

Brussels, 6 October 2011

EPEE Comments on European Commission draft note on Ecodesign on Ventilation Products (ENER Lot 10 and ENTR Lot 6)

The European Partnership for Energy and the Environment (EPEE), representing the heating, cooling and refrigeration industry in Europe, would like to thank the European Commission for giving us the opportunity to comment on the Commission's intention on the future consideration of ventilation products under the Ecodesign Directive.

As it is explained in the draft note issued by the European Commission, EPEE is deeply concerned that EuP/ErP implementing measures for ventilation equipment are currently split into three separate Lots. We believe that one single implementing measure covering ENER Lot 10 and ENTR Lot 6, and eventually ENER Lot 11 as it is suggested in the draft note, is an effective approach to simplify the regulation and reduce unnecessary burden placed on manufacturers. Therefore we fully support the "two-tier" approach as proposed in the draft note.

In addition to the above we would like to ask the European Commission to consider the following ISO standardisation project when considering future ventilation implementing measures:

- Currently a standard on "Heat recovery ventilators and energy recovery ventilators - Method of test and performance" is in the process of development at the ISO/TC 86/SC 6/WG 10 level. This ISO draft has already been approved as CD16494 in September 2010.
- This draft standard aims to consolidate various performance testing methods for "*heat* recovery ventilators" and "*energy* recovery ventilators" currently existing in different regions across the world. Therefore EPEE believes that it offers a comprehensive and fair evaluation of performance of various types of heat/energy recovery ventilators.

- In addition the draft standard proposes new criteria concerning energy-savings performance:
 - Coefficient of energy (COE: Ratio of total energy recovery to power input)
 - Effective work (EW: Net total energy savings)

These criteria would be particularly helpful from a consumer viewpoint in helping the end-user judge the effectiveness of these products and to compare their performance.

- Furthermore the draft standard will also harmonise other ISO standards, with regard to uncertainties of measurements and variations allowed during tests. Therefore it is qualified to be a world standard which will be referred to repeatedly for many years to come.

EPEE looks forward to further working with the Commission on ventilation products and remains at your disposal for further clarifications.

Best regards,



Andrea Voigt
EPEE Director-General

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