

Stakeholder comments form

Draft Ecodesign Regulation and Energy Labelling Regulation on refrigerating appliances with a direct sales function

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#	Reg.	Text	Section	Page	Comment	Proposed change	Reply from EC
1	ED	ACT	Article 1	p.4	This Regulation shall not apply to: (m) refrigerating appliances with a direct sales function with few or no moving parts supplied with chilled air by an external chiller unit; It is not clear enough and it could create some loopholes	This Regulation shall not apply to: (m) refrigerating appliances with a direct sales function with few or no moving parts supplied with chilled air by an external chiller unit;	
2	ED	ACT	Article 2	p.5	6. 'chilled operating temperature for cabinets equipped with EMD' means that the temperature of products stored in the compartment or cabinet is continuously maintained between -1°C and 15°C; According to the EN 16902 it should be -3,5°C	6. 'chilled operating temperature for cabinets equipped with EMD' means that the temperature of products stored in the compartment or cabinet is continuously maintained	

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						between -1 -3,5°C and 15°C;	
3	ED	ACT	Article 2	p.5	<p>7. ‘chilled operating temperature for cabinets not equipped with EMD’ means that the temperature of products stored in the compartment or cabinet is continuously maintained between -1°C and 10°C;</p> <p>According to the EN 16902 it should be -3,5°C</p>	<p>7. ‘chilled operating temperature for cabinets not equipped with EMD’ means that the temperature of products stored in the compartment or cabinet is continuously maintained between -1 -3,5°C and 10°C;</p>	
4	ED	ACT	Article 4	p.7	<p>Where the information included in the technical documentation for a particular model has been obtained by calculation on the basis of design, or extrapolation from another model, or both, the documentation shall include details of such calculations or extrapolations, or both, and of tests undertaken by manufacturers to verify the accuracy of the calculations undertaken.</p> <p>It should not apply to beverage coolers. This is due to the fact that beverage coolers are on the market in a limited number of families and it is possible to test them all</p>	<p>Where the information included in the technical documentation for a particular model has been obtained by calculation on the basis of design, or extrapolation from another model, or both, the documentation shall include details of such calculations or extrapolations, or both, and of tests undertaken by manufacturers to verify the accuracy of the calculations undertaken.</p>	

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						This does not apply to beverage cooler	
5	ED	ACT	Article 9	p. 8	<p>This Regulation shall apply from 1 January 2020.</p> <p>Eurovent supports 1 January 2020 as application date; Eurovent wants also to stress that if the final regulation text would present major modifications, additional 12 months from the publication date are requested.</p>		
6	ED	ANNEX	ANNEX I	p.6 –	<p>‘roll-in cabinet’ means a vertical supermarket cabinet typically used for fresh dairy products, which is normally an open cabinet</p> <p>The definition is not in line with the one in the EN ISO 23953. Eurovent suggest to be coherent with the one in the standard</p>	<p>‘roll-in cabinet’ means a vertical supermarket cabinet typically used for fresh dairy products, which is normally an open cabinet cabinet which enables goods to be displayed directly on their pallets or rolls which can be placed inside by lifting, swinging, or removing the lower front part, where fitted</p>	
7	ED	ANNEX	ANNEX III	p.6 – Table 5	The table numbering is wrong. It should be Table 3	<p>Table 5 3</p> <p>The numbering (table and related text) must be updated accordingly in all the Annexes</p>	
8	ED	ANNEX	ANNEX III	p.7 – Table 6	Beverage cooler: the N value should be 0,006 (it seems to be a typo because the previously communicated value was N=0,006)	Beverage Cooler Value for N: 0,0006 0,006	

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9	ED	ANNEX	ANNEX III	p.7 – Table 6	<p>Eurovent wants to reiterate its request of a further segmentation between Vertical and Semi-vertical refrigerator cabinets (Eurovent & EPEE PP 1.9.2014 - Eurovent & EPEE PP 2.10.2015).</p> <p>Concerning Vertical refrigerator cabinets the regression study does not provide sufficient justification on the proposed M=9,1 and N=9,1</p> <p>Concerning semi-vertical refrigerator cabinets this is also due to the different aeraulic of a semi-vertical unit.</p>	<p>Vertical supermarket refrigerator Cabinet: M=9,1 8,56 – N=9,1 10,72</p> <p>Semi-Vertical refrigerator Cabinet: M=9,1 9,65 – N=9,1 12,08</p>	
9	ED	ANNEX	ANNEX III	p.7 – Table 6	<p>Eurovent wants to reiterate its request of different M and N coefficients for horizontal supermarket refrigerator cabinet (Eurovent & EPEE PP 1.9.2014 - Eurovent & EPEE PP 2.10.2015).</p>	<p>horizontal supermarket refrigerator cabinet: M=3,7 1,38 – N=3,5 5,23</p>	
10	ED	ANNEX	ANNEX III	p.8 – Table 7	<p>*For all supermarket cabinets the ambient conditions are those of Set 1 in Table 4.</p> <p>According to the EN 16902 the same conditions shall apply to beverage coolers</p>	<p>*For all supermarket cabinets and beverage coolers the ambient conditions are those of Set 1 in Table 4.</p>	
11	ED	ANNEX	ANNEX III	p.8 – Table 7	<p>****For ice-cream freezers and beverage coolers the ambient conditions are those of Set 2 in Table 4.</p> <p>According to the EN16902 these conditions shall not apply to beverage coolers</p>	<p>****For ice-cream freezers and beverage coolers the ambient conditions are those of Set 2 in Table 4.</p>	
12	ED	ANNEX	ANNEX III	p.8 – Table 7	<p>*****Following EN ISO 23953-2:2005+A1:2012.</p> <p>It shall refer to the last revision of the standard</p>	<p>*****Following EN ISO 23953-2:2015 2005+A1:2012.</p>	

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13	ED	ANNEX	ANNEX III	p.9 – Table 10	The proposed Tc values are +18°C and +7°C; According to the EN 16901 they should be both negative values	Tc +18°C +7°C	
14	ED	ANNEX	ANNEX IV	p.12- Table 13	The tolerances related to TDA are missed	The determined value shall not exceed the declared value of the TDA by more than -3%	
15	EL	ACT	Article 1	p. 7	This Regulation shall not apply to: (m) refrigerating appliances with a direct sales function with few or no moving parts supplied with chilled air by an external chiller unit; It is not clear enough and it could create some loopholes	This Regulation shall not apply to: (m) refrigerating appliances with a direct sales function with few or no moving parts supplied with chilled air by an external chiller unit;	
16	EL	ACT	Article 2	p. 7	6. ‘chilled operating temperature for cabinets equipped with EMD’ means that the temperature of products stored in the compartment or cabinet is continuously maintained between -1°C and 15°C; According to the EN 16902 it should be -3,5°C	6. ‘chilled operating temperature for cabinets equipped with EMD’ means that the temperature of products stored in the compartment or cabinet is continuously maintained between ± -3,5°C and 15°C;	

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17	EL	ACT	Article 2	p.7	<p>7. ‘chilled operating temperature for cabinets not equipped with EMD’ means that the temperature of products stored in the compartment or cabinet is continuously maintained between -1°C and 10°C;</p> <p>According to the EN 16902 it should be -3,5°C</p>	<p>7. ‘chilled operating temperature for cabinets not equipped with EMD’ means that the temperature of products stored in the compartment or cabinet is continuously maintained between -1 -3,5°C and 10°C;</p>	
18	EL	ACT	Article 9	p.11	<p>This Regulation shall apply from 1 January 2020.</p> <p>Eurovent supports 1 January 2020 as application date; Eurovent wants also to stress that if the final regulation text would present major modifications, additional 12 months from the publication date are requested.</p>		
19	EL	ACT	Article 9	p.11	<p>However, for the purposed of the obligations laid down in Articles 3(1) and (b) this Regulation shall apply from 1 September 2019</p> <p>This is not in line with the ED requirements. Eurovent asks to delete this sentence</p>	<p>However, for the purposed of the obligations laid down in Articles 3(1) and (b) this Regulation shall apply from 1 September 2019</p>	
20	EL	ANNEX	ANNEX I	p.2	<p>This Regulation shall not apply to:</p> <p>(m) refrigerating appliances with a direct sales function with few or no moving parts supplied with chilled air by an external chiller unit;</p>	<p>This Regulation shall not apply to:</p> <p>(m) refrigerating appliances with a direct</p>	

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					It is not clear enough and it could create some loopholes	sales function with few or no moving parts supplied with chilled air by an external chiller unit;	
21	EL	ANNEX	ANNEX III	p.5-6	Any reference to TDA is missed	The following information shall be included in the label: VI: For Ice cream freezers, Beverage coolers: the sum of the volumes of all compartments with frozen operating temperatures rounded to the nearest integer; if the refrigerating appliance does not contain compartments with frozen operating temperatures the value needs to be replaced by a dash; For supermarket refrigerators or freezers: TDA	
22	EL	ANNEX	ANNEX III	p.5-6	Any reference to TDA is missed	The following information shall be included in the label:	

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						<p>VII. For Ice cream freezers, Beverage coolers: the sum of the volumes of all chill compartments with chilled operating temperature, rounded to the nearest integer; if the refrigerating appliance does not contain compartments with chilled operating temperature the value needs to be replaced by a dash.</p> <p>For supermarket refrigerators or freezers: TDA</p>	
23	EL	ANNEX	ANNEX III	p.5-6	Eurovent suggests to add an additional point clarifying the main product categories (supermarket cabinets, beverage coolers, ice cream freezers, vending machines etc). This In order to support the market surveillance authority.	<p>VIII. Product category (supermarket cabinets, beverage coolers, ice cream freezers, vending machines etc)</p>	
24	EL	ANNEX	ANNEX IV	p.8 – Table 3	Beverage cooler: the N value should be 0,006 (it seems to be a typo because the previously communicated value was N=0,006)	Beverage Cooler Value for N: 0,0006 0,006	
25	EL	ANNEX	ANNEX IV	p.8 – Table 3	Eurovent wants to reiterate its request of a further segmentation between Vertical and Semi-vertical refrigerator cabinets (Eurovent & EPEE PP 1.9.2014 - Eurovent & EPEE PP 2.10.2015).	<p>Vertical supermarket refrigerator Cabinet: M=9,1 8,56 – N=9,1 10,72</p> <p>Semi-Vertical refrigerator Cabinet:</p>	

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					Concerning Vertical refrigerator cabinet the regression study does not provide sufficient justification on the proposed M=9,1 and N=9,1 Concerning semi-vertical refrigerator cabinet this is also due to the different aerualic of a semi-vertical unit.	M=9,1-9,65 – N=9,1-12,08	
26	EL	ANNEX	ANNEX IV	p.8 – Table 3	Eurovent wants to reiterate its request of different M and N coefficients for horizontal supermarket refrigerator cabinet.	horizontal supermarket refrigerator cabinet: M=3,7 1,38 – N=3,5 5,23	
27	EL	ANNEX	ANNEX IV	p.9 – Table 4	*For all supermarket cabinets the ambient conditions are those of Set 1 in Table 4. According to the EN 16902 the same conditions shall apply to beverage coolers	*For all supermarket cabinets and beverage coolers the ambient conditions are those of Set 1 in Table 4.	
28	EL	ANNEX	ANNEX IV	p.9 – Table 4	****For ice-cream freezers and beverage coolers the ambient conditions are those of Set 2 in Table 4. According to the EN16902 these conditions shall not apply to beverage coolers	****For ice-cream freezers and beverage coolers the ambient conditions are those of Set 2 in Table 4.	
29	EL	ANNEX	ANNEX IV	p.9 – Table 4	*****Following EN ISO 23953-2:2005+A1:2012. It shall refer to the last revision of the standard	*****Following EN ISO 23953-2: 2015 2005+A1:2012.	
30	EL	ANNEX	ANNEX IV	p.10 – Table 7	The proposed Tc values are +18°C and +7°C; According to the EN 16901 they should be both negative values	Tc +18°C +7°C	
31	EL	ANNEX	ANNEX VI	p.14	Where the information included in the technical documentation file for a particular model has been obtained by calculation on the basis of design, or extrapolation from other equivalent model, the documentation shall include	Where the information included in the technical documentation for a particular model has been	

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					<p>details of such calculations or extrapolations, or both, and of tests undertaken by suppliers to verify the accuracy of the calculations undertaken.</p> <p>It should not apply to beverage coolers. This is due to the fact that beverage coolers are on the market in a limited number of families and it is possible to test them all</p>	<p>obtained by calculation on the basis of design, or extrapolation from another model, or both, the documentation shall include details of such calculations or extrapolations, or both, and of tests undertaken by manufacturers to verify the accuracy of the calculations undertaken.</p> <p>This does not apply to beverage cooler</p>	
32	EL	ANNEX	ANNEX IX	p.18- Table 11	The tolerances related to TDA are missed	The determined value shall not exceed the declared value of the TDA by more than -3%	
33	EL-ED	ACT- ANNEX			Remove all the references to products not in the scope of these Regulations (e.g. dishwashers, household refrigerators etc.)		