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European Heat Pump Association

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Questions and requests for clarifications on the EPREL database

The members of the European Heat Pump Association appreciate the opportunity to provide input in the process of the preparation of the European Product Database for Energy Labelling. We therefore kindly ask you to take into consideration the following questions and requests for clarifications and we look forward to receiving your reply on the points outlined.

President
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1. Technical documentation

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Each distributor selling products under its own brand has to register such products in the EPREL database and fill in both the compliant and public parts. A clarification of what points exactly the technical documentation should contain would be appreciated, in particular with reference to the level of details to be included on the “testing conditions”.

2. Changes to the model identifier before the product is placed on the market

After a new model is created and before the product is placed on the market, is it possible to change the model identifier? If so, wouldn't this quickly lead to high identification numbers, given the fact that when a product is in the development phase, it is likely that its name is changed multiple times?

3. Changes in data with no effects on the model identifier

Currently, three reasons for changing data are allowed: a typo, a label scale change and a change in standards. We recommend extending this rule to every change that affects the performance and comes from the legislation itself, such as a change of the conversion factor, label scale changes, changes in standards, etc. Additionally, there are other changes that should be allowed as well without having to change the model identifier: the adding of information, such as adding more precautions or testing conditions, or adding additional voluntary documentation.

4. Deletion of data for products not placed on the market

In case a supplier has registered a model (with label, fiche and technical documentation), obtaining in return a registration number, but finally decides not to sell the product anymore, can the supplier delete all the data, or will the model remain with an incomplete status?

5. Temperature control and solar devices

Do temperature control and solar devices, which are included in several lots (1, 2, 15), have to be entered into the EPREL database?

6. Products sold as package

In case a product is sold as a package (outdoor sensor included in the box), is it the data from the package that have to be entered into the EPREL database?

7. Change in product label for Lot 1

For Lot 1, the product label will change in September 2019 with the introduction of A+++ class. Will it be possible to implement such change earlier (i.e. declare the A+++ class before September, when the data is first uploaded in the database) in order to avoid having to modify in September all the data already entered?

8. File upload in public part

Is it possible to upload a file (e.g. manuals) in the public part?

9. Translation

With reference to page 9 of the document 'Assumptions' of March 2018, we would like to receive clarifications in relation to the translation of the field with free text, for example regarding the translation of "Any specific precautions that shall be taken when the combination heater is assembled, installed or maintained".

10. Product internal unique identifier

With reference to page 14 of the document 'Assumptions', we would like to receive clarifications in relation to what is meant with the "product internal unique identifier".

11. Ecodesign requirements

With reference to page 7 in the document 'Assumptions', we would like to receive clarifications concerning the reason why in the following sentence Ecodesign appears in brackets: *The EPREL database will be accessible through a public web portal, on which the EC will also include wider information pertaining to the Energy Labelling (and Ecodesign) policy.* Does it mean that Ecodesign requirements could be added and that products only covered by Ecodesign regulation would be included?