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Mr P Hodson
Energy Efficiency & Intelligent Energy
DG Transport and Energy
European Commission

20 October 2011

By email

Dear Mr Hodson

ECODESIGN ON VENTILATION PRODUCTS (ENER LOT 10 AND ENTR LOT 6)

1. Thank you for the opportunity to comment on your proposals for ecodesign and energy labelling measures on ventilation products. We welcome the fact that the European Commission is looking at the relationship between product groups and opportunities for rationalisation. However, we are concerned that the current proposal would not be technically feasible in practice.
2. We are also concerned that the regulation for kitchen hoods and domestic ventilation units is being delayed as a result of this proposal. We welcomed the initial proposal in January 2011. We regret that work on the regulation of these products is now being held up until after the ENTR Lot 6 preparatory study has been completed. We urge the Commission to press ahead with developing proposals for these products.
3. We consider that the scope of the proposed single ecodesign regulation on ventilation products above 30W is too wide in terms of both power ranges and the control technologies used. We could not support a scope that was so complex it risked creating loopholes, was subject to lengthy delay, or became difficult for market surveillance authorities and manufacturers to interpret.
4. In our view, it is also too early to consider whether ENER Lot 11 (fans between 125W and 500 kW) should be merged with a ventilation regulation when Regulation 327/2011 is reviewed in 2015. The review in 2015 will need to assess how effectively Regulation 327/2011 has operated in practice. We would not wish to prejudice this consideration by drawing premature conclusions on the way forward.
5. Lot 6 covers both ventilation equipment and air conditioning equipment. The Commission's proposal for a single ventilation regulation does not mention air conditioning products. We do not wish to see work to regulate air conditioning equipment (eg chillers,

split air conditioners) held up. We urge the Commission not to delay work on the regulation of air conditioners greater than 12kW.

6. We commend the Commission's ambition in seeking to harmonise standards across ventilation products. We note, however, that there is no overlap of substance between the two domestic products from ENER Lot 10: domestic ventilation units and kitchen hoods. Kitchen hoods are only subject to one EEI criterion that takes account of the fan power and lamp power, whereas domestic ventilation units are subject to different criteria:

- thermal efficiency of heat recovery systems;
- specific power consumption of the unit;
- control factor; and
- sound power.

There is therefore nothing directly to be gained from putting them in the same standard.

7. The proposal becomes increasingly problematic when attempting to include commercial standards, as pressure levels vary between commercial and domestic standards. We have some concerns following discussions with technical experts and industry stakeholders about the potential for a harmonised ventilation standard.

Yours sincerely

A handwritten signature in black ink that reads "Iain Notman". The script is cursive and fluid, with the first letters of "Iain" and "Notman" being capitalized and prominent.

IAIN NOTMAN

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