifiable, however one might get the impression, as stated above, that an equivalent scheme needs to specify its own measures to ensure installer competency. It should be made possible to satisfy the need for competent installers by referring to other schemes providing this part (e.g. MIS 3001, MIS 3004, MIS 3005) It needs to be clarified that an applicant may apply for an equivalence assessment of a product certification scheme only and vice versa.

- 1.b. In your opinion, do the 'fundamentals' of a certification scheme as defined in EN ISO/IEC 17067 contain any requirements that are not necessary for equivalence to MCS? If so, please explain your answer and provide examples.

**Answer:**

No, EN ISO/IEC 17067 seems relevant.

### Question 2: The assessment panel

- 2.a. In your opinion, are the terms of reference for the assessment panel [outlined in Appendix 2] appropriate and sufficient? If not, please explain your answer.

**Answer:**

The foreseen composition of the assessment panel appear appropriate but seems to lack any form of exchange of information and experience from European and other national quality schemes.

- 2.b. In your opinion, what qualification, experience or organisational representation would suitably qualify someone to be a representative on this panel? Please explain your answer.

**Answer:**

The required competence of the panel is fairly well described in the consultation paper. Representatives of product manufacturers, industry associations, test- and training centres, accreditation bodies as well as certification bodies seem obvious. In addition to the above the panel would benefit from a representative with good insight in similar schemes elsewhere in Europe. This could e.g. be a representative of a foreign certification body or European industry associations.

### Question 3: The assessment process

3.a. In your opinion, will the proposed assessment process [outlined in Section 6] enable Ofgem to robustly assess scheme equivalency to MCS? If not, please explain your answer.

**Answer:**

Yes and in some cases it might even seem exaggerated, explanation given in answer 3.b.

3.b. In your opinion, does the proposed assessment process [outlined in Section 6] contain any additional stages that are not necessary for assessing equivalency to MCS? If so, please explain your answer and provide examples.

**Answer:**

The proposed two part process might not always be necessary. In the case of an applicant only applying for an equivalence status of a product certification scheme the scheme should in itself, by its own definition of requirements, provide enough quality assurance. The second part introduce additional costs and time delay which should be avoided.

Yours sincerely,

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Secretary General

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**About EHPA:** The European Heat Pump Association (EHPA, [www.ehpa.org](http://www.ehpa.org)) promotes awareness and proper deployment of heat pump technology in the European market place for residential, commercial and industrial applications. EHPA has 109 members from 22 European countries representing the majority of actors in the European heat pump industry. The association aims to provide technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production. It is the declared aim of the association to make heat pumps a core technology in the development towards a more energy efficient, RES-based, sustainable energy system.