

MARCOGAZ comments on Draft Ecodesign Mandate with Annexes A and B

Part 1: MARCOGAZ comments on LOT 1 & 2 Boilers and combi-boilers (gas and oil fired boilers, heat pumps and mCHP)

The items on the list of "**Standardisation needs**" is covering well most the points regarding standardization from our the latest version of the Gas Industry position paper (*UTIL-10-21_D300_MARCOGAZ PP Eco-Design Final 30-11-10*). *In annex of this document*

However technical studies in support of the development of the standards should also be mentioned in the mandate. Here we see at least two actions missing in the mandate.

1. Inter-comparisons in support of the development of standards

The development of new testing methods shall be accompanied by inter-comparison test between accredited laboratories to ensure an acceptable repeatability and inter-laboratory reproducibility of the methods developed. Those tests will highlight the weak points of the methods and enable immediate improvements of the standards to allow non controversial application of the directive.

For gas appliances, such test should at least cover.

For the efficiency:

- Hot water production test with EN 13203
- mCHP
- Gas heat pump

For the NOx

- Gas boilers (results for NOx can be extrapolated to other appliances)

2. Study to demonstrate the equivalence of standards used for the different appliances under Lot 1 & 2.

Appliances under the Lot 1&2 are very different and are standardized by different CEN groups with experts representing rather different Industries. As a result the standards, the certification processes, the testing of those appliances are very different. For example, when standards require measurement of efficiency with accuracy of at least 2% some other requires 5% or more! Therefore we believe that a study should demonstrate that the various standards, certification and testing procedure are not bringing market distortions.

Part 2: MARCOGAZ overall comments and comments on other LOTS

We noticed that the mention to standards for a number of gas appliances is missing and that MARCOGAZ is not mentioned as relevant stakeholder for some of the gas appliances concerned (hobs and grills).

Annex: Extracts of the latest version of the gas industry position paper (UTIL-10-21_D300_Marcogaz PP Eco-Design Final 30-11-10).

There are basically two needs there:

- 1) The development of standards covering the measurements of the parameters needed for the application of the Directive;
- 2) The resolution of some technical issues with some of the standards.

Among the points to be examined:

- 1) The description of the model in a standard. A possible validation of the model should be envisaged especially regarding some aspects that are controversial (e.g. brine temperature etc.);
- 2) The improvement of the existing methods for the measurement of low NO_x emissions and the control of inter-laboratory reproducibility (*);
- 3) The control of inter-laboratory reproducibility for hot water production of gas appliances (*). Contrary to boiler efficiency, our Industry has only a limited experience with the standards for the hot water production performances. Test shall be done and standard improved when needed;
- 4) Micro-CHP testing methods. The method suggested by COGEN Europe shall be implemented in a standard and laboratories shall test the procedure in view of validation;
- 5) Equivalence of standards used for the different appliances under Lot 1. Appliances under the Lot 1 are very different and are standardized by different CEN groups with experts representing rather different Industries. As a result the standards, the certification processes, the testing of those appliances are very different. For example, when standards require measurement of efficiency with accuracy of at least 2% some other requires 5% or more! Therefore we believe that a study should demonstrate that the various standards, certification and testing procedure are not bringing market distortions.