FRENCH REPUBLIC

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The Ministry of Economy, Finance and Industrial, Energy and Digital Sovereignty

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Order of XX
laying down the conditions for the approval of heat pump models as regards quality and industrial resilience

NOR: ECOR2612352A

Target audience: *manufacturers, importers, distributors and purchasers of heat pumps.*

Purpose: *to define the conditions for the approval of heat pump models that contribute to improving the quality of this equipment, the resilience of their supply chains and the reduction of associated environmental impacts, as well as the information and supporting documents that must be made available by the manufacturer to the French Agency for Ecological Transition.*

Entry into force: *this order shall apply from the day after its publication.*

Application: *this order is adopted pursuant to Decree XX on the processing of applications for the approval of heat pump models with respect to quality and industrial resilience.*

The Minister of Economy, Finance and Industrial, Energy and Digital Sovereignty,

Having regard to Regulation (EC) No 765/2008 of the European Parliament and of the Council, of 9 July 2008, setting out the requirements for accreditation and market surveillance relating to the marketing of products;

Having regard to Regulation (EU) 2017/1369 of the European Parliament and of the Council, of 4 July 2017, establishing a framework for energy labelling;

Having regard to Directive 2009/125/EC of the European Parliament and of the Council concerning the ecodesign requirements for space heaters and combination heating systems;

Having regard to Law No 2008-776, of 4 August 2008, on the modernisation of the economy, and in particular Article 137 thereof;

Having regard to Decree No 2008-1401, of 19 December 2008, concerning accreditation and conformity assessment;

Having regard to Decree XX concerning the processing of applications for approval of heat pump models as regards quality and industrial resilience;

Having regard to the opinion of the High Council for Energy, of 16 April 2025;

Having regard to the observations made during the public consultation conducted from 9 April 2026 to 30 April 2026 pursuant to Article L. 123-19-1 of the Environmental Code;

Having regard to notification No XXX/FR sent on XXX to the European Commission,

Orders:

Article 1

This order concerns individual air-to-water, water-to-water or ground-to-water heat pump models.

Article 2

For the purposes of this order, the following definitions apply:

1. “Heat pump”: a space heating device using a heat pump or a combined heat and power device using a heat pump, as defined by Commission Regulation (EU) No 813/2013, of 2 August 2013, implementing Directive 2009/125/EC of the European Parliament and of the Council as regards the ecodesign requirements for space heating devices and combined heat and power devices;

2. “Model”: a set of heat pump units from the same manufacturer whose final assembly is carried out at the same manufacturing site in the case of a monobloc equipment, or the final assembly of a sub-assembly that is carried out at the same manufacturing site in the case of a split-type equipment, and sharing the following characteristics: refrigerant, rated thermal output or capacity, type of heat pump (energy source, motive energy, hot source, cold source, etc.), refrigeration circuit, defrosting process, domestic hot water storage tank volume (if applicable) and domestic hot water tank heat exchanger (if applicable);

3. “Manufacturer”: any natural or legal person who manufactures a product or has a product designed or manufactured and who markets this product under their own name or trademark;

4. “Refrigeration circuit”: a closed system comprising at least a compressor, a condenser, an expansion valve and an evaporator, as well as the pipes and accessories ensuring the thermodynamic cycle;

5. “Refrigeration circuit sub-assembly”: a pre-assembled set of parts and components of the refrigeration circuit that perform a specific function of the thermodynamic cycle (compression, condensation, expansion, evaporation). This sub-assembly may be either an outdoor unit (compressor, evaporator, fan, etc.) or an indoor unit (condenser, heat exchanger, control devices, etc.), and includes, if applicable, its immediate accessories (piping, valves, sensors, control or regulating devices);

6. “Indoor unit”: the part of a split-type system that contains at least the condenser, which controls the temperature inside the building for space heating or assures domestic hot water production;

7. “Outdoor unit”: the part of a split-type system installed outside the building, which extracts heat from the air, ground or water, and houses at least the compressor and evaporator. It transfers this heat to the indoor unit via the refrigerant;

8. “Monobloc-type equipment”: an apparatus in which the components of the refrigeration circuit have been factory-assembled on a common support to form a single apparatus;

9. “Split-type equipment”: an apparatus in which the components of the refrigeration circuit have been factory-assembled on two supports to form a single functional apparatus;

10. “Manufacturing site”: location where the final assembly of the refrigeration circuit, or a sub-assembly of the refrigeration circuit (indoor unit or outdoor unit) takes place;

11. “Final assembly of the refrigeration circuit”: operation consisting of assembling and connecting all the components of the refrigeration circuit, whether individually integrated or pre-assembled, to form a finished product;

12. “Final assembly of the refrigeration circuit sub-assembly”: operation consisting of assembling and connecting all the components of the refrigeration circuit sub-assembly (indoor unit or outdoor unit), whether individually integrated or pre-assembled, to form a finished product.

Article 3

The approval referred to in Article 1 of the aforementioned Decree XX is granted if the heat pump model meets the following cumulative conditions:

1. The model holds a Heat Pump KEYMARK, NF PAC or Eurovent Certified Performance (ECP) for Liquid Chilling Packages and Hydronic Heat Pumps (LCP-HP) certification, or an equivalent certification issued by a body established in the European Economic Area and accredited in accordance with standard NF EN ISO/IEC 17065: 2012, by the French Accreditation Committee (COFRAC) or by any other accreditation body that is a signatory to the relevant European multilateral agreement concluded within the framework of the European co-operation for Accreditation (EA);

2. For monobloc-type equipment, the final assembly of the refrigeration circuit takes place within the European Economic Area; or for split-type equipment, the final assembly of at least one sub-assembly of the refrigeration circuit takes place within the European Economic Area.

Article 4

For each model for which an approval is sought, the manufacturer must demonstrate compliance with the criteria set out in Article 3 by providing a technical demonstration or, in the case of an application for transitional approval, by submitting an investment plan setting out how those criteria will be met.

The application for approval submitted by the manufacturer on the platform referred to in Article 2 of the aforementioned Decree XX must include the information and supporting documents as follows:

1. Section I of the Annex to this order for an application for approval pursuant to Section I of Article 2 of the aforementioned Decree;

2. Section II of the Annex to this order for a request for an opinion on the investment plan prior to an application for a transitional approval pursuant to Section II of Article 2 of the aforementioned decree;

3. Section III of the Annex to this order for an application for a transitional approval pursuant to Section II of Article 2 of the aforementioned decree;

4. Section IV of the Annex to this order for an application for the renewal of a transitional approval pursuant to Section II of Article 2 of the aforementioned decree.

Where the same heat pump model is assembled at more than one site, or includes a refrigeration circuit of which least one sub-assembly is assembled at more than one site, the file must include the aforementioned information and supporting documents for each of these sites.

Article 5

At the request of the French Agency for Ecological Transition, the manufacturer must include with the supporting documents submitted to the platform referred to in the first paragraph of Article 2 of the aforementioned Decree XX, a certified French translation, if such translation is necessary, for the proper examination of the file.

The French Agency for Ecological Transition, or any body it mandates for this purpose, may carry out on-site audits to verify the accuracy of the information and supporting documents submitted by the manufacturer pursuant to this order.

Article 6

The Director-General for Enterprises and the Director-General for Energy and Climate are each responsible, within their respective areas of competence, for the implementation of this order, which will be published in the Official Journal of the French Republic.

Issued on XX

The Minister of Economy, Finance and Industrial, Energy and Digital Sovereignty,

Roland LESCURE

The Minister Delegate, Government Spokesperson to the Prime Minister, responsible for energy under the Minister of Economy, Finance and Industrial, Energy and Digital Sovereignty,

Maud BREGEON

Annex

CONTENTS OF THE APPLICATION FOR APPROVAL BY HEAT PUMP MODEL

I.- APPLICATION FOR APPROVAL (COMMON LAW REGIME)

The application file includes the following:

Section		Required information or supporting documents
Information	**General information regarding the heat pump model**	• Manufacturer (company name, identifying details); • Heat pump model; • Heat pump range; • Brand and commercial reference; • Refrigerant; • Type of heat pump (air-to-water, water-to-water, ground-to-water, glycol-to-water); • Configuration (monobloc/split); • Use(s) covered by the heat pump (heating; domestic hot water; cooling); • Rated thermal output (Prated) for operation at 35 °C (kW); • Rated thermal output (Prated) for operation at 55 °C (kW); • EPREL model reference (code defined according to EU Delegated Regulation (EU) No 811/2013); • Certification mark, name of the certifier, certificate number and expiry date. • Address of the assembly site meeting the eligibility criteria.
	Heat pump energy performance	• Seasonal Coefficient of Performance (SCOP) calculated in accordance with the requirements of the NF EN 14825: 2022, for low-temperature and medium-temperature applications (if applicable); • Seasonal energy efficiency (ηs), in accordance with Commission Regulation (EU) No 813/2013, of 2 August 2013, expressed as a percentage for operation at low-temperature (35 °C) and medium-temperature (55 °C), if applicable.
Supporting documents		• Heat Pump KEYMARK, NF PAC or Eurovent Certified Performance for Liquid Chilling Packages and Hydronic Heat Pumps (LCP-HP) certificate, or equivalent; • Reports from all audits of the model's manufacturing sites, carried out as part of the Heat Pump KEYMARK, NF PAC or Eurovent Certified Performance for Liquid Chilling Packages and Hydronic Heat Pumps (LCP-HP) certification processes, or equivalent;

	○ Name of the manufacturing site; ○ Exact address of the manufacturing site (including its postcode or equivalent, if applicable, town/city and country); ○ Leak tests or pressure tests performed on all or part of the refrigeration circuit; • If applicable, any other document demonstrating equivalence to Heat Pump KEYMARK, NF PAC or Eurovent Certified Performance for Liquid Chilling Packages and Hydronic Heat Pumps (LCP-HP) certification. • If the same model is assembled at two manufacturing sites, one of which is located outside the EEA: traceability certificate, issued by the certification body, based on the product serial number, allowing differentiation to be made between products manufactured within the EEA.

II.- REQUEST FOR AN OPINION ON THE INVESTMENT PLAN (PREVIOUS TO TRANSITIONAL APPROVAL)

The file relating to the investment plan is comprised of the following:

Section	Required information or supporting documents
Description of the industrial project	• A detailed descriptive note on the planned industrial investments (site creation, extension, renovation, acquisition of production lines) aimed at ensuring that production activities comply with the conditions laid down in Article 3 of this order; • The precise location of the future production site(s) (address, cadastral references, or equivalent); • A layout plan of the production line, specifying the industrial operations (assembly of the refrigeration circuit, brazing, leak testing, etc.). • If a production line is to be installed at an existing site: a layout plan of the future line and photographs of the existing factory. • If applicable, a list of the industrial equipment, machinery and tools, of which the acquisition is planned.

Implementation schedule	• The anticipated start date for construction or equipment orders; • The anticipated date for industrial commissioning; • A schedule detailing the interim technical and financial milestones (e.g. obtaining the building permit, validating machine orders, completion of the building envelope, testing, certification).
Economic and financial viability	• The overall financing plan for the investment project, distinguishing between equity, bank financing, requested public subsidies, and other sources of financing; • Documents demonstrating the manufacturer's financial soundness (latest audited annual accounts).
Evidence of commitment	• Any document that demonstrates the reality and progress of the investment project, such as: o Land title, industrial lease, or signed preliminary sales/lease agreement; o Acknowledgement of building permit application or building permit decision; o Signed quotations or purchase orders for the main industrial equipment; o Bank financing agreements or decisions granting public aid.

III.- APPLICATION FOR TRANSITIONAL APPROVAL

In the case of an application for transitional approval submitted following the receipt of an opinion from the French Agency for Ecological Transition regarding the investment plan, the file must include:

- The opinion issued by the French Agency for Ecological Transition on the investment plan;
- The information referred to under the headings "General information relating to the heat pump model" and "Energy performance of the heat pump" as well as the items listed under the heading "Supporting documents" in Part I of this Annex.

IV.- APPLICATION FOR RENEWAL OF A TRANSITIONAL APPROVAL

In the case of an application for renewal of a transitional approval, the file must include the following elements demonstrating compliance with the milestones set out in the provisional schedule included in the initial application:

- A summary report detailing the progress of the investment plan and compliance with the milestones set out in the provisional schedule;

- Evidence of expenditure incurred during the past year in connection with the investment plan (such as paid invoices, bank statements showing disbursements or a certificate from an auditor or chartered accountant);
- Any other supporting document demonstrating the tangible progress of the project (e.g. photographs of the progress of the work, acceptance certificates of industrial equipment, an audit report drawn up by a certification body for the production line etc.);
- Where applicable, the updating of the information mentioned in the headings “General information on the heat pump model” and “Energy performance of the heat pump” in Section I of this Annex.