

Team member
Igor SikonczykPhone
+32 (0)466 90 04 01Email
igor.sikonczyk@eurovent.euDate
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Eurovent comments to the second Stakeholder meeting on 7 May 2020 and to the Discussion Document for 2nd Stakeholder Meeting (v1.1) on Residential Aspect

Background

The second Stakeholder meeting on the review of VU Regulation (1253/2014) and VU Energy Labelling Regulation (1254/2014) was held on 7 May 2020. It was preceded by the publication of Discussion Document (v1.1). The document summarized the results of the work for Phase 1 of the Review Study, comprising the Technical Analysis (Phase 1.1) and the update of the Preparatory studies (Phase 1.2).

Eurovent welcomes the tabled proposals for revisions. We believe they bring significant improvements and take into account the suggestions made by stakeholders.

In this paper, Eurovent presents additional comments on Residential aspects to the subjects addressed in the course of stakeholder meeting and to proposals for revisions included in the Discussion Document

1. Include VUs with electric power input < 30 W per airstream in EU 1253/2014 (par. 3.7 in the Discussion Document)

Eurovent fully supports the proposal to extend the scope of the Ecodesign Regulation with VUs below 30 watts per airstream.

In addition, if this extension is to come into force, we believe that the requirements in Annex II of 1253/2014 for BVUs below 30W/air stream (particularly equipped with the plate exchanger) on the mandatory by-pass facility should be revised and modified.

In opinion of our members, in such small compact Bidirectional Ventilation Units, implementation of a thermal by-pass facility is not possible. Thus, this requirement for BVU with electric power input below 30W per airstream should be lifted.

2. Multifunctional Residential BVUs (par. 3.10)

Eurovent supports the proposal to include performance data of Multifunctional Residential BVUs (residential BVUs that have one or more other functions additional to ventilation, e.g. space heating/cooling, DHW) in the information requirements of the revised VU Regulations.

The existing standards are not adjusted to the new technology that means that the overall efficiency of the unit is not well reflected. The need would be to see an overall approach in the future that consider the different functions as a whole unit. Therefore, we believe that introducing at this stage information requirements to collect data for the next review is a good compromise.

3. New list of CTRL-factors (par. 5.2)

Eurovent members appreciate the ambitious approach proposed by VHK to include in the assessment, in addition to the performance of a unit itself, also features directly related to the system (type of the installation and sensors installed in spaces of a dwelling). We agree this is the correct target way for improving overall energy efficiency of ventilation systems and indoor air quality.

However, we see several issues that might hinder the effective impact on the market of the revised Regulation, if such an approach is to be introduced.

In our opinion, too many values of the factor (that impact the energy rating on the Energy Label) might be difficult to accept by end users and lead to confusion and misunderstandings.

Residential Ventilation Units are typically mass-produced. The same goes to control equipment, both sensors and flow-control devices. A manufacturer does not know in which type of system and configuration the products will be installed. The decision is up to the system designer or contractor. This raises the question who is responsible for choosing the right CTRL factor, and in turn energy rating class to be communicated to the end-user.

Variety of design options, makes it practically impossible to combine and dispatch from the factory correctly labelled packages. Moreover, some components included in the predefined types of systems (e.g. controlled grilles) are usually not offered by RVU suppliers. These elements are picked by the contractor on site.

Possible attempt for adjusting to the delivery of multi-option packages, would impose on manufactures crucial, difficult and costly changes in the production and logistic processes.

Given that the VU Regulation is a product regulation, the above arguments bring us to a position that CTRL-factors (and related energy classification) should be limited to features and performance of the product that are under manufactures control, without addressing the system design.

The proposal of CTRL factors presented in Annex II of the Discussion document does not meet this postulate. **In our view, the choice of CTRL factor should be reduced and not related to the type of system.**

4. Ventilation Performance (par. 5.1)

Following up conclusions of the previous paragraph, Eurovent does not supports introduction of Ventilation Performance Indicator (VPI) and displaying its value on the Energy Label. We would like to stress that the main purpose of the label should be to clearly indicate the product's performance in respect of energy efficiency. Adding excessive information would create confusion and be counterproductive.

5. Filter type / filter class on the Energy Label (par. 5.1)

Eurovent reiterates its support for the proposal to show the filter type and filter class on the Energy Label. The displayed filter class should be rated according to EN ISO 16890. The previous EN 779 standard was withdrawn and its classification is obsolete.

6. Adjustments SEC-formula (par 5.3)

Eurovent members support the proposal to adjust SEC-formula. However, in our opinion this proposal requires further in-depth discussion with Stakeholders.

7. Reference filter classes (par 5.4)

Eurovent reiterates its support for introducing reference filter classes for the tests. We also support the proposed approach for performing tests (If filters are missing, use reference class filters).

8. Increase initial filter pressure drop by a factor for SPI test (par 5.4)

In opinion of Eurovent members, the approach to increase the initial pressure drop by a factor of the default or actual (resulting from the test) value may only be introduced when a proper test method is available.

For the moment, we hold that the initial pressure drop should be used for determination of the specific power input (SPI).

9. Including humidity recovery (par. 5.5)

In the original Position Paper of March 2019, Eurovent has proposed consideration of humidity recovery but only for Non-residential ventilation units. It was motivated energy-wise, since in applications involving control of indoor air humidity, the use of enthalpy heat exchangers leads to significant energy savings (for humidification and dehumidification). In residential applications, the indoor humidity control is not a typical case. Also, the flow rates of ventilation air in residential buildings are much lower compared to non-residential buildings (where ventilation air is also used for cooling purposes).

Humidity recovery in residential applications also has an impact on energy consumption and contributes to improving IEQ. This impact, however, depends on the climate. It differs for the cold and warm regions. Determining the exact climate impact requires further studies.

In this respect, Eurovent holds that it would only be appropriate to include humidity recovery if climate zones are distinguished in the assessment.

10. Reference external pressure difference (par. 5.6.1)

After reconsideration of all pros and cons for the proposed method to use a mathematical function for the reference external pressure, Eurovent members suggest maintaining the approach of the current Regulation (fixed reference external pressure of 50 Pa to determine the reference flowrate).

Introducing a function would force modification of standards EN 13142 and 13141-7 which work with constant max. external pressure 100 Pa and respectively ref. external pressure 50 Pa, what makes the results clearly comparable. It could also complexify the tests and increase their cost.

11. Limit values BVU leakages (par. 5.7)

Eurovent endorses the proposal for limiting BVU leakages and support the proposed limit values. We also reiterate our proposal to set a limit for class B3 or C3.

12. Adjustments Energy Label (par. 5.10)

Eurovent supports the proposal to show on the Energy Label

- energy classes for different climates
- filter type and class

Eurovent endorses the proposal to harmonise the reference working point for sound power level and flow rate on the label. However, in the opinion of Eurovent members, the reference flow rate and the sound power at reference flow should be displayed.

We also support the proposal to adjust Label classes.

Eurovent does not support the proposal for adding Ventilation Performance Indicator (VPI) on the Energy Label.

13. Other proposal

With regard to other proposals in the document, Eurovent does not take a position or holds positions already presented in the previous papers.

Eurovent and transparency

When assessing position papers, are you aware whom you are dealing with?

Eurovent’s structure rests upon democratic decision-making procedures between its members and their representatives. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers’ questions regarding our representativeness and decisions-making processes as follows:

<p>1. Who receives which number of votes?</p> <p>At Eurovent, the number of votes is never determined by organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission (‘steering committee’), our national Member Associations receive two votes per country.</p>	<p>2. Who has the final decision-making power?</p> <p>The Eurovent Commission acts as the association’s ‘steering committee’. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two votes per country independent from its size or economic weight.</p>
<p>3. How European is the association?</p> <p>More than 90 per cent of manufacturers within Eurovent manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the secondary sector. Our structure as an umbrella enables us to consolidate manufacturers’ positions across the industry, ensuring a broad and credible representation.</p>	<p>4. How representative is the organisation?</p> <p>Eurovent represents more than 1.000 companies of all sizes spread widely across 20+ European countries, which are treated equally. As each country receives the same number of votes, there is no ‘leading’ country. Our national Member Associations ensure a wide-ranging national outreach also to remote locations.</p>

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.

We are Europe’s Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking ‘Beyond HVACR’

Eurovent is Europe’s Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association’s geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation’s activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent’s roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.