

ECODESIGN WORKING GROUP

8 JANUARY 2015

EPEE, The European Partnership for Energy and the Environment

www.epeeglobal.org

“Heating and cooling is your life and our mission”

1. AGENDA

1. Welcome by the Chair, Call to order, Competition Law
2. Matters arising and adoption of agenda
3. Review and adoption of Minutes of the last meeting – 18 September 2014
4. Ecodesign Strategic Activities and Deliverables
5. Ecodesign Procedure
6. ENTR Lot 6/ENER Lot 21 – Air conditioning, air heating and HT chillers
7. ENER Lot 11 - Fans
8. ENTR Lot 1 – Refrigeration
9. ENER Lot 12 – Display cabinets
10. ENER Lot 10/ENTR Lot 6 – Ventilation
11. ENER Lot 30 – Motors
12. ENER Lot 1/2 – Space and water heaters
13. Review of Ecodesign and Energy Labelling Directives
14. Other issues with an impact on Ecodesign
15. Market Surveillance on Ecodesign
16. MEP Champions

Ecodesign WG meeting 8 January 2014

EPEE Competition Policy Statement

The European Partnership for Energy and the Environment (EPEE) **is committed to comply strictly with all laws that govern its activities, including all competition and antitrust laws in the countries in which it is active.**

The EPEE Steering Committee has agreed to conduct all meetings and activities taking place in the EPEE framework in strict accordance with the ***EPEE Governance and Compliance Programme.***

These various steps include the following:

- **EPEE staff and membership** have been requested to familiarise themselves with the essential elements of the competition rules;
- **Copies of the EPEE Governance and Compliance Programme** will be made available at all EPEE meetings and **can also be obtained at any time from the Secretariat;**
- **Discussions at such meetings will focus on EPEE's legitimate purposes thus avoiding any aspects which could result in violations of the competition rules;**
- **Prior to meetings, a written agenda is sent out and has been checked to ensure that all items satisfy the EPEE Governance and Compliance Programme. The agenda shall also indicate the exact time of the beginning and end of the meeting.**

*EPEE is committed to comply strictly with all laws that govern its activities, including all competition and antitrust laws in the countries in which it is active. **Failure to do so may have serious consequences for EPEE, its members and their customers as well as for the final consumer.***

Reminder:

Violations of EU competition rules may result in the imposition of fines and/or penalty payments for the undertakings responsible.

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3. ACTIONS OF LAST MEETING: 18 SEPTEMBER 2014

What	Who	When
<p>The Ecodesign Procedure</p> <ul style="list-style-type: none"> • Secretariat will double-check as of when the new Comitology procedure will apply for Ecodesign lots • Secretariat will update procedure slide to include further relevant information. 	EPEE Secretariat	Done
<p>Ecodesign strategic activities & deliverables</p> <ul style="list-style-type: none"> • Replace description of "human resources" by "services" 	EPEE Secretariat	Done
<p>ENTR Lot 6/ENER Lot 21</p> <ul style="list-style-type: none"> • Secretariat to continue monitoring the launch of ISC • Members to share ISC documents in case they receive before 	EPEE Secretariat & Members	ongoing
<p>ENER Lot 11</p> <ul style="list-style-type: none"> • Bill McQuade to share information on AHRI example of show-casing argument against cascading • Members to provide arguments against cascading • Secretariat to prepare position paper on cascading (one for Fan review, one general) • Secretariat to reach out to other industry associations to co-sign spare parts position paper • Chair to share position papers and argumentation on the subject preceding entry into force of current Regulation 	EPEE Secretariat & Members	Done
<p>ENTR Lot 1</p> <ul style="list-style-type: none"> • EPEE Secretariat to stay in contact with European Commission to find monitor relevant developments • EPEE will assist the Commission in drafting FAQs and a potential guidance document at the end of the year. 	EPEE Secretariat	Ongoing
<p>ENTR Lot 6</p> <ul style="list-style-type: none"> • The Secretariat will monitor the publication and report back to members. 	EPEE Secretariat	Done
<p>ENER Lot 30</p> <ul style="list-style-type: none"> • EPEE Secretariat to prepare position paper on concerns before Consultation Forum meeting 	EPEE Secretariat	Done
<p>ENER Lot 12</p> <ul style="list-style-type: none"> • Set up meeting with Commission official to see in how far position was taken up. • Follow ongoing Impact Assessment 	EPEE Secretariat	Ongoing
<p>ENER Lot 1</p> <ul style="list-style-type: none"> • EPEE Secretariat will continue monitoring any relevant developments on this Lot. 	EPEE Secretariat & Members	Ongoing
<p>Material efficiency under Ecodesign</p> <ul style="list-style-type: none"> • EPEE Secretariat to continue monitoring the development of material efficiency requirements under Ecodesign 	EPEE Secretariat	Ongoing
<p>Revision of the Energy Labelling/Ecodesign Directives</p> <ul style="list-style-type: none"> • EPEE Secretariat to prepare position papers on the learning curve and energy label suggestions by the NGOs. • EPEE Secretariat to monitor relevant developments in the review process 	EPEE Secretariat & Members	Ongoing
<p>Market Surveillance</p> <ul style="list-style-type: none"> • EPEE Secretariat to clarify issue of 3rd party verification with interested associations • Pursue the second project proposal under the Horizon 2020 programme. 	EPEE Secretariat & Members	Done



Agenda Point 4.

ECODESIGN STRATEGIC ACTIVITIES AND DELIVERABLES

4a. Ecodesign WG – Strategic Activities

Target	To strengthen EPEE's position as a leading association and to ensure appropriate Minimum Energy Performance Standards (MEPS) and adequate revision of the umbrella directive.
Budget	2014: 80k€ 2015: 80k€
Leadership	Chair: Els Baert (Daikin Europe) Vice-Chair: Dina Koepke (Emerson Climate Technologies)
Key Priorities	<ul style="list-style-type: none">▪ The revision of the Ecodesign (ED) and Energy Labelling (EL) directives▪ Finalisation of ENTR Lot1 (professional refrigeration equipment)▪ Finalisation of ENER Lot21 (large heating and cooling equipment)▪ Revision of the ENER Lot11 (fans) implementing measure▪ Finalisation of ENER Lot 12 (commercial refrigeration equipment)
Main Activities	<ul style="list-style-type: none">▪ Engage with the European Parliament and the Council, including national experts, in the revision process of the ED / EL directive▪ Set-up quarterly industry round-tables to align industry positions on the revision process. Reach out to NGOs whenever useful.▪ Closely follow-up and engage on Lot6/21 Interservice Consultation and Regulatory Committee vote (national experts).▪ Closely follow-up and engage on ENTR Lot1▪ Engage with the Commission and national experts on the revision of Lot11. Set-up industry alliances whenever required and useful.▪ Promote and raise awareness on market surveillance. Continue to engage with national experts, MSAs and the European Commission in that sense.

4b. Ecodesign WG – Deliverables

Deliverable	Status
Set up industry round tables to align positions on the revision	✓ First done on December 3rd
Set up alliance with industry associations on the revision of Lot11	✓ Position paper developed with CECED, DIGITALEUROPE, JBCE, JRAIA
Set up meetings with DGs at Interservice Consultations	• To be done as soon as ISC for priority Lots is launched
Advanced preparation of network in view of votes on Lot 21, 12, 11, e.g. set up roundtables with MS to raise points of interest	• To be explored once regulatory process advances (i.e. delay ISC on ENTR Lot 6)
Follow-up on transitional methods, e.g. FAQs	✓ Input on guidelines on ENER Lot 1 & 2, future guidelines/FAQs on ENTR Lot 1
Follow-up on new lots of potential interest to EPEE	✓ Monitoring of potentially relevant Lots ongoing (i.e. ENER Lot 26 on networked standby)



Agenda Points 5 – 12

ECODESIGN LOTS/FRAMEWORK DIRECTIVE

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5. The Ecodesign procedure



The Commission has announced that the Ecodesign Directive will not be reviewed in a near future. Consequences: Regulatory Committee remains the procedure for Ecodesign requirements and no alignment between Ecodesign and Energy labelling procedures.

Preparatory Study

- Time: 2 years on average
- Aim: Basis for drafting the IM
- Several stakeholders meetings organised

Consultation Forum

- Time: 2-3 weeks after Commission circulates draft IM
- Aim: Stakeholders provides comments to the draft IM
- In practice, two meetings are organised

Inter-Service Consultation

- Time: Once draft IM finalised and ready to be approved by the Regulatory Committee
- Aim: Provide comments and raise any critical issue

WTO Notification

- Time: Once IM finalised and ready to be approved by the Regulatory Committee
- Aim: Ensure compliance between IM and WTO requirements (equal treatment between EU and non-EU manufacturers)

Regulatory Committee

- Time: Informally on a regular basis but formally 3 weeks after the Consultation Forum, it sometimes takes longer
- Aim: Discusses and approves the draft IM
- Composition: Member States representatives + Commission

EP and Council Scrutiny

- Time: 3 months after receiving the approved IM from the Commission
- Aim: Veto possibility for the EP and Council if proposed IM exceeds Commission powers or contrary to the purpose of Eco-design Directive

Publication in the Official Journal (Entry into force 20 days after publication – Not transposition needed)

6a. ENTR Lot 6/ENER Lot 21 (central air conditioning & heating) Current Status

Scope: Large air conditioning products > 12 kW (heating & cooling): air conditioners, VRF, rooftops, chillers (incl. HT chillers)

Latest developments:

- Ecodesign WG appointed TF to finalise EPEE's position on ENTR Lot 6/ENER Lot 21
- TF finalised position paper on rooftops and VRFs, (co-signed by Eurovent)
- Meeting with European Commission official Marcos González Álvarez and several exchange on EPEE's arguments considered in final MEPS
- Finalisation of SEER counter-proposal / Position on SEER/SEPR for HT chillers
- Launch of ISC delayed due to institutional changes. ISC to be launched in January.

Next steps:

- **January 2014 (tbc):** Interservice Consultation
- **January 2014 (tbc):** WTO notification
- **April 2015 (tbc):** Regulatory Committee Vote
- **Septembre 2015 (tbc):** Entry into force of Regulation

6b. EPEE Position Lot6/21

- Reduce the requirements to a realistic yet ambitious level
- Set specific requirements for rooftops and follow the same rationale as for chillers
- HT Process Chillers: Use SEPR if chillers are exclusively used as process chillers; Use SEER if dual use is intended. Additional SEPR would create disproportionate burden for measurement and enforcement
- Sound power requirements should be deleted

7a. ENER Lot 11 (Fans)

Scope: Fans driven by motors with an electric input power between 125 W and 500 kW

Latest developments:

- VHK has been chosen as consultant for the preparatory study of the revision of the Fans Regulation – Started on **23 April 2014**
- **August 2014:** 1st interim report
- **16 September:** Meeting with Paul Hodson to discuss EPEE's main concerns

EPEE activities:

- Joint position paper on Fans spare parts issue, co-signed by, DIGITALEUROPE, EVIA, JBCE, JRAIA
- Joint position paper on Fan review, by CECED, DIGITALEUROPE, JBCE, JRAIA
- Both papers have been shared with the Ecodesign Consultation Forum and uploaded on the VHK website

Next steps (indicative timing):

- **22 January 2015:** 2nd stakeholder meeting, 9:30 – 17:30, Brussels (Registration possible until 14th January) – 2nd interim report to be presented before.
- **March 2015:** Consultation Forum meeting
- **October 2015:** Final report from VHK

7b.

The 3 Top Critical Issues for EPEE Members

1. Remove spare parts provision – Ask for derogation

- HVACR products have a longer life-time than 10y
- There are no compliant „drop-in“ fans
- ➡ Fans cannot be replaced, unless the OEM stores them.
- ➡ Potential waste of material without gain for the environment

2. Exclude incomplete assemblies

- An impeller is part of a fan and not a fan as such
- A fan without a motor is an incomplete assembly
- ➡ Manufacturers would be forced to buy motor and impeller as a package without gain for the environment

3. No to double regulation, i.e. regulating components

- Products covered by ecodesign should be excluded
- Market Surveillance would be impossible
- Ignore the actual application of the component
- ➡ Manufacturers need technically neutral requirements to develop energy efficient products at an affordable cost for users

7c. The Political Landscape

No to double regulation: Requirements for fans incorporated into products

YES	IN-BETWEEN	NO
Preparatory Study		
Commission DG ENER	Commission DG ENTR	
Parliament	Parliament	
Fan Industry		Appliance Industry: CECED, DigitalEurope, EHI, EHPA, EPEE, Orgalime, JBCE
NGOs		
	Member States	

Fighting against cascading under Lot11 is likely to be an uphill and resource-intensive battle with uncertain outcome

8. ENTR Lot 1 (Professional Refrigeration)

Scope: Service cabinets, Blast cabinets, Walk-in cold rooms, Chillers, Remote Condensing Units, etc.

Latest developments:

- Meeting with Commission official Davide Polverini on 21 May 2014, informal discussion of outcomes of Regulatory Committee:
 - Timing of Implementing Tier 1 has been delayed (Tier 1: July 2016, Tier 2 remains unchanged)
 - Tolerance levels will be maintained at 10%
- September: JIEG clarified temperature ranges and calculation of part load ratio

Next steps:

- **January (tbc):** Publication in the Official Journal & Entry into force of Regulation
- **Early 2015:** JIEG to assist in development of FAQ/Guidance document
- **July 2016:** Implementation of Tier 1

9a. ENER Lot 12 (Commercial Refrigeration)

Scope: refrigerated display cabinets (plug in and remote) and on refrigerated vending machines

Latest developments:

- 2 July: Consultation Forum Meeting
- 4 August: Meeting with Commission Official
- August – September: Finalisation of EPEE/Eurovent position paper
- September: EPEE/EuroCommerce joint statement
- November: Publication of CLASP analysis of specific issues

EPEE activities:

- EPEE to prepare position on CLASP study, possibly together with Eurocommerce

Next steps:

- **September – December** : Impact Assessment
- **January 2015** (tbc): Interservice Consultation of draft Regulations
- **March 2015** (tbc): WTO notification
- **May 2015** (tbc): Regulatory Committee vote
- **December 2015** (tbc): Expected entry into force of Regulation

9b. ECODESIGN ENER Lot 12

EPEE position

- **Revision of the calculation schemes** for energy efficiency index and the Annual Energy Consumption (AEC) to consider real life conditions and climatic seasonality
- **Differentiation between more product categories**, taking into account temperature classes and functional differences of these products
- **Exclusion of all corner units and specially designed models of supermarket display cabinets**
- **Deletion of mandatory energy labelling**

10. ENTR Lot 6/ENER Lot 10 (Ventilation)

Scope: Room ventilation appliances and large ventilation equipment(>12kW)

Latest developments:

- Regulatory Committee Vote on 17 December 2013; Energy labelling requirements delayed
- November: OJ publication
- December 2014: Entry into force

Next steps: Main Ecodesign requirements from 1 January 2016

RV	NRV
<ul style="list-style-type: none">- SEC not higher than 0kWh/(m².a)- All VUs: multi-speed or variable speed drive- All BVUs: thermal by-pass facility- Non-ducted units intended to be equipped with one duct connection shall have minimum L_{WA} of 45 dB	<ul style="list-style-type: none">- All VUs: multi-speed drive or a variable speed drive.- All BVUs shall have a HRS.- The HRS shall have a thermal by-pass facility.- Minimum thermal efficiency of HRS (67%)- Minimum fan efficiency for UVUs 6.2 % * ln(P) + 35.0 % if P ≤ 30 kW and 56.1 % if P > 30 kW.

11a. ENER Lot 30 (Motors)

Latest developments

- End of August 2014: Publication of Working Documents
- Consultation Forum, 29 September, Brussels

EPEE activities:

- Joint industry position paper on issue of double regulation, co-signed by CECED, DIGITALEUROPE, JBCE, JRAIA

Next steps :

- **November 2014 – February 2015 (tbc):** Impact Assessment
- **March 2015 (tbc):** Interservice Consultation
- **May 2015 (tbc):** WTO notification
- **July 2015 (tbc):** Regulatory Committee Vote
- **Early 2016 (tbc):** Entry into force

11b. ENER Lot 30: Joint Industry final position

- **Cascading should be avoided as it only creates burden without gains for the environment.**
 - Products which incorporate a motor that are already regulated by a specific ecodesign measure on a product level should not be regulated on the component level, this creates additional burden on manufacturers without clear gains.

Will ENER Lot 30 become a precedence case for the review of the Fans Regulation?

- **Information requirements for exempted products should be deleted.**
 - The motors that are exempted should not be subject to information requirements. Most of the requirements are redundant, as most already need to be displayed on or near the rating plate of the motor. Nevertheless, new would be to add the information on manufacturers' websites, this create additional burden on manufacturers, without substantial benefits.

11.c. Double Regulation

- Based on EPEE's position on Motors and Fans, a general paper against double-regulation will be prepared.
- Arguments will include:
 - Double regulation increases the economic burden for users and manufacturers without necessarily leading to more efficient products
 - Ecodesign requirements at product level are based on the analysis of the ecodesign preparatory study, which takes into account the components' efficiencies
 - Regulating components incorporated into products will represent a significant burden for market surveillance authorities
 - Double regulation would result in a misalignment of the various implementation tiers

12a. ENER Lot 1/2 (space and water heaters)

- **Latest developments**

- 2013: Ecodesign and Energy Labelling regulations for space heaters and water heaters were published
- Draft guidelines have been published by the Commission and EPEE has submitted comments

- **Next steps :**

- January: Publication of guidelines
- 26 September 2015: requirements for Tier 1
- 2018: foreseen review of the Regulations

12b. EPEE position on draft guidelines

- **Comments on guidelines**
 - The sound power level has to be A-weighted
- **Comments on FAQ**
 - Any label displayed shall be compliant with the regulations
 - For all space heaters the label shall be provided in the box, but for heat pumps specifically in the box of the heat generator.
 - Clarification on how to deal with hybrid products
 - Clarification on solar water heaters/solar only products
 - Clarification on how to fill in the data for the colder and warmer conditions for heat pump water heaters which use ventilation exhaust air or indoor air or brine or water as the heat source
- **Comments and questions on the package label tool**

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Agenda Point 13

REVIEW ED/EL DIRECTIVES

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13a. Review of the Energy Labelling/Ecodesign Directives

- The European Commission is working on a review of the framework Directives of Energy labelling and certain aspects of Ecodesign
- EPEE is involved in the consultation process on the review
- The Commission has announced that it will not review the Ecodesign Directive, only the Energy labelling Directive
- Timeline of the Review:



- Meeting with ECOS/EEB - 16 September, further meetings planned

13b. EPEE Position

After the Consultation Forum meeting in June, EPEE finalised its position and shared with the Ecodesign Consultation Forum and the European Commission:

- Level of ambition of requirements
- Weak enforcement
- Primary Energy Factor
- Effectiveness of the Energy label
- Other general comments

13c. Outcome meeting EEB/ECOS

- **Energy label:** differentiate energy labels depending on product categories (plug and play, small business appliances, B2B)
- **Label layout:** one fixed efficiency value with moving scale
- **Level of ambition:** Introducing learning curve for determining LLCC

13d. EEB/ECOS proposal – learning curve

- EEB/ECOS: “LCC analysis should anticipate future cost reductions in a sufficiently robust way to ensure the analysis is still correct by the time policy measures take effect”

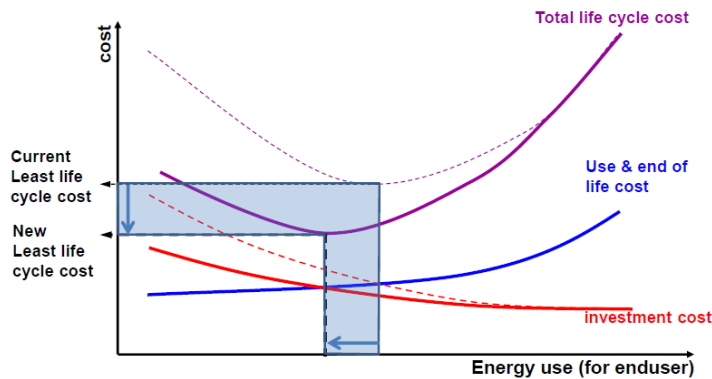
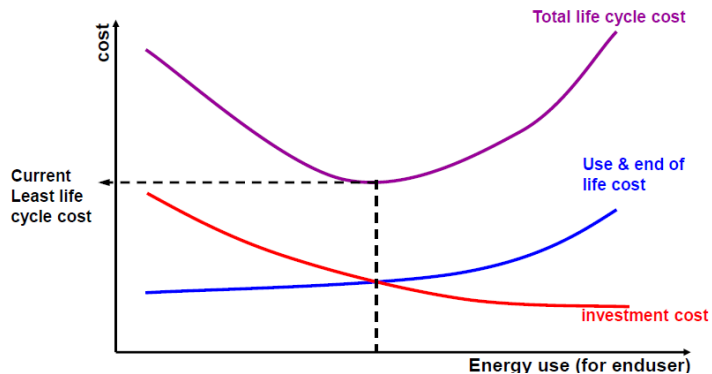
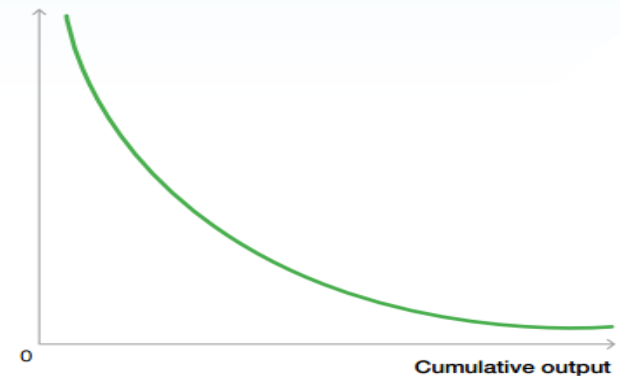


Figure 2. Learning Curve chart

Average cost

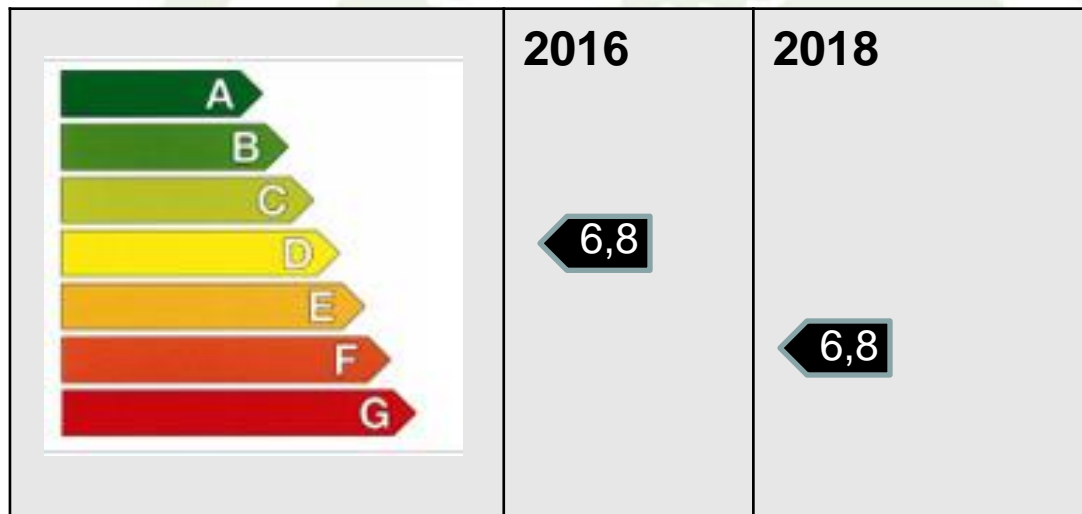


13e. EEB/ECOS proposal – Energy label

- Fixed energy efficiency value + moving energy label scale to reflect market developments

Example:

product has efficiency of 6,8 and scale will move in 2018



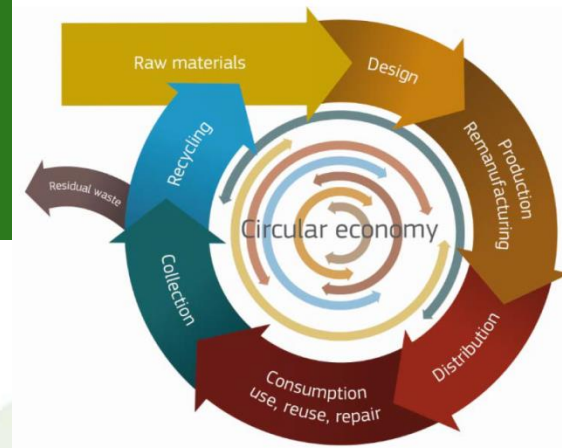


Agenda Point 14

**OTHER ISSUES WITH AN IMPACT ON
ECODESIGN**

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Circular Economy Package



A zero waste programme for Europe:

Published on 2 July:

- A [Communication](#) on the Circular Economy
- [Legislative proposals](#) to review the Waste Framework Directive.
- Communications “[A Green Action Plan for SMEs](#)” “[A Green Employment initiative](#)” and
- A communication on “[Resource Efficiency Opportunities in the Building Sector](#)”

Waste

- A 70% recycling target for municipal waste by 2030
- An 80% recycling target for packaging, such as glass, paper, metal and plastic by 2030
- Ban on landfilling of recyclable and biodegradable waste by 2025 with aim to virtually eliminate landfill by 2030

Resource efficiency

- Headline target on resource productivity to be based on GDP relative to Raw Material Consumption
- Non binding target set at EU level only
- To be set in the mid-term review of the Europe 2020 strategy

Ecodesign

- Resource efficiency criteria to be included in future ecodesign applications

Environmental Footprint

- Results of EF pilot phase (2016) to indicate how to apply environmental impact measurement in product and process design

According to the Commission’s work plan 2015 this package will be withdrawn and replaced by a new and more ambitious proposal by the end of 2015 to promote circular economy.

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Agenda Point 15

MARKET SURVEILLANCE

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15a. Market Surveillance

EPEE Market Surveillance Call to Action

- As a direct outcome of the 7 May Workshop, “Market surveillance in Europe - the myths, the reality, the solutions”, EPEE launched Call to Action
- Call to Action identifies four priority areas:
 - Strengthening the EU’s role in market surveillance
 - Intensifying cooperation among national market surveillance authorities
 - Considering third party assessment as an additional solution
 - Increasingly involving industry in market surveillance activities
- Call to Action has been shared with Ecodesign Consultation Forum and the European Commission
- It has been co-signed by AREA, CECED, DIGITALEUROPE, EHI, EVIA, and LIGHTING EUROPE

15b. Market Surveillance

Ecopliant Project

- Last Ecopliant meeting was held on 23 September in Budapest
- Scope for EPEE to help with determining suitable and competent test labs, test programmes and sharing results & training MSAs on relevant ecodesign lots for instance
- A final report is being drafted to communicate about the project. It will contain a section to include comments from each representative organisation of the project advisory group
- EPEE has submitted comments to the first draft project report
- Next steps:
 - Second draft will be available for comment mid-January 2015
 - Final draft will be available early February
 - Final Report to be completed by end of March
 - Launch of the report in London around Mid-April

15c. SEVEN Proposal (Horizon 2020)

Empowering stakeholders in fully understanding Energy Label and Ecodesign policies and preventing noncompliance

- **Horizon 2020 priority:**
 - EE9: Empowering stakeholders to assist public authorities in the definition and implementation of sustainable energy policies and measures
- **Focus on working with individual stakeholders in industry, authorities, and civil society:**
 - Identify areas of possible noncompliance resulting from a lack of awareness, unclear formulations, and different understanding of specific requirements,
 - Identify clarifications and reach consensus in answering such issues,
 - Disseminate these to the respective stakeholders and thereby preventing noncompliance.
- **Project members:**
 - Coordinator: SEVEN
 - Partners: Industry (e.g. EPEE), MSAs, Consultancies, MS, NGOs

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Agenda Point 16

CHAMPION MEPS DATABASE

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Champion MEP database

OBJECTIVES

- Reference document to contact relevant MEPs; and
- Identify EPEE champion MEPs.

STRUCTURE

- MEPs from the **key committees** (ITRE, IMCO, ENVI) classified on the basis of their **nationality**.
- Members to provide information on:
 - **Type of contact:**
 - What kind of contact you had with the MEP: exchange of emails; sent position papers; face to face meetings; on behalf of whom you met him/her: your company or EPEE;
 - His/ Her position towards EPEE (supportive or not) and any other general comment on his/her attitude; and
 - Why his/her is relevant for EPEE: constituency; specific role on the file, e.g. rapporteur or shadow; any other reasons linked to his/her national activities.
 - **Issue:** topics of interest for the MEP (e.g. F-Gas, Ecodesign, Energy Efficiency, market surveillance, climate change)

NEXT STEPS

- Circulate the final database to all members

Date of next meeting

- **Tuesday 9 June 2015, 13:30 – 16:00**