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Position Paper

In a nutshell

Further to the online meeting of the Ecodesign and Energy Labelling Consultation Forum (x03609) on draft omnibus regulations related to 2019 ecodesign and energy labelling regulations on 4 June 2020, Eurovent would like to provide its suggestions for amending the Commission Delegated Regulation (EU) 2019/2018 and the Commission Regulation (EU) 2019/2024 on refrigerating appliances with a direct sales function.

Background

Eurovent would like to thank the EC for providing the opportunity for commenting the text of the Commission Delegated Regulation (EU) 2019/2018 and of the Commission Regulation (EU) 2019/2024 on refrigerating appliances with a direct sales function.

Eurovent supports and welcome the EC proposal for the horizontal amendments related to the notions of parameters and declared values

Additional Eurovent suggestions can be found in the Enclosed ANNEX A and ANNEX B.

ANNEX A
Commission Regulation (EU) 2019/2024 of 1 October 2019 laying down Ecodesign requirements for refrigerating appliances with a direct sales function pursuant to Directive 2009/125/EC of the European Parliament and of the Council

Provision	Current text	Amended text	Rationale
Whereas	Vertical static-air cabinets are professional refrigerating appliances and are defined in Commission Regulation (EU) 2015/1095 (5), and should therefore be excluded from this Regulation.	Vertical static-air cabinets are professional refrigerating appliances cooled with natural convection and are defined in Commission Regulation (EU) 2015/1095 (5), and should therefore be excluded from in the scope of this Regulation.	The Commission Regulation (EU) 2015/1095 clearly excludes vertical static-air cabinet. They are to be considered in the scope of this Regulation
Article 2	'corner cabinet' means a refrigerating appliance with a direct sales function used to achieve geometrical continuity between two linear cabinets that are at an angle to each other and/or that form a curve. A corner cabinet does not have a recognisable longitudinal axis or length since it consists only of a filling shape (wedge or similar) and is not designed to function as a stand-alone refrigerated unit. The two ends of the corner cabinet are inclined at an angle between 30 ° and 90 °	'corner, curved, or carousel cabinet' means a refrigerating appliance with a direct sales function used to achieve geometrical continuity between two linear cabinets that are at an angle to each other and/or that form a curve. A corner/ curved/carousel cabinet does not have a recognisable longitudinal axis or length since it consists only of a filling shape (wedge or similar) and is not designed to function as a stand-alone	The definition of curved/carousel cabinet is missed in the Regulation text

		refrigerated unit. The two ends of the corner cabinet are inclined at an angle between 30 ° and 90 °	
ANNEX II 2. Resources Efficiency Requirements – (a) availability of spare parts (1)		<ul style="list-style-type: none"> – Controls – Compressors, Inverters – Refrigeration circuit components – Doors – Covers, Lids – Night blinds – Sidewalls, Endwalls – Air grilles, baffles – Dripwater system 	Set of spare parts commonly used in refrigerating appliances having a direct sales function not listed in the Regulation text: to be added
ANNEX II 2. Resources Efficiency Requirements – (a) availability of spare parts (1)	<p>Availability of spare parts</p> <p>(1) Manufacturers, importers or authorised representatives of refrigerating appliances with a direct sales function shall make available to professional repairers at least the following spare parts:</p> <p>....</p>	<p>Availability of spare parts</p> <p>(1) Manufacturers, importers or authorised representatives of refrigerating appliances with a direct sales function shall make available to professional repairers at least the following spare parts (Or the related component at the higher assembly level):</p>	Addition to be considered in order to better clarify the Regulation

ANNEX II 2. Resources Efficiency Requirements – (a) availability of spare parts (2)	1. Manufacturers, importers or authorised representatives of refrigerating appliances with a direct sales function shall make available to professional repairers and end-users at least the following spare parts: Manufacturers, importers or authorised representatives of refrigerating appliances with a direct sales function shall make available to professional repairers and end- users at least the following spare parts (Or the related component at the higher assembly level):	As above
ANNEX II 2. Resources Efficiency Requirements – (a) availability of spare parts (2)		<ul style="list-style-type: none"> – Covers, Lids – Night blinds – Air grilles, baffles 	Set of spare parts commonly used in refrigerating appliances having a direct sales function not listed in the Regulation text: to be added
ANNEX II 2. Resources Efficiency Requirements – (c) access to repair and maintenance information	<ul style="list-style-type: none"> – The available repair and maintenance information shall include: – the unequivocal appliance identification; – a disassembly map or exploded view; – technical manual of instructions for repair; – list of necessary repair and test equipment; – component and diagnosis information (such as minimum and maximum theoretical values for measurements); – wiring and connection diagrams; 	<ul style="list-style-type: none"> – The available repair and maintenance information shall include: – the unequivocal appliance identification; – a disassembly map or exploded view; – technical manual of instructions for repair; 	The set of information highlighted in red is responsibility of the controller manufacturers not of the refrigerated display cabinets manufacturers: to be deleted

	<ul style="list-style-type: none"> – diagnostic fault and error codes (including manufacturer-specific codes, where applicable); – instructions for installation of relevant software and firmware including reset software; and – information on how to access data records of reported failure incidents stored on the refrigerating appliance with a direct sales function (where applicable). 	<ul style="list-style-type: none"> – list of necessary repair and test equipment; – component and diagnosis information (such as minimum and maximum theoretical values for measurements); – wiring and connection diagrams; – diagnostic fault and error codes (including manufacturer-specific codes, where applicable); – instructions for installation of relevant software and firmware including reset software; and – information on how to access data records of reported failure incidents stored on the refrigerating appliance with a direct sales function (where applicable). 																																													
ANNEX II 3. Information requirements	(b) an estimation of the impact of temperature settings on food waste;	(b) an estimation of the impact of temperature settings on food waste;	Information not available to the refrigerated display cabinets manufacturers: to be deleted																																												
ANNEX III table 5	<table border="1"> <thead> <tr> <th colspan="6">(a) Supermarket cabinets</th> </tr> <tr> <th>Category</th> <th>Temperature class</th> <th>Highest temperature of warmest M-package (°C)</th> <th>Lowest temperature of coldest M-package (°C)</th> <th>Highest minimum temperature of all M-packages (°C)</th> <th>Value for C</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Vertical and combined supermarket refrigerator cabinets</td> <td>M2</td> <td>≤ +7</td> <td>≥ -1</td> <td>n.a.</td> <td>1,00</td> </tr> <tr> <td>H1 and H2</td> <td>≤ +10</td> <td>≥ -1</td> <td>n.a.</td> <td>0,82</td> </tr> <tr> <td>M1</td> <td>≤ +5</td> <td>≥ -1</td> <td>n.a.</td> <td>1,15</td> </tr> <tr> <td rowspan="3">Horizontal supermarket refrigerator cabinets</td> <td>M2</td> <td>≤ +7</td> <td>≥ -1</td> <td>n.a.</td> <td>1,00</td> </tr> <tr> <td>H1 and H2</td> <td>≤ +10</td> <td>≥ -1</td> <td>n.a.</td> <td>0,92</td> </tr> <tr> <td>M1</td> <td>≤ +5</td> <td>≥ -1</td> <td>n.a.</td> <td>1,08</td> </tr> </tbody> </table>	(a) Supermarket cabinets						Category	Temperature class	Highest temperature of warmest M-package (°C)	Lowest temperature of coldest M-package (°C)	Highest minimum temperature of all M-packages (°C)	Value for C	Vertical and combined supermarket refrigerator cabinets	M2	≤ +7	≥ -1	n.a.	1,00	H1 and H2	≤ +10	≥ -1	n.a.	0,82	M1	≤ +5	≥ -1	n.a.	1,15	Horizontal supermarket refrigerator cabinets	M2	≤ +7	≥ -1	n.a.	1,00	H1 and H2	≤ +10	≥ -1	n.a.	0,92	M1	≤ +5	≥ -1	n.a.	1,08	Vertical and combined supermarket refrigerator cabinets → C = 1,3 Horizontal supermarket	Product Temperature M0 (as in the EN ISO 23953) is missed in the regulation text. The related Value
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ANNEX B
Commission Delegated Regulation (EU) 2019/2018 of 11 March 2019 supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council with regard to energy labelling of refrigerating appliances with a direct sales function

Provision	Current text	Amended text	Rationale
Whereas	Vertical static-air cabinets are professional refrigerating appliances and are defined in Commission Regulation (EU) 2015/1095 (5), and should therefore be excluded from this Regulation.	Vertical static-air cabinets are professional refrigerating appliances cooled with natural convection and are defined in Commission Regulation (EU) 2015/1095 (5), and should therefore be excluded from in the scope of this Regulation.	The Commission Regulation (EU) 2015/1095 clearly excludes vertical static-air cabinet. They are to be considered in the scope of this Regulation
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Eurovent and transparency

When assessing position papers, are you aware whom you are dealing with?

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers' questions regarding our representativeness and decisions-making processes as follows:

<p>1. Who receives which number of votes?</p> <p>At Eurovent, the number of votes is never determined by organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission ('steering committee'), our national Member Associations receive two votes per country.</p>	<p>2. Who has the final decision-making power?</p> <p>The Eurovent Commission acts as the association's 'steering committee'. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two votes per country independent from its size or economic weight.</p>
<p>3. How European is the association?</p> <p>More than 90 per cent of manufacturers within Eurovent manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the secondary sector. Our structure as an umbrella enables us to consolidate manufacturers' positions across the industry, ensuring a broad and credible representation.</p>	<p>4. How representative is the organisation?</p> <p>Eurovent represents more than 1.000 companies of all sizes spread widely across 20+ European countries, which are treated equally. As each country receives the same number of votes, there is no 'leading' country. Our national Member Associations ensure a wide-ranging national outreach also to remote locations.</p>

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.

We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.