

EVIA Comments on Non-residential Ventilation Units Scope and Exclusions

5 June 2020

Following the 2nd stakeholder meeting on the review of Regulations (EU) 1253/2014 and 1254/2014 on 7th May 2020 and in addition to the positions submitted previously, EVIA would highlight the following important non-residential ventilation aspect to be considered in a future revision.

The below is a proposal for an exclusion from the heat recovery requirements for BVUs installed in non-residential buildings where heating/cooling is not necessary, i.e. in a clothing storage warehouse. In this situation requiring heat recovery could possibly mean that the ventilation function which is the only required function for such a building could be made less efficient due to the presence of heat recovery.

To avoid this becoming a loophole the proposal suggests additional information requirements to the effect that the product is placed on the market for the above application. The information requirements would be in the form of a certificate/approval form a Member State authorised body or a report using the definitions for building types under national EPBD implementation.

Proposal:

Article 1: Subject matter and scope

1. This Regulation applies to ventilation units and establishes ecodesign requirements for their placing on the market or putting into service.

2. This Regulation shall not apply to ventilation units which:

[Placeholder]

3. This Regulation shall not apply to non-residential ventilation units, except for information requirements which:

- a) *are exclusively specified for historic or listed buildings, where installation space does not allow the installation of a ventilation unit complying with the minimum requirements according to Annex III, or*
- b) *are exclusively specified as a replacement of an identical ventilation unit in an existing building, where installation space does not allow the installation of a ventilation unit or where this replacement cannot be achieved without entailing disproportionate costs associated to their transportation and/or installation.*
- c) *are bidirectional ventilation units exclusively specified as operating:*
 - (i) *in conditions, applications and buildings where evidence based approval according to Annex V point 4(a) to (b) demonstrates, that the minimum requirements for heat recovery according Annex III will lead to higher energy consumption or CO2 emission, shall fulfil the requirements in Annex NEW.*
 - (ii) *in buildings, applications and spaces not heated nor cooled (no heating or cooling system installed), which shall be considered as supply and exhaust UVU and shall comply with these minimum requirements.*

Annex V

Information requirements for NRVUs as referred to in Article 4(2)

4. From xx xx 20xx the following additional product information shall be provided for NRVUs referred to in Article 1(3) in the form of evidence that the product is placed on the market specifically for the mentioned operating condition, building, application and space:

- (a) a certificate or approval from a Member State authorised body, or
- (b) a report, according to national or regional implementation of Article 8(9) and Article 11 of Directive (EU) 2018/844 on technical buildings systems and the energy performance certificate, or an inspection report carried out by an accredited inspector.

5. The information listed in point 4(a) to (b) shall be available

- in the technical documentation of NRVUs.

Annex NEW

1. Non-residential bidirectional ventilation units for special application, building and operation conditions under Article 1(3), where evidence based approval according to Annex V point 4(a) to (b) demonstrates, that the minimum requirements for heat recovery according Annex III will lead to higher energy consumption or CO₂ emission, shall fulfil the following requirements:

- All ventilation units, except dual use units, shall be equipped ... Controls...
- All BVUs shall have a HRS. The HRS shall have a thermal by-pass facility.
- The minimum thermal efficiency η_{t_nrvu} and $SFP_{int,limit}$

N.B – Annex NEW is just to specify the method in principle. Formula, filter, control bonus etc. shall be updated in the framework of the revisions to Annex III.

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.