

Brussels, 15/02/2024

Joint Action on HARmonized Products 2022

JAHARP2022-02

(Grant Agreement No. JA2021-2-02)

Work Package (WP) 3 Pellet Stoves

Summary of questions received and answers to the Call for Tenders for Test Bodies

Date of publication of the Official Call: 26/01/2024

 Rounds of answers - 1st publish on 31/01/2024, 2nd publish on 02/02/2024, 3rd publish on 15/02/2024

Ref	Date	Question	Answer
1	31/01/2024	<p>Would it be possible to include a clause in the final contract with the selected laboratory in which it is specified that the liability of the contractor is limited to the value of the contract?</p> <p>(Except for death or bodily injury or any other act or omission for which liability cannot be limited by law)</p>	<p>Yes, a clause establishing a limit to the liability of the contractor is included in our standard contract.</p>
2	02/02/2024	<p>Pellet stoves are usually tested for 2 or even more heat outputs (nominal and minimum heat output).</p> <p>Both heat outputs have an effect on the resulting seasonal efficiency and energy class. Therefore, it probably is necessary to test both performances. But that implies twice the time for testing, which affects the price.</p> <p>How many performances will need to be tested (if you already know the selected samples)?</p>	<p>Appendix III (Price List) to the tender explains that the test programme for Pellet Stoves will consider all test parameters under Commission Regulation (EU) 2015/1185 Ecodesign requirements for solid fuel local space heaters (Annex II) & Commission Delegated Regulation (EU) 2015/1186 Energy labelling of local space heaters (Annex V), including nominal heat output and minimum heat output.</p> <p>Appendix III (Price List) to the tender also allows bidding laboratories to add exclusions and separate pricing (last column). As such, laboratories are free to specify limited testing to one heat output and provide sperate pricing to the main unit cost pricing included in columns 4 to 6.</p> <p>You may also suggest comments and adjustment to the test programme in the second point with the same title on page 2.</p>
3	02/02/2024	<p>The table in Appendix III consists of two head rows (left column) concerning fulfilment of:</p> <ul style="list-style-type: none"> - in the first row of the regulation EU 2015/1185 + EU 2015/1186 - in the second row only the regulation EU 2015/1185. <p>Does this mean that in the first row there shall be no emission measurement done? Because if you shall fulfil the regulation EU 2015/1185 you have to fulfil both the efficiency requirement and the emission requirements. Or does it mean that you shall add the first and second row together for the complete price of testing?</p>	<p>The table in Appendix III is meant to collect separate and different pricing per group of test parameters and product type and also variation in prices due to larger batches of products being tested.</p> <ol style="list-style-type: none"> 1. In the first row please provide the price for testing one product unit for the parameters included in the second column "Tested Parameter", as quoted "Nominal heat output + minimum heat output (...)" any control options stated by the supplier." 2. In the second row please provide the price for testing the full group of tests as quoted "Emissions of particulate matter (...)" emissions of nitrogen oxides". <p>The testing according to regulation EU 2015/1185 includes both efficiency and emission requirements, but we would like to receive <u>separate</u> prices.</p> <p>Please also review the answer to question 2 above where we state that even within one group of parameters other individual prices can be proposed at granular level.</p>

4	05/02/2024	<p>The table in Appendix III does not have a field for a combined price for the "two" tests, efficiency and emission. Considering that the price would be higher if the parameters are tested separately than if the two tests are carried out in one setup, which is the common practice, simply adding the prices in rows one and two would not give the same amount.</p> <p>Could we add a third row where the price for both efficiency and emissions tests are provided?</p>	<p>Appendix III (Price List) to the tender allows bidding laboratories to add exclusions and separate pricing (last column). As such, laboratories are free to specify that energy efficiency and emission testing must be conducted at the same time and that the prices in the previous columns need to be added for any single test. Alternatively, bidding laboratories are free to specify combined prices for energy efficiency and emission testing by adding a third row to the table.</p>
5	05/02/2024	<p>Regarding the personnel, we have a colleague who is not able to show 3 years of testing experience but has more than 5 years of experience working at our organisation. We would like to include this colleague as part of the administrative and project management team. Would that be acceptable?</p>	<p>If your question refers to Qualifying criterion <u>5.9 Experience</u>, the three-years-experience requirement applies to the applicant laboratory as a whole organisation, and not to single team members. Please note that if the candidate laboratory fails to include evidence that it indeed has an experience of at least three years (as of 2018 onwards) in testing pellet stoves or similar products to all or some of the required standards for establishing compliance with the relevant EU regulations listed in the tender, the bid will be excluded in this phase of the evaluation.</p> <p>Additionally, the applicants' experience is again being evaluated but this time for the proposed team level in the Assessment criterion <u>6.5 Testing Experience</u>. This criterion requests a description of your testing team's collective experience in carrying out testing on pellet stoves and using the mentioned standards and methods in the past five years. This applies solely for the team that shall be conducting the testing and not to the adjacent administrative staff.</p> <p>Neither of the above criteria refer to the personnel involved in administrative and project management tasks.</p>
6	09/02/2024	<p>The standard IEC 62301:2011 is valid for household electrical appliances and is not relevant for pellet stoves.</p> <p>It can be used as an alternative, but, in that case, it needs to be validated. We never use this test standard for pellets stoves and we will therefore not write our experience according to this standard.</p> <p>According to the standard EN 16510-1, it is required to use EN 15456:2008 which is intended and written for heating boilers for measurements of electrical consumption (both standby, nominal and part load).</p>	<p>The Commission Communication (2017/C 076/02)¹ lists IEC 62301:2011 as one of two acceptable standards for measuring "Standby mode power consumption, e_{sb}" in Solid fuel fired local space heaters. The other standard listed in the Transitional Methods for measuring "Standby mode power consumption, e_{sb}" in Solid fuel fired local space heaters is EN 15456:2008.</p> <p>We recognise that other standards, such as EN 15456:2008, may be more commonly used for supporting measurement of "Standby mode power consumption, e_{sb}" in Solid fuel fired local space heaters. Nevertheless, given that the Commission Transitional Methods explicitly mention IEC 62301:2011, we were obligated to list this standard in the Call for Tenders.</p> <p>Bidding laboratories will not be disadvantaged in the evaluation procedure for having experience in the last five years to test according to one of the two standards EN 15456:2008 or IEC 62301:2011. Please remember to include proof of accreditation for each of the two standards if you own it.</p>

¹ Commission communication in the framework of the implementation of Commission Regulation (EU) 2015/1188 of the implementation of Commission Regulation (EU) 2015/1185 and of the implementation of Commission Delegated Regulation (EU) 2015/1186 with regard to energy labelling and ecodesign requirements of local space heaters, [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017XC0310\(04\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017XC0310(04)).