

Future implementation:

The ecodesign process and its challenges by examples

Jeremy Tait
Tait Consulting Limited

Danish Technological Institute, Århus,
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Agenda

1. Why does the regulation take 55 months?
2. The preparatory study method
3. Opportunities to influence the process
4. Challenges of future product groups:
 - Short term: Lot 21 and HT Chillers
 - Short term: Lot 12 commercial display cabinets
 - Medium term: Refrigerated containers
5. Some factors for successful implementation

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The process

Crucial stages for stakeholder input:

55 months

Research, analysis, policy proposals & impact assessments

Final review and edits by Member States

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The Preparatory study

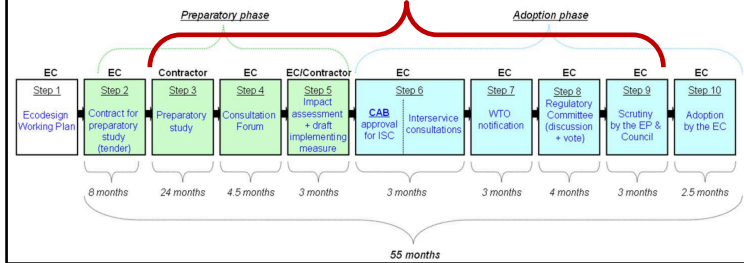
- Contractor appointed by the Commission
- Follows prescribed methodology:
 - *MEErP – Methodology for Ecodesign of Energy Related Products*

55 months

Opportunities to influence

At almost any time via:

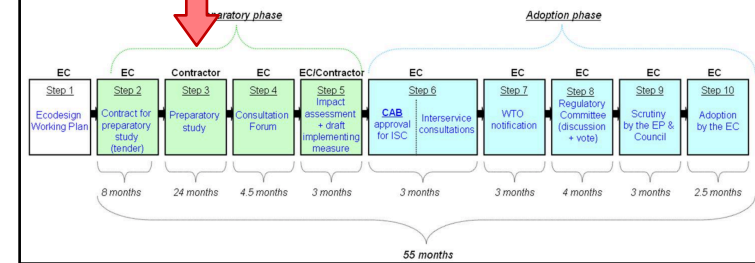
- The Commission Desk Officer
- Via Member State delegates
- Direct to contractor(s)
- Submit and/or publish position papers
- Articles in the press / websites / Twitter



Opportunities to influence

Preparatory study:

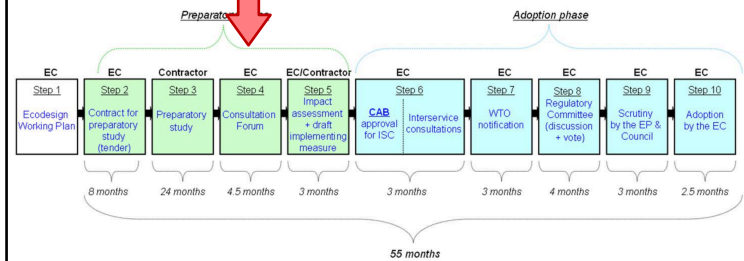
- Questionnaires
- Calls for data
- Working group meetings



Opportunities to influence

Consultation forum:

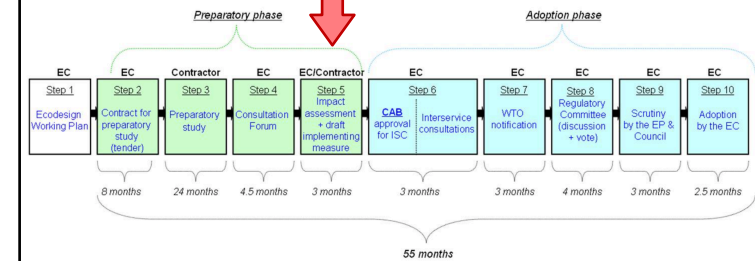
- Meeting in Brussels
- Attend in person
- Comments via a national delegate

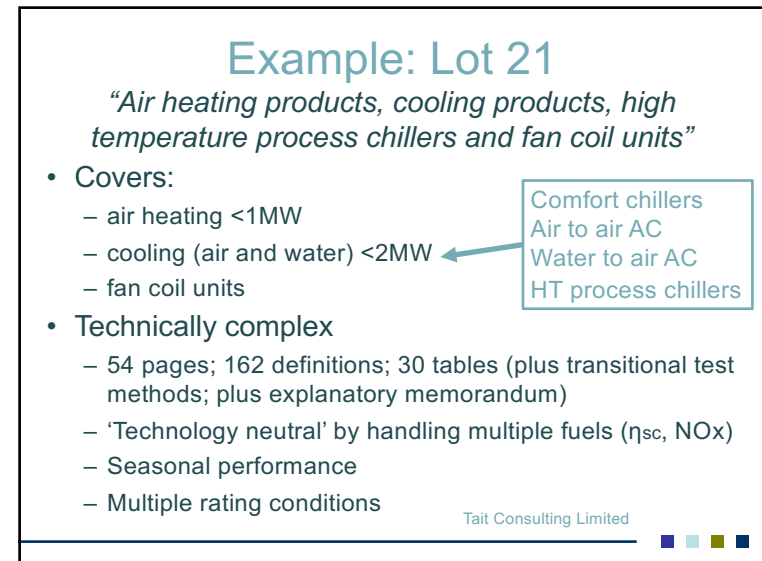
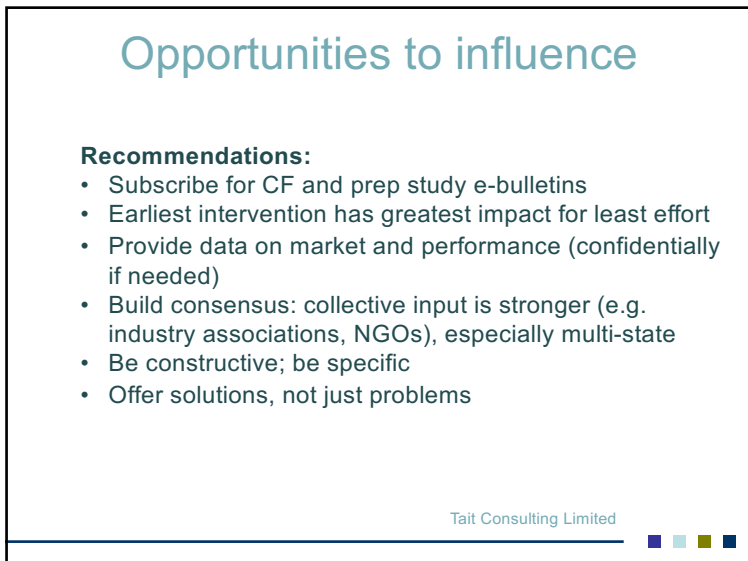
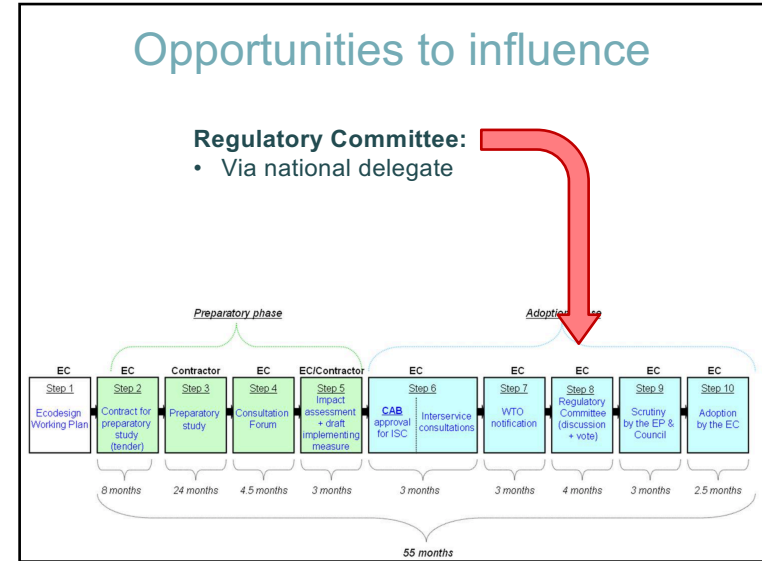
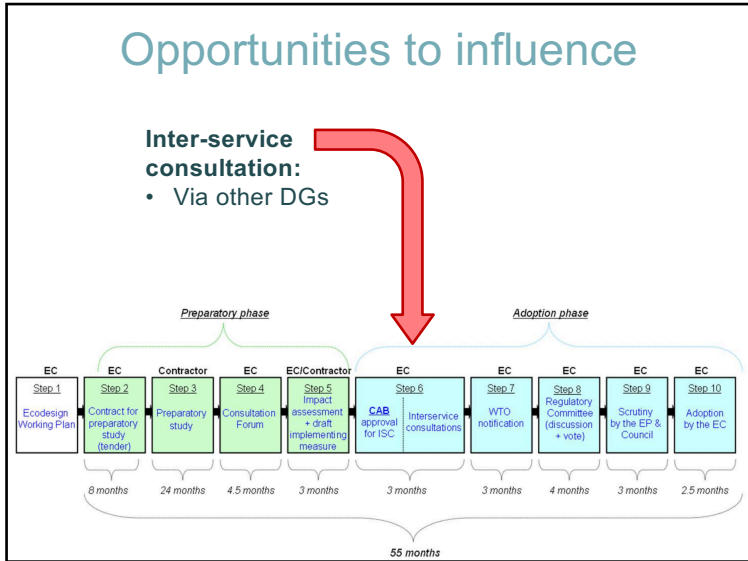


Opportunities to influence

Impact assessment:

- Questionnaire(s)
- (Consultation meeting)
- Focus on SMEs





Example: Lot 21

Challenges (chillers):

- Originally no MEPS for 80% of process chiller capacity (i.e. HT chillers). So CLASP, EPEE (JIEG), stakeholders & DG ENER developed some!



- Defining and differentiating comfort and HT process chillers. 'Stated end use' counts.

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Example: Lot 21

Challenges (chillers):

Unintended rating temperatures for MEPS: low **and** medium temperature; instead of just **low**

Which means:

- 20% less stringent
- 23% of chillers removed (instead of 70%)

Extract of Table 21:

D	20	21%	18*	10*	27 (19)	
Air-to-water comfort chillers						
Rating point	T _a (°C)	Part load ratio	Outdoor air dry bulb temperatures (°C)	Fin coil application inlet/outlet water temperatures (°C)		Cooling floor application inlet/outlet water temperatures (°C)
				Fixed outlet	Variable outlet**	
A	35	100%	35	12/7	12/7	20/18
B	30	74%	30	*7	*8.5	*18
C	25	49%	25	*7	*10	*18
D	20	21%	20	*7	*11.5	*18
Water-to-water comfort chillers						
Rating point	T _a (°C)	Part load ratio	Cooling tower or water-loop application	Ground cooled inlet/outlet water temperatures (°C)		Cooling floor application inlet/outlet water temperatures (°C)
				Fixed outlet	Variable outlet**	
A	35	100%	35	12/7	12/7	20/18
B	30	74%	30	*7	*8.5	*18
C	25	49%	25	*7	*10	*18
D	20	21%	20	*7	*11.5	*18

Extract of Table 10:

GWP of the refrigerant	GCV	kg CO ₂ e (100 years)

Standard rating conditions used: [low temperature application / medium temperature application]

Contact details: [Name and address of the manufacturer or of its authorised representative.]

** If C_{def} is not determined by measurement then the default degradation coefficient of chillers shall be 0.9.

*** from 26 September 2018.

imited



Example: Lot 21

Challenges (chillers):

Concession was inserted for heat pump chillers:

- This Regulation shall not apply to products meeting at least one of the following criteria:
 - products covered by Commission Regulation (EU) No 813/2013 with regard to ecodesign requirements for space heaters and combination heaters⁶;

Net result: All reversible chillers <400kW excluded and subject to no cooling efficiency requirement at all (=11% of comfort chilling capacity).

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Example: Lot 12

"Refrigerated commercial display cabinets"

Covers:

- Retail display cabinets
- Beverage coolers
- Ice cream freezers
- Vending machines
- Gelato scooping cabinets

- Vertical, semi-vertical & combined freezers
- Horizontal freezers
- Vertical, semi-vertical & combined chilled
- Horizontal chilled



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Example: Lot 12

"Refrigerated commercial display cabinets"

Challenges:

- Test methods were developed in parallel to reg.
- Rating temperatures (M1, M2, H2 etc.)
- Efficiency data: quality, age, availability, comparability
- Appropriate stringency (e.g. glass doors)
- Dealing with variants ('one-off' & custom made)
- Allowing appropriate exclusions (are 16 in total, e.g. corner cabinets, static air, wine coolers)

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Example: Refrigerated containers

- Otherwise known as 'reefers' or ISO containers for shipping and articulated trucks (like WICR)
- Confirmed by Mr Timmermans last week as in Commission Working Plan 2017



Challenges:

- Multi-fuel: diesel or electric hook-up
- Covered by ATP standard, but not for efficiency
- Very varied and stressful operating conditions
- Obscure ownership and 'placing on EU market'

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Some factors for successful implementation

1. Preparation! Stakeholder engagement throughout, with data sharing
2. Clarity on test methods (hopefully published!) and associated test data
3. Raise awareness; explain requirements to suppliers as soon as draft is available
4. Plan for how market surveillance will work, with adequate information requirements.

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Thank you Århus!

