

EVIA Position on Energy Labelling for Residential Ventilation (revision of Regulation (EU) 1254/2014) – 11 August 2021

EVIA welcomes the revision of Regulation (EU) 1254/2014 and the introduction of a new energy labelling scheme for residential ventilation units. However, after analysing the new proposal in the consultant's Final Task 6 Report, EVIA is concerned about the possible unintended consequences of the proposed energy labelling calculation and the energy classes for the different products.

In this document, EVIA provides alternative solutions for a targeted energy labelling and customer information for residential ventilation unit. The comments below are supporting our position of March 2021, illustrated with examples.

Short summary of the EVIA position of March 2021:

- Unidirectional Ventilation Units (UVUs) and Bidirectional Ventilation Units (BVUs) **are not interchangeable: a customer in an existing building does not have the possibility to change the product and in consequence the system without engaging into a deep renovations at significant costs.** Such a change is entirely different from changing a heat generator, a refrigerator, room air conditioner, or a dishwasher, for example. In addition, national building regulations can add to this non-substitutability.
- Furthermore, it is accepted that the energy performance of ventilation systems is accounted for within the harmonised or national EPBD calculations. In these calculations, the ventilation energy demand is calculated based on a typical user scenario with the known parameters of the given building and interacting parameters with the ventilation system. The energy labelling is not useful for these calculations and should instead cover only the specific characteristics of the ventilation system, such as electrical power of fans SPI, heat recovery, or leakage rates. These elements, provided according to Regulation (EU) 1253/2014, are typical input parameters for the energy performance calculation of the buildings and thus its Energy Performance Certificate (EPC) class but **not the energy labelling class.**
- Initiatives to promote the installation of new and the retrofitting existing of ventilation units (for both UVU and BVU) must be based on a visible improvement on the product's energy labelling.
- *The EU's energy related products (ErP) legislative framework, comprising the Ecodesign Directive and the Energy Labelling Regulation, are effective tools for improving energy efficiency. They **help eliminate the least performing products from an energy efficiency perspective** from the market and support industrial competitiveness and innovation by **promoting the better environmental** performance of products throughout the internal market.¹*

The consultant's Final Task 6 Report on the review of Regulation (EU) 1254/2014 is not in line with the above-mentioned points.

¹ European Commission, *About the energy label and ecodesign*. <https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/about_en> (accessed on 11 August 2021).

The proposed energy labelling scale does not provide an incentive for the decision-making process nor a basis for conditioning public or private financing initiatives. **Therefore, EVIA requests a fundamental change of the energy label for residential ventilation.** It is not understandable why it is proposed to split the label between unducted and ducted units, which perform similarly, while a split label for UVUs and BVUs is not being considered.

Energy labelling for residential units must remain based on a common SEC calculation for all types of ducted BVUs and UVUs. In addition, a fair comparison of ducted and non-ducted BVUs and UVUs is needed. On that basis, a split energy labelling scaling would be welcomed.

The following examples have been developed on the basis of already existing energy labels and styles:

- A split of energy labels is not new, it is currently applied in ENER Lot 10 on room air conditioners (Regulation (EU) 626/2011) and during the review process some stakeholders highlighted the need to keep the split energy label because the products are not comparable and exchangeable. A similar approach is valid for UVUs and BVUs.
- The ENTR Lot 6 revision already shows a split energy labelling, but for ducted and non-ducted units, wet rooms and living rooms. This is not realistic because the same products might be used in different scenarios, applications, and rooms.
- A need for considering different scales for climate zones have been identified and this was accepted widely at the Consultation Forum.
- The following additional items based on EVIA's other previous comments should also be implemented:
 - Filters tested and classified shall be labelled with the following minimum information requirements:
 - Manufacturer, name, trademark, or other means of identification.
 - Filter performance: group name and efficiency in accordance with ISO 16890 at specified air flow including initial pressure drop.
 - Indication for waste disposal of used filters, possibly to be depicted by a symbol.
 - The ventilation performance indicator shall be renamed to Ventilation Controls Indicator in order to reflect better the definition and the calculation on this parameter.

This example shows how an energy label might be styled to fulfil user needs and product requirements.

The following elements are in the proposal:

The SEC calculation is the same for all units and the result is based on a common approach.

1. The left scale is individual for the two product groups and indicates the class within each product group for average climate:

a. UVU 

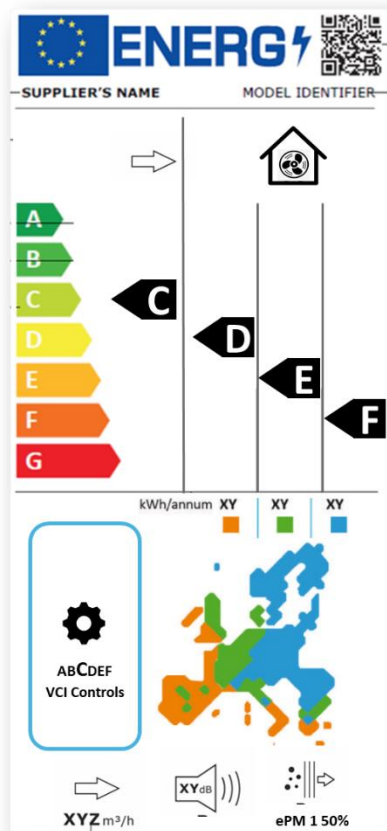
b. BVU 

2. The group of 3 on the right is the common scale for 3 climate zones.

This indicates how the product rates within the common rating model. This scale is the same for UVU and BVU and allows comparison over all product groups in each climate zone.

3. Additional indicators are common:

- a. Ventilation Controls
- b. Air volume flow
- c. Acoustic
- d. Filtration



- The energy label shall help customers to select products based on the supply of appropriate information.
- The choice of the ventilation system for newbuilds will be based on several parameters, including the energy performance calculated with real building and product data and according to the climate zone.
- Funding and financial support will be granted based on the labelling class.
- UVUs and BVUs are not interchangeable in existing buildings.
- Energy labelling shall support the replacement of old and inefficient products.

