

July 2015

## **EPEE/JRAIA proposal regarding Technical Assistance Study for the Ventilation Product Group “Commission Regulation 1253/2014 and Commission Delegated Regulation 1254/2014”**

In view of the Draft report (Task 1-3, planned for July 2015) concerning the Technical Assistance Study for the Ventilation Product Group, EPEE and JRAIA propose to include ISO 16494:2014 (Heat recovery ventilators and energy recovery ventilators – method of test for performance) to the list of Transitional Methods. We believe that the standards that are currently included in the list are insufficient when it comes to specifying the tracer gas method for the measurement of the unit exhaust air transfer rate and therefore recommend the following:

- 1) Include a row that states tracer gas method and the reference to ISO 16494 in the transitional method
- 2) Clearly indicate that current EN standards shall be harmonised and should be based on ISO 16494 when including the tracer gas method as a method to determine exhaust air transfer rate
- 3) Include this requirement in the mandate for ventilation units to ensure that this is duly respected

### **BACKGROUND**

- A. The legal text, setting out Ecodesign requirements for ventilation units, clearly refers to the tracer gas method in ANNEX V clause 1. (o). The method should therefore be recognised and embedded in all applicable harmonised standards.
- B. Heat recovery ventilation units apply different types of technologies to exchange the heat between indoor air and outdoor air. Some units apply metal heat exchangers, other units use special thin film. Current EN standards require a pressure test for determining the leakage of heat recovery ventilation units with the same test pressure independent of the size of the unit or the type of heat exchanger. This test pressure exceeds the normal working pressure of some units, for example, units of smaller size. Consequently, this results in the fact that the leakage value obtained is not representative for the leakage present during normal operation of the unit. Moreover, this high pressure damages the heat exchanger of some units, resulting in leakage of the unit. It is clear that the test described in current EN standards is not realistic and discriminates certain technologies, for example, smaller units and units using thin film heat exchangers.
- C. The standards that are referred to seem to be outdated; e.g. EN 308, for which the latest publication dates back to 1997. EN 308 already mentions the traces gas technique, for example, in section 5.3, Note 3: ‘the tracer gas technique can also be applied for measuring the internal exhaust air leakage for category I and in some cases for category II’. However, no clear description of the tracer gas technique is provided in the standard. That is why we propose to elaborate the tracer gas method in EN 308 based on the specifications given in ISO 16494.

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## **About EPEE**

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies, national and international associations.

EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment.

EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. Please see our website ([www.epeeglobal.org](http://www.epeeglobal.org)) for further information.

## **About JRAIA:**

JRAIA, the Japan Refrigeration and Air Conditioning Industry Association, was originally established in February 1949 as the Japan Refrigerating Machine Manufacturers Association which was thereafter reorganized in February 1969 to become an incorporated association and renamed as it is at present.

JRAIA is the trade association representing over 100 manufacturers of refrigeration and air-conditioning equipment in Japan. We, the members of JRAIA, have so far been dedicated to offering quality products to the markets of EU. JRAIA aims to promote and improve production, distribution and consumption of refrigeration and air conditioning equipment and their applied products, as well as auxiliary devices and components, automatic controls and accessories and thereby contribute to the steady development of HVAC&R industry and the improvement in people's standard of living.

For more information, please see our website [www.jraia.or.jp](http://www.jraia.or.jp)