

Preparatory Study on Ecodesign and Energy Labelling for Ventilation Units – second stakeholders meeting

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Task #	Section #	slide #	Topic	Comment	Proposed change	Reply study team
			Process	It is not always clear where the data from the proposals comes from. For instance, in Task 3, section 1.7 (p.42) on heat recovery for RVUs it is not clear why EVIA proposes a conversion factor of 8%. During the meeting it was apparent that most data was taken from the stakeholders and from existing standards.	Provide clear reasoning for selecting specific factors in the draft reports.	
2	7	7	Scope extension - VUs <30W per exhaust	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. However, we would like to see an impact estimation of including intermittent devices such as those installed in a toilet, to justify their exclusion.	Estimate impact of including intermittent devices such as those installed in a toilet, to justify their exclusion.	
2	8	8	Scope extension - BVUs with heat exchanger and heat pump for heat recovery	We support the proposed scope extension. In order to assess the need for minimum requirements during the next revision, the information requirements should be clearly determined in this study report.	Determine information requirements	

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	3	10	Scope exclusion	The motivation for removing AHUs primarily used for heating and cooling should be clearly spelled out in the study report.	<p>The study report should</p> <ol style="list-style-type: none"> 1. justify the exclusion in terms of energy savings. 2. describe how the 10% figure of the total declared air flow is chosen as the cutoff for exclusion. 	
	4.1	13	RVU – Ventilation Performance	<p>We agree to have the ventilation performance of the unit displayed next to the energy label. Without a performance indicator, the comparison between two devices cannot be made.</p> <p>As highlighted during the stakeholder meeting, the exact methodology used to compute the performance indicator must be more thoroughly analyzed. This to avoid incoherence between certain figures, that wrongly indicate that the airflow adjustable per room has a lower performance than centrally adjustable airflow).</p>	The exact methodology used to compute the performance indicator must be more thoroughly analyzed.	
	4.4	23	RVU - Filters and energy consumption	ECOS supports the idea behind the proposal, but more clarity should be provided on the numbers (see first comment), such as the 2.5 pressure drop multiplier for clean filters, to quantitatively assess the proposal.	Provide more clarity on how the numbers have been chosen.	
	4.5	24	RVU- Inclusion of humidity recovery	ECOS supports the inclusion of humidity recovery in the revised Regulation.	None	

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	4.10	31-34	RVU - Adjustments Energy label	We support proposals 1, 2, 3 and 5 for adjusting the energy label. It makes sense to keep both UVUs and BVUs in the same label, since they have the same function. Concerning proposal 4, it makes more sense to display airflow and sound for the same airflow (either nominal or maximal). Displaying the sound at nominal airflow makes more sense for the user than displaying it at maximum airflow.	Display the values that correspond with the VU's nominal airflow.	
	AOB1	36	Verification tolerances	ECOS does not support higher tolerances than the current 7%. Any potential increase of tolerances should be properly scrutinized.	None. Keep verification tolerances at 7%	
	7.2	45	NRVU - Minimum requirements HRS/process	<p>ECOS supports the proposal to calculate the thermal efficiency requirements based on the intended use of the VU.</p> <p>The proposal only works for VUs specifically designed for a known building. The study team should investigate whether this process is also applicable for mass produced VUs, when the exact building is not known, but the climate zone in which the VU is intended to be used is known.</p>	Investigate the possibilities to set requirements on both custom-made NRVUs and mass-produced VUs for which the climate zone is known	
	7.5	52	NRVU - controls	Considering the big impact of controls, this is an important topic. At first glance, it seems like both options put forward will have a similar outcome. We would like to have both options investigated to propose the best option.		

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	7.8	59	NRVU- Frost protection	<p>In cold countries, defrosting is essential but energy consuming. Computing the energy for defrosting in cold climate zones is thus important, but might not make sense in warm climates.</p> <p>Therefore, it is key to investigate whether requirements can be set according to climate zone, for instance through a declaration of intended use.</p> <p>Setting information requirements on the suitability of a NRVU for certain climate zones can inform the discussion in order to decide whether a declaration of intended use would make sense.</p>	Investigate whether requirements can be set according to climate zone	

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	AOB2	62	Box and roof fans	<p>Any potential loophole as described in the study report should be closed. However, ECOS objects EVIA's current proposal to regulate box and roof fans under the VU Regulation by means of an annex that essentially introduces the less stringent requirements of the Fan Regulation. As highlighted by ALDES in their feedback on the Inception Impact Assessment, this can lead to reintroducing inefficient impellers that are currently excluded from the market by the VU Regulation.</p> <p>Furthermore, the requirement of "having casing fans used as UVUs without air treatment [...] equipped with a multi speed drive or a variable speed drive" clearly weakens the VU Regulation as the less efficient multi speed drives are no longer allowed in the VU Regulation.</p> <p>ECOS does not object the introduction of an annex regulating box and roof fans under the VU Regulation per se. However, it is key that the requirements set in this annex (notably on the 0.78 factor and the impact of allowing multi speed drives) are scrutinized in order not to weaken the current VU Ecodesign legislation.</p>	<p>Explain how the requirements set in any annex to the Regulation are chosen and what the impact on the VU and fans market will be.</p>	