

ECO-DESIGN REQUIREMENTS OF ENERGY USING PRODUCTS - Refrigeration and freezing equipment

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Object: EPEE comments on the "TASK 2 REPORT-June 2009 PREPARED BY BIO IS"

Brussels, 3 July 2009

Dear Mr. Mudgal and Ms. Iyama,

The present Task 2 report is giving an overview of market and economical data. However, some items require modification to give a more correct representation of reality. We believe that this is important, as this work will be used as a base for possible forthcoming implementing measures.

In summary:

1. More clear definitions and terminology are needed
2. Chillers should be out of the scope
3. Prodcom references

In detail:

1. Terminology

EPEE recommends that the definitions used throughout the document should refer to EN 378-1 - 2008, EN 14511-1-2007 and the International Refrigeration Institute (IIR) Dictionary. This is to avoid confusion and misleading interpretations.

We cannot give you an exhaustive review on all items, but one particular item we would like to address is the need for clarification of the term “chiller” as used in the document. The way in which the term is used, suggests that it also includes chillers for air conditioning applications. However, air-conditioning is not in the intended scope of the study. See also Section 2 of this document.

The terminology issue found in the Task 1 and Task 2 reports have to be addressed now because the quality and the accuracy of the final report can be drastically affected by this.

The questionnaires to be answered during the month of June were very difficult to be answered to correctly because of the inappropriate terminology used.

2. Chillers

Chillers should be excluded from the scope of the study. When clarifying the intended scope and excluding air-conditioning chillers to only include process/industrial type of chillers, the remaining volume is low. The Task 2 report, page 8, gives a total EU-27 market of 3991 units. This is nearly 0% of the total and the growth rate is negative for the future (Task 2, page 19).

So EPEE strongly recommends removing chillers from the study, as their impact is negligible.

These products can be used in commercial refrigeration, but they can also be used for a lot of other applications: air conditioning applications (‘comfort cooling’), industrial applications, process applications.

The report seems to mix ‘Chiller’ and ‘Condensing unit’ as generic applications versus the specific applications which seem to be the scope of this study, namely: ‘refrigerating and freezing equipment’.

To give an example:

| | |
|------------------------------|-----------------------------|
| | Temperature range |
| Chillers for comfort cooling | 4 to 16 °C |
| Appliances studied in Task 2 | 1 to 4 °C and -18 to -25 °C |

As can be seen from the table above e.g. certain chillers can be used for several applications: comfort cooling versus freezing/refrigeration. However, comfort cooling does not seem to be in the temperature range tackled in the scope of Lot 1, which is why comfort cooling applications should be excluded from the scope.

The above shall be clarified before going further in the different task of the present study.

The market data available: EUROSTAT, Intrastat and manufacturer association data does not segregate these different applications.

E.g. for condensing units: they can be installed with direct expansion coils to become an air conditioning unit or with an water cooled evaporator to become a chiller. The manufacturer does not know the final application of such product.

3. Prodcom references

Our third comment concerns the reference to PRODCOM classification based on the EU regulation COMMISSION REGULATION (EC) No 1165/2007 of 3 September 2007.

The task 2 reports refer to the 2 following PRODCOM classifications:

NACE 29.23: Manufacture of non-domestic cooling and ventilation equipment
NACE 29.71: Manufacture of electric domestic appliances

As the scope of Lot 1 is commercial appliances, all reference and data related to PRODCOM 29.71 shall not be part of the present study because this code concerns domestic appliances which are not considered as commercial refrigerating and freezing equipment.

It has to be noted that for 2008, the Prodcom code will be changed by the COMMISSION REGULATION (EC) No 36/2009 of 11 July 2008. The figure of table 2.2 will decrease accordingly from 26,8 Millions of units to 7 Millions and in euros from 10.544 to 6.200 M€

We trust that the information contained in this position paper will be of relevance and interest to you. Should you have any questions or require any additional input, please do not hesitate to contact us.

Yours sincerely,

Friedrich P. Busch

Friedrich P Busch
Director General – EPEE