POSITION

January 2026

EHPA position paper on the simplification of heat pump-related product legislation

Introduction

The purpose of this position paper is to provide constructive and critical feedback from the heat pump industry to the European Commission's work on the forthcoming Energy-related Products Omnibus proposal, as well as the revision of the New Legislative Framework.

Heat pumps have the potential to delivering REPowerEU objectives[1], whilst strengthening energy security and boosting industrial competitiveness. With 2.31 million heat pump units sold in 2024, the sector already makes a substantial contribution to employment across manufacturing, installation and maintenance. Overall employment is significant, with approximately 433,000 jobs supported directly and indirectly (latest available data: 2023, Eurobserv'ER).

The scale and continuity of these annual sales, however, depend not only on market readiness, but also on a coherent, predictable and supportive regulatory framework that enables their rollout.

EHPA therefore welcomes the Commission's commitment to the urgently needed simplification. However, current legislative developments risk moving in the opposite direction. For example, the draft revisions of Delegated Regulation for space and water heaters (No Ecodesign and Energy labelling Regulation No 811-814/2013), now under public enquiry have expanded significantly in scope and length (from 183 to more than 300 pages) despite the Commission's 2023 commitment to reduce administrative burdens by 25%[2]. Beyond their increased length, the draft revisions introduce a range of new requirements, including additional Ecodesign requirements, such as material efficiency and self-monitoring, mandatory third-party conformity assessment, and changes to testing procedures. Taken together, these measures are likely to undermine heat pump affordability, by increasing compliance costs and adding administrative burdens for manufacturers.

EHPA therefore wishes to ensure that energy-product omnibus initiative from the Commission accelerate, rather than hinder, the deployment of heat pumps across Europe.

Simplification in this context, should be understood as a call for coherence: **drawing on real-world implementation experience by making appropriate use of existing instruments, fixing elements that do not function as intended, and to design a legislative framework that accelerates the roll out of heat pumps across EU**.

The need for simplification is evident when delving in the current regulatory landscape. Heat pump manufacturers navigate **multiple EU and national-level product requirements**

[1] https://commission.europa.eu/topics/energy/repowereu_en

[2] 2023 State of the Union address, the President announced that the Commission would put forward proposals to reduce EU-wide reporting obligations by 25 %, explicitly to reduce the administrative burden for SMEs. https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13201-Energy-efficiency-labelling-requirements-for-space-and-combination-heaters-review-rescaling-/feedback_en?p_id=21418

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including those related to Ecodesign, refrigerants and emerging requirements linked to grid connection and demand-response. These often require product redesigns and recertification processes, adding technical, manufacturing, and administrative burdens. While heat pumps are a mature and competitive technology, the cumulative effect of these requirements dilute efficiency gains, absorb investment capacity and slow down-market roll-out. Moreover, these burdens directly affect the upfront costs, undermine any heat pump affordability goals. Streamlining the legislative framework is therefore not merely an exercise in administrative efficiency, but a necessary condition to preserve investment momentum and accelerate the deployment of heat pumps across Europe.

This position paper sets out measures to make the EU framework for heat pumps more effective and future proof. EHPA's proposal is structured around two complementary areas:

1. **First**, the paper identifies **horizontal measures to simplify energy-related product legislation. These include:**

    - Place the requirements at the level of the finished product (heat pump) rather than its individual components;
    - increase the coordination on product requirements;
    - synchronize regulatory revision by product;
    - stick to the revision timeline given to ensure predictability of the product requirements;
    - ensure legislative requirements support, not slow down, the uptake of heat pumps
    - implementing and refraining from reopening legislations.

2. Targeted improvements on the relevant legislative framework for heat pumps, notably:
    - Ecodesign and Energy Labelling
    - Refrigerant-related legislation
    - Digital regulatory framework for heat pumps

1. The current product legislative framework

To illustrate the complexity of the legislative landscape shaping the heat pump industry, the main frameworks can be grouped into a few broad macro-categories:

1) **Ecodesign and Energy Labelling Regulations:** the core of EU product policy, now undergoing simultaneous revision across multiple files (space[3] and water heaters[4], air-to-air heat pumps and air conditioners[5], as well as air heating and cooling products, high-temperature process chillers, and fan coil units[6]). These revisions will likely introduce many new requirements to which manufactures need to adapt the production. For example, the revision of the space heaters and water heaters regulations, are about to introduce new potential Ecodesign requirement on material resources efficiency, self-monitoring, new sound power level classes, and new testing methods.

2) **Refrigerant-related Legislation:** refrigerants are central to the heat pump's thermodynamic cycle. They determine system efficiency, capacity, environmental impact, and safety performance. Consequently, **heat pump manufacturers are directly affected by evolving EU legislation governing refrigerant use** – in particular by the revised **F-Gas Regulation**[7], which introduced an accelerated phase-down of hydrofluorocarbons (HFCs), and the potential upcoming **PFAS** (per- and polyfluoroalkyl substances) **restriction** under the REACH Regulation.[8]

3) **The EU regulatory framework for smart and connected heat pumps:** digitalisation is increasingly enabling heat pumps to operate as smart, connected energy assets that interact with buildings, users, and the wider energy system, making them a key component of Europe's energy security and flexibility strategy. The evolving EU regulatory landscape defines the conditions for their digital, data-driven, and grid-integrated operation. It covers three main areas:

    - **Building automation and flexibility related requirements: the revised Energy Performance of Buildings Directive (EPBD) introduces new obligations related to Building Automation and Control Systems (BACS), which indirectly affect heat pumps as connected building technologies. While the Directive attributes significant energy-saving potential to automation and smart controls, these expectations remain high-level and are not consistently underpinned by evidence for all building types and heating systems. Moreover, EPBD leaves substantial discretion to Member States in defining technical requirements and implementation pathways. As a result, manufacturers risk facing up to 26 different national interpretations, implemented under a very tight timeline, with national transposition required by May 2026.** Also worth to mention is the ongoing revision of the ***Network Code on Demand Response***, the voluntary *Code of Conduct* **requirement**,

[3] Commission Regulation (EU) No 813/2013, OJ L 239, 6.9.2013; and Commission Delegated Regulation (EU) No 811/2013, OJ L 239, 6.9.2013
[4] Commission Regulation (EU) No 814/2013, OJ L 239, 6.9.2013; and Commission Delegated Regulation (EU) No 812/2013, OJ L 239, 6.9.2013
[5] Commission Regulation (EU) No 206/2012, OJ L 72, 10.3.2012; and Commission Delegated Regulation (EU) No 626/2011, OJ L 178, 6.7.2011.
[6] Commission Regulation (EU) No 2016/2281, OJ L 346, 20.12.2016.
[7] Regulation (EU) 2024/573 OJ L, 2024/573, 20.2.2024
[8] On the 20 August 2025, The European Chemicals Agency (ECHA) has published the updated proposal to restrict per- and polyfluoroalkyl substances (PFAS) under the EU's chemicals regulation. More information available here: https://echa.europa.eu/fr/-/echa-publishes-updated-pfas-restriction-proposal

communication protocols and ontologies, with potential implications for both **software** and **hardware** design.

- **Data and cybersecurity rules:** the ***Cyber Resilience Act***[9] introduces new security obligations for connected products, including protection against cyberattacks and **information requirements for end users**. It will influence **software development**, **technical documentation**, and **conformity assessment procedures**, which may vary from **self-declaration** to **third-party verification** depending on product classification. The ***Data Act***[10] complements this by establishing rules for **data access, sharing, and use**, key enablers of interoperability, service innovation, and consumer empowerment.

- **Grid connection and system security:** the ***Network Code on Demand Connection***[11] and its **technical annex on heat pump certification** set requirements to ensure that connected heat pumps contribute safely to **grid stability and flexibility**.

4) **Other Horizontal Environmental Legislation:** broader EU sustainability policies — such as the Waste Framework Directive[12], WEEE Directive[13], Battery Regulation[14], and the Critical Raw Materials Act[15] — introduce new obligations related to material traceability, circularity, recycling, and responsible sourcing. Although not specific to heat pumps, **these horizontal measures have a cumulative impact on product design, supply-chain management, and compliance costs**. Manufacturers must increasingly ensure the recovery of critical materials, provide component-level information, and adapt to new reporting and labelling obligations.

2. EHPA proposals on the simplification of the energy product policy

Simplification of the legislation affecting heat pumps should aim to create synergy across the existing heat pump requirements (e.g., Ecodesign, refrigerants, flexibility). To achieve this, the Energy-related Product Omnibus and the New Legislative Framework revision should look at:

- **Place the requirements at the level of the finished product (heat pump) rather than its individual components.** Often both finished products and their components are regulated by Ecodesign. This fragmented regulatory landscape creates uncertainty about which requirements apply at product versus component level. It also generates a

[9] Regulation (EU) 2024/2847 on horizontal cybersecurity requirements for products with digital elements (*Cyber Resilience Act*), OJ L 202, 15.7.2024 — eur-lex.europa.eu/CELEX:32024R2847
[10] Regulation (EU) 2023/2854 on harmonised rules on fair access to and use of data (*Data Act*), OJ L 202, 22.12.2023 — eur-lex.europa.eu/CELEX:32023R2854.
[11] Commission Regulation (EU) 2016/1388 establishing a network code on demand connection, OJ L 223, 18.8.2016 — eur-lex.europa.eu/CELEX:32016R1388
[12] Directive 2008/98/EC on waste (*Waste Framework Directive*), OJ L 312, 22.11.2008 — eur-lex.europa.eu/CELEX:02008L0098-20180705
[13] Directive 2012/19/EU on waste electrical and electronic equipment (*WEEE Directive*), OJ L 197, 24.7.2012 — eur-lex.europa.eu/CELEX:32012L0019
[14] Regulation (EU) 2023/1542 on batteries and waste batteries (*Battery Regulation*), OJ L 191, 28.7.2023 — eur-lex.europa.eu/CELEX:32023R1542
15 Regulation (EU) 2024/1252 establishing a framework for secure and sustainable supply of critical raw materials (Critical Raw Materials Act), OJ L 202, 3.5.2024 — eur lex.europa.eu/CELEX:32024R1252.

significant administrative and resource burden for manufacturers, who must interpret overlapping rules and comply with differing sets of obligations. The result is an unnecessary layer of complexity that only increase the costs of the product attention and capacity away from innovation and from scaling efficient, low-carbon heating solutions across Europe.

- **Increase the coordination on product requirements.** Manufacturers should not be required to report the same product information multiple times in different EU or national databases. Today, similar or identical data shall be submitted separately to systems such the European Product Registry for Energy Labelling (EPREL), and may depending on its design, the Digital Product Passport. The EU framework should therefore ensure that the same information is reported only once and reused across databases, whether through a single reporting interface or through full interoperability between systems.

- **Synchronize regulatory revision by product.** EU laws affecting heat pumps are revised at different times (e.g., Ecodesign, energy labelling, F-GAS etc..) forcing manufacturers into repeated redesigns, new testing cycles and update the documentation. These frequent "redesign loops" drain engineering capacity, raise the costs and delay heat pump deployment across EU. **A practical fix is to adopt product-specific regulatory roadmaps that signal well in advance when key requirements for a product — currently spread across different pieces of legislation, each with its own implementation and revision timeline — will be revised or updated, giving industry the predictability needed to plan investments**. The revision of the New Legislative Framework is an opportunity to make such coordination possible.

- **Stick to the revision timeline given to ensure predictability of the product requirements.** The heat pump sector has faced years of uncertainty, particularly because one of its key files (the Ecodesign and Energy Labelling regulation for space and water heaters) has been delayed for years – with the review study began in 2017 and the final public consultation published only in 2025. At the same time, unpredictability has also arisen in the opposite direction, as illustrated by the revision of the F-gas Regulation, where requirements became more stringent than initially signalled and were introduced over a compressed timeframe, forcing rapid redesigns of certain heat pump categories, including units below 12 kW. Both delayed and unexpectedly accelerated regulatory changes undermine investment planning and increase implementation risks. To avoid repeating these situations, the Commission should adhere strictly to announced revision timelines and publish the revised acts on schedule. Any new requirements or outstanding issues that risk delaying the process should be deferred to the next revision cycle, rather than holding up the entire regulatory update. This is essential for providing industry with the stable planning environment it needs to invest and innovate.

- **Ensure legislative requirements support, not slow down, the uptake of heat pumps.** As outlined in Section 1 of this paper, heat pumps are subject to a wide and growing set of legislative requirements across several regulatory frameworks. Taken together, these requirements create additional technical, administrative and compliance burdens for manufacturers at a time when rapid deployment and large-scale implementation of heat pumps are urgently needed. Therefore, to **accelerate the shift to sustainable heating, all new requirements for heat pumps should be assessed together for their benefits, costs and effects on market uptake. Additionally, the Commission should not provide more obligation requirements for heat pumps than those foreseen for other competing heating technology.**

  Therefore, additional regulatory burdens must be based on:

- **(i) measurable societal and industrial benefits**.
- **(ii)** contribution to **decarbonization and energy efficiency**.
- **(iii)** demonstrated **technological readiness and proportionality**; and
- **(iv)** clear **global competitiveness considerations**, meaning that **legislations that significantly impact EU products as opposed to global norms without clear benefit should be avoided as this can undermine the European competitiveness**.

- **Implement and refrain from reopening legislation**. The EU has adopted a comprehensive set of provisions relevant to the decarbonisation of heating and cooling, particularly in the Energy Performance of Buildings Directive (EPBD), the Energy Efficiency Directive (EED), the Renewable Energy Directive (RED), the Electricity Market Directive (EMD), Emission Trading Scheme 2 (ETS2) and the Social Climate Fund (SCF). Many of these measures are still in the process of transposition at national level. Ensuring their effective and timely implementation is a priority to unlock cost-reduction opportunities. Therefore, these should be properly implemented, and the Commission should refrain from reopening them to ensure predictability. Before reopening any of these in the framework of the future legislative framework after 2030, the Commission should evaluate their impact on climate neutrality goals (e.g. emission reductions, decarbonization of buildings rates…) and on the EU economy (consequences for the different sectors involved like the heating and the building sector).

3. Targeted improvements on the relevant legislative framework for heat pumps

Below, EHPA presents a **series of targeted proposals** within the existing legislative frameworks which, would help ensure that these regulations are better aligned with market realities and needs.

I. Ecodesign and Energy Labelling frameworks

Ecodesign and Energy Labelling together act as a "quality shield" ensuring only efficient, high-standard products enter in the EU market. However, as technologies are evolving, these frameworks must also remain proportionate to the burden on manufactures. To this end, EHPA put forward a series of recommendations.

1) A stable regulatory cycle to accelerate heat pump scale-up

Timely, predictable regulation is essential for scaling heat pumps in Europe. Delays and uncertainty around key Ecodesign and Energy Labelling files prevent manufacturers from planning investments, redesigning products and organising supply chains. This slows innovation, keeps inefficient technologies on the market and undermines progress toward EU decarbonisation and energy-security goals.

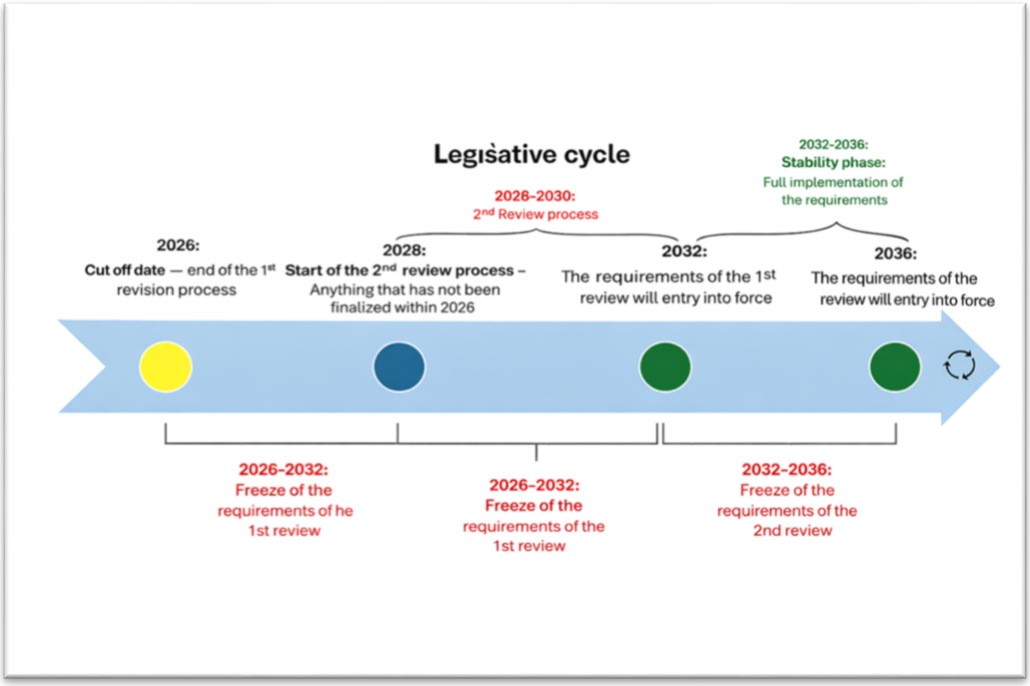
To avoid repeating years of regulatory limbo, in particular, situations where the addition of new requirements leads to repeated postponements should be avoided. Where the introduction of a new requirement would delay the adoption or significantly extend the timeline of a revision—by months or even years - the Commission should adhere to the agreed regulatory timetable. Any additional requirements should instead be addressed in the next review of the regulation, where appropriate through an early review. A predictable legislative cycle, with clear adoption

dates, would give manufacturers the certainty needed to adapt product designs, plan production and scale up heat pump deployment across Europe.

Example of a predictable and stable regulatory cycle

1. **Provide sufficient time to adapt to the new requirement, of at least 5 years (for example, from 2028 to 2032):** Once a regulation is finalised and frozen at the end of a review process, the focus should shift to full implementation, supported by a sufficient transition period of at least five years before the requirements enter into force. During this implementation phase, no new requirements should be added to the adopted text.

2. **Early planning of the next legislative window (in 2027 for 2032– 2036):** starting in the second year of the implementation phase (2027), the European Commission and stakeholders could begin preparing **the next generation of revisions**. These would then be adopted and enter into force in the next ten-year cycle (2036). This rolling rhythm, five years of review followed by five years of implementation, creates a **stable, predictable pattern** that benefits both policymakers, industry and consumers



2) Introduce the digital energy label to avoid paper waste and cost

EHPA calls for the **option to use fully digital energy labels** as an **alternative** to printed ones. Today, a printed colour label must accompany every heating or cooling unit sold in the EU, yet most of these labels are never seen by consumers and are immediately discarded. Retailers typically display one physical label per model; the printed label rarely influences the buying decision.

This requirement has become a **source of unnecessary paper waste and cost**. The average label costs €0.20 to produce, and with around 100 million units placed on the EU market

annually, this represents over **€20 million in avoidable costs** for the sector, not to mention the environmental impact of millions of unused printed sheets.

EHPA therefore proposes to **amend Article 3(1) of the Energy Labelling Framework Regulation (EU) 2017/1369** to explicitly allow suppliers to provide **digital energy labels and product information sheets** through **EPREL**, **with printed versions available on request.**

The amendments are suggested in red as indicated below:

> "1.1. The supplier shall ensure that products that are placed on the market are accompanied, for each individual unit, free of charge, with accurate printed labels and with product information sheets in accordance with this Regulation and the relevant delegated acts. As an alternative to supplying the label and the product information sheet with the product, delegated acts referred to in point (h) of Article 16(3) may provide that it is sufficient for the supplier to enter the parameters of such label and product information sheet into the product database. In such a case, the supplier shall provide the label and/or the product information sheet in printed form to the dealer on request.
>
> ~~Delegated acts may provide that the label is printed on the packaging of the product.~~
>
> 2. The supplier shall deliver printed labels, including rescaled labels in accordance with Article 11(13), and product information sheets, to the dealer free of charge, promptly and in any event within five working days upon the dealer's request."

3) Remove the obligation to include both existing and upcoming rescaled label for existing model already placed on the market during 4 months before the entry into force

The obligations laid down in Article 11(13)(a) of the Energy Labelling Framework Regulation – in particular the requirement for suppliers to provide both the existing label and the rescaled label for models placed on the market during the four-month period preceding the date for starting the display of the rescaled label – impose significant administrative and logistical burdens, without delivering commensurate benefits for consumers or for market surveillance.

EHPA therefore suggests **either removing this obligation** altogether **or amending the relevant provisions to allow the supplier to voluntary display the rescaled label during the four months preceding its date of application**.

4) Suggestion (s) to simplify EPREL

Manufacturers should be able to revise performance data while retaining the original model identifier. The current structure of the EPREL database makes it difficult to update performance information without changing the model identifier (e.g., in cases of errors or evolving testing methods). Therefore, it should be considered how to improve this since this approach has several negative consequences for manufacturers, as it increases the administrative and compliance burden, along with the associated costs.

If updates are made resulting in the need to change the model identifier, the old model identifier currently remains visible on the public website even though this is no longer the relevant information for consumers. The recommendation in this case would be that in this case, the archived model info is only visible on the compliance part of the database.

II. Refrigerants related legislation

The F-gas Regulation and the potential upcoming PFAS restriction are the two main refrigerant-related legislative initiatives. Their interaction needs to be evaluated to avoid unnecessary overlaps for heat pump manufacturers. The two frameworks are developed with different objectives: F-gas focusing on reducing climate impact of refrigerants, while the PFAS initiative aims to eliminate substances considered highly persistent in the environment, including many synthetic fluorinated chemicals. Because of this difference in scope, additional synthetic refrigerants could be restricted or phased out under PFAS criteria irrespective of their global warming potential (GWP) levels.

During the ongoing PFAS consultations, the European Chemical Agency (ECHA) should acknowledge and properly consider this overlap, especially as the Socio-Economic Analysis Committee (SEAC) still notes that in some cases it remains unclear which regulatory pathway may ultimately apply to certain heat pump types. This situation creates uncertainty for manufacturers, particularly when planning product development. To support predictability and ensure coherent implementation of EU objectives, it is important that the Commission explicitly addresses the interaction between the two regulations and provides guidance on how potential overlaps will be managed once the final decisions regarding the PFAS restriction are formulated.

This is particularly important given the current uncertainty about the timing of bans to be introduced and final scope of the PFAS restriction. It remains uncertain whether and when some HFOs, currently permitted under the F-gas Regulation, could fall under the PFAS definition if no specific exemptions are introduced in some applications based on socio-economic analysis. Such an outcome would further limit the range of refrigerants available on the market, adding complexity for manufacturers at a moment when long-term investment and product planning depend strongly on regulatory stability. At the same time, regulatory uncertainty also discourages manufacturers from investing in alternative refrigerants that may be subject to future PFAS restrictions. In this context, investment and design decisions are increasingly shaped by risk avoidance rather than by optimal technological choices. The interaction between these dynamics therefore needs to be carefully evaluated, considering the granularity of existing product models and the assessments already carried out.

III. EU regulatory framework for smart and connected heat pumps

The electrification of heating and cooling means that heat pumps are no longer just efficient appliances; they are increasingly active components of the energy system. Their ability to shift consumption in time and interact with the grid makes them central to a flexible, renewable-based electricity system. This represents a major opportunity for manufacturers, as flexibility-ready heat pumps will play an important role in future electricity markets.

Yet today, **there two main regulatory issues that risk undermining this potential**:

1. **Diverging EU and national approaches to grid integration and flexibility create inconsistent requirements across Member States.** The lack of harmonized EU rules for flexibility participation means that this potential remains unevenly exploited. Today, flexibility schemes, electricity tariffs and aggregation rules are largely defined at national level. This fragmentation creates inconsistent incentives, uneven consumer access to smart electricity tariffs, and a patchwork of technical requirements. Identical heat pumps can therefore deliver very different economic benefits depending on the Member State in which they are installed.

2. **Requirements for heat pumps are often developed outside product legislation.** There are many EU initiatives that introduce **product-level obligations through frameworks not designed for product regulation**. These discussions often take place without full alignment on implementation timelines or proper assessment of the additional burden for manufacturers. To provide few examples:

   (i) the **Smart Energy Expert Group for Data for Energy (commonly known among industry practitioners as SEEG D4E)**, established by the European Commission under the Action Plan for the Digitalisation of the Energy System, focuses on data sharing and digital tools such as a proposed "flexibility passport" for connected devices; and

   (ii) the inclusion of the heat pumps in the scope of the Network Code on Demand Connection (here in after referred as to the ***NC DC***) **which sets the technical rules for** heat pumps on how they should interact with the grid just before a potential blackout. **As a result, the industry faces growing regulatory pressure from outside product legislation** which **EHPA considers unnecessary and counterproductive, given that existing instruments already provide the right framework to address such requirements effectively**.

To simplify this framework, **EHPA asks to**:

- **Keep product requirements in product policy** by making use of the Ecodesign framework.
- **Harmonize the flexibility requirements for heat pumps through a voluntary harmonized framework to ensure that electricity tariffs are defined, and demand response can generate financial benefit for consumer.**
- **The NC DC revision should not introduce new mandatory entry-to-market conditions for heat pumps.** Any potential requirement for grid functionalities within heat pumps should be evaluated with attention to its impact on product design, certification timelines and overall costs. Emergency grid response measures can be achieved more efficiently through smart meters and home energy management systems (HEMS), which are better placed to ensure a coordinated and future-proof approach, rather than imposing additional hardware or certification burdens on products at entry to market. . This system-level approach would also make it possible to manage other grid-intensive appliances, without imposing additional hardware or certification burdens on individual products at entry to market.
- **Make use of the already existing EU database and initiatives such as:**
  - **the European Product Registry for Energy Labelling** (here in after referred as to ***EPREL***), which is the European **database for managing product information**. Instead of creating a new flexibility passport or additional onboarding data schemes, the relevant information could be collected and managed through this single existing portal. This would streamline compliance procedures and reduce the administrative burden on manufacturers

- the **Code of Conduct on Energy Smart Appliances** (here in after referred to as ***CoC ESA***), should be used as reference tool for enabling demand-response capabilities and other digital functionalities. To this end, the CoC ESA is a voluntary EU initiative coordinated by the European Commission that defines common principles and technical specifications for household and commercial appliances, such as heat pumps, water heaters, and electric vehicle chargers, so they can provide demand-side flexibility and smart grid interaction. By signing the COC ESA, manufacturers commit voluntary to ensuring that their products can communicate securely with energy systems, respond to grid signals, and manage energy use intelligently.

4. Conclusion

EHPA wishes to express its full support for the Commission's Energy-related Products Omnibus initiative and the New Legislative Framework revision.

For EHPA, simplification is not about lowering ambition, it is about doing better: making full use of existing instruments, fixing what does not work, and learning from implementation to improve future legislations.

The current complexity of EU product legislation affecting heat pumps has room for improvements to ensure a faster deployment of this strategic technology across Europe.

EHPA has prepared this paper with the aim of putting forward both horizontal improvements and targeted adjustments to sector-specific legislation. The ultimate goal of the Energy Product Omnibus and the New legislative Framework revision is to ease unnecessary burdens on manufacturers while maintaining high environmental performance, ultimately helping Europe scale heat pumps faster.

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