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Position of ECOS (on behalf of Environmental NGOs)

on the revised draft Ecodesign and Energy Labelling measures for domestic air-conditioners

(documents of April 2010)

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Ecodesign part

We definitely cannot support the new proposal from the Commission, as it shows a decrease in ambition compared to the previous version (which was already very far from benchmark levels).
According to a recent policy report "roadmap to 2050" commissioned by the European Climate Foundation, implementing measures of the Ecodesign directive should be based on the best available technologies on the global market[1], if we are to achieve our climate goals. This proposal falls short of this objective.
The energy requirements have been watered down by three factors: delayed timeline, lower levels for double ducts, bonus for some models.

We urgently call the Commission to chose a different approach:

➢ Delayed timeline

If the requirements enter into force one year later than originally planned (2013 and 2015, instead of 2012 and 2014), it should be logical that the levels are readjusted accordingly. The 1st stage requirements should at least be increased by 10%. For the 2nd stage, we propose to set the requirements closer to benchmarks by raising them by 50% for the cooling function, and 30% for the heating function. It is necessary and not absurd to challenge the industry over a 5-year period.

➢ Lower levels for double ducts

The Commission's paper proposes new requirements on COP and EER for double ducts (below 1 kW). In the Eurovent database of certified products[2], we were not able to find any packaged product performing less than these COP values (both stage 1 and stage 2) and stage 1 for EER. These levels seem ineffective.

➢ Bonus for models using green refrigerants

We are strongly in favour of promoting natural refrigerants, and this Ecodesign measure is perfectly relevant to achieve this goal. However, the proposed bonus scheme means that the overall energy saving potential of the regulation is decreased. Also, a 5% bonus is below the tolerance check level of 8%, so we doubt it would have any substantial impact.

We suggest the opposite approach, based on the 'polluter pays' principle: appliances using refrigerants of GWP > 150 should have a 10 to 15% malus on the energy efficiency requirements.

[1] http://www.roadmap2050.eu/
[2] http://www.eurovent-certification.com/

Other requests

- As we already mentioned, the scope could be extended to products up to 17 kW output.
- The requirements on standby mode, off mode and power management should enter into force at tier 1 (not tier 2). We also request the availability of a 0 W mode on all air-conditioners.
- We regret the lack of any requirement increasing resource efficiency, for instance imposing a share of recycled material and ensuring products are easily dismantled and recyclable. The WEEE directive is not helping on this, since its stakeholders usually expect such requirements to be covered by the Ecodesign policy ("*passing the buck*" syndrome).
- We support a low tolerance value for market surveillance.

Energy labelling part

We fully support a single label for all air-conditioners and coolers, which is the fairest way to inform consumers.

However, we regret the proposed use of already 3 classes on top of A. Classes with pluses should only be introduced in the future if new technological development justifies it. Therefore, class A (and not A+++) should correspond to current benchmark levels. It would also ensure more consistency between the label and Ecodesign regulation (avoiding many empty classes after tier 1 and tier 2).

We find the label pictograms for the 'cooling function' and 'heating function' (bluish or yellowish house) unclear and too small. It would be better to put a large indication on the top of each scale.

Last, we recommend maintaining on the label an indication of the average annual energy consumption.

END.