

Position for Ecodesign ENTR Lot 6/ENER Lot21 (Central air conditioning & heating)

November 2015

Declaration of multisplit air conditioners and multisplit heat pumps

JBCE would like to thank the commission for including the proposal with regard to the multisplit air conditioner and multisplit heat pump. We believe that the improvements to the document will facilitate declaration for the manufacturers and market surveillance.

After further evaluation, we believe some additional rewording might be necessary in the transitional method to avoid misinterpretation and to further align the wording with the wording in the standard.

THE TRANSITIONAL METHOD

-----TRANSITIONAL METHODSCLAUSE 5-----

5. Additional elements for calculations related to the seasonal space heating and cooling efficiency and the testing of multisplit air conditioners and multisplit heat pumps.

1) Introductory sentence:

The choice of the indoor unit for multisplit air conditioners and multisplit heat pumps related to ~~the power input and~~ the capacity shall be limited to

2) Second dash:

The number as described in the table below and the same size of the indoor units if the ~~connection ratio~~ system capacity ratio of 100 +/-5% can be reached. If the system capacity ratio of 100 +/-5% with same sizes cannot be reached, sizes as similar as possible, with the number of indoor units but no more than prescribed in the table below, to meet the system capacity ratio within 100% +/-5%.

DETAILED EXPLANATION OF THE CHANGES:

1) Introductory sentence:

➤ 'related to ~~the power input~~ and capacity'

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Reasoning: This was confusing; some people thought this meant that the power input had to be included in the calculations.

2) Second dash:

- ~~'connection ratio~~ system capacity ratio' and 100

Reasoning: To be in line with EN 14511, the wording used has to change to system capacity ratio and reference to 1 has to be made instead of 100%.

- addition of: 'with the number of indoor units but no more than' prescribed in the table below

Reasoning: Clarification was needed to make sure that this is not misunderstood.

- 'meet the system capacity ratio as near as possible to within 1 +/-5%'

Reasoning: More precise, makes clear what is meant with as near as possible.

About JBCE:

Created in 1999, **the Japan Business Council in Europe (JBCE)** is a leading European organization representing the interests of more than 70 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, railway, textiles and glass products. Together, our member companies represented in 2013 global sales of 1.4 trillion euros. Building a new era of cooperation between the European Union (EU) and Japan is the core of our activities. www.jbce.org

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