



Tech. Ass. Ventilation units

Legal/Proc. questions

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Some "F.A.Q." with preliminary draft answers...to be finalised in the "Implementing guide" document

placing on the market and/or putting into service

The term "putting into service" is used, as the EU legislation also needs to cover products, which are "physically" never placed on the market, but installed directly at the end-user's place.

"Placing on the market" (making a product available for the first time on the EU market) and "putting into service" (first use of a product for its intended purpose by an end-user in the EU) refer to two different 'moments' in the process of bringing a product to the market; compliance for the 'entry' into the market is required only once based either on the moment when the product is placed on the market or when it is put into service. Only where a product is "not placed on the market" in the literal meaning, the moment of compliance is the putting into service.

VU + heat pump

"We sell a hybrid system UVU + heat pump for...It is unclear to us if this is now in or out of the Ecodesign Regulation on Ventilation units"

Such a product/system does **not** fall under the ventilation unit regulation, **as long as** the component(s) which constitute a ventilation unit are integrated into the rest of the system, and they are not commercialized/delivered separately (as an example, if one delivers the ventilation unit separately (capable to operate), and it is up to the final user to integrate it with the heat pump, then this ventilation unit is not compliant with the ventilation units regulation).

Graphics

"The EL regulation 1254/2014 includes a detailed description of the requirements for product labels. To avoid many suppliers recreating the same base labels are graphic templates available in a vector format (eps, ai, etc.)?"

The supporting material for this label is published on the European Commission webpages.

- The Energy label templates (InDesign format) for ventilation units are available at the address: <http://ec.europa.eu/energy/en/energy-labelling-tools>
- The Energy Label Generator (<http://eepf-energylabelgenerator.eu/>) should be made available around the end of June.

VU for ships

"We manufacture VUs for marine/cruise ship applications. Are they in scope to Lot6 measures?"

1. Article 2- (1) of the 'Ventilation unit' Ecodesign Reg.:

'ventilation unit (VU)' means an electricity driven appliance equipped with at least one impeller, one motor and a casing and intended to replace utilised air by outdoor air **in a building or a part of a building;**

2. Article 1 (3) of the Ecodesign Directive 2009/125/EC stipulates that the Directive does not apply to means of transport for persons or goods.

It follows that an implementing Regulation should **not** apply to products that are designed **only** for use in e.g. marine ships.

However, if the same product is designed for use in a means of transport for persons or goods **and** for use in a building, it should comply with all relevant requirements of the Ecodesign measure (bearing in mind the exclusions of scope of the regulation itself).

Equipment for cleanrooms

"We manufacture ventilation equipment for "cleanrooms". Cleanrooms can be found in hospitals, research centers, pharmaceutical and certain other manufacturing plants. The ventilation units used for clean rooms treat large volumes of air, with very limited replacement of the treated air by new air. One objective is ensure overpressure in the cleanroom so that the level of pollutants (dust, microbes...) is kept at minimal or controlled. Are they in scope to Lot6 measures?"

As long as:

1. These products can be defined as ventilation units, in line with definition 1 of article 2 of the Ecodesign Regulation on Ventilation units, i.e. "an electricity driven appliance.....intended to replace air by outdoor air in a building")
2. These products are not between the scope exclusions.

they fall in scope to the Ecodesign (and Energy Labelling, if RVUs) regulation.

Free access websites

"Some Ecodesign Regulations require that certain information be available in a free access website. If you need to subscribe and then use a password – is this to be considered a free access website if anyone can subscribe to the website?"

No, free access is to be understood as without having to pay or provide personal information. If a regulation, however, refers to a part for professionals of free access websites, that part for professionals can require subscription through password.

Product configurations/combinations

"Configuration programmes for the NRVUs result in a very large number of possible product combinations. Is the manufacturer allowed to only provide data for the standard configurations they have developed, while they could voluntarily they decide to make the data for all of the other possible combinations publicly available as well?"

Product configurations/combinations

The information to be provided for NRVUs according to Annex V of Regulation (EU) 1253/2014 should be based on the "reference configuration" of the product as indicated in Annex IX concerning measurements and calculations for NRVUs. Definitions for "reference configuration" are provided in Annex I, part 2, definition 3 and 4.

Nevertheless, manufacturers are under a legal obligation to ensure that any ventilation unit (i.e., deriving from any possible product combination) within the scope of the Ecodesign Regulation, shall meet the requirements within that regulation.



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Thank you!

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