

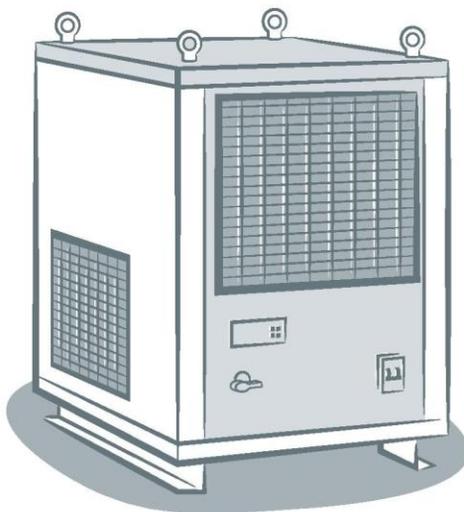
FAQ related to

April
2018

Regulation (EU)
No 2015/1094 with regard
to **the energy labelling of
professional refrigerated
storage cabinets**

and

Regulation (EU) No 2015/1095 with
regard to **ecodesign requirements for
professional refrigerated storage
cabinets, blast cabinets, condensing
units and process chillers**



This FAQ list is intended to be used only for facilitating the implementation of Regulation (EU) 2015/1095 and Regulation (EU) 2015/1094. They are not intended to replace the regulations nor to provide legal “interpretation”. This FAQ list only reflects the opinion of the Commission services and is not legally binding. A finally binding legal Interpretation of EU legislation may only be provided by the European Court of Justice. This FAQ list is without prejudice to the position the Commission might take should an issue arise in a procedure before the European Court of Justice.

Please note that further Q&As on professional refrigeration products could also be published in the *Frequently Asked Questions (FAQ) on the Ecodesign Directive and its Implementing Regulations*¹ and in the *Frequently Asked Questions on the Energy Labelling Directive and its Implementing Regulations*². The reader is also invited to refer to the *Commission communication in the framework of the implementation of Commission Regulation (EU) 2015/1095 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for professional refrigerated storage cabinets, blast cabinets, condensing units and process chillers and of Commission Delegated Regulation (EU) 2015/1094 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the energy labelling of professional refrigerated storage cabinets*³, which gives useful supporting information on the relevant standards and transitional methods of measurement and calculation for the implementation of these two Regulations.

1 QUESTIONS REGARDING PROFESSIONAL REFRIGERATED STORAGE CABINETS

1. Are refrigerated storage cabinets with a glass or transparent door in scope to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095?

Yes, as long as these refrigerated storage cabinets are for professional use, i.e. 'intended for the storage of foodstuffs in non-household environments but not for the display to or access by customers' (Article 2.1.a of Regulation (EU) 2015/1095).

2. What is the difference between refrigerated storage cabinets for professional applications and for commercial applications?

Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095 apply to the refrigerated storage cabinets belonging to the professional sector, i.e. to those appliances intended for use "in non-household environments but not for the display to or access by customers" (Article 2.1.a of Regulation (EU) 2015/1095⁴). Therefore, an appliance for commercial use (i.e. to be used to display products to the final customer, or directly accessible by him/her) is not in scope to these Regulations.

3. Are laboratory refrigerators and laboratory freezers in scope to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095?

Laboratory equipment is typically designed to operate at temperatures which are (much) lower than those ones defined in Regulation (EU) 2015/1095 (annex I, chilled operating temperature' and frozen operating temperature', definitions 2 and 3), therefore these cabinets are out of scope of Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095. Moreover, if a professional refrigerated storage cabinet is capable to operate in one of the temperature ranges foreseen in Regulation (EU) 2015/1095 (annex I, chilled operating temperature' and frozen operating temperature', definitions 2 and 3), we can have two situations:

- If the cabinet is specifically designed and marketed to maintain the temperature of materials other than foodstuff, it is out of scope of Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095.

¹ Available at <http://ec.europa.eu/energy/en/topics/energy-efficiency/energy-efficient-products>

² Available at https://ec.europa.eu/energy/sites/ener/files/documents/ec_faq_el_2015-1.pdf

³ Available at <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017XC0210%2803%29&from=EN>

⁴ The same definition is also present in Regulation (EU) 2015/1094

- If the cabinet is designed and marketed to maintain the temperature of foodstuff and other materials, it is in scope to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095.

4. Are professional refrigerated storage cabinets used for fish and operating between -2° and 2 °C in scope to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095? How to test them?

Based on this description, the operating temperature range declared for these cabinets (between -2° and 2°C) almost overlaps with the chilled operating temperature intervals (between -1° and 5°C), as defined in Annex I.2 to Regulation (EU) 2015/1095, therefore it is assumed that these cabinets are capable to maintain the temperature of foodstuff at chilled operating temperature.

Based on this assumption, and also hypothesizing that these professional refrigerated storage cabinets do not fall into the scope exclusion of Article 1.1.n of Regulation (EU) 2015/1095⁵ (as this can be sometimes the case for professional refrigerated storage cabinets for fish), it derives that they are in scope to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095, and they should be tested at chilled operating temperature.

5. Are trolley chambers used to preserve and to rethermalize foodstuffs in scope to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095? And what about trolley chambers which refrigerate foodstuffs only for a limited time?

Based on the description, both kinds of devices are, in general terms, out of scope of Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095. More in detail, trolley chambers used to preserve and to rethermalize foodstuffs are out of scope as long as they fall into the scope exclusion laid down in Article 1.1.e of Regulation (EU) 2015/1095⁶ ('cabinets specifically designed only for the purpose of thawing frozen foodstuffs in a controlled manner, where the mere presence of one compartment specifically designed for thawing frozen foodstuffs in a controlled manner is not sufficient for exemption'). Concerning trolley chambers which refrigerate foodstuffs only for a limited time, this product does not meet the definition of professional refrigerated storage cabinets, as from Reg. 2015/1095, article 2.1.a⁷ ('professional refrigerated storage cabinet' means an insulated refrigerating appliance..., capable of continuously maintaining the temperature of foodstuffs within prescribed limits').

6. Are beverage counters, beer counters and bottle counters with operating temperatures in the range +4°/+10 °C in scope to Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095?

Based on the description, these appliances are, in general terms, out of scope of Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095. Given that their operating temperature is in the range +4°/+10°C, they are not designed nor declared to operate in the temperature ranges foreseen in Annex I.2 and Annex I.3 to Regulation (EU) 2015/1095⁸.

7. Do Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095 also apply to professional refrigerated storage cabinets sold in Switzerland?

The energy labelling and ecodesign Regulations are not included in the Mutual Recognition Agreement with Switzerland. However, sometimes Switzerland independently adopts elements of EU law in areas not covered by bilateral accords. In case of Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095,

⁵ The same scope exclusion is also present in Regulation (EU) 2015/1094

⁶ The same scope exclusion is also present in Regulation (EU) 2015/1094

⁷ The same definition is also present in Regulation (EU) 2015/1094

⁸ The same definitions are also present in Regulation (EU) 2015/1094

according to information provided by Swiss authorities, Switzerland has adopted legislation mirroring both the regulations. For more information, please check:

<http://www.bfe.admin.ch/energieetikette/index.html?lang=en>

8. In the energy label for a heavy duty cabinet, should we indicate the climate class 4 or 5? At which climate class shall heavy duty cabinets be tested to declare the EEI?

For heavy duty cabinets, the climate class to be indicated in the energy label (lower right of the label, item VII of Annex III.1 to 2015/1094) is climate class 5. To this extent, to verify the capability of the heavy duty cabinet to maintain the temperature in the compartment(s), a temperature test at climate class 5, as indicated in the EN 16825 standard, is necessary. Moreover, concerning heavy duty cabinets, in order to calculate the EEI index (energy efficiency index, as defined in Annex VIII to Regulation (EU) 2015/1094), the ambient conditions of the testing environment shall correspond to climate class 4 (as from Annex IV.2.b to 2015/1095 and Annex IX.2 to 2015/1094).

9. In the energy label for professional refrigerated storage cabinets, concerning the name of supplier and/or the trademark (upper left of the label, item I of Annex III.1 to 2015/1094), can one manufacturer declare, for this field, the VAT number of a company in case, for commercial reasons, the supplier doesn't want to appear with its name/trademark?

Pursuant to Annex IV.1.a to Regulation (EU) 2015/1094, the supplier's name or trademark has to be provided in the product fiche. Providing the VAT number does not comply with the provision of Annex IV.1.a to Regulation (EU) 2015/1094. Concerning the trademark, please refer to its characteristics, as defined in the BlueGuide⁹.

10. Is it necessary to supply a physical energy label for each professional refrigerated storage cabinet placed on the market by a supplier?

Article 3(1)(a) of Regulation (EU) 2015/1094 states that 'a printed label in the format and containing the information set out in Annex III shall be provided for each professional refrigerated storage cabinet', therefore the legislative text is quite clear on this point.

11. How to deal with multi-use cabinets to the extent of the net volume declaration (lower part of the label, items V and VI of Annex III.1 to 2015/1094)? And how to calculate the EEI index of multi-use cabinets?

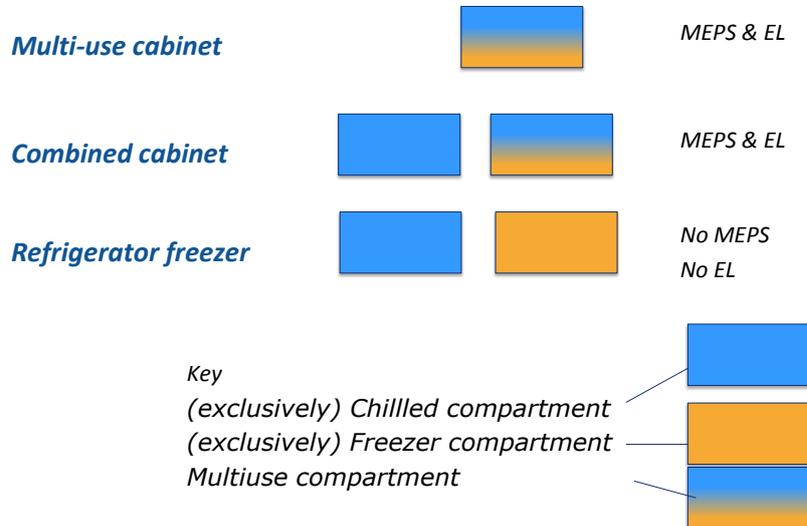
To the extent of the calculation of the net volumes to be declared in the energy label, the net volume of the multi-use compartment(s) shall be regarded as net volume of a compartment at frozen operating temperature. Analogously, in order to calculate the EEI index of multi-use cabinets, the multi-use compartment(s) shall be regarded as compartment(s) at frozen operating temperature. Please also refer to FAQ 12 on how to deal with refrigerator-freezers.

12. How are multi-use cabinets, combined cabinets and refrigerator-freezers treated under Regulation (EU) 2015/1094 and Regulation (EU) 2015/1095? How to test them?

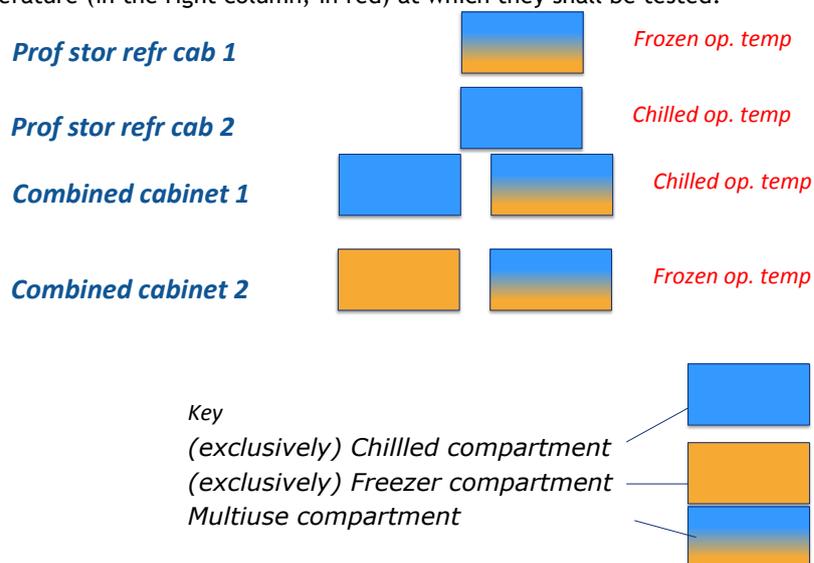
Concerning Ecodesign, please note that refrigerator-freezers are in scope of Regulation (EU) 2015/1095, however they are not subject to the energy efficiency index (EEI) limits laid down in annex II.1.a, as different requirements on the indication of the daily energy consumption apply to these products (please

⁹ <http://ec.europa.eu/DocsRoom/documents/16210>, footnote 192

refer to Annex II.2.a.vi to Regulation (EU) 2015/1095). Multi-use cabinets and combined cabinets are in scope to Regulation (EU) 2015/1095. Concerning energy labelling, please note that refrigerator-freezers are out of scope of Regulation (EU) 2015/1094 whereas multi-use cabinets and combined cabinets are in scope to this Regulation. The figure below shows a schematic representation of the features of these cabinets.



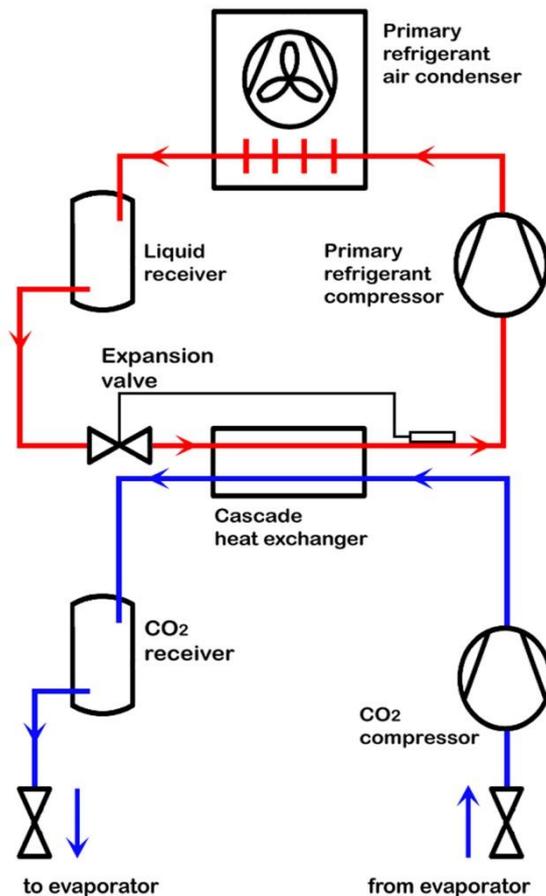
Concerning the operating temperatures at which the professional refrigerated storage cabinets shall be tested, the provisions laid down in Annex IV.2c to Regulation (EU) 2015/1095¹⁰ apply. The figure below schematically shows some examples of professional refrigerated storage cabinets, together with the operating temperature (in the right column, in red) at which they shall be tested.



2 QUESTIONS REGARDING CONDENSING UNITS

¹⁰ The same provision is also present in Regulation (EU) 2015/1094

13. How should the subcritical cascade condensing unit in the figure below be considered under Regulation (EU) 2015/1095? Is it, or any of its circuits, in scope to this Regulation?



Regulation (EU) 2015/1095 does not specifically address cascade systems, therefore one has to analyse the system and its various parts in light of the definitions given in the Regulation. Based on the information provided in the figure:

- when considering the system in its entirety, the whole system should be out of scope of the Regulation, because of the exclusion in Article 1.2.a (specifically affecting the primary circuit)
- If we would consider the secondary circuit as an independent condensing unit, it should be out of scope because of the exclusion in Article 1.2.c.

14. When determining the rated cooling capacity of a condensing unit at the standard rating conditions, the suction gas superheat is not specified. The condensing unit standard EN13215:2016 allows considering either a return gas temperature of 20°C (RGT=20°C) or a superheat of 10K, however differences in the resulting cooling capacity can emerge by using one method or the other. What is the approach to use under Regulation (EU) 2015/1095?

To assess compliance with Regulation (EU) 2015/1095, the same approach of EN13215:2016 is allowed (both RGT=20°C or SH=10K can be used). This is, because different suction gas conditions are given, based on the refrigerant technology.

15. For condensing units with rated cooling capacity higher than 5kW and 2kW, according to Annex V.2.a.(iii) to Regulation (EU) 2015/1095, the declared cooling capacity has to be rounded to three decimal places, as well as the declared power input. However, in the corresponding template of Table

5, it is shown that the cooling capacity should be presented with two decimal places (x.xx), as well as the power input. With how many decimals shall cooling capacity and power input be presented?

Table 4 and Table 5 (of Regulation (EU) 2015/1095) provide an indicative layout, therefore they do not give prescriptive provisions on the number of decimal places of the various parameters. To this extent, please refer to the provisions laid down in Annex V.2 a (ii) and in Annex V.2. a (iii).

3 QUESTIONS REGARDING PROCESS CHILLERS

16. The definition of process chillers laid down in Article 2.1.s of Regulation (EU) 2015/1095 contains the following part: 'in order to provide cooling to a refrigerated appliance or system'. Does this mean that only chillers to be used for refrigeration systems for foodstuffs (such as chiller cabinets, freezer rooms, etc.) are in scope to Regulation (EU) 2015/1095?

The reply is no. A 'refrigerated appliance or system' has to be understood as not necessarily being something related (only) to food and drinks, but with a more general meaning, i.e. related to the presence of a refrigerated environment.

17. How should performance data be presented when the same process chiller can operate with different process fluids, as it may be typical for medium temperature or low temperature process chillers? Should the performance data be based on the actual fluid for the application in question or should it be based on a standardised fluid - if the latter, how can one manufacturer decide which fluid to use?

A standardised process fluid is not given under Regulation (EU) 2015/1095. In the case of a process chiller working with fluids other than water, compliance with requirements of Regulation (EU) 2015/1095 has to be assessed by testing the product with the process liquid operated by the process chiller.

If the same process chiller can operate with different process fluids (e.g. water, brine, oil, etc.), it is up to manufacturer to choose the process fluid with which to show compliance against the requirements of Regulation (EU) 2015/1095.

18. Are high temperature process chillers in scope to Regulation (EU) 2015/1095?

No. Regulation (EU) 2015/1095 sets ecodesign requirements for the placing on the market of process chillers intended to operate at low or medium temperature. High temperature process chillers are in scope to Regulation (EU) 2016/2281.

19. What does the expression 'indoor heat exchanger' (mentioned in Article 2.1.t, 2.1.v and 2.1.z of Regulation (EU) 2015/1095) refer to?

The indoor heat exchanger has to be understood as the evaporator.