

# EHPA Feedback

Ecodesign requirements for air conditioning appliances – Review ENER Lot 10

EHPA would like to thank the European Commission and the study team for the work already carried out and welcomes the opportunity given to send feedback on the call for evidence for the impact assessment on the Ecodesign requirements for air-to-air conditioners, air-to-air heat pumps and comfort fans.

## Thermal Comfort

EHPA appreciates that thermal comfort of occupants has been taken into account. We support the European Commission approach of limiting the airflow.

Products that are used to cool unoccupied spaces such as data centers and control board rooms (close control units), where neither comfort nor dehumidification is needed, should not be required to follow the thermal comfort requirements specified for occupied spaces in order to determine their performance

Our full position is available on EHPA website.<sup>1</sup>

## Material efficiency aspects

EHPA supports the inclusion of relevant, meaningful and verifiable/enforceable material efficiency requirements but has several comments and recommendations. EHPA appreciates that an exhaustive list of spare parts has been defined, referring to the most critical spare parts; accessible only to professional repairers. Only trained and F-gas certified installers are legally allowed to intervene on split air-conditioners. Finally, EHPA recommends setting a requirement ensuring the availability of spare parts for seven years and the maximum delivering time of spare parts within fifteen working days. Our full position is available on EHPA website.<sup>2</sup>

## Compensation method and alternative solutions

EHPA supports the conclusion of the Commission that the compensation method is not yet fit for regulatory application and should be postponed to later on, considering the lack of information and limited results as available today. Our full position is available on EHPA website.<sup>3</sup>

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<sup>1</sup> EHPA Position on Lot 10 after the last Ecodesign and Energy Labelling Consultation Forum (14 September 2021)  
[https://www.ehpa.org/fileadmin/user\\_upload/20210914\\_EHPA\\_comments\\_on\\_the\\_review\\_of\\_ENER\\_Lot\\_10.pdf](https://www.ehpa.org/fileadmin/user_upload/20210914_EHPA_comments_on_the_review_of_ENER_Lot_10.pdf)

<sup>2</sup> EHPA Position on the suggested resource requirements for air-conditioners by Viegand Maagøe (7 September 2021)  
[https://www.ehpa.org/fileadmin/user\\_upload/20210709\\_EHPA\\_written\\_comments\\_on\\_the\\_suggested\\_resource\\_requirements\\_for\\_air-conditioners.pdf](https://www.ehpa.org/fileadmin/user_upload/20210709_EHPA_written_comments_on_the_suggested_resource_requirements_for_air-conditioners.pdf)

<sup>3</sup> EHPA Position on Lot 10 after the last Ecodesign and Energy Labelling Consultation Forum (14 September 2021)  
[https://www.ehpa.org/fileadmin/user\\_upload/20210914\\_EHPA\\_comments\\_on\\_the\\_review\\_of\\_ENER\\_Lot\\_10.pdf](https://www.ehpa.org/fileadmin/user_upload/20210914_EHPA_comments_on_the_review_of_ENER_Lot_10.pdf)



## Avoid setting testing method in the regulation

EHPA would like to share some general recommendations. The legal texts should not contain too many details on measurements and calculations, which should be left to the standards. This may create some unexpected loopholes. Learning from the winter package, it will increase the number of errors and the need for amending regulations. For this reason, we recommend excluding details on test methods/test conditions from the regulation.

## Timing and implementation

EHPA recommends that there should be a period of at least two years between the publication and the implementation of the new rules. Keeping in mind that an implementation either in the beginning or in the end of the year is more appropriate due to AC\_ES market seasonality. This time is necessary to:

- Retest the units that exceed the proposed airflow limitations;
- Redesign of impacted units that fail the MEPS under airflow limitation requirements;
- Amend the relevant CEN standards and harmonize them with the revised regulation.
- For the calorimeter test room method, additional consideration is needed for dealing with the fan speed variation when measuring and setting the test airflow rate;



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## ABOUT EHPA

The European Heat Pump Association (EHPA) is a Brussels based industry association which aims at promoting awareness and proper deployment of heat pump technology in the European marketplace for residential, commercial and industrial applications.

EHPA provides technical and economic input to European, national and local authorities in legislative, regulatory and energy efficiency matters. All activities are aimed at overcoming market barriers and dissemination of information in order to speed up market development of heat pumps for heating, cooling and hot water production.

EHPA coordinates quality initiatives: including the HP KEYMARK, a Quality label for heat pumps and Certification standards for heat pump installers. The association compiles the annual heat pump statistics and organizes a number of events, among them an annual heat pump conference.