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By email

Ref. email 27th of July/Isabelle Michiels
and the Ecodesign Consultation Forum meeting of 25 September 2013, on air heating products,
cooling products and high temperature process chillers

Preliminary Finnish views to the Commission's working document on possible requirements for air heating products, cooling products and high temperature process chillers, Draft Ecodesign Regulation

Ministry of the Environment supports the goal towards greater energy efficiency on air heating products, cooling products and high temperature process chillers. However, Ministry of the Environment has still some concerns with the proposed regulations.

- 1) **The scope should be revised so that ecodesign requirements would concern products with a rated heat output or rated cooling output of 400 kW or less. The Regulation should not apply to fan coils and high temperature process chillers at all**
 - The rated heat output defined in the scope should be reduced, because the products in MW scale are rather custom made products than products produced in series (see Explanatory notes, page 17, footnote²⁴)
 - Fan coils should be out of the scope, because they are generally local terminal devices in rooms (heating or cooling units in rooms and parts of air conditioning systems) and as such out of suitable boundaries for the scope of this draft Regulation
 - High temperature process chillers could possibly be handled together with "Process chillers and Condensing Units" (http://ec.europa.eu/enterprise/policies/sustainable-business/ecodesign/product-groups/freezing/chillers/index_en.htm)
 - the wide scope results in massive lists of definitions, which in fact makes the document complicated for the user.

- 2) **SI-units should be used throughout the documents, for example air flow in m³/s. Air flow values with unit could be accepted in parenthesis in connection with m³/s (or l/s or dm³/s, since 1 l = 1 dm³)**
 - an example of the definition: "the nominal air flow rate means the air flow rate in m³/s (m³/h) measured at..."

- 3) **The level of ecodesign requirements of seasonal space heating energy efficiency can't be assessed at the moment, because the calculation method presented in "Transitional methods"-document is unclear and contains an incorrect equation.**
- in Transitional methods -document the correct equation for 2.6 emission efficiency should be given, and
 - the constant 9.78 in the equation (in Transitional methods –document, paragraph 2.6) should be explained, and
 - air flow unit kW/m³h (totally unclear) should be defined as well as
 - the term and concept "emission efficiency" should be defined.
- 4) **The ecodesign requirements concerning sound power levels should be reconsidered**
- the allowed noise levels for products are relatively high (although lower than in COMMISSION REGULATION (EU) No 206/2012) compared to national requirements for sound levels in rooms, thus the product information should include also sound power levels in octave bands so that designers can determine noise insulation and absorption measures
 - information set out in tables 12-13 of Annex II lacks the information of the indoor side sound power level
 - what is the explanation for having a 5 dB higher limit for packaged products (Annex II, tables 7 and 8).
- 5) **The climatic data should be reconsidered and supplemented with "cold" and "warm" climate data**
- why is the cooling season temperature range -19 °C - +38 °C (Annex III, table 28) while the heating season is practically -10 °C - +15 °C (Annex III, table 26)
 - European cooling and heating season(s) are defined in COMMISSION REGULATION (EU) No 206/2012, Annex II, Table 1
 - seasonal space heating energy efficiency should be calculated with "cold" and "warm" climate data as well, since the climate may have a great impact on the efficiency.