EUROPEAN ENVIRONMENTAL CITIZENS ORGANISATION FOR STANDARDISATION

ORGANISATION EUROPÉENNE ENVIRONNEMENTALE CITOYENNE POUR LA NORMALISATION

ECOS

April 2020

ECOS reply to the combined evaluation roadmap/Inception Impact Assessment on the review of the Ecodesign and energy labelling requirements for ventilation units

ECOS believes that the EU should act to further reduce the environmental impact of ventilation units (VUs) by reviewing its ecodesign and energy labelling requirements.

The current regulations have brought about significant energy savings. However, as sales of VUs are expected to increase significantly (see Task 2 of the ongoing Preparatory Study) it is essential to assess how energy and resource efficiency requirements can be further improved.

Regarding the policy options presented, ECOS considers that Option 3 is most appropriate to deliver these improvements. We do not believe that self-regulation by industry (Option 2) would be sufficient to attain further energy and resource savings. Furthermore, Option 1 would not adequately address the issues that remain, such as the need for more stringent Ecodesign requirements.

Building on Option 3, we welcome the possibility to impose more ambitious Ecodesign requirements, improving both energy and resource efficiency. It is ECOS opinion that the current review should at the very least address all eight aspects listed below.

1. ECOS supports an assessment to broaden the scope to include VUs with an electric power input of less than 30 W per air stream, as well as the intention to consider effects of filters on the energy efficiency of VUs.
2. Air leakage is one of the important parameters related to the loss of efficiency for both residential and non-residential VUs. We therefore strongly encourage the Commission to conduct an assessment of the impact of the leakage rates of all VUs, and to set Ecodesign requirements accordingly.
3. The distinction made between residential and non-residential ventilation units can create loopholes since many VUs fall into both categories. We therefore urge the Commission to investigate the effects of this differentiation and assess the benefits of setting the same requirements for all these products.
4. We welcome any clarifications and improvements of definitions set in the Regulations. We want to stress that these adjustments should however not lead to additional exemptions. The definition of VUs currently proposed by the Preparatory Study, for instance, refers to the presence of human beings. This could create a loophole for VUs used in buildings that are not used by people.
5. ECOS is supportive of assessing the impact of climatic conditions on heat recovery to improve the requirements for heat recovery.

In addition to these five issues mentioned by the IIA, it is key that the following aspects are addressed as well:

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6. In line with Article 8 of Ecodesign Regulation (EU) No 1253/2014 on the review of the regulation, an assessment of the current verification tolerances set out in Annex VI is needed.
7. In line with Article 8 of Energy labelling Regulation (EU) No 1254/2014, the broadening of the scope of the energy label should be assessed to include i.a. non-residential VUs and VUs with an electric power input of less than 30 W per air stream.
8. Last but not least, the potential circular economy gains that can be delivered by further regulating VUs should be assessed as it has and is been done for the rest of the product groups under the Ecodesign Framework. Material efficiency requirements should be introduced, for example to facilitate recyclability. In this regard it is essential to consider design evolutions, such as the increased use of plastics, that may complicate current practices.