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## Position Paper

### In a nutshell

**With this paper, Eurovent provides its feedback following the online Consultation Forum for the revision of the Ecodesign and Energy Labelling Regulations on air-to-air conditioners and heat pumps, and comfort fans, held by DG ENERGY on 06 July 2021.**

**Specifically, this paper provides additional comments on the addendum reports presented during the Consultation Forum**

### Addendum report regarding fixed double duct air conditioners

Eurovent welcomes the new addendum report on fixed double duct air conditioners and has carefully assessed it. The report has provided a better understanding of the products specificity. Such an analysis shows also that the competition between Fixed Double Ducts and Split air conditioners is unlikely, confirming industry's comments made during the Consultation Forum of September 2019.

Eurovent also recalls and re-confirms its past positions (also jointly with APPLiA) on single and double duct units.

Specifically:

### Seasonal efficiency approach for portable SD, fixed SD, portable DD and fixed DD is not justified.

The proposed introduction of the seasonal efficiency approach for single and double duct units (working for a limited number of days during the summer and/or winter seasons) is not justified and it does not reflect their real-life usage, thus we strongly ask to set the Ecodesign and Energy Labelling requirements only in terms of COP and EER (as in the current Regulations and according to EN 14511).

The Framework Ecodesign Regulation states that in the interest of a proper functioning of the internal market, the testing methods should, to the extent possible, take into account the real-life usage of a given product, and reflect the average consumer behaviour. Recent court cases have proved how important is respecting this principle.

It is Eurovent opinion that, the proposed introduction of the seasonal efficiency approach does not take into account the real-life usage of single and double duct units (both fixed and portable).

Eurovent holds that the proposed introduction of the seasonal efficiency approach is not justified and it does not reflect the real-life usage of the single and double duct units (both portable and fixed), ***thus we strongly ask to set the Ecodesign and Energy Labelling requirements only in terms of COP and EER (as in the current Regulations).***

### Minimum Ecodesign requirements

In order to coordinate minimum efficiency values with energy label scales, ecodesign and energy labelling regulations are to be kept together. It is also to be reminded that the proposal current phases out of the market 99% of the Single duct units.

As already in the past Eurovent PPs, *Eurovent proposes to keep the product segmentation/distinction as in the current legislation:*

- minimum requirements for air conditioners (based on SCOP and SEER approach)
- minimum requirements for double duct units (based on the EER and COP approach)
- minimum requirements for single duct units (based on the EER and COP approach)

*For single and double duct, Eurovent proposes the following figures:*

Product	EER <sub>rated</sub>	COP <sub>rated</sub>
Single/double duct fixed unit	2,6	2,6
Single/double duct portable unit	2,7	2,2

### Separate Energy Label for single duct, double duct and split units

As already in the past Eurovent PPs, we call for having product specific energy label classifications. Single duct and double duct air units should be treated as in the actual Regulation 626/2011. It is to be noted that this is also in line with the current proposal for comfort fans, where separate labels have been proposed for ceiling fans and other fans (the study conclusions are that this enables consumers to distinguish between fans according with their energy efficiency class).

With a common classification for all kind of air conditioners (single duct, double duct, split), single units will be relegated in class F or G and double duct in class E through G, with no possibility and incentive to improve the efficiency. A common classification does not reflect the diversity of the products, the products' features, the products' distinctive functions, the approach of the different EN testing methods, and the customers' behaviour.

*Proposal for single duct units:*

Revised Energy Label				
	EER		COP	
	≥	<	≥	<
A	4,1		3,6	
B	3,6	4,1	3,2	3,6
C	3,2	3,6	2,8	3,2
D	2,9	3,2	2,5	2,8
E	2,6	2,9	2,3	2,5
F	2,3	2,6	2,1	2,3
G		2,3		2,1

*Proposal for double duct units:*

Revised Energy Label				
	EER		COP	
	≥	<	≥	<
<b>A</b>	4,1		4,6	
<b>B</b>	3,6	4,1	3,8	4,6
<b>C</b>	3,1	3,6	3,2	3,8
<b>D</b>	2,7	3,1	2,8	3,2
<b>E</b>	2,4	2,7	2,5	2,8
<b>F</b>	2,1	2,4	2,2	2,5
<b>G</b>		2,1		2,2

## Addendum report regarding alternative testing methods

### Thermal comfort

Eurovent thanks the EC Consultant for considering the industry's position discussed at the online Working Group meeting on 18 June 2020.

Eurovent welcomes the considerations as in the addendum report and *would like to stress that the same maximum airflow limitations for both heating and cooling should provide the industry with stability, and not change with each review.*

It is to be reminded that since March 2021 the ECC (Eurovent Certita Certification) VRF certification programme<sup>1</sup> introduces limits in the airflow of both cassette and ducted VRF indoor units (in both heating and cooling mode). Such limit is set at 275 m<sup>3</sup>/h/kW.

*The ECC VRF approach has marked a new era of guaranteed certified performances, already very much accepted by the market, and Eurovent suggests keeping such approach.*

### Load-based testing methods

Eurovent supports the conclusions of the addendum report, the load-based testing methods cannot be applied before the next revision and *would like to add that an early review 3 years after the publication of the revised regulation might be too optimistic considering the current status of repeatability and reproducibility of the mentioned testing methods.*

### Exclude from scope units not designed for the comfort of human beings

The proposed measures relate to the cooling for the comfort of human beings and are not adapted to other applications, such as close control units.

One has to consider that the units' intended use is always presented in the related instruction manual, this means that the exclusion of such units would not result in any loophole.

The product applications are given in combination tables stating if the product is designed for human comfort or for technical cooling. Additionally, such technical cooling products are sold through independent sales channels. Therefore, we do not see a risk of creating loopholes.

If such close control units need to be regulated by ErP, this should be done by another regulation with specific adapted requirements, tests conditions and efficiency calculation methods.

<sup>1</sup> <https://www.eurovent-certification.com/en/category/comfort/article/vrf-indoor-unit-airflow-limit>

Close control units shall not be in the scope of this regulation not only because of the original ErP scope (human comfort) but also because the operating conditions are different.

**Thus, Eurovent calls for a clear exclusion of Close Control Units, as well as any other unit not designed for the comfort of human beings, from the scope of the regulations.**

### Multi-splits units

Eurovent appreciates the Commission's proposal on multi-split units to compensate the maximum airflow during testing applying a capacity ratio (CR). For systems with CR different from one, the nominal capacity of the indoor units and the corresponding outdoor unit cannot be verified, thus creating a possibility of a loophole. **To avoid such risk, we suggest considering a verification procedure that can check the declared CR for those combinations where CR is different from 1.**

### Implementation timing

The introduction of new requirements (e.g. comfort requirements) will result in a huge products' re-design and re-testing. The official EN testing methods will also need to be updated accordingly. The industry will be widely impacted and thus **Eurovent suggests increasing the implementation period to at least two years between publication and implementation. The implementation date should start in January, this will allow for an easing pairing of the products' seasonality.**

### Final report regarding Consumer study space heaters air conditioners

Eurovent appreciates the efforts of the Commission regarding the consumer study on merging the energy labels for air-conditioners and local air heaters.

However, it is to be stressed that the study needs **to focus more on the units' energy efficiency instead of the units' energy consumption.**

In fact, the label values for the unit's energy efficiency and the unit's annual consumption are shown in different sizes and fonts. This contrast might have caused confusion and might have biased the results of the study. On the label, the annual consumption was shown in great bold numbers, giving the impression to the participants in the study that annual consumption is the most important parameter to consider when making a final choice. In this aspect, energy efficiency is thus less emphasized. Furthermore, an energy label containing only the heating energy efficiency of the unit was not considered at all in the study.

Eurovent believes that efficiency alone can be easier for users to understand and may solve the issue of granularity within the same technologies. Furthermore, the annual consumption of the unit itself is indirectly part of the energy efficiency calculation methodology. Therefore, we think that studying the effect of the efficiency alone on the understanding of the energy label by the end user should be considered in a more detailed approach.

It is also to be stressed that the current study does assess heating only products without any assessment of cooling products (although clearly in the scope of the current review).

Furthermore, the study does not assess /consider what might be beneficial for the consumers (e.g. what must be listed in the Energy Label).

**Thus, Eurovent asks for an updated study assessing:**

- **The products' energy efficiency (instead of energy consumption)**
- **Cooling products**

- *What might be beneficial for the consumers*

Furthermore, considering that the current review is on its final stages and according to the considerations at the above-sections, Eurovent would like to re-stress its request of keeping separated energy labels for split units, single duct units and double duct units.

Eurovent is also considering providing the EC with a dedicate PP clarifying the pros and cons of merging the Energy Label of products covered by Lot 10 and Lot 20.

**Delivery annotation**

Recipient	[Mr Philippe Riviere, EC Policy Officer, DG-ENERGY, philippe.riviere@ec.europa.eu]
Concerns	Eurovent comments on Air conditioners and Comfort Fans following the CF of 06 July 2021
Other comments of relevance	

## 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><b>1. Who receives which number of votes?</b></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><b>2. Who has the final decision-making power?</b></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><b>3. How European is the association?</b></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><b>4. How representative is the organisation?</b></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.