EVIA comments on EU 1253 and 1254/2014 (LOT 6) Review following Draft Task 1,2 and 3 reports November 2019

Non-Residential aspects

EVIA strongly supports the Ecodesign and energy Labelling Legislation. Both regulations are pushing the market to develop energy efficient products and support the harmonisation of product performance and test methods. Furthermore, they are enhancing the positioning of European Products on export markets.

Following the publication of the draft report Task 1,2 and 3 reports in November 2019, EVIA and its members have discussed the report and are submitting the below comments.

General Aspects:

Based on the published draft report, it is not really clear for EVIA, what is intended to be used for the further development of the regulation.

EVIA members are strongly requesting a 2nd Stakeholder Meeting to clarify the open issues.

EVIA welcomes the intention, to consider multifunctional ventilation units in the revision of the regulation. To consider the important aspects, EVIA will submit a separate document on this topic as part of the Industry Platform on Multifunctional Units.

Detailed Comments :

Minimum requirements for heat recovery

Task 1 Introduction page 7, Task 3 Summary Page 9, Task 3 1.7.3 page 43;

EVIA highlighted and demonstrated in several documents, that life cycle issues have to be considered.

Task 3 Summary Page 9

Is not helpful for all climate zones, application, time to specify a minimum requirement of 77%.

EVIA recommend maintaining 73% for the revision if northern climate is considered (current level). This level is already too high for most non-residential applications in medium and warm climates.

Legal aspects for free trading shall be considered in the stakeholder process and solved. But free trading aspects shall not lead to minimum requirements which will lead to higher energy consumption or disproportional material and space use.

EVIA would like to repeat that a declaration of (temperature/operating conditions, operating hours, use etc.) would be a strong basis for the regulation.

Historic and listed buildings - Refurbishments

Task 1 Introduction page 7; Task 1 1.4.2 page 22

EVIA welcomes the recognition of the specific issues presented by historic and listed buildings. We additionally highlight the point, that the same aspects are also applicable in refurbishments where space limitations are a constraint.

Manufacturers are reporting, that in many cases, refurbishments is prevented due to a space limitations with the implication that existing inefficient AHU´s are not replaced.

EVIA reiterate that the principle of Declaration of Intended Use would solve these issues.

AHUs primarily used for air heating/cooling with 0-10% ventilation

Task 1 1.4.1 page 22;

EVIA welcomes the acceptance of the definitions made in the FAQ Documents.

VUs exclusively for dehumidification and de-chlorination of spaces

Task 1 1.4.3 page 22

AHU in swimming pools shall be in the scope of the regulation. There is no reason to exclude these units.

UVUs not classified as range hoods but used in commercial kitchen hoods

Task 1 1.4.4. page 23

This example underlines issues related to the definition of box and roof fans. The current definition of ventilation lacks clarity and as a result it is possible that box fans might be considered as a non-ventilation application and out of the scope.

Separate EVIA proposal on box and roof fans proposes a solution to this issue.

Definition of ventilation

Task 1 1.3.2 page 20

'ventilation units (VU)' means an electricity driven appliance equipped with at least one impeller, one motor and a casing and intended to replace air that is utilised/polluted due to presence of human beings and their use of the building including emissions from building materials, decorative and interior product and equipment.

EVIA supports the proposed definition

Task 1 2.8 page 38

FprEN *13503*
Strangely enough, the function ventilation does not appear in this definition

The standard is not only relevant for ventilation functions but also for other AHU applications. It is up to the regulation to specify ventilation.

Identification of new Circular Economy requirements

Task 3 3.3. page 112

As a general comment. AHU and in particular tailor-made made units are specially designed and built for long service of up to 20 years or more. Furthermore, special application (ATEX) shall be considered in the availability of spare parts (exemptions). Longer delivery times and other constraints on availability of unique parts must be considered.

Controls

Task 3 4.5. page 117, Task 3 1.7.3 page 43; Task 3 Summary Page 10

EVIA welcomes the intention to include a controls bonus. The controls shall only be granted for SFPint.

It shall not be used to compensate aspects of heat recovery in relation to climate zones and/or application or operation time issues.

EVIA would like to participate in further discussions to specify the controls to be used for the bonus and will table a concrete proposal in the context of the ongoing review.

Humidity recovery

Task 3 Summary Page 9; Task 3 1.6.3. page 36; Task 3 Summary Page 9

EVIA welcomes the introduction of humidity recovery based on the proposal.

Test methods of EN 308 shall be used to determine humidity recovery performance.

The energy bonus shall be calculated in the same way as with all heat recovery systems.

Task 3 Summary Page 9

As explained in the paragraph above, the minimum requirements shall not lead to innefficient units. As a consequence, the minimum value for any combination shall not be higher than 75% (EN 308 review summer conditions for ηx)

Filters

Task 3 Summary Page 9; Task 3 1.9 page 54

10. Modifications regarding Filters (section 1.8.1 and 1.9)
10.a. It is proposed to separate the SFPint-limit in two values, one for the NRVUs without filters and a separate one for the various filter classes.

EVIA supports the proposal. The factors shall be used if filters are part of the unit.

Task 3 Page 11; Task 3 Summary Page 9; Task 3 1.8.1 page 44

10.b It is proposed to introduce the parameter filter-velocity, and set the limit value for filter-velocity to 0.2 m/s

EVIA supports the proposal tabled by Eurovent's filter group, to specify the energy consumption as a creiteria.

Working / operation point

Task 3 1.8.1 page 44 1.10 page 57; Task 3 1.8.2 page 49

It shall be clarified that a graph with area of compliancy is only mandatory, if individual calculation is not provided.

Manufacturers shall provide information to be compliant with regulation.

Leakages and corrections

Task 3 Page 12 12a -c; Task 3 2.1.3 Page 65

EVIA proposes to limit the leakage and EATR/OACF (as minimum requirement, reference pressure shall be specified according to EN 308 revised).

A recalculation of flows and heat recovery performance would be disproportionately expensive. Furthermore, any controls and checks will be impossible for market surveillance or other involved parties.

Leakages and correction of heat recovery, depend on:

- Pressure in supply and exhaust area
- Position of leakages
- Air volume flows etc.

Even identical units would have different performance data in their specific surroundings.

Defrosting

Task 3 Page 13; Task 3 2.4.1. Page 75; Task 3 1.6.4 page 37

EVIA proposes not to consider defrosting because it is only relevant to cold climates and defrosting will furthermore cause condensing aspects and further complex considerations in the heat recovery systems.

The energy consumption impact might be only 2%, but higher with the minimum requirements on thermal efficiency.

Toxic environment

1.4.6. page 23

Harmonisation with fans standard EN 17166 and the fan regulation should be pursued .

About EVIA

The European Ventilation Industry Association (EVIA)’s mission is to represent the views and interests of

the ventilation industry and serve as a platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States. Our membership is composed of more than 35 member companies and 6 national associations across Europe, realising an annual turnover of over 7 billion euros and employing more than 45,000 people in Europe.

EVIA aims to promote highly energy efficient ventilation applications across Europe, with high consideration for health and comfort aspects. Fresh and good indoor air quality is a critical element of comfort and contributes to keeping people healthy in buildings.