

Mr. Stephan Kolb

9 November 2007

Directorate-General for Energy and Transport
Energy Efficiency
TREN D 3
DM 24 4/8 BE-1049 Brussels

Cc: Mr. Andre Brisaer, Mr. Ismo Gronroos

Subject: 'Eco-design of Energy Using Products' (EuP) Directive 2005/32/EC: Comments on possible eco-design requirements for standby and off-mode electric power consumption of electrical and electronic household and office equipment' (Lot 6)

Dear Sir,

Following discussions in the consultation forum meeting on Lot 6, EPEE would like to clarify its position that heat pumps, air conditioners and ventilation systems should be excluded from the scope of Lot 6.

Although EPEE is supporting the Commission targets to reduce energy use, we believe that the industry needs to make its technical evaluation and to assess how to reach the prescribed targets.

Currently, heat pumps, air conditioning & ventilation manufacturers are not ready to achieve these goals and EPEE would like to mention that it was not assessed whether the targets were achievable for these types of products.

As already stated in the consultation forum, the study only investigated limited types of products and did not include building integrated products and connected products. The product cases investigated consist of single casing plug-and-play appliances that are not built in.

EPEE is of the opinion that it is not possible to extrapolate these requirements to appliances such as heat pumps, air-conditioning and ventilation equipments which differ a lot from the product cases investigated in the Lot 6 study. EPEE would like to stress the following points:

1. CEN working group TC113 is currently in the process of setting the calculation requirements for seasonal energy efficiency (SEER) on energy efficiency. This seasonal energy efficiency ratio will include the energy use in off and on mode and as such will integrate the stand by & off mode losses as defined in Lot 6 which are considered as a portion of the total energy use of an air conditioner. For this kind of equipment, the total energy use is more important than the portion of energy use coming from stand by and off mode which are two modes that do not occur frequently.
2. There is technology available to reduce the energy use, however it is currently only applied on a limited range of air conditioner systems (room air-conditioners) and due investigation is ongoing to improve this.
3. Single split and multisplit air-conditioning systems are built up out of more than one component and these systems are in general built in.

- *The requirements for Lot 6 are based on a study done for single casing appliances and do not consider systems consisting of more than one component.*

EPEE would like to stress that the industry is taking the necessary actions to work on energy efficiency and to reduce all possible consumption phases in air conditioning systems.

In this respect, we are obviously supporting the work of Lot 6 and request to consider the following:

1. Exclude heat pumps, air conditioners and ventilation equipments from the scope of lot 6.
2. Limit the present requirements to only plug-and-play appliances with less than 500W rated power input as those were studied in the current Lot 6 report.
3. Set up a review study for appliances other than plug & play appliances and for plug and play appliances with a rated power input exceeding 500W, and study carefully the stand by and off mode losses of these kinds of appliances. Based on this study, specific stand by and off mode loss requirements can be set. We would then propose a timing of 5 years.

We are looking forward to discuss these issues with you. Should you have any question or require additional input, please do not hesitate to contact us.

Yours sincerely,

Friedrich P Busch
Director General - EPEE