JRAIA’s comment on the 1st WG1 “Hydrogen” meeting
for the follow-up of preparatory review studies on ENER-Lot1 and Lot2

The Japan Refrigeration and Air Conditioning Industry Association (JRAIA) representing manufacturers of refrigeration and air conditioning equipment in Japan would like to comment on VHK’s proposals in the discussion document for the 1st meeting of WG1 “Hydrogen” on 13th February 2020 as shown in the table below.

We deeply appreciate it if you could take our comments into consideration during the review.

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<th>#</th>
<th>Article</th>
<th>JRAIA’s comment</th>
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<td>1</td>
<td>1.4 Primary energy factor, impact on limits</td>
<td>JRAIA support the proposal to change PEF from 2.5 to 2.1. SCOP of LT heat pumps is theoretically about 20% higher than medium temperature heat pumps. Therefore, we support the change of PEF from the current 125% to PEF-corrected 150%. However, proposed limits of class and MEPS for LT heat pumps suggesting change to 170-175% are extremely ambitious, and JRAIA opposes to this proposal. The change of seasonal space heating efficiency value from 150% to 175% corresponds to about 17% improvement of performance. This will lead to higher price of products thus hindering the transition to heat pumps from boilers, which will give negative impact to EU’s CO₂ reduction policy.</td>
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About JRAIA

The Japan Refrigeration and Air Conditioning Industry Association (JRAIA) was originally established in February 1949 as the Japan Refrigerating Machine Manufacturers Association which was thereafter reorganized in February 1969 to become an incorporated association and renamed as it is at present.

JRAIA is the industry association representing over 160 manufacturers of refrigeration and air conditioning equipment in Japan. We, the members of JRAIA, have so far been dedicated to offering quality products to the markets of EU. JRAIA aims to promote and improve production, distribution and consumption of refrigeration and air conditioning equipment and their applied products, as well as auxiliary devices and components, automatic controls and accessories and thereby contribute to the steady development of Japanese industry and the improvement in people’s standard of living.

For more information, please see JRAIA’s website: www.jraia.or.jp

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