

PP – 2018-12-13

PP – 2018-12-13: Eurovent comments on EL measure on refrigerating appliances with a direct sales function

Organisation: Eurovent Association - Product Group 'Commercial Refrigeration Equipment'	Name: francesco.scuderi@eurovent.eu felix.vaneyken@eurovent.eu	Date: 13 December 2018
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#	Text	Section	Page	Comment	Proposed change
1	ACT	Article 1	p. 11	Eurovent holds that fish counters with flaked ice are out of the scope (there is no testing method covering them).	(r) fish counter with flaked ice
2	ACT	Article 2	p. 14	The Total Display Area is not defined. The TDA definition (according to ISO 23953-2:2015) should be added.	32. TDA= total visible foodstuffs area, including visible area through the glazing, defined by the sum of horizontal and vertical projected surface areas of the net volume. It must be measured in square meters (m²)
3	ACT	Article 2 – point 14	p.12-13	The numbering is not correct. It shall start from 1 instead of 2.	<p>'specifically tested and approved' means that the product complies with all the following requirements:</p> <p>(1) it has been specifically tested for the mentioned operating condition or application, according to the European legislation mentioned or related acts, relevant Member State legislation, and/or</p>

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					relevant European or international standards; (2) ...
4	ACT	p.7	EEl table	G EEI \leq 80. This seems to be wrong, correct reading should be: G EEI \geq 80	G EEI \geq 80
5	ANNEX I	p. 2	Point (10)	The TDA definition is not in line with the one in the EN/ISO 23953-2:2015.	(10) TDA= total visible foodstuffs area, including visible area through the glazing, defined by the sum of horizontal and vertical projected surface areas of the net volume. It must be measured in square meters (m²)
6	ANNEX I	p.1	Point (5)	Point 5 does not recognise the M and N dependence to TDA. It should be introduced according to the EN/ISO 23953	(5) 'M' and 'N' means modelling parameters that take into account the TDA or volume- dependence of the energy use, with values as set out in Table 3, Annex IV;
7	ANNEX III	1. Label	p.5 - VI	for all other refrigerating appliances with a direct sales function: the sum of the display areas with frozen operating temperatures, expressed in litres (l) and rounded to the nearest integer; The TDA (total display area) is calculated in m ² (according to ISO/EN 23953-2	for all other refrigerating appliances with a direct sales function: the sum of the display areas with frozen operating temperatures, expressed in square meters (m²) and rounded to the nearest integer;
8	ANNEX III	1. Label	p.5 - VII	for all other refrigerating appliances with a direct sales function: the sum of the display areas with chilled	for all other refrigerating appliances with a direct sales function: the sum of the

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				<p>operating temperatures, expressed in litres (l) and rounded to the nearest integer;</p> <p>The TDA (total display area) is calculated in m² (according to ISO/EN 23953-2</p>	<p>display areas with chilled operating temperatures, expressed in square meters (m²) and rounded to the nearest integer;</p>
9	ANNEX III	1. Label	p.4-5	<p>ANNEX III, page 4 &5, clause 1 & 2: The Category (i.e. beverage/supermarket/ice cream freezer etc.) is not included in the label.</p> <p>Eurovent suggests to add an additional point clarifying the main product categories (supermarket cabinets, beverage coolers, ice cream freezers, vending machines etc). This is in order to support the market surveillance authority.</p>	<p>IX. Product category (supermarket cabinets, beverage coolers, ice cream freezers, vending machines etc)</p>
10	ANNEX III	Label design	p. 7 – 3.1 Description – d (3)	<p>The colour of the energy logo shall be 100,80,0,0;</p> <p>Eurovent suggests having the energy logo in Black (CMYK= 0,0,0,0,100). This will reduce the cost of inhouse printing</p>	<p>The colour of the energy logo shall be 0,0,0,0,100</p>
11	ANNEX III	Label design	p. 7 – 3.1 Description – d (4)	<p>The colour of the QR code shall be 100,80,0,0;</p> <p>Eurovent suggests having the QR code in black (CMYK= 0,0,0,0,100). This will reduce the cost of inhouse printing</p>	<p>The colour of the energy logo shall be 0,0,0,0,100</p>
12	ANNEX IV	Table 3	p.8	<p>Eurovent wants to reiterate its request of a further segmentation between Vertical and Semi-vertical</p>	<p>Vertical supermarket refrigerator Cabinet: M=9,1 8,56 – N=9,1 10,72</p>

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				refrigerator cabinets (Eurovent & EPEE PP 1.9.2014 - Eurovent & EPEE PP 2.10.2015). Concerning Vertical refrigerator cabinet, the regression study does not provide sufficient justification on the proposed M=9,1 and N=9,1 Concerning semi-vertical refrigerator cabinet this is also due to the different aeraulic of a semi-vertical unit.	Semi-Vertical refrigerator Cabinet: M=9,1 9,65 – N=9,1 12,08														
13	ANNEX IV	Table 3	p.8	Eurovent wants to reiterate its request of different M and N coefficients for horizontal supermarket refrigerator cabinet.	horizontal supermarket refrigerator cabinet: M=3,7 1,38 – N=3,5 5,23														
14	ANNEX IV	Table 9	13	Table 9 is not clear enough. Eurovent suggests to clearly list all the product families. This would avoid any market confusion	<table border="1"> <thead> <tr> <th>Cabinet type</th> <th>P</th> </tr> </thead> <tbody> <tr> <td>Remote supermarket cabinets</td> <td>1,00</td> </tr> <tr> <td>Integral (Plug-in) supermarket cabinets</td> <td>1,10</td> </tr> <tr> <td>Beverage coolers</td> <td>1,00</td> </tr> <tr> <td>Ice cream freezers</td> <td>1,00</td> </tr> <tr> <td>Ice cream displays</td> <td>1,00</td> </tr> <tr> <td>Vending machines</td> <td>1,00</td> </tr> </tbody> </table>	Cabinet type	P	Remote supermarket cabinets	1,00	Integral (Plug-in) supermarket cabinets	1,10	Beverage coolers	1,00	Ice cream freezers	1,00	Ice cream displays	1,00	Vending machines	1,00
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