

Preparatory Study on Ecodesign and Energy Labelling for Ventilation Units - Tasks 1-3

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Task #	Section #	line #	Topic	Comment	Proposed change	Reply study team
1	1.1.2		Scope extension	We support the extension of the scope to include VUs with <30W per exhaust, especially considering the current potential loophole described in the study report		

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1	1.3.2		Definition of 'Ventilation Unit'	<p>The new definition is a significant improvement compared to the previous one. One issue is that the new definition specifies that a ventilation unit replaces the air polluted due to the presence of humans and their use of the building, and thus excludes from the scope devices used to replace air in indoor spaces not intended for humans (see decision tree, Figure 1). This is not in line with the standard by which this new definition is inspired, where the two pollutant sources are mentioned independently: the pollutants coming from the occupants, and the pollutants coming from building materials, regardless of the occupants. The new definition should properly reflect this so that the scope is extended to devices placed in areas not regularly used by humans. Furthermore, the sentence "not regularly used for persons" is vague and could be interpreted in different ways.</p>	<p>Replace the definition included in the current regulation by the new definition "<i>ventilation units (VU)</i> means an electricity driven appliance equipped with at least one impeller, one motor and a casing and intended to replace air that is utilised/polluted due to presence of human beings and due to the building including emissions from building materials, decorative and interior product and equipment.</p>	
1	1.4.1		AHUs with <10% ventilation	<p>The air heating units (AHUs) which are primarily used for heating and cooling are proposed to be left out of the scope if they use less than 10% ventilation. The rationale for leaving them out, and for the 10% figure, are not detailed.</p>	<p>Provide the rationale for the choice of the 10% figure.</p>	
1	1.4.1		AHUs exclusively intended for free-cooling purposes	<p>It is proposed to leave the "free cooling" AHUs out of the scope. Based on the new proposed definition, they are already out of scope, since their purpose is not to replace polluted air, but to cool indoor air.</p>	<p>Link those devices to the new definition.</p>	

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1	1.4.5		Thermal bypass exception	It is suggested to exempt the thermal bypass requirement “for duly justified cases”. This sentence is open to interpretation, and the exemption should have clearly defined conditions to avoid loopholes.	The exclusion conditions should be clearly defined so as to leave no room for interpretation.	
3	1.2		Ventilation performance unit	We agree with the need to have the ventilation performance of the unit displayed next to the energy label. As mentioned, it does not make sense to display the energy efficiency without information on the performance.	Indicate the performance of the ventilation unit on the energy label.	
3	Executive summary (3.b)		Climate zones – Specific Energy Consumption (SEC)	We support the decision to display the different SEC on the energy label based on climate zones, considering the impact that the climate can have on the heat recovery.	Include the differences in specific energy consumption (SEC) for the various climate zones on the Energy Label.	
3			Provision of information requirement for RVUs	We support the proposal to have an information requirement regarding filters for RVUs.	Include information requirements regarding filters for RVUs	
3	1.6.3		Humidity recovery	The bonus factor used for humidity efficiency is proposed at 0.08. The rationale behind the choice of this figure is not discussed, and neither are its implications.	Discuss the choice of the bonus factor for humidity efficiency, and the implications of this choice	

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3	1.7		Proposed revisions addressing heat recovery	The different proposals are not substantiated. It is not clear why each figure is chosen for each proposal, for example how the minimum thermal efficiency of 77% was computed, how the minimum energy efficiency of 80% was chosen, and how the specific bonus equation was established.	Explain the rationale behind the choices of figures included in the proposals.	
	Slides presented during the stakeholder meeting		Differentiate between UVU and BVU	We agree with the feedback that the energy label should not differentiate UVUs and BVUs, as they perform the same function.		
	Slides presented during the stakeholder meeting		Better consideration of controls	Considering the impact of adequate control, proposal 1 (setting minimum control requirements) seems preferable to proposal 2 (the bonus system), and we would like to see this option investigated.	Investigate the possibility of having minimum control requirements in further task reports.	