Aardgas
Le gaz naturel

LAB TQ

Why third party involvement is needed in the ECO-design lot 1 and 2 framework

Brussels

3rd of May 2012

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Evolution of requirements for energy using (or related) appliances

Not that long ago → hardly any requirements regarding emissions and only a few on national or regional level on efficiency

On EU level first initiatives were taken beginning of the 90's with

- Gas Appliances Directive 90/396/EEC (now 2009/142/EC)
- Boiler Efficiency Directive 92/42/EEC
  - ✓ standard boiler
  - ✓ low temperature boiler
  - ✓ condensing boiler

Increasing environmental concern last decade → new initiatives like

- ECO-design (ErP)
- Labeling
- Energy Performance of Buildings

Examples of evolution of modern appliance performances :

- NO_x : 350 → < 70 mg/kWh
- η : 84 → >107 % (part load, net calorific value)

Statement 1

As far as ECO-design is concerned LAB^{TQ} believes that third party certification based on independent and accurate measurement is a crucial element to make sure that minimum requirements are respected and that energy efficiency labeling informs the consumer fairly and reliably. While for a manufacturer the commercial pressure to have its products as high as possible in such kind of ranking is obviously very important, an independent accredited lab is not under the same pressure and is bound to neutral assessment of the product's performances.

Statement 2

To protect the proper functioning of the free market in the ECO-design context market surveillance certainly is an essential tool, but it is not sufficient as many thousands of the concerned appliances may be installed before detecting a possible non-conformity. Type examination completed by a production surveillance module therefore seems required.

Statement 3

Market surveillance will only be efficient if the repeatability of measurement results is high. If not, it will only lead to endless discussions between the manufacturer of the product and the concerned market authorities (and involved lab). Experience, widely present in our association, has shown that to get to such high repeatability of measurements one needs besides harmonization of measurement methods also inter-laboratory testing with binding results. Such kind of inter-laboratory testing seems unfortunately hardly imaginable between all manufacturer's labs.

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CONCLUSION :
Is a third party needed in the process of performance measurement?

YES !

Why?

- impartiality
- experience
- professionalism
- reliability
- market surveillance

Correct user information!

Effective measures saving our environment!

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Actual draft implementing measures for lot 1

Chapter 4 on Conformity Assessment states :
"The conformity assessment procedure referred to in Article 8 of Directive 2009/125/EC shall be
*the **full quality assurance** in accordance with module H set out in Annex IV to this Regulation*
or
*the **EC-type examination** in combination with **conformity to type based on product verification** in accordance with*
modules B and F
set out in Annex V to this Regulation."

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Module H according the EU's Blue Guide *

"*Covers the design and production phases. Derives from quality assurance standard EN ISO 9001, with the intervention of a notified body responsible for approving and controlling the quality system for design, manufacture, final product inspection and testing set up by the manufacturer.*"

⇒ **in line with the earlier statements LAB TQ does NOT support this module in the ECO-design lot 1 and 2 framework as it does not include any independent type examination, and so prefers…**

* 'Blue Guide' = Guide to the implementation of directives based on the New Approach and the Global Approach

⇒ **… the second proposed option**

Module B according the Blue Guide

"*Covers the design phase, and must be followed up by a module providing for assessment in the production phase. The EC type-examination certificate is issued by a notified body.*"

completed by a surveillance module

Module F according the Blue Guide

"*Covers the production phase and follows module B. A notified body controls conformity to the type as described in the EC type-examination certificate issued according to module B, and issues a certificate of conformity.*"

⇒ **eventually one of the other surveillance modules**

More information

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