

October 2014

## EPEE POSITION PAPER – **Standardisation mandate for Ecodesign ENER Lot 1 & Lot 2**

### **EXECUTIVE SUMMARY**

**EPEE, representing the heating, cooling and refrigeration industry calls for an exclusion of requirements related to emissions from the draft standardisation mandate.**

The standardisation mandate for Ecodesign ENER Lot 1 & 2 should be limited to specify how to test and calculate the values on performance in order to assess compliance with the relevant Ecodesign requirements. The area of emissions is not part of these Ecodesign requirements as they are already covered under the F-gas Regulation. Furthermore, the mandate of TC113 is limited to assessing performance. Consequently, we suggest removing the proposed requirement from the mandate in order to ensure an efficient development of harmonised standards, avoiding the doubling of already existing standards that are in place for emission requirements.

EPEE understands that standardization mandates ensure that legal requirements are duly integrated in the standards, so that they can be declared “harmonized”. However, EPEE believes that the suggested standardization mandate goes beyond the legal boundary of Ecodesign ENER Lot 1 and Lot 2 by requesting to include emissions of HFC and HC as well as life cycle emissions of greenhouse gases under the scope of EN 14825.

EPEE calls for an exclusion of requirements on emissions for the following reasons:

First of all, requirements referring to emissions are already dealt with in the F-gas Regulation and the following standards have been established under TC182 to support these requirements:

- EN 14903 on the tightness of components,
- EN 378 on the tightness of systems,
- Part 3 and 4 of EN 378 on installation, maintenance, recovery of refrigerants,
- EN 13133 and all standards covered in TC182 on training of installers,
- EN 378 on TEWI calculation.

In addition, the mandate of TC113 is limited to assessing performance and covers the following:

*"Standardization of testing and requirements for the performance of factory assembled heat pumps, air conditioning units (ducted and non-ducted), hydronic room fan coil units, and liquid chilling packages whether vapor compression or sorption, regardless of energy used, for domestic or commercial purposes excluding industrial processes, excluding the rational use of gas energy which is*



*within the scope of CEN/TC 299. In addition, the scope covers the standardization of rating conditions, performance testing and the presentation of data of refrigerant compressors and condensing units."*

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## **About EPEE:**

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies, national and international associations.

EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment.

EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. Please see our website ([www.epeeglobal.org](http://www.epeeglobal.org)) for further information.