

## CE labelling and manufacturer's declaration for air handling units – guideline.

Original Swedish title: *CE-märkning och tillverkarintyg för ventilationsaggregat – vägledning.*

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The list below presents common interpretations on how manufacturers should CE label air handling units and declare conformity with relevant EU directives. The list is a result from work within working group *Aggregatdirektiv* within the business organization Svensk Ventilation.

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<b>Directive</b>	<b>Interpretation by Svensk Ventilation</b>
Machinery Directive, 2006/42/EG	<p>All air handling units, whether delivered with or without control equipment, shall be regarded as completed machinery, and hence be CE labelled and declared. See press release 2015-10-19 from Eurovent PG-AHU. When declaring a unit without control equipment, the following wording can be used*:</p> <p><i>This declaration relates exclusively to the machinery in the state in which it was placed on the market and installed onsite according to the supplied instructions. This declaration does not include components which are added and/or operations carried out subsequently by the final user.</i></p> <p>*) The wording is based on Eurovent 3/2 2015, but has been supplemented with provisions for installation according to supplied instructions.</p>
Low Voltage Directive, 2014/35/EU	<p>Air handling units intended for non-commercial use shall be CE labelled and declared against the Low Voltage Directive.</p> <p>Air handling units intended for commercial use should not be CE labelled and declared against the Low Voltage Directive, see next paragraph.</p> <p>Air handling units that can be used both by consumers or commercial party can be declared both against the Low Voltage Directive (consumer) and the Machinery Directive (commercially).</p> <p>Both directives refer to many common standards (e g EN 60204-1, EN 60335-1, EN 60335-2-40), so practically the same requirements apply in the details.</p>
Electromagnetic Compatibility, 2014/30/EU	<p>All air handling units shall be declared regarding electromagnetic compatibility and the harmonized standards controlled against shall be presented.</p>

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### Svensk Ventilation

Mailing address

Box 17154

SE-104 62 Stockholm

Visiting/delivery address

Ringvägen 100

Stockholm, Sweden

Telephone

+46 8-762 73 60

E-mail

[info@svenskventilation.se](mailto:info@svenskventilation.se)

Webb

[www.svenskventilation.se](http://www.svenskventilation.se)

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<b>Directive</b>	<b>Interpretation by Svensk Ventilation</b>
Ecodesign Directive (ERP), 2009/125/EG	All air handling units shall be CE labelled and declared against the Ecodesign Directive. Regulation 1253/2014 on ventilation units shall be declared, as well as ecodesign regulations relevant to components included in the unit.
Pressure Equipment Directive (PED), 2014/68/EU	Air handling units are normally not CE labelled and declared as pressure equipment. Exceptions might occur for products with large cooling circuits.
Radio Equipment Directive (RED) 2014/53/EU	All air handling units with wireless controls shall be CE labelled and declared as radio equipment according to 2014/53/EU.
Restriction of Hazardous Substances (RoHS), 2011/65/EU	<p>All air handling units being sold to or used by private consumers shall be CE labelled and declared regarding Restriction of Hazardous Substances in Electrical and Electronic Equipment RoHS, 2011/65/EU.</p> <p>Air handling units being sold to commercial parties intended to be commissioned, kept and maintained professionally can be exempted from the RoHS Directive, regarded as <i>large-scale fixed installation</i>. Kemikalieinspektionen (RoHS authority in Sweden) has partly opposed against this interpretation, see below.</p>
Collection and recovery of Electrical and Electronic Products (WEEE), 2012/19/EU	<p>All air handling units being sold to or used by private consumers shall be labelled with waste symbol according to the WEEE Directive, 2012/19/EU.</p> <p>Air handling units being sold to commercial parties may also be labelled with waste symbol according to the WEEE Directive.</p> <p>Air handling units being sold to commercial parties intended to be commissioned, kept and maintained professionally can be exempted from the WEEE Directive, regarded as <i>large-scale fixed installation</i>. Naturvårdsverket (WEEE authority in Sweden) has partly opposed against this interpretation, see below.</p>

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### **Interpretation by Svensk Ventilation on the exemptions for *large-scale fixed installations***

Our interpretation is that even a medium size central ventilation system fulfils the qualitative (excluded being large-scale) criteria for *large-scale fixed installation* given by RoHS 2 FAQ dated 2012-12-12, question Q3.1, namely that the ventilation system

- is a combination of several types of apparatus and, where applicable, other devices;
- is assembled, installed and de-installed by professionals;
- is used and maintained by professionals;

Question Q3.1 also clearly states that if a *large-scale fixed installation* is exempted, also its included components are exempted. Hence, air handling units (as well as other components in a ventilation system) can be exempted.

As one example of *large-scale fixed installation* Q3.1 mentions fixed installed cooling, air conditioning and refrigerating systems or heating systems designed exclusively for non-residential use. This is an example of objects that definitely can be exempted. The example thus does not in principle exclude exempting a large-scale fixed installation also in a residential building.

One member of the working group has tried to anchor our interpretation with Kemikalieinspektionen, the RoHS authority in Sweden. The group member has in addition reinforced our argumentation by referring to the distinction in Ecodesign Regulation 2014/1253/EU between *residential* and *non-residential*. Kemikalieinspektionen has informed that they interpret FAQ 3.1 as "air handling units in rental apartment buildings are not exempted", but that they will raise this point of view when the FAQ document is revised (dnr H17-03999).

### **About this document**

The work was initiated by a member company. The association office anchored the proposal for a working group in *Styrgrupp Produkter* (the "Products" steering committee) in a webb meeting on 2017-01-24. After that the working group has convened at the association office 2017-02-14 and in webb meetings on 2017-03-03, 2017-03-23, and 2017-06-01. The group consisted of the following persons:

Anna Lindén, Fläkt Woods  
Erik Österlund, Svensk Ventilation (association office)  
Johan Haglind, Fläkt Woods  
Juhani Tarkka, Systemair  
Magnus Ahl, Swegon  
William Lawrance, Swegon  
Marie Johansson, Voltair  
Mats Ryd, Lindab  
Per Gustafsson, Welair

The final document has been reviewed by *Styrgrupp Produkter* on 2017-09-28 and has been approved since no comments were received at deadline 2017-10-31.