

## **EVIA Comments on Resource efficiency requirements for Non-Residential Ventilation Units**

**5 June 2020**

Non-Residential Ventilation Units (NRVU) are designed to operate for minimum 12 years under normal operating conditions and typically have much longer life spans. Studies on the average lifetime of AHUs in Germany show an average of 27 years. This means that most aspects of resource efficiency and availability of spare parts are already well provided for by the nature of the market and thus are not an issue for a stronger regulation. Furthermore, NRVUs in the building stock are currently repaired, even those with an age of over 30 years with energy performance well below modern requirements under ErP. Material efficiency requirements must therefore be balanced with the intention of ErP to drive the uptake of more energy efficient products in support of decarbonisation targets.

Many of these units are individually designed and installed, an aspect that must be considered in future regulation, for example in requirements on the availability of spare parts. Bespoke parts need to be produced individually, which is by nature a more time intensive process.

In addition, access to repair and maintenance information requirements and other information requirements will need to be tailored to account for the specific nature of the NRVU market. Any public availability of documents cannot be realised for individually designed units. Furthermore, data security and intellectual property aspects might not allow for the such information to always be make publicly available.

New requirements on Resource efficiency shall consider these facts.

### **EVIA proposal on NRVU resources efficiency requirements for the revision of Regulation (EU) 1253/2014:**

Resource efficiency requirements:

- (a) Availability of spare parts

Manufacturers, importers or authorised representatives of NRVUs shall make available to the customer a list of spare parts and the procedure for ordering them, on the placing on the market of the unit for a period of 7 years after the placing on the market.

#### ***Justification***

*The list of spare parts and the procedure for ordering them cannot be made publicly available on the free access website of the manufacturer, importer or authorised representative, because these units are mainly individually designed to the bespoke specifications of the customer. As such the information shall be handed over to the customer when the product is placed on the market.*

- (b) Maximum delivery time of spare parts

During the period mentioned under point (a), the manufacturer, importer or authorised representatives shall ensure the delivery of the spare parts for NRVUs within 8 weeks after having received the order.

#### ***Justification***

*Due to the individually designed bespoke nature of NRVUs, components are also often similarly bespoke. Such components cannot always be sourced off-the-shelf as spare parts and therefore, need to be manufactured individually to order, as such*

*more time is needed to provide the respective part. Providing repair often also necessitates the need for specialist equipment to safely access and repair the NRVU, for instance cranes, forklifts and/or welding equipment.*

In the case of spare parts available concerned by point (a), the availability of the spare parts may be limited to professional repairers authorised in accordance with point (c).

(c) Access to repair and maintenance information

From the placing on the market of the NRVU, and until the end of the period mentioned under (a), the manufacturer, importer or authorised representative shall provide access to the appliance repair and maintenance information to the customer and to professional repairers on the authorisation of the customer:

**Justification**

*NRVUs are only installed/repared by professional installers/contractors with the technical competence required under the applicable regulations for the repairers of electrical equipment in the Member States in which they operate. Further obligations and registrations of the repairer shall be avoided. Authorisation should be provided by the customer in respect to intellectual property and data protection/cybersecurity considerations.*

Following authorisation by the customer, a professional repairer shall have access, within one working day after requesting it, to the requested repair and maintenance information.

The available repair and maintenance information shall include:

- 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, on request after diagnosis);
- instructions for installation of relevant software and firmware including reset software, on request after diagnosis); and
- information on how to access data records of reported failure incidents stored on the product (on request after diagnosis).

**Justification**

*Access to error codes, and instructions for software and firmware, as well as to data reports should be provided on specific request and on the basis of a diagnostic report, in respect to intellectual property and data protection/cybersecurity considerations.*

(d) Requirements for dismantling for material recovery and recycling while avoiding pollution

(1) Manufacturers, importers and authorised representatives shall fulfil the obligations laid down in point 1 of Article 15 of Directive 2012/19/EU.

5. Information requirements:

From xxx.20xx, instruction manuals for installers and end-users, from manufacturers importers and authorised representatives shall include the following information:

- (1) instructions for the correct installation and maintenance, including filter replacement;
- (2) access to professional repair (internet webpages, addresses, contact details);
- (3) relevant information for ordering spare parts, directly from the manufacturer;
- (4) the minimum period during which spare parts, necessary for the repair of the appliance, are available;
- (5) the minimum duration of the guarantee of the NRVU in years;

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### 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 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.