

EVIA position on material efficiency requirements for fans

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EVIA recognises the EU’s desire to reduce the environmental impact of energy-related products (ErP) by introducing resource/material efficiency requirements via the Ecodesign Directive. In the context of the ongoing review/revision of Regulation (EU) 327/2011 setting ecodesign requirements for fans, EVIA would like to take the opportunity to contribute suggestions on resource/material efficiency requirements.

Material/Resource efficiency	Type of Requirement	Possible application to revision of Regulation (EU) 327/2011 for fans
Service related requirements	1. Availability of spare parts	<p><i>(1) Manufacturers, importers or authorised representatives of fans shall make available to independent repair service providers at least the following spare parts if part of the fan:</i></p> <ul style="list-style-type: none"> - motors; - impellers; - stator elements (casing/housing/inlet ring); - mechanical drive components; - variable speed drives; - sensors; and - wearing parts (sacrificial elements); <p><i>for a minimum of seven years after placing the last unit of the model on the market.</i></p> <p><i>(2) Manufacturers, importers or authorised representatives of safety critical fans shall make available to manufacturer-authorized repair service providers at least the following spare parts if part of the fan:</i></p> <ul style="list-style-type: none"> - motors; - impellers, - stator elements (casing/housing/inlet ring); - mechanical drive components; - variable speed drives; - sensors; and - wearing parts (sacrificial elements); <p><i>for a minimum of seven years after placing the last unit of the model on the market. Only spare parts provided by the original manufacturer, importer, or authorised representative shall be used, and the repair undertaken by a manufacturer-authorized repair service provider to continue the principle of the original safety certification (reference: EN 45554, Table A.7, Class C).</i></p> <p><i>Safety critical fans based on Regulation (EU) No. 305/2011 and safety critical fans based on Directive 2014/34/EU are specifically designed and manufactured for safe</i></p>

		<p>operation in safety critical applications. Harmonised standards of these regulations define a list of critical components. Repair and replacement of the defined critical components may only be carried out by the manufacturer, their authorised representative, or their authorized repair service provider.</p> <p>For fans EU-type examined by a notified third body, the replacement of a critical component by a different version of this component, must be approved by the notified body.</p> <p>(3) The spare parts concerned by points (1) and (2) shall be made available. The procedure for ordering them shall be publicly available on the free access website of the manufacturer, importer or authorised representative, at the latest two years after the placing on the market of the first unit of a model and until the end of the period of availability of these spare parts.</p>
	<p>2. Maximum delivery time of spare parts</p>	<p>During the period mentioned under point (a)(1) and (2), the manufacturer, importer or authorised representatives shall ensure the delivery of the spare parts for fans to the delivery period specified in the following:</p> <ul style="list-style-type: none"> – for fans incorporated into another product covered by another ecodesign regulation; the period defined in the end-product regulation; – if not, as specified in a contract, where a contract exists between the manufacturer and the end user of the fan; – if not, as defined in the product information of the technical documentation of the fan and made available on free access websites – if not, then 8 weeks after having received the order;
	<p>3. Access to repair and maintenance information (RMI) requirements</p>	<p>The available repair and maintenance information shall include:</p> <ul style="list-style-type: none"> • the unequivocal appliance identification; • a disassembly map or exploded view; • technical manual of instructions for repair; • list of necessary repair and test equipment; • component and diagnosis information (such as minimum and maximum theoretical values for measurements); • wiring and connection diagrams; • diagnostic fault and error codes (including manufacturer-specific codes, where applicable); • instructions for installation of relevant software and firmware including reset software; and

		<ul style="list-style-type: none"> information on how to access data records of reported failure incidents stored on the product (where applicable).
Product related requirements	4. Disassembly: requirements for dismantling for material recovery and recycling while avoiding pollution	<p>(1) Manufacturers, importers or authorised representatives shall ensure that products are designed in such a way that the materials and components referred to in Annex VII to Directive 2012/19/EU can be removed with the use of commonly available tools. Where a commonly available tool is not safe or practical, the manufacturer shall make available a proprietary tool.</p> <p>(2) Manufacturers, importers and authorised representatives shall fulfil the obligations laid down in point 1 of Article 15 of Directive 2012/19/EU.</p>
	5. Material efficiency product information requirements	<p>Instruction manuals for installers and end-users, and free access websites of manufacturers, importers and authorised representatives shall include the following information:</p> <p>(1) instructions for the correct installation and maintenance, including cleaning, of the fan;</p> <p>(2) access to professional repair (internet webpages, addresses, contact details);</p> <p>(3) relevant information for ordering spare parts, directly from the manufacturer or through other channels;</p> <p>(4) the minimum period during which spare parts, necessary for the repair of the appliance, are available;</p> <p>(5) the minimum duration of the guarantee of the fan in years;</p> <p>(6) details of any proprietary tool required for repair.</p>
Material efficiency labelling	6. Consumer labelling requirements	No relevant.
Definitions	Safety Critical Fan	<p>is a fan that has been designed, verified, certified, and manufactured under the scope of either the Construction Product Regulation 305/2011 or Directive 2014/34 relating to equipment and protective systems intended for use in potentially explosive atmospheres.</p> <p>(1) in the case of Regulation 305/2011 these fans have been third-party EU-type examined by a Notified Body to harmonised standard EN12101-3 Smoke and heat control systems - Specification for powered smoke and heat control ventilators (Fans). These fans are commonly called 'smoke extraction fans'.</p> <p>(2) in the case of Directive 2014/34 these fans have either been third-party EU-type examined by a Notified Body or self-certified and the internal production control set out in Annex VIII and the communication of the technical documentation provided for in Annex VIII, point 2, of the directive have been registered with a Notified Body, reference Article 3.1 (a), (b) and (c). These fans are commonly called ATEX fans.</p>

	Independent repair service provider	<p><i>A self-employed professional or a legally established organization providing repair services</i></p> <p><i>Reference: EN 45554, table A.5, Expert Class C</i> <i>Reference: EN 45554, table A.7, independent repair service repairer Class B</i></p>
	Manufacturer-authorized repair service provider	<p><i>A service provider authorized by the product manufacturer to offer repair services.</i></p> <p><i>Note: they are trained by the manufacturer, or their authorised representative, how to repair the manufacturer's safety critical fan.</i></p> <p><i>Reference: EN 45554, Table A5, authorized expert Class D</i> <i>Reference: EN 45554, table A.7, manufacturer-authorized repair service provider Class C</i></p>
	Wearing Parts (sacrificial elements)	<p><i>are parts that are intentionally designed to wear to meet the requirements of the intended use. For example, where a fan is used in a abrasive environment the fan can quickly become damaged by the abrasion. Some parts are designed as sacrificial elements to protect other critical areas and are designed to be replaced more frequently.</i></p>
	Proprietary tool	<p><i>Is a tool that is not commonly available. It is a tool specifically designed for a function that cannot be safely and/or reliably achieved by a commonly available tool.</i></p> <p><i>Reference: EN 45554, Table A3, Class C-D</i></p>

About EVIA

The European Ventilation Industry Association (EVIA) was established in Brussels in July 2010. 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 40 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.

For more information, see www.evia.eu.