

INFORMATIVE NOTE. Regulation 2016/2281

AFEC reminds that related to *Regulation (EU) 2016/2281 of 30 November 2016 implementing Directive 2009/125/EC of the European Parliament and of the Council establishing a framework for the setting of ecodesign requirements for energy-related products, with regard to ecodesign requirements for air heating products, cooling products, high temperature process chillers and fan coil units* (http://www.afec.es/en/directivas/reg_2016_2281_en.pdf), from January 1st, 2018, it is mandatory that the air conditioning equipment as specified in this regulation, must meet the requirements, among which are:

- Values of minimum seasonal space heating energy efficiency or air heating products and minimum seasonal space cooling energy efficiency of cooling products.
- Product Information Requirements, indicating, in different tables, the parameters that manufacturers have to provide.

Among these *Air Heating Products* and *Refrigeration Products* that are within the scope of this Regulation are the Package Equipment and RoofTop Units. The ecodesign requirements for those specific units are the same for both cases.

In relation to the above, based on the definitions of its Article 2 and Annex I, it is pointed out that:

- **Air Heating Product** means a device that: incorporates or provides heat to an air-based heating system → 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.
- **Cooling Product** means a device that: incorporates, or provides chilled air or water to, an air-based cooling system or water-based cooling system → where the propose of this 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 being.

Annex I

(35) <<heat pump>>: an **Air Heating Product**:

(38) <<rooftop heat pump>>: an air-to-air heat pump, driven by an electric compressor, of which the evaporator, compressor and condenser are integrated into a single package;

(41) <<air conditioner>>: a **Cooling Product** that provides space cooling

(44) <<rooftop air conditioner>>: an air-to-air air conditioner, driven by an electric compressor, of which the evaporator, compressor and condenser are integrated into a single package;

The ROOFTOP equipment, in addition to its basic use of providing heating or cooling, can incorporate mixing boxes, outdoor air intakes, free cooling, as well as heat recovery systems, or any variation of such is always considered a ROOFTOP.

CONCLUSIONS

- 1) The Air Conditioning and ROOFTOP Heat Pumps for thermal comfort are within the scope of Regulation 2016/2281, independently of the components that they incorporate.

Therefore, ROOFTOP equipment that, in addition to heating and / or cooling for comfort, performs other functions through components that incorporate, such as free cooling, heat recovery, etc., must comply with the requirements established in the mentioned Regulation. That is, there is no exception for this equipment, although they incorporate any type of components.

- 2) The ROOFTOP and the Package equipment have very clear characteristics that define them as such, and they are perfectly differentiated from splits, VRF, etc. That is, splits and VRF can't be categorized with ROOFTOP and Package Units, except in cases where the parts of the split are identical to those of the compact version.
- 3) The manuals of instructions for installers and end users, as well as the free access web pages of manufacturers and their authorized representatives and importers shall provide all the information established in the Regulation, about the corresponding equipment.
- 4) Related to the CE Marking, Article 5 of *Directive 2009/125, establishing a framework for the setting of ecodesign requirements for energy-related products* states that the EC declaration of conformity shall refer to the appropriate implementing measures. Based on this, it's not sufficient just to declare that the product complies with that Directive; the relevant implementing measures have to be specifically mentioned in that declaration. Therefore, the Declaration of Conformity for Rooftops and Package Units shall indicate the compliance with the Regulation 2016/2281.

Once again, AFEC stresses that all manufacturers have to strictly comply with regulatory obligations, thus ensuring a balanced and fair market.