

Frequently Asked Questions (FAQ) on the Ecodesign Directive

The Commission has updated the FAQ on the implementing Regulations

The updated FAQ on the Ecodesign Directive now runs up to 107 pages covering all implementing Regulations. Of note are the new FAQ on motors, fans, air conditioners (wine cellars), space heaters (heat pumps) and regulation 2016/2281 (Air to Water heat pumps, driven by an electric motor above 400kW). The interpretation of the FAQ is not legally binding.

FAQ of note

The FAQ document has been complemented with new frequently asked questions and answers and now runs to 107 pages.

Below, you may find abstracts from the new 2018 FAQ of relevance for the scope of Eurovent.

The titles mention pages where these FAQ can be found. The earliest questions on the same regulations can be found in the FAQ document preceding the 2018 FAQ.

Regulation 640/2009

(11) Question on motors not listed on the importers website (11-2018) – page 27

Regulation 640/2009 specifies the product information requirements for motors in Annex I, point 2: From 16 June 2011, the information on motors set out in points 1 to 12 shall be visibly displayed on:

- A. The technical documentation of motors
- B. The technical documentation of products in which motors are incorporated
- C. Free access websites of manufacturers of motors
- D. Free access websites of manufacturers of products in which motors are incorporated

Recent inspection revealed an importer not having any of the required information visible on the website. However, at the same time, the website did not inform about which models were for sale in the assortment. The products were not described or listed on the website, and one could not download a catalogue. The suppliers simply informed in general terms about their assortment of high efficiency standard 3-phased electric motors. However, not one single model name was mentioned on the website. It says to call for further information.

Is an importer or a manufacturer obliged to display the assortment and the product information in the some format on their public accessible website?

(11) Answer on motors not listed on the importers website (11-2018)

Union harmonisation legislation applies to products that are intended to be placed on the EU market. Obviously, the importer has the intention to place electric motors on the EU market. The Ecodesign directive (art 4) stipulates that for imported goods, the importer is responsible for compliance, in the absence of an authorised representative.

The importer has to comply with regulation 640/2009, unless they can demonstrate that all products they offer on the EU market are out of scope, or that there is an authorised representative in the EU.

Therefore, in the absence of an authorised representative in the EU, the importer is obliged to list motors in scope of 640/2009 they are offering to the EU market, with product information on its free access website. If there is an authorised representative, its details and the website should be indicated on the importer's website, so that compliance can be proven.

Regulation 327/2011

(4) Question on measurement parameters for fans efficiency (11-2018) – page 68

Many large fans are supplied without a variable speed drive and can be connected to the three-phase-grid in different ways. The regulation 327/2011 and the (non-harmonised) standard EN ISO 5801:2008 contain no provisions on which type of connection to choose for performance measurements.

Similarly, the rotor blade pitch can be adjustable in some fans, and the method does not specify which angle is to be used. Annex II 3.1 of the regulation just states that the fan has to be measured "at its optimum energy efficiency point". The point 10.2 of the FAQ states that the manufacturer should document which pitch angle was used, but there is no indication on the type of connection to the grid either. Which parameters shall the MSA use in these cases?

(4) Answer on measurement parameters for fans efficiency (11-2018)

The parameters used for measurement shall be those that the manufacturer states in the technical documentation for the best efficiency point, including information on blade angle, grid connection VSD, housing and other variables. In the ongoing review of the regulation and in the standard setting process, these issues could be made clearer.

Regulation 626/2011

(3) Question on wine cellars (11-2018) – page 75

Are wine cellar conditioners covered by Regulation 626/2011?

(3) Answer on wine cellars (11-2018)

Air conditioners intended (and marketed) for other purposes than comfort cooling or comfort heating are outside of the scope of the regulation.

Regulation 813/2013

(6) Question on low temperature heat-pumps versus low temperature application (11-2018) - page 81

What is the minimum seasonal space heating energy efficiency of heat pumps that are capable for low and medium temperature application?

(6) Answer on low temperature heat-pumps versus low temperature application (11-2018)

Low and medium temperature applications should not be confused with the requirements for low temperature heat pumps. Low temperature heat pumps are specifically designed for low temperature application and are NOT able to deliver heating water with an outlet temperature of 52°C at an inlet dry (wet) bulb temperature of -7°C (-8°C) in the reference design conditions for average climate. The seasonal space heating energy efficiency of low temperature heat pumps shall not fall below 125%.

For low-temperature heat pumps, parameters shall be declared for low-temperature application. For all other heat pumps, the seasonal space heating energy efficiency shall not fall below 110%. Parameters shall be declared for medium-temperature application. Manufacturers can declare values

for low temperature application on a voluntary basis, but there is no requirement attached to this declaration.

Regulation 2016/2281

(2) Question on Air to Water heat pumps, driven by an electric motor with capacity above 400KW (11-2018) – page 107

What is the minimum seasonal space heating energy efficiency according to Annex II Table 1 for an Air to Water heat pumps, driven by an electric motor with capacity above 400KW?

(2) Answer on Air to Water heat pumps, driven by an electric motor with capacity above 400KW (11-2018). The following definitions in Regulation (EU) 2016/2281 have to be considered:

1. 'Air heating product' means a device that complies with the following three conditions:
 - a. Incorporates or provides heat to an air-based heating system
 - b. Is equipped with one or more heat generators
 - c. May include an air-based heating system for supplying heated air directly into the heated space by means of an air-moving device.

A heat generator designed for an air heating product and an air heating product housing designed to be equipped with such a heat generator shall, together, be considered as an air heating product.

2. 'Air-based heating system' means the components and/or equipment necessary for the supply of heated air, by means of an air-moving device, either through ducting or directly into the heated space, where the purpose of the system is to attain and maintain the desired indoor temperature of an enclosed space, such as a building or parts thereof, for the thermal comfort of human beings.

Air to water heat pumps are not in the scope of this Regulation, because they are not covered by the definition of air heating products. The same applies to 'water to water' heat pumps.

Recommended Actions

Manufacturers and associations may find it useful to check the FAQ in case they have specific questions on Ecodesign Regulations. The answers provided in the FAQ are not legally binding.

Related documents and links

All related documents and articles can be found in the respective sections in the right sidebar.

- https://ec.europa.eu/energy/sites/ener/files/faq_06112018_final.pdf