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Comments from ECOS (*on behalf of Environmental NGOs*) on the draft final reports of the EuP Lot 10 studies « Residential room air-conditioning »

ECOS first congratulates the ARMINES team for the amount of expertise gathered and the level of ambition supported in the EuP Lot 10 studies. This is basically in line with what Environmental NGOs involved in the EuP process (ECOS, EEB, INFORSE, WWF, Greenpeace, CAN-E) expect from the EuP process. **However, ECOS would also like to add these more specific comments and requests:**

- On comfort fans, ECOS fully supports cleaning up the market from free riders by improving testing methods, market surveillance and going for appropriate minimum energy performance requirements. ECOS also believes that there is no clear correlation between the price of this product and its energy performance, meaning that the least-life cycle cost should not be a concern and stringent provisions should be considered.
- On ventilation equipment, ECOS supports the conclusions of the study, but is concerned by recent indication that the industry may mobilise against mandatory energy performance requirements. If this is truly the case, ECOS would consider increasing its work on this particular product group.

However, the main priority for Environmental NGOs in this Lot 10 remains air-conditioners. This is why we have more detailed comments on this particular study:

- ECOS supports the approach to favour seasonal part-load indexes. In this context, ECOS insists on the importance of CEN standard 14825 (enquiry phase now and final TC 113 WG7 meeting next year).
- ECOS fully supports the study conclusions on reduced tolerances for SCOP & SEER. Although, we fully regret that the same is not suggested for COP and EER. Why not considering only the uncertainty of measurement for existing indexes? The existing tolerances are not acceptable to Environmental NGOs.
- Regarding refrigerants, ECOS finds the CO2 rating idea very interesting, although doubting that the calculation method will gather consensus. ECOS would also like to see more aggressive specific minimum requirements to phase-out the most climate-unfriendly fluids in a dynamic timeline. This would ensure industry can plan technological change in advance.
- ECOS acknowledges that there is probably not enough competition between manufacturers at the moment, and that it doesn't help for the promotion of the best products. However, we believe the risks for monopoly situation should not refrain from setting mandatory legislation earlier. If they are combined with better consumer information through more accurate labelling, it should promote more transparent rules for green competition.
- As a principle, ECOS is more in favour of setting specific targets for standby consumption. We believe standby mode is not a main function of the equipment and therefore does not address the core design of the product. The level of standby consumption should be set very rapidly at the BAT level for all products. This is something all consumers would want.
- Finally, from all the scenarios suggested ECOS supports the so-called "Excellence" one, as the only one to (perhaps) succeed in stabilising the energy consumption of the product category, which is already not a very aggressive goal considering the -20% European target. However, we are concerned by the way this scenario is being put forward in the study. Being the fourth and last in the list of scenarios and bearing the name "excellence", we believe this scenario will implicitly sound as a luxurious and unaffordable option for most readers. From experience, we know that there is much chance that this scenario is disregarded. We would have appreciated at least a more neutral name and a 5th more stringent scenario clearly aiming at -20% energy consumption of the product category. So that the so-called "excellence" scenario is more fairly considered.
- It is also obvious that accurate market surveillance will be a key point to prevent free riders. We hope Member States can improve collaboration and find a way to run more effective testing. The case of LG in Australia could be a good inspiring case as how to flag out a brand and make the threat strong enough.

ECOS is a Brussels-based umbrella organisation coordinating the involvement of Environmental NGOs in the Ecodesign of EuP policy process. Info: www.ecostandard.org / Contact: edouard.toulouse@ecostandard.org