



# ecee comments on the proposed Eco-design and labelling requirements for air conditioning appliances.

2010-05-19

## Summary and proposals

ecee welcomes the proposal for Eco-design requirements for air conditioning appliances and supports the proposal to introduce one single label for all air-conditioning products covered by this measure. However, the requirements can be made more stringent to maximise energy savings in a cost efficient manner.

Since the product development of this type of appliances is rapid, strict energy efficiency requirements within the EU will promote appliances of higher quality, and thus serve as a stimulus for product development by EU-based manufacturers and strengthen their position on the global market.

ecee supports the objective to promote climate-friendly refrigerants. However, we are concerned that this approach may lead to a reduction in the electricity saving potential of the measure by giving too large additional energy consumption allowances for equipment using those refrigerants. Every effort must therefore be made to harvest the potential for using those climate-friendly refrigerants that do not reduce the energy efficiency of the appliances.

## Eco-design requirements

### *Minimum energy performance requirements*

After contacts with several manufacturers of air conditioning appliances, more stringent requirements for air conditioning appliances appear to be realistic and also desired by manufacturers focusing on quality and energy efficiency. Given the fact that the introduction of the implementing measure has been delayed and the requirements in the new proposal are not significantly more stringent, there still appears to be a potential for stricter requirements.

*ecee proposes that:*

- Minimum energy efficiency requirements for air conditioning appliances should be more stringent.

### **About the European Council for an Energy Efficient Economy (ecee)**

ecee is a non-profit, membership-based European NGO. The goal of ecee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, ecee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of ecee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 people and offers a unique resource of evidence-based knowledge and access to reliable information.

One section of the ecee web site is dedicated to the Eco-design Directive and includes an overview of the regulatory process as well as specific information for each product. [www.ecee.org/Eco\\_design/products/](http://www.ecee.org/Eco_design/products/)

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### ***Climate-friendly refrigerants***

eceee supports the objective to promote climate-friendly refrigerants. However since such refrigerants are rapidly developing and easy accessible on the market, there is potential for more stringent Eco-design requirements *also* for products with such refrigerants.

*eceee proposes that*

- The allowance for climate friendly refrigerants should be eliminated or reduced.

### ***Off and standby***

eceee believes that the horizontal stand-by and off mode requirements in the horizontal Commission Regulation (EC) No 1275/2008 should apply to all air-condition products unless there are specific technical reasons for exemptions to be made.

## **Energy labelling**

### ***eceee supports one single label***

eceee supports the proposal to use one single label for split air conditioning and single/double duct air conditioners, since this adequately shows the relative efficiency of the different products. According to the proposal, single and double duct products would populate classes E, F and G and split packages and heat pumps would be labelled within the A to A+++ levels. Separate labels with different scales would make the single/double duct units appear more efficient than they are in comparison with the split units in the other scale (for example by labelling single and double ducts as A) while a more efficient split unit may even have a lower labelling class.

### ***Redefinition of energy classes***

For most of the appliances in this lot, the proposed Eco-design requirements would ban the lower energy classes in the first tier. In the second tier, the requirements would even lead to the exclusion of class C for the heating function.

For split packages the proposed Eco-design requirements would give the following result:

- Minimum performance requirements for the cooling function would ban energy class D in 2013 and class C in 2015.
- Minimum performance requirements for the heating function would ban energy class C in 2013 and energy class B in 2015.

The consequence would be that only split packages with energy class A (heating function) or better are allowed. eceee therefore suggests that the energy efficiency scale for the heating function is moved and that the bands between G and A+++ are narrowed. This would leave products in more energy classes after the minimum performance requirements have banned products in the lower classes.

*eceee proposes that:*

- The energy efficiency classes for heating functions should be moved in order to keep products in more labelling classes after the lowest classes have been banned.
- The bands between the energy efficiency classes G to A+++ should be made narrower to create stronger incentives for upgrading to a better class.



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## **Benchmarks**

According to the proposal, benchmark (class A+++) for heating mode air-conditioning appliances is set to 5,1 SCOP/COP. This level appears to be too low. Split air conditioning appliances with reversible functions have mostly been designed for cooling functions and there should still be a potential for improving the heating functions. eceee suggests that this potential is investigated before a new benchmark level is set.

*eceee proposes that:*

The benchmark for heating functions should be investigated and reformulated.

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