





"Common understanding of the heating energy labelling concept, key elements"

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### **EXECUTIVE SUMMARY**

This document presents the "common understanding of the energy labelling concept, key elements" and aims at setting the common framework within which the Label Pack A+ consortium develops its activity. It is a working document aimed at the consortium members, in order to guide their activities, namely the pilot actions to establish at the national levels and assure a common line of work and communication with the market actors.

The document briefly addresses the Ecodesign and Energy Labelling Directives and the contextualization of the Regulated Acts No.811 and 812/2013 within these. The most relevant and innovative aspect introduced by these regulations lies on the introduction of a new concept in the energy labelling requirements, **the package labelling**, meant for the labelling of **heating systems composed by more than one appliance**, in an overall system evaluation perspective. To address the specifics of this new label, the distinction between individual products and package systems is presented, and both regulations are analysed in order to understand the different energy labelling application frameworks. The added value of solar packages is also addressed, as the combination of conventional heaters with solar systems has the potential to maximize the package's energy efficiency, providing a high energy class heating system.

The document also looks into the challenges addressing the end-consumer and the initiatives to disseminate and raise the community's awareness on the new energy labelling system. One of the most pressing issues is the definition of the consumer's hot water demand profiles as it affects the selection of the appliance's output range.

Regarding the documentation, this new legislation does not restrict itself to the calculation and presentation of the energy label in the considered heating appliances, and a wide set of documents should compulsory be displayed, or available upon request, namely the product fiche, technical documentation, detailed information and advertisement and promotional material.

The heating market chain is thoroughly addressed, identifying the various models possible and the responsibilities for issuing the package label in the different scenarios. The ultimate difference relies on the labelling of customized solutions when the responsibility for issuing and presenting the energy label to the end-consumer relies on the system distributor, which can either be the retailer or the installer integrator, depending on who assembles the customized system.

The competences of the different stakeholders along the value chain are discussed, from the public authorities, to the industry associations and consumer defence organizations, addressing also the market surveillance entities and their role in assuring the adequate implementation of the legislation.

Finally, a wide set of Frequently Asked Questions are listed and answered to help all the market agents to comply with their responsibilities and assure a successful approach to the market.





### 1 Introduction

The **Ecodesign and Energy Labelling Directives** express the European Commission's goal towards reducing the energy consumed by products, at the design and manufacture stage, Ecodesign Directive, and at the operation stage, Energy Labelling Directive.

The Ecodesign Directive, Directive 2009/125/EC, established the framework for setting mandatory requirements for energy related products. The Directive targets equipment manufacturers, establishing minimum performance criteria for putting new products on the market.

The Energy Labelling Directive, Directive 2010/30/EU, aims at providing the end-consumers with more information regarding the products energy performance, in order to better decide on the acquisition stage. It established the binding obligation for energy labelling and standard product information on the consumption of energy and other resources by energy-related products.

The technical specifications for each of the products covered by these regulations are set via Delegated Regulations, non-legislative acts of general application to supplement or amend certain non-essential elements of a legislative act, used where uniform conditions for implementing legally binding Union acts are required.

The regulations for space, water and combination heaters, Commission Delegated Regulation (EU) No 811/2013 and No 812/2013 were published in 2013 and are to enter in force on the 26<sup>th</sup> of September 2015.

Within this context, the **Label Pack A+** project was set, in the auspicious of the Horizon 2020 Programme, aiming to support the implementation of the energy labelling of heating appliances and boosting its impact on solar thermal products by using the "package label".

This document presents the "Common understanding of the energy labelling concept, key elements" and aims at setting the common framework within which the Label Pack A+ consortium develops its activity. It's targeted at the consortium members, in order to guide their activities, namely the pilot actions to establish at the national levels and assure a common line of work and communication with the market actors, assuring the success of the communication provided.





# 2 Energy labelling of heating appliances

The **Ecodesign and Energy Labelling Directives** were published respectively in **2009 and 2010.** These regulations express the European Commission's commitment towards energy efficiency, compelling the market to offer more efficient energy consuming products, in a "from design to operation" perspective.

The delegated regulations set for space, water and combination heaters were published in 2013.

Commission Delegated Regulation (EU) **No 811/2013** of 18 February 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the **energy labelling of space heaters, combination heaters, packages of space heater, temperature control and solar device and packages of combination heater, temperature control and solar device** 

Commission Delegated Regulation (EU) **No 812/2013** of 18 February 2013 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to the **energy labelling of water heaters, hot water storage tanks and packages of water heater and solar device.** 

Commission Regulation (EU) **No 813/2013** of 2 August 2013 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for space heaters and combination heaters

Commission Regulation (EU) **No 814/2013** of 2 August 2013 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for water heaters and hot water storage tanks

http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2013:239:FULL&from=EN

The most relevant and innovative aspect introduced by these regulations lies on the introduction of a new concept in the energy labelling requirements, the package labelling, meant for the labelling of heating systems composed by more than one equipment, in an overall system evaluation perspective.

#### 2.1 Definitions

**Individual products**: individual heater (space or water), individual combination heater (space and water) temperature control, solar device.

**Package**: a system that is offered to the end-user combining one or more heaters (water, space or combi) with one or more temperature controls (in the case of space and combi packages) and one or more solar devices.

#### Packages:

**Standard package** – a package of products, pre-assembled by the supplier as a standard solution, constituted by a set of products supplied by the same supplier.

**Custom-made package** – a package of products locally assembled by the dealer or installer, who combines a set of products (not necessarily with the same brand or within the offer of brands supplied by one exclusive supplier) commercialized by the dealer and assembled at the moment of sale to meet the demand of one precise client.

For further definitions, please check the ANNEXES.





# 3 Space heating appliances

## 3.1 Scope

**No 811/2013 -** space heaters and combination heaters with a rated heat output  $\leq$  70 kW, packages of space heater  $\leq$  70 kW, temperature control and solar device and packages of combination heater  $\leq$  70 kW, temperature control and solar device.

## 3.2 Heating equipment's

The Energy labelling regulating covers products with a rated output up to 70kW.

## 3.2.1 Individual products:

- Space heater ≤ 70 kW;
  - Fuel boiler space heaters
  - Electric boiler space heaters
  - Cogeneration space heaters
  - Heat pump space heaters
  - Heat pump space heaters with fuel driven combustion unit
- Combination heaters;
  - Fuel boiler combination heaters
  - Electric boiler combination heaters
  - Cogeneration combination heaters
  - Heat pump combination heaters
  - Heat pump combination heaters with fuel driven combustion unit

Note – Regarding heat pumps, heaters designed for using gaseous or liquid fuels from biomass are excluded. A specific legislation covering these equipment's will be issued. Other pieces of legislation, such as the Gas Appliances Directive might apply to them as far as appliances burning gaseous fuels are concerned.

#### 3.2.2 Packages of Space Heating Equipment's:

- Packages of space heater, temperature control and/or solar device
  - Hot water storage tank
  - Solar device
    - Solar collector
    - Solar hot water storage tank, "Thermosyphon system", or pump in the collector loop





## 3.2.3 Packages of Combination (Space and Water) Heating Equipment's:

- Packages of boiler combination heater (space and water), temperature control and solar device
- Packages of heat pump combination heater (space and water), temperature control and solar device

# 3.3 - Quick guide to Regulated Act No 811/2013

The Regulated Acts present the energy efficiency classes, the templates for the different labels, product fiches, technical documentation and other necessary documentation, for each equipment and combination of equipment for the package label.

## 3.3.1 For individual products

	September 2015				
811 - Space heaters	Label	Product fiche	Technical docs	Alternative info	
Individual space heaters					
Boiler space heaters	Annex III, 1.1.1				
Cogeneration space heaters	Annex III, 1.1.2	Annov IV/ 1	Annex V, 1	Annov \ \	
Heat pump space heaters	Annex III, 1.1.3	Annex IV, 1		Annex VI, 1	
Low temperature heat pumps	Annex III, 1.1.4				
Individual combination heaters					
Boiler combination heaters for space and water heating	Annex III, 2.1.1	- Annex IV, 2	Annex V, 2	Annex VI, 2	
Hheat pump combination heaters for space and water heating	Annex III, 2.1.2	Allilex IV, 2	Aillex V, Z	Aillex VI, 2	
	_				
Temperature controls		Annex IV, 3	Annex V, 3		
Solar devices		Annex IV, 4	Annex V, 4		

## 3.3.2 For space heating packages

	September 2015			
811 - Space heaters	Label	<b>Product fiche</b>	Technical docs	Alternative info
packages of space heater, temperature control and solar device	Annex III, 3	Annex IV, 5	Annex V, 5	Annex VI, 3

## 3.3.1 For combination heating (space and water) packages

	September 2015				
811 - Space heaters	Label	Product fiche	Technical docs	Alternative info	
Packages of combination (space and water) heater, temperature control and solar device	Annex III, 4	Annex IV, 6	Annex V, 6	Annex VI, 4	





# 4 Water heating appliances

## 4.1 Scope

**No 812/2013 -** water heaters with a rated heat output  $\leq$  70 kW, hot water storage tanks with a storage volume  $\leq$  500 litres and packages of water heater  $\leq$  70 kW and /or storage volume  $\leq$  500 litres and solar device.

## 4.2 Equipment's

## 4.2.1 Individual products:

- Water heater with a rated heat output ≤ 70kW;
  - Conventional water heater (fossil fuel based)
  - Electric water heater
  - Solar water heater (thermos syphon system (with electric backup));
  - Heat pump water heater;
  - Heat pump water heaters with fuel driven combustion unit
- Hot water storage tanks with a volume ≤ 500 l

Solar device – Solar devices, according to the relevant definitions in the Regulations, are made of a solar collector, a solar hot water storage tank or a pump in the collector loop. This means that a solar device always contains a solar collector. The components of these systems are not to be labelled individually, as most of are not energy consuming products.

#### 4.2.2 Packages of Water Heating Equipment:

- Packages of water heater and solar device

#### 4.3 Load Profiles for water heaters (and for combination heaters)

One important feature when selecting the adequate water heater is the load profile. Load profiles are defined in distribution tables containing the time, the energy, kWh, the temperature,  ${}^{\circ}$ C, and types (shower, dish washing, hand washing) of each "tapping". It represents a daily sequence of water draw-offs, a combination of useful water flow rate, useful water temperature, useful energy content and peak temperature.

The Regulated Act No 812/2013 presents eight load profiles, from XXS to XXL and each water heater meets at least one load profile.

The load profile is characterized by:

- The reference energy, Qref, which accounts for sum of the useful energy content of the water draw-offs, expressed in kWh;
- The useful water flow rate, f, the minimum flow rate, in litters per minute, for which the water is contributing to the reference energy;
- The useful water temperature, Tm, the water temperature in degrees Celsius
- The peak water temperature, Tp, the minimum water temperature in degrees Celsius.





The Qref for various load profiles is presented, with a calculation example for quantification of the profile in hot showers per day:

Profile	3XS	XXS	XS	S	M	L	XL	XXL
Qref (kWh)	0,345	2,100	2,100	2,100	5,845	11,655	19,07	24,53
Showers	0	1	1	1	2-3	3-4	7-9	11-12

Calculation: 40 litters/day. dwelling, water at 60°C, T water grid =15 °C => 2.1kWh/day

Heater load profile	Hot water needs associated to the profile	Application	
зхѕ	Seldom hand wash	Small offices	
xxs	Household washes	Small offices	
xs	Kitchen (small dish wash) and household washes simultaneously	Offices	
s	Kitchen (small dish wash) household washes	Offices	
М	Kitchen, household washes and 2 showers	Residential (1-2 pax)	
L	Kitchen, household washes, showers or bath	Residential (3 – 5 pax)	
XL	Kitchen, household washes, showers and/or baths	Residential (5 – 8 pax)	
XXL	Kitchen, several household washes, showers and bath simultaneously	Residential (9 and more pax)	

Figure 1 – Hot water needs associated to the heater's load profile

# 4.4 - Quick guide to Regulated Act No 812/2013

## 4.4.1 For individual products:

	September 2015				
812 –Water heaters	Label	Product fiche	Technical docs	Alternative info	
Individual water heater					
Conventional water heaters	Annex III, point 1.1.1	Annex IV, point 1	Annex V, point 1	Annex VI, point 1	
Heat pump water heater	Annex III, point 1.1.3				
Storage tank	Annex III, point 2.1	Annex IV, point 2	Annex V, point 2	Annex VI , point 2	
Solar water heaters	Annex III, point 1.1.2	Annex IV, point 3	Annex V, point 3		
Solar device		Annex IV, point 3	Annex V, point 3		





### 4.4.2 For water heating packages

	September 2015				
812 - Water heaters	Label	<b>Product fiche</b>	Technical docs	Alternative info	
Package:					
water heater and solar device	Annex III, point 3	Annex IV, point 4	Annex V, point 4	Annex VI, point 3	

### 5 Solar solutions

Per se, solar devices do not require energy labels.

The exception to this are *thermosyphon* systems with integrated electrical resistance (the regulated acts define these equipment as solar water heaters). According to the regulation's calculation procedures solar water heaters best energy class is limited to A, given that electrical water heaters have a predefined efficiency of 40%, and as so, an electrical water heater will be classified between C and D, enhanced to A with solar.

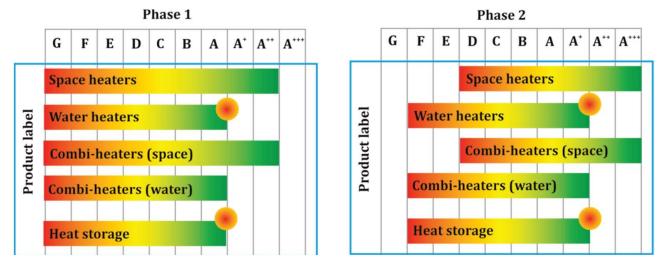


Figure 2 – Product labels energy class range, highlighting the solar enhanced solutions. (Source: "Ecodesign and the Energy label for solar thermal related products – Part 1., 2015, vAconsult)

To benefit from this new legislation, the solar industry should focus on pushing for solar driven heating solutions, that is "enlarging the solar industry's pie" in the heating market, by attracting new clients who wish to purchase efficient, high energy class solutions.

This option is particularly interesting in package solutions, where the combination with solar systems has the potential to maximize the package's energy efficiency.





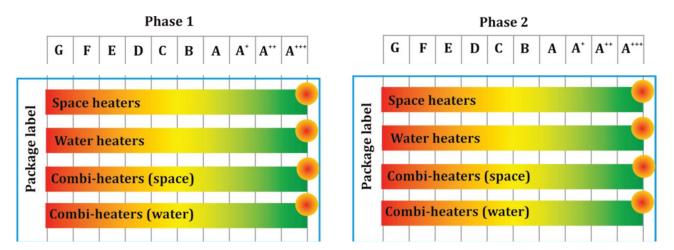


Figure 3 – Package labels energy class range, highlighting the solar enhanced solutions. (Source: "Ecodesign and the Energy label for solar thermal related products – Part 1., 2015, vAconsult)

When high class backup heaters are part of the heating package, the distinction in the added value of solar devices is limited to the range A to A<sup>+++</sup>. The space for distinction between brands and types will be short, and the differences will mainly focus on the system size than on the system's efficiency. Additionally, the end-user perception on the differences between the A to A<sup>+++</sup> class is not clear, and the real added value of A<sup>+++</sup> classes is not correctly valued.

# 5.1 Solar systems data and the SOLCAL methodology

A package is a system that is offered to the end-user combining one or more heaters (water, space or combi) with one or more temperature controls (in the case of space and combi packages) and one or more solar devices.

While calculating the system energy efficiency and class several elements regarding the solar system are requested, such as the solar collector area and efficiency.

In the water-heating packages, meaning packages using water heaters or combi heaters, the energy efficiency of the system is based on:

- the value of the water heating energy efficiency of the water heater, expressed in %, taken from the water-heater product fiche.
- the value of a mathematical expression combining the reference energy volume (Qref) associated to each load profile, and the annual non-solar heat contribution (Qnonsol) corresponding to annual contribution of electricity (expressed in kWh in "terms of primary energy") and/or fuels (expressed in kWh in Gross Calorific Value) to the useful heat output of a solar water heater or a package of water heater and solar device, taking into account the annual amount of heat captured by the solar collector and the heat losses of the solar hot water storage tank.
- Qaux, auxiliary electricity consumption, which is the annual electricity consumption of a solar
  water heater or a solar-only system that is due to the pump power consumption and the standby
  power consumption, expressed in kWh in terms of final energy.

Both Qnonsol and Qaux are to be calculated in an auxiliary tool, the vAConsult spread sheet SOLCAL.





The sheet is available for free download at <a href="http://www.vaconsult.net/Downloads/SOLCAL%202015%2007%2028%20V3">http://www.vaconsult.net/Downloads/SOLCAL%202015%2007%2028%20V3</a> 7.xlsm and for its ease of use it should be made available via the online tool webpage.

The SOLCAL methodology requires for the calculation of Qnonsol:

#### Collector

- Asol (m2)- The collector area;
- ηo The zero loss efficiency coefficient;
- a1(W/m<sup>2</sup>.K) The first order heat loss coefficient;
- a2 (W/ m<sup>2</sup>.K<sup>2</sup>) The second order heat loss coefficient;
- IAM The incident angle modifier coefficient.

#### Heat storage

- Vnom (litres) The nominal volume
- Vbu (litres) The backup volume (the volume above the lowest part of the heat exchanger, an approximate value should be half of the nominal volume)
- Backup control select if the backup control is permanently on (on a thermostat basis); only at night (controlled by a watch that sets the on hours) or only in emergency situations (manual on/off switch).
- Pbsol The heat loss coefficient of the storage (this value corresponds to the standing value in W, presented in the tank energy label, divided by 45, which is the assumed temperature difference between the interior and the exterior of the tank)
- StoLOC the location of the storage, inside or outside

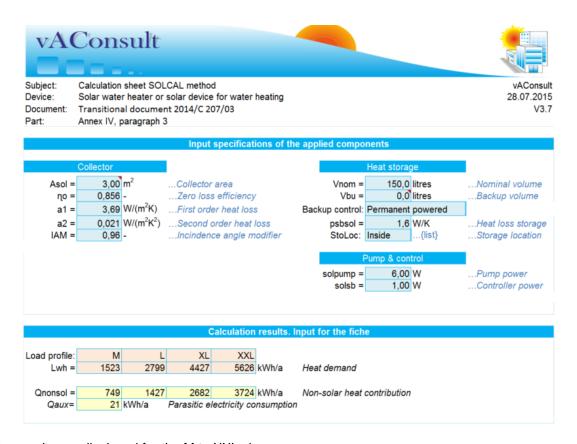
For the calculation of Qaux the SOLCAL methodology requires the elements that characterize the pump and control system:

#### Pump & Control

- Solpump The pump power (in the case of pumps with variable power the average power should be used)
- Solsb The controller's power







The results are displayed for the M to XXL classes.

Only after calculating these elements should the user access the online tool and complete the system's energy efficiency and labelling class calculation.

# 6 Accessory Equipment for heating packages

The Energy Labelling directive covers all products that consume energy, also including controls, which are defined using 'classes'. These run from Class I (a simple on/off room stat) to Class VIII (multi-sensor room control for use with modulating heating appliances). Each control class equates to a certain percentage uplift in system efficiency e.g. A class VI weather compensating control and room thermostat will add 4% efficiency to the heating system.

- Temperature controls (according to "Guidelines Accompanying Regulations (EU) No 811 & 812/2013 and 813 & 814/2013, January 2015")
  - Class I On/off Room Thermostat: A room thermostat that controls the on/off operation
    of a heater. Performance parameters, including switching differential and room
    temperature control accuracy are determined by the thermostat's mechanical
    construction.
  - Class II Weather compensator control, for use with modulating heaters: A heater flow temperature control that varies the set point of the flow temperature of water leaving





the heater dependent upon prevailing outside temperature and selected weather compensation curve. Control is achieved by modulating the output of the heater.

- Class III Weather compensator control, for use with on/off output heaters: A heater flow temperature control that varies the set point of the flow temperature of water leaving the heater dependent upon prevailing outside temperature and selected weather compensation curve. Heater flow temperature is varied by controlling the on/off operation of the heater.
- Class IV TPI room thermostat, for use with on/off output heaters: An electronic room thermostat that controls both thermostat cycle rate and in-cycle on/off ratio of the heater proportional to room temperature. TPI control strategy reduces mean water temperature, improves room temperature control accuracy and enhances system efficiency.
- Class V Modulating room thermostat, for use with modulating heaters: An electronic room thermostat that varies the flow temperature of the water leaving the heater dependent upon measured room temperature deviation from room thermostat set point.
   Control is achieved by modulating the output of the heater.
- Class VI Weather compensator and room sensor, for use with modulating heaters: A heater flow temperature control that varies the flow temperature of water leaving the heater dependent upon prevailing outside temperature and selected weather compensation curve. A room temperature sensor monitors room temperature and adjusts the compensation curve parallel displacement to improve room comfort. Control is achieved by modulating the output of the heater.
- Class VII Weather compensator and room sensor, for use with on/off output heaters: A heater flow temperature control that varies the flow temperature of water leaving the heater dependent upon prevailing outside temperature and selected weather compensation curve. A room temperature sensor monitors room temperature and adjusts the compensation curve parallel displacement to improve room comfort. Heater flow temperature is varied by controlling the on/off operation of the heater.
- Class VIII Multi-sensor room temperature control, for use with modulating heaters: An
  electronic control, equipped with 3 or more room sensors that varies the flow
  temperature of the water leaving the heater dependent upon the aggregated measured
  room temperature deviation from room sensor set points. Control is achieved by
  modulating the output of the heater.





### 7 Documents

The equipment covered by the space and water heating regulations should compulsory present, or have available upon request, a set of documents. The most relevant information set in these documents regards the identification of the energy class on the label, but also all the relevant technical information that allows for the package label to be issued.

## 7.1 Label

The energy label is the most visible document in the heating appliance, which presents the energy class. The label also states information on the equipment supplier, the model and more detailed information on the appliance's technical characteristics like the rated heat power and the sound power level.

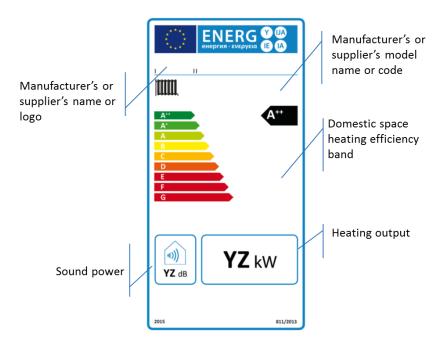


Figure 4 - Example of heating label: Boiler space heaters in seasonal space heating energy efficiency classes A ++ to G





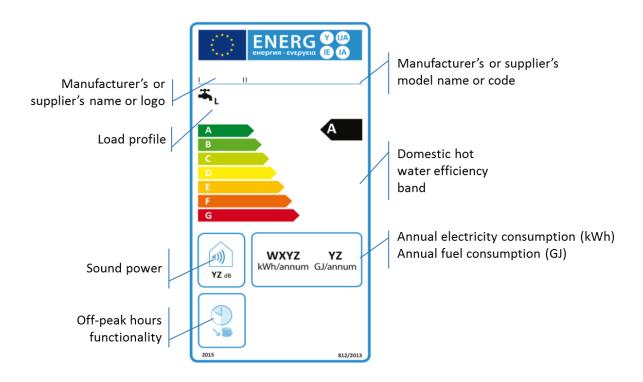


Figure 5 - Example of water heating label: Conventional water heaters in water heating energy efficiency classes A to G.

For packages an additional label should be issued identifying which appliances constitute the final solution. It's important to underline that this label does not replace the individual labels. For example, when installing a water heating system with a conventional water heater and a forced circulation solar thermal system, with a storage tank decoupled from the solar thermal collector, three labels must be issued: a label for the conventional water heating appliance, a label for the hot water storage tank and a label for the package of water heater and solar device. (See example in Figure 3)





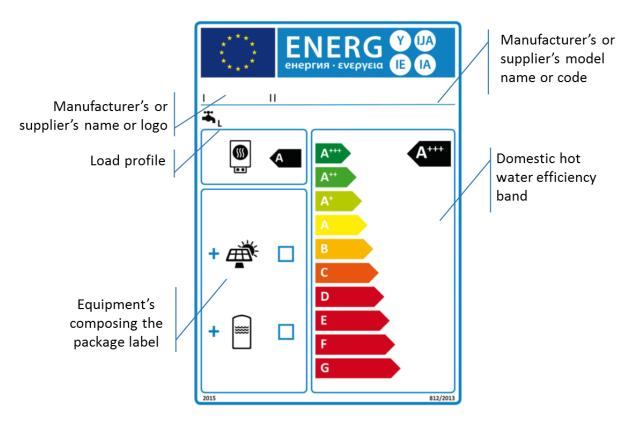


Figure 6 – Example of water heating label: Label for packages of water heater and solar device in water heating energy efficiency classes A +++ to G

#### 7.2 Product Fiche

The product fiche contains detailed technical information on the appliance and it should be supplied with each appliance, included in the product brochure or other literature provided with the product.

Specific information according to the appliance type, namely load profile for which it was tested, heating energy efficiency, electricity consumption (when applicable), sound power  $L_{WA}$  indoors, standby power consumption, standing loss (for storage tanks) and indication of specific precautions that shall be taken when the appliance is assembled, installed or maintained are some of the information's listed in the product fiche.

The same product fiche may cover a wide number of appliance models provided by the same supplier.



1.1 (u) Pump power consumption:

1.1 (v) Standby power consumption:

Compliments: Solar Certification Fund (4C16-EcoDes-12)



PF-SWH Product fiche Group: Water heaters & storage tanks Date: 31/12/2013 Section: Solar devices Reference: CDR 812/2013, annex IV, point 1 1.1 (a) Supliers name or trademark: Informative section 1.1 (b) Suppliers model identifier: Brand: vAConsult Solar Water Type: MarkIX Model: Technical parameters: Description: Symbol: Value: Unit: Load 1.1. (c) Declared load profile: Annex VII, table 3 profiles: 1.1. (d) Water heating efficiency class (average climate): 0 Annex II, point 1 1.1. (e) Water heating energy efficiency (average climate) 163 96 Annex VIII, point 3 L 1.1 (f) Annual electricity consumption (average climate) AEC = 25 kWh Annex VIII, point 4 XI 1/1 (g) not implemented XXL 1.1 (h) Thermostat temperature setting: °C n.a. 1.1(i) Sound power level: 15 dB Technical doc 1.1 (j) Only off-peak hours operation: n.a. Yes/No 1.1 (k) Special precautions: 1.1 (I) Only applicable with smart control enabled: Yes/No Label n.a. 1.1 (m) Water heating energy efficiency (colder climate): 149 % Annex VIII, point 3 classes: Water heating energy efficiency (warmer climate): 178 % Annex VIII, point 3 Α Annual electricity consumption (colder climate): 28 kWh Annex VIII, point 4 В Annual electricity consumption (warmte climate): 23 kWh Annex VIII, point 4 C 5.00 m<sup>2</sup> 1.1 (o) Collector aperture area: Technical doc D  $\eta_o = 0.800$  -1.1 (p) Zero loss collector efficiency: Technical doc E a<sub>1</sub> = 3.50 W/(K.m<sup>2</sup>) Technical doc 1.1 (g) First order heat loss coefficient: F  $a_2 = 0.000 \text{ W/(K}^2 \cdot \text{m}^2 \text{ Technical doc}$ 1.1 (r) Second order heat loss coefficient: G 1.1 (s) Incidence angle modifier: IAM = 0.94 -Technical doc 1.1(t) Storage nominal volume: V= 150 litres Technical doc Backup designated part of storage: Vbu = 0 litres Technical doc

Figure 7 – Illustration of the product fiche of a solar water heater

solpump = 30 W

vAConsult 2014

Solstandby = 5.00 W

Technical doc

Technical doc

(Source: "Ecodesign and the Energy label for solar thermal related products – Part 2., 2015, vAconsult)





#### 7.3 Technical Documentation

The technical documentation is not a commercial document, and is only to be made available upon request to the authorities of the Member States and to the European Commission.

The technical documentation details data such as references of the harmonized standards applied other technical standards and specifications used, and the results of measurements and calculations on specific technical parameters. Any specific precautions that shall be taken when the heating appliance is assembled installed or maintained is also to be stated in the technical documentation.

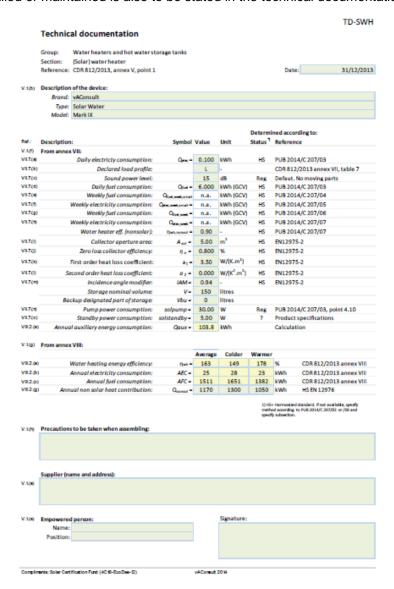


Figure 8 – Illustration of the technical document of a solar water heater

(Source: "Ecodesign and the Energy label for solar thermal related products – Part 2., 2015, vAconsult)





#### 7.4 Detailed information

The detailed information package is a responsibility of the dealer and is to be provided to the consumers in the cases when they cannot be expected to see the product displayed. An example of such a situation is the presentation of equipment via catalogues or via advertising material, when the product is not physically accessible.

The information assembled is a compilation of the information displayed in the energy label and in the product fiche.

EN Official Journal of the European Union L 239/121 6.9.2013 ANNEX VI Information to be provided in cases where end-users cannot be expected to see the product displayed WATER HEATERS 1.1. The information referred to in Article 4(1)(b) shall be provided in the following order: (a) the declared load profile, expressed by the appropriate letter and typical usage in accordance with Table 3 of (b) the water heating energy efficiency class of the model, under average climate conditions, in accordance with point 1 of Annex II; (c) the water hearing energy efficiency in %, under average climate conditions, rounded to the nearest integer and calculated in accordance with point 3 of Annex VIII; (d) the annual electricity consumption in kWh in terms of final energy and/or the annual fuel consumption in GJ in terms of GCV, under average climate conditions, rounded to the nearest integer and calculated in accordance with point 4 of Annex VIII; (e) the sound power level, indoors, in dB, rounded to the nearest integer (for heat pump water heaters, if applicable); in addition, for solar water heaters and heat pump water heaters: (f) the water heating energy efficiency in %, under colder and warmer climate conditions, rounded to the nearest integer and calculated in accordance with point 3 of Annex VIII; (g) the annual electricity consumption in kWh in terms of final energy and/or the annual fuel consumption in GJ in terms of GCV, under colder and warmer climate conditions, rounded to the nearest integer and calculated in in addition, for solar water heaters: (h) the collector aperture area in m2, to two decimal places, (i) the storage volume in litres, rounded to the nearest integer; in addition, for heat pump water heaters: (j) the sound power level, outdoors, in dB, rounded to the nearest integer.

Figure 9 – Example for a detailed information for water heaters.

1.2. Where other information contained in the product fiche is also provided, it shall be in the form and order specified

1.3. The size and font in which the information referred in points 1.1 and 1.2 is printed or shown shall be legible.

in point 1 of Annex IV.





# 7.5 Advertisement and promotional material

Any advertisement and technical promotional material should reference the equipment energy efficiency class.



Figure 10 – Example of a hot water storage tank with the energy label

This is particularly important as advertising, and knowing the energy efficiency class of the products under consideration, is crucial in the decision making process.

This also applies to web advertising and sales, where the energy class should also be displayed.

#### **Gas Tankless Water Heaters**



Figure 11 – Example of a water heater display online





# 8 Actors and Responsibilities

The heating solutions supply market involves several actors: the manufacturer, or supplier as defined in the legislation; the dealer or retailer who distributes the equipment's, the installer who can act as dealer and installer or exclusively as responsible for installing the heating solution at the end-consumer's residency and the end-consumer who assures that the heating equipment he has just acquired bears the energy label. Additional to this, the market chain can also integrate the system designer who is responsible for designing and conceiving the heating system, typically more complex systems, namely package systems. In this case, the system designer should also be aware of the energy labelling legislation and provide the most efficient solutions.

#### 8.1 Actors

## 8.1.1 Supplier

Suppliers are understood as the one's responsible for the manufacturing of the product. According to the regulation "Supplier' means the manufacturer or its authorised representative in the Union or the importer who places or puts into service the product on the Union market."

Article 3 – **Responsibilities of suppliers** placing space heaters on the market and or putting them into service, including those integrated in packages of space heater, temperature control and solar device, shall ensure that each piece of equipment is provided with:

- (a) a printed label
- (b) a product fiche
- (c) the technical documentation
- (d) advertisement includes a reference to the seasonal space heating energy efficiency class
- (e) technical promotional material includes a reference to the seasonal space heating energy efficiency

The supplier must present all the documentation regarding each individual piece of equipment. If it is the case when the supplier is also offering a pre-assembled heating package solution, it is the supplier's responsibility to also ensure the calculation and presentation of the package's energy label, which provides the combined energy efficiency rating.

#### 8.1.2 Dealer

The dealer should ensure that individual equipment and pre-assembled packages are displayed for sale bearing the energy label, and that the advertising complies with the guidelines defined in the legislation. If the dealer is to propose a custom-made package to the customer he is responsible for issuing the package label. In any of the cases, he must assure that the end-user receives all the documentation regarding the energy efficiency and technical characteristics of the individual heating equipment.

#### 8.1.3 System Designer

In more complex heating systems designers may be contracted to outline the system, assuring the compatibility between the buildings heating needs and the most adequate solutions. The system designer does not have a direct responsibility in the labelling provision but, can be an important player in the global chain, namely in the definition of the guidelines for the procurement process, identifying in the procurement technical documents the requirements to be meet by the equipment's, namely the





energy class. To this, the system designer should simulate, in the project definition stage, the energy class of the heating system and present this energy label simulation to the customer as part of the system's technical project. This information is to be delivered to the installer, who installs the system and issues the final energy label. This provision of an energy class simulation by the system designer is essential to make the customer aware of the proposed system's energy class and prevent any discontents with this regard after the system is installed.

#### 8.1.4 Installer

The new Energy Label will be supplied with each individual and pre-assembled package heating system by the manufacturer.

It will be the installer's responsibility to ensure that the customer has received the energy label, and additional documentation of the heating appliance, at the point of sale.

### 8.1.5 Installer Integrator

If the heating system contains different products, whoeveris responsible for the packaging, is responsible for providing a package label when combining a heating appliance with a temperature control and/or solar device, hot water storage tank or a supplementary heating appliance.

The professional who puts the package together is the one responsible for producing a package label. That package label will need to provide the combined energy efficiency rating of the whole system rather than only the ratings of each individual component. This could be the manufacturers' responsibility if they supply a pre-assembled package, or the installer's if the items are bought individually, as separate parts, and the installer is the system integrator. If this is the case, the installer is responsible for calculating the overall package efficiency, this information must be recorded, regarding each product on a document known as a fiche, and systematized in the energy label that provides the combined energy efficiency rating.

#### 8.1.6 End-user

The end user should be aware for the correct presentation of the energy labelling and correspondent documentation. He should require the presentation of the energy label, being aware of the additional labels if a package is provided, and inquire the commercial responsible for the sale if the documentation is not available. In case of doubt the consumer can contact the consumer protection agencies and/or report to the market surveillance authorities in case of detecting non-compliance.

#### 8.2 The market chain

The market chain in the supply of heating solutions can be presented in two distinct models:

- Individual equipment or standardized combined packages
- Custom-made packages

In the first solution, the energy label, and all the additional documentation are a responsibly of the manufacturer. The manufacturer is responsible for providing all the technical information, all the documents presented in detail in chapter 7, regarding individual equipment and complete package, to the dealer, be it a commercial dealer or an installer integrator. The dealer or installer integrator, the one making the sale to the final customer is responsible for providing the documentation to the end-consumer. Recall that in the case of standardized or custom made packages, the end-user should receive the energy labels from the individual equipment and the label for the package.





When the dealer is the one making the sale, the installation is usually contracted by the dealer itself, or the dealer suggests a network of installers with whom it usually works and that offer guarantees to the good installation of the heating equipment.

In the second solution, of custom-made packages, several situations can occur:

- The dealer assembles a custom-made package;
- The installer integrator assembles a custom-made package;
- The dealer or the installer propose changes to a standardized package;
- The heating systems are designed by a system designer.

The **dealer is responsible for assembling a custom made** solution and, as so, is responsible for providing the package label, beyond the individual documentation each piece of equipment must carry. In this case the installer has no responsibility regarding the emission of the package energy label.



Figure 11 - Supply chain when the dealer is responsible for the custom made package

When the **installer offers a custom made package system** and the installer is the system integrator he is the one responsible for providing the package documentation, namely the package energy label.

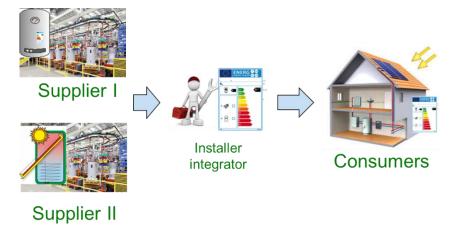


Figure 12 - Supply chain when the installer integrator is responsible for the custom made package





There's a third possibility, when the dealer or installer propose additional equipment to a standardized package, for example a more intelligent controller, a second hot water storage tank, among other possibilities, and, in this case, the installer should issue a new label for the final solution installed.

The expectancy is that the manufacturers will most likely provide all kinds of pre-assembled packages to prevent this kind of situations.

In the event of a more complex package system, designed by a system designer, and although the package labelling is not the designer's responsibility, he should, as a good practice and to make the client aware, simulate the expected energy efficiency class of the system. As a requisite, this expected energy class should be presented in the procurement process and validated by the final dealer or installer of the solution, according to whom the labelling issuing responsibility stands.



Figure 13 - Supply chain when the system designer is responsible for the heating package solution.

#### 8.3 Market Surveillance authorities

Market surveillance authorities are responsible for economic surveillance activities, monitoring the enforcement of the regulation and preventing the misappropriation of legal acts.

Surveillance authorities are mandated to operate in public spaces, public commercial spheres where economic transactions take place. Regarding the energy labelling of equipment's the main task of the surveillance entities is to assure the presence of the energy label in the equipment at the moment of sale, verifying also the format of the label, to assure that the right label is provided to the final consumer.











Figure 14 – Examples of non-complying energy labels (first and second figures: the energy class and the energy consumption data are not embedded in the same label, as a second tape is added; third figure: the label format is incorrect and is not presented in the country's national language)

Regarding the package label, market surveillance authorities can only access and verify the compliance with the legal requirements, namely in terms of the energy labelling displaying in complete packages available in the market. The process to verify the compliance with the directive in the cases where the installer is the system integrator, assembling the system in the final consumer's house, are still unclear, as the surveillance entities do not have a direct way to validate if the consumer was informed of the package's energy class and if the customer received all the compulsory documentation.

Some measures could be implemented to facilitate the market surveillance activity in this task, namely:

- collaboration with national installer associations and local authorities, especially with regard to the implementation of the package label;
- manufacturers could support the authorities with product related information, namely uploaded in the Label Pack A+ platform;
- when inspecting the installer integrator activity the market surveillance authority can request a copy of the energy labels issued according to the sales registry;

Either way, the final consumer's awareness for the package label is essential and in the act of non-compliance the final user can complain to the market surveillance authority. In this sense, the creation of focus groups and the interaction with consumers associations is extremely important.

## 8.3.1 ICSMS

The ICSMS - internet-supported information and communication system for the pan-European market surveillance, creates the basis for an effective and efficient cooperation between the market surveillance bodies in Europe.

Supported by the internet, it enables a comprehensive exchange of information between all the market surveillance bodies. (https://webgate.ec.europa.eu/icsms/). This platform can be an important tool for the exchange of experiences regarding the surveillance of the package label.





### 8.4 Relevant Stakeholders

Industry Associations – are essential actors to promote the direct contact with the manufacturers. Manufacturers are an essential link has they possess all the information regarding the equipment and should be called to cooperate with the Label Pack A+ project, namely uploading product information in the platform for the emission of package labels in the case of custom made packages, and access to pre-defined labels.

Installers Associations – Installers are the central figure of this legislation. Installers associations are essential in the validation of contents for the training activities and in the contacts with installers to disseminate the training sessions and foster partnerships with relevant events and other initiatives.

Training Centres – several training centres offer training courses for the installation of heating equipment, namely for the installation of solar thermal systems. These training centres are a crucial contact point with installers, new to the heating market, who should receive, at the earliest stage of their entering in the market, information on the energy label, and in particular the package label. Synergies can be built with these entities to provide training in loco, based on the materials developed within Label Pack A+.

Consumer Protection Entities – consumer protection entities are key partners in the contact with the end-consumer, proving information on new legislation and offering support to clarify issues addressing the market and receiving complaints on the market activity. The Label Pack A+ consortium can benefit largely from the contact with these entities, providing training to the actors in direct contact with the consumers and receiving information on non-compliance activities, identifying key areas for additional action.

Market surveillance entities – the relation with market surveillance authorities is a synergetic one. The Label Pack A+ consortium can provide information, namely via the database platform, and training to the technicians operating on the field. The market surveillance authorities procedures for evaluating compliance with the delegated acts 811/2013 and 812/2013, can also be designed with the contribution of the Label Pack A+ consortium, since the custom made systems package label can be difficult to access.





## **ANNEXES**

### **TERMINOLOGIES BY COUNTRY**

EN	PT	DE	IT	FR	
Solar collector -	Coletor solar - um	"Sonnenkollektor"	Collettore solare	Capteur solaire - un	
means a device	dispositivo	bezeichnet eine	- un dispositivo	dispositif conçu pour	
designed to absorb	concebido para	Vorrichtung, die dazu	progettato per	absorber l'irradiation	
global solar	absorver a radiação	ausgelegt ist,	assorbire	solaire globale et	
irradiance and to	solar global e	Gesamtsonneneinstra	l'irraggiamento	transférer l'énergie	
transfer the heat	transferir a energia	hlung zu absorbieren	solare globale e	thermique ainsi	
energy so produced	térmica assim	und die so erzeugte	trasferire l'energia	produite à un fluide	
to a fluid passing	produzida para um	Wärmeenergie an ein	calorifica così	qui le traverse	
through it;	fluido que passa	durch den Kollektor	prodotta verso un		
(811)	através dele;	strömendes Fluid	fluido vettore;		
(011)		weiterzugeben			
Solar device -	Dispositivo solar -	"Solareinrichtung"	Dispositivo	Dispositif solaire -	
means a solar-only	um sistema	bezeichnet eine reine	solare - un	un système tout	
system, a solar	exclusivamente	Solaranlage, einen	sistema	solaire, un capteur	
collector, a solar hot	solar, um coletor	Sonnenkollektor, einen	esclusivamente	solaire, un ballon	
water storage tank	solar, um	solarbetriebenen	solare, un	d'eau chaude	
or a pump in the	reservatório de água	Warmwasserspeicher	collettore solare,	solaire ou une	
collector loop, which	quente solar ou uma	oder eine Pumpe im	un serbatoio per	pompe de boucle de	
are placed on the	bomba no circuito	Kollektorkreislauf,	l'acqua calda di	captage, qui sont	
market separately;	do coletor,	welche separat in	origine solare o	mis sur le marché	
(811&812)	comercializados	Verkehr gebracht	una pompa del	séparément	
(0.1.0.0.1_)	separadamente	werden	circuito del		
			collettore,		
			ciascuno		
			commercializzato		
			separatamente		
Solar water heater	Aquecedor de	"solarbetriebener	Scaldacqua	Chauffe-eau solaire	
- means a water	<b>água solar</b> - um	Warmwasserbereiter	solare - uno	- un chauffe-eau	
heater equipped	aquecedor de água	" bezeichnet einen	scaldacqua	équipé d'un ou de	
with one or more	equipado com um	Warmwasserbereiter,	munito di uno o	plusieurs capteurs	
solar collectors,	ou vários coletores	der mit einem oder	più collettori	solaires, ballons	
solar hot water	solares,	mehreren	solari, serbatoi	d'eau chaude	
storage tanks, heat	reservatórios de	Sonnenkollektoren,	per l'acqua calda	solaires,	
generators and	água quente	solarbetriebenen	di origine solare,	générateurs de	
possibly pumps in	solares, geradores	Warmwasserspeichern	generatori di	chaleur et	
the collector loop	de calor e,	, Wärmeerzeugern und	calore ed	éventuellement	
and other parts, a	eventualmente,	möglicherweise	eventuali pompe	pompes de la	
solar water heater is	bombas de calor no	Pumpen im	nel circuito del	boucle de captage	
placed on the	circuito dos	Kollektorkreislauf	collettore nonché	et d'autres	
market as one unit;	coletores e noutros	sowie mit sonstigen	altre parti; uno	éléments; un	
	componentes; um	Bauteilen ausgestattet	scaldacqua solare	chauffe-eau solaire	
	aquecedor de água	ist; solarbetriebene	è	est mis sur le	





		144		
	solar é colocado no	Warmwasserbereiter	commercializzato	marché en tant que
	mercado como uma	werden als Einheit in	come unità a sé	produit unitaire
	só unidade;	Verkehr gebracht;	stante	(812)
Solar only systems	Sistema	"reine Solaranlage"	Sistema	Système tout solaire
- means a device	exclusivamente	bezeichnet eine	esclusivamente	- un dispositif
that is equipped with	solar - um	Vorrichtung, die mit	solare - un	comprenant un ou
one or more solar	dispositivo equipado	einem oder mehreren	dispositivo munito	plusieurs capteurs
collectors and solar	com um ou mais	Sonnenkollektoren und	di uno o più	solaires et ballons
hot water storage	coletores solares e	solarbetriebenen	collettori solari e	d'eau chaude
tanks and possibly	reservatórios de	Warmwasserspeichern	serbatoi per	solaires ainsi que,
pumps in the	água quente solares	sowie möglicherweise	l'acqua calda da	éventuellement, des
collector loop and	e, eventualmente,	mit Pumpen im	energia solare ed	pompes de boucle
other parts, which is	bombas no circuito	Kollektorkreislauf und	eventuali pompe	de captage et
placed on the	dos coletores e	sonstigen Bauteilen	del circuito del	d'autres éléments,
market as one unit	noutros	ausgestattet ist, auf	collettore nonché	qui est mis sur le
and is not equipped	componentes, que é	dem Markt als ein	altre parti,	marché sous forme
with any heat	comercializado	Gerät bereitgestellt	commercializzato	unitaire et n'est pas
generator except	como uma só	wird und mit keiner	come singola	équipé de
possibly one or	unidade e não está	Wärmequelle außer	unità e privo di	générateur de
more back-up	equipado com	eventuell einem oder	generatori di	chaleur, à
immersion heaters;	geradores de calor,	mehreren Hilfs-	calore, fatta	l'exception
(811&812)	com a eventual	Tauchheizelementente	eventualmente	éventuelle d'un ou
(0110012)	exceção de um ou	n ausgestattet ist;	eccezione per	plusieurs
	mais aquecedores		uno o più	thermoplongeurs de
	de imersão		elementi	secours (811 & 812)
	auxiliares;		riscaldanti	
			ausiliari a	
			immersione;	
Package of water	Sistema misto de	"Verbundanlage aus	Insieme di	Produit combiné
heater and solar	aquecedor de água	Warmwasserbereiter	scaldacqua e	constitué d'un
device - means a	e dispositivo solar	n und	dispositivo	chauffe-eau et d'un
package offered to	- um sistema misto	Solareinrichtungen"	solare - un	dispositif solaire -
the end-user	oferecido ao	bezeichnet eine für	insieme proposto	une combinaison
containing one or	utilizador final que	den Endnutzer	all'utilizzatore	proposée à
more water heaters	contém um ou mais	erhältliche	finale contenente	l'utilisateur final
and one or more	aquecedores de	Verbundanlage aus	uno o più	contenant un ou
solar devices;	água e um ou mais	einem oder mehreren	scaldacqua e uno	plusieurs chauffe-
(812)	dispositivos solares;	Warmwasserbereitern	o più dispositivi	eau et un ou
(012)		und einer oder	solari	plusieurs dispositifs
		mehreren		solaires (812)
		Solareinrichtungen;		

## **SOLAR THERMAL TESTING NORMS**

- EN 12975 1+A1: Thermal solar systems and components Solar collectors Part 1: General requirements, 2006; A1, 2010;
- EN ISO 9806 Solar energy Solar thermal collectors Test methods, 2013;
- EN 12976 1: Thermal solar systems and components Factory made systems Part 1: General requirements, 2006;





- EN 12976 2: Thermal solar systems and components Factory made systems Part 2: Test methods, 2006;
- ISO 9459-2: Solar Heating Domestic water heating systems Part 2: Outdoor test methods for system performance characterization and yearly performance prediction of solar-only systems, First edition, 1995;
- ISO 9459-5: Solar heating Domestic water heating systems Part 5: System performance characterization by means of whole-system tests and computer simulation, 2007;
- EN 12977-1:2012: Thermal solar systems and components. Custom built systems. General requirements for solar water heaters and combisystems;
- EN 12977-2:2012: BS EN 12977-2:2012. Thermal solar systems and components. Custom built systems. Test methods for solar water heaters and combisystems;
- EN 12977-3:2012: BS EN 12977-3:2012. Thermal solar systems and components. Custom built systems. Performance test methods for solar water heater stores;
- EN 12977-4:2012: BS EN 12977-4:2012. Thermal solar systems and components. Custom built systems. Performance test methods for solar combistores;
- EN 12977-5:2012: BS EN 12977-5:2012. Thermal solar systems and components. Custom built systems. Performance test methods for control equipment.