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PP - 2018-12-13 - Eurovent comments on ED measure on refrigerating appliances with a direct sales function

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#	Text	Section	Page	Comment	Proposed change
1	ACT	Article 1	p.4	Eurovent holds that fish counters with flaked ice are out of the scope (there is no testing method covering them).	(r) fish counter with flaked ice
2	ACT	Article 2	p.7	The Total Display Area is not defined. The TDA definition (according to ISO 23953-2:2015) should be added.	31. TDA= total visible foodstuffs area, including visible area through the glazing, defined by the sum of horizontal and vertical projected surface areas of the net volume. It must be measured in square meters (m²)
3	ACT	Article 4	p.8	In order to make the market surveillance effective and to ensure the level playing-field, Eurovent holds that the conformity assessments should be in line with EN/ISO 23953-2:2015 Annex D Furthermore, in order to ensure the level playing-field, Eurovent strongly asks that a reference (for supermarket equipment, both integral and remote units) model as well as a common extrapolation method should be defined.	

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4	ACT	Article 4	p.8	<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> <p>This does not apply to beverage cooler</p>
5	ANNEX I	p. 2	Point (17)	The TDA definition is not in line with the one in the EN/ISO 23953-2:2015.	(17) TDA= total visible foodstuffs area, including visible area through the glazing, defined by the sum of horizontal and vertical projected surface areas of the net volume
6	ANNEX I	p.1	(10)	Point 10 does not recognise the M and N dependence to TDA. It should be introduced according to the EN/ISO 23953	(10) 'M' and 'N' means modelling parameters that take into account the TDA or volume- dependence of the energy use, with values as set out in Table 3, Annex IV;
7	ANNEX III	Table 4	p.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>

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8	ANNEX III	Table 4	p.6	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).	horizontal supermarket refrigerator cabinet: M=3,7 1,38 – N=3,5 5,23	
9	ANNEX III	Table 10	p.9	Table 10 is not clear enough. Eurovent suggests to clearly list all the product families. This would avoid any market confusion	Cabinet type	P
					Remote supermarket cabinets	1,00
					Integral (Plug-in) supermarket cabinets	1,10
					Beverage coolers	1,00
					Ice cream freezers	1,00
					Ice cream displays	1,00
					Vending machines	1,00