CONSULTATION RESPONSE FORM

MCS 007 The Heat Pump Product Standard

Thank you for taking the time to comment on this consultation. MCS values the input from all interested parties in the development of its Standards as without you we would not be able to define and raise the quality of installations. We would be grateful if you could use this form for your response which helps with collation and consideration of the feedback. The form is in two parts: the first part includes a table where you can make comments on each line/paragraph of the draft document; the second part includes specific questions that will help arrive at a final published version.

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| Introduction:This consultation is to seek feedback on our update of MCS 007, Issue 7.0, Product Standard.The standard has been substantially re-written to accommodate several changes, the most significant being: the consideration of raising the minimum performance benchmarks for heat pumps above those of statutory requirements (a potential first for any MCS product standard), the requirement to publish heat capacity data and other metrics to the MID, and the introduction of solar-assisted, air-to-air and hybrid heat pumps to the scope of the standard.In addition, a ‘definitions’ section has been introduced, updated standards references throughout, improvements to the overall structure, clarification of sentences, and incorporated the new MCS document style and layout.  |

| Respondent Name: | Company Name: |  |  | Date | Document |
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|  |  |  |  | XX/XX/XX | MCS 007 The Heat Pump Product Standard |

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| Company Name | Paragraph/Table | Comments | Proposed new text | Outcome |  |
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Note: You may add as many additional rows as required to table above.

**Consultation Questions**

1. With MCS being a voluntary quality assurance scheme for the micro-renewables sector, should consideration be made to raise the minimum performance benchmarks of its certified products above those of statutory requirements as a way of actively promoting this?

In the case of heat pumps for MCS 007, this would require performance benchmarks, such as the Seasonal Coefficient of Performance **(SCOP)** or Seasonal Space Heating Energy Efficiency **(SSHEE),** to be raised beyond those of the statutory Ecodesign requirements of the Energy-Related Products (ErP) Directive. These ErP requirements came into force for heat pumps on 26 September 2017 and have since remained the same benchmark for MCS Certified heat pump products to meet.

MCS wishes to proceed with this and has prepared an accompanying proposal titled **‘MCS HP Performance Benchmark Proposal’** which outlines what the new performance benchmarks would be, and the advantages/disadvantages of implementing them. It provides an impact assessment of the number of existing MCS certified products that would be affected by the changes proposed, based on the data available within the MCS Installation Database (MID) as of the date of publishing (28th November 2022).

Please comment on whether you agree or not, with an explanation, that:

* the minimum performance benchmarks for MCS Certified products should be higher than statutory requirements.
* the following MCS proposal for minimum SCOP performance is acceptable: **3.5 at a 35°C flow temperature.**

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1. The proposed text for defining the test conditions at which the sound power level takes place within MCS 007 was agreed as “*…at the relevant full load standard rating condition.*” This is designed to avoid the use of a part-load sound pressure level, in favour of a full load sound pressure level, when assessing a heat pump installation for permitted-development planning applications under MCS 020 (due for a full rewrite in 2023).

Do you agree with this wording?

a) Yes
b) No

 If no, why not? Or can you provide any alternatives and discuss their merits over the aforementioned?

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1. A ‘combination’ heater is defined in EU Commission Regulation 813/2013 as *‘…a space heater that is designed to also provide heat to deliver hot drinking or sanitary water at given temperature levels, quantities and flow rates during given intervals,* ***and is connected to an external supply of drinking or sanitary water’*.**

Given a combination heat pump is typically thought of as a heat pump providing both space heating and hot water *indirectly* through cylinders or calorifiers, rather than directly like a combination boiler or a point of use water heater as is implied, should MCS 007 remove the use of the term 'combination' heat pump in favour of something else? If so, what term might be used instead?

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1. This update to MCS 007 will require additional data to be published to the MCS Product Directory than the previous version, including SCOP values, thermal capacity values, and sound power levels. Appendix B attempts to address how this data might be captured by Certification Bodies, ready for publishing when the product is registered on the directory.

Do you feel this section provides enough information and clarity about what is required to be published by Certification Bodies? If not, how might this be improved?

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1. For the first time in MCS 007 we have introduced requirements for both Hybrid Heat Pump Units & Systems. As a consequence, there was discussion around appropriate control strategies. The wording below was suggested by the working group, but alternative ideas would be welcome. Do you agree with the suggested wording?

a) Yes
b) No

If not, please provide alternatives.
* 7.5.3 - *The unit or system shall be controlled by a common controller, providing the user with several choices of control parameters. These may include carbon emissions, operating costs, external ambient temperature, and electrical supply limitations.*
* 7.5.4 - *Instructions on how these controls can be implemented and adjusted by the user should be within the user documentation.*
* 7.5.5 - *The recommended proportion of the total heat supplied by the system is no less than 80% from the heat pump, in line with the Climate Change Committee (CCC) recommendation.*

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1. Should it be made clear in Section 6: Technical Documentation that weather compensation is **not** applicable to DHW only heat pumps? Should clarity be made that this only applies to heat pumps that can provide space heating?

a) Yes
b) No

Please provide reasons for or against below.

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