



Dear Ms. Baijia Huang  
(cc: Ms. Veerle Beelaerts)

The Japan Business Council in Europe (JBCE), representing companies of Japanese parentage operating in Europe, and the Japan Refrigeration and Air Conditioning Industry Association (JRAIA), representing manufacturers of refrigeration and air conditioning equipment in Japan welcome the draft interim report of Task 1 and 2 on ecodesign and energy labeling for air conditioners and comfort fans.

The membership of the JBCE covers a wide range of industry sectors, producing energy related products especially air conditioning, heat pumps and home appliances. In a similar way the membership of JRAIA covers the refrigeration and air conditioning equipment.

JBCE and JRAIA supports the review of Commission Regulation (EU) No 206/2012 and the Commission Delegated Regulation (EU) No 626/2011 on air conditioners and comfort fans.

In the table of the Annex you will find JBCE and JRAIA's comments and proposals for the draft interim report of Task 1 and 2 on ecodesign and energy labeling for air conditioners and comfort fans.

As key stakeholders, JBCE and JRAIA would like to make further contributions whenever it is useful and needed and share the knowledge and experience of our members. We remain at your disposal and look forward to working with you throughout this study.

Best regards,

A handwritten signature in blue ink, appearing to read "M. Scumpieru".

Mihai Scumpieru  
Chairman of Environment Committee  
Japan Business Council in Europe (JBCE)

A handwritten signature in blue ink, appearing to read "Hideaki Kasahara".

Hideaki Kasahara  
Senior Manager, International Affairs Department  
Japan Refrigeration and Air Conditioning  
Industry Association (JRAIA)



#### **About JBCE:**

The Japan Business Council in Europe was established in 1999 and is a leading European organisation representing the interests of almost 80 multinational companies of Japanese parentage operating in the European Union.

Our members operate across a wide range of sectors, including electronics, wholesale trade, precision instruments, pharmaceutical, railway, textiles, glass, automotive, and chemical manufacturing. In 2014, our member companies had global sales of 1.4 trillion euros.

Building a new era of cooperation between the EU and Japan is the core of our activities. The key goal of JBCE is to contribute to EU public policy in a positive and constructive way by drawing on the expertise and experience of our member companies.

Website: <http://www.jbce.org/>

E-mail: [info@jbce.org](mailto:info@jbce.org)

#### **About JRAIA:**

JRAIA, the Japan Refrigeration and Air Conditioning Industry Association, was originally established in February 1949 as the Japan Refrigerating Machine Manufactures Association which was thereafter reorganized in February 1969 to become an incorporated association and renamed as it is at present.

JRAIA is the trade association representing over 160 manufacturers of refrigeration and air conditioning equipment in Japan. We, the members of JRAIA, have so far been dedicated to offering quality products to the markets of EU. JRAIA aims to promote and improve production, distribution and consumption of refrigeration and air conditioning equipment and their applied products, as well as auxiliary devices and components, automatic controls and accessories and thereby contribute to the steady development of HVAC&R industry and the improvement in people's standard of living. For more information, please see our website [www.jraia.or.jp](http://www.jraia.or.jp)

## ANNEX

### JBCE/JRAIA's Comments on Lot10 Task Report 1&2 (draft version)

JBCE/JRAIA's comments are as follows:

Task Report	Page	JBCE/JRAIA's comment
1.1.4 Recommended product scope	P25	In the recommended product scope, “ventilation exhaust air-to-air heat pumps and air conditioners $\leq 12\text{kW}$ ” are included. We would like to point out that the market size of this product category is rather limited and if this category is to be included in the product scope, it's market size should match the criteria of Ecodesign Framework Directive(Article 15, 2(a) of 2009/125/EC). It is necessary to provide a clear definition of exhaust air ventilation units.
1.2.1.1 European standards	P30	The report specifies the uncertainties of the test standards. These uncertainties are relevant for the tolerance that will be established for market surveillance. We kindly request to investigate whether and 8% tolerance is suitable given the uncertainties in the standards.
1.3.1 EU Legislation	P69	“EU Directive 97/23/EC” should be “2014/68/EU”, the latest Pressure Equipment Directive
		Directives such as Machinery Directive(2006/42/EC) and Biocidal Product Directive (98/8/EC) should be included among EU legislation.
1.4 Conclusions and Recommendations	P85	We understand that the promotion of low GWP alternatives usage are already covered by F-Gas regulation and see no need to be covered by Lot10. At this moment, there are no feasible alternatives of less than 150 GWP for air conditioners and we consider that GWP bonus system for air conditioners using low GWP refrigerants is not necessary in the sentence below; “As a result of F-Gas regulation, the industry will be required to reduce the impact of high GWP refrigerants and the need for a bonus system for air conditioners using low GWP refrigerant in the revised eco-design regulation is reduced”
2.2.3 Estimated sales and stock Figure 22	P103	We see that the sales estimate is extremely optimistic, and would like to ask European associations to check if this estimate is feasible.
2.3.3.2 Noise	P111	When evaluating sound power it is necessary to evaluate this in combination with energy efficiency. The Figure 32 and 33 clearly show that due to the minimum requirements, the sound power has increased. The lower end of the graph has increased since 2006.

As a general remark regarding Annex I of Commission Implementing Decision of 15.12.2015(M/543), JBCE/JRAIA considers air conditioner products have longer product life time compared to IT products, and believes re-using of the components are not viable.