

EVIA Comments on Resource efficiency requirements for Residential Ventilation Units

5 March 2021

EVIA recognise 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) 1253/2014 setting ecodesign requirements for ventilation units EVIA would like to take the opportunity to contribute suggests on resource/material efficiency requirements.

The following submission makes suggestions on resource/material efficiency requirements for residential ventilation units. (EVIA made a separate [submission](#) in June 2020 on such requirements for non-residential ventilation units, in respect to the specificity of the market-place for non-residential units). Residential ventilation units (RVU) are designed to operate with an average lifespan of approximately 17 years under normal operating conditions, as recognised in the Ecodesign Impact Accounting (EIA).

In the following, the suggested requirements build on the requirements detailed in the draft Annex for the revision of Regulation (EU) 206/2021 for air conditioners, heat pumps and comfort fans as an example.

EVIA proposal on RVU resource efficiency requirements for the revision of Regulation (EU) 1253/2014:

X. Resource efficiency requirements:

(a) Availability of spare parts

- (1) Manufacturers, importers or authorised representatives of **residential ventilation units** shall make available to professional repairers at least the following spare parts, **if part of the ventilation unit**:

- **heat exchangers;**
- **printed circuit boards;**
- **fans;**
- **filters;**
- **controls interface;**
- **actuators;**
- **sensors; and**
- **heaters;**

for a minimum of seven years after placing the last unit of the model on the market.

- (2) The list of spare parts concerned by point (1) and 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.

Justification

For residential ventilation heat exchangers, printed circuit boards, and fans should be retained as spare parts that must be made available to professional repairers. An addition for residential ventilation units could be heaters, where pre-heaters are installed to avoid defrosting or to increase the supply temperature to 16 °C. EVIA suggests adding the clarification, "if part of the ventilation unit", as not all units are fitted with heat exchangers, heaters or controls (see below)

EVIA suggests adding controls interfaces, actuators, and sensors (i.e. temperature, CO₂/Volatile Organic Compounds, relative humidity) to the availability of spare parts requirements.

EVIA would note that technological improvements in control technology are being made quickly. As such over the life-span of a residential unit significant improvements can result from the upgradability of controls. Prioritising repairability, i.e., like for like replacement, could come at the expense of upgrades which could deliver additional energy efficiency savings and Indoor Air Quality improvements via controls that facilitate more efficient use of the product. The approach whilst facilitating access to spare parts must incentivise upgrades.

(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 residential ventilation function within **20** working days after having received the order.

In the case of spare parts available concerned by point a(1) the availability of the spare parts may be limited to professional repairers registered in accordance with point c(1) and (2).

Justification

EVIA suggest increasing the maximum delivery time for spare parts to 20 working days from the 15 working days in the draft LOT 10 Annex. 20 working days is considered to be the industry standard for the residential ventilation unit industry.

In the case of spare parts available concerned by point a(1) the availability of the spare parts may be limited to professional repairers registered in accordance with point c(1) and (2).

(c) Access to repair and maintenance information

After a period of two years after the placing on the market of the first unit of a model or of an equivalent model, 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 professional repairers in the following conditions:

- (1) the manufacturer's, importer's or authorised representative's website shall indicate the process for professional repairers to register for access to information; to accept such a request, manufacturers, importers or authorised representative may require the professional repairer to demonstrate that:
 - (i) the professional repairer has the technical competence to repair the relevant product and complies with the applicable regulations for repairers of electrical equipment in the Member States where it operates. Reference to an official registration system as professional repairer, where such system exists in the Member States concerned, shall be accepted as proof of compliance with this point;
 - (j) the professional repairer is covered by insurance covering liabilities resulting from its activity regardless of whether this is required by the Member State.
- (2) the manufacturers, importers or authorised representatives shall accept or refuse the registration within 5 working days from the date of the request;

- (3) manufacturers, importers or authorised representatives may charge reasonable and proportionate fees for access to the repair and maintenance information or for receiving regular updates. A fee is reasonable if it does not discourage access by failing to take into account the extent to which the professional repairer uses the information.

Once registered, a professional repairer shall have access, within one working day after requesting it, to the requested repair and maintenance information. The information may be provided for an equivalent model or model of the same family, if relevant.

- 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;
- information on how to access data records of reported failure incidents stored on the product (where applicable); **and**
- **filter specifications.**

Justification

EVIA suggest adding the provision of filter specification information to better facilitate filter installation, maintenance, and replacement. If non-compliant filters are installed, the energy performance and/or the IAQ parameters will not be met and the product will fail to meet its intended parameters.

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

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

XX. Information requirements:

From **[Insert Date]** instruction manuals for installers and end-users, and free access websites of manufacturers, importers and authorised representatives shall include the following information:

- (1) instructions for the correct installation and maintenance, including cleaning and filter replacement, of the **residential ventilation unit**;
- (2) access to professional repair (internet webpages, addresses, contact details);
- (3) relevant information for ordering spare parts, directly from the manufacturer or through other channels;
- (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 **residential ventilation unit** in years;

- (6) instructions on how to find the model information in the product database, as set out in Regulation (EU) 20XX/XXX [OP- Please insert here the references of the energy labelling regulation for **energy labelling of residential ventilation units**] by means of a weblink that links the model information as stored in the product database or a link to the product database and information on how to find the model identifier on the product.

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.