

BLUE ANGEL

The German Ecolabel



Stationary air conditioners

DE-UZ 204

Basic Award Criteria

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Version 4

The Environmental Label is supported by the following four institutions:



Federal Ministry
for the Environment, Nature Conservation
and Nuclear Safety

The Federal Ministry for the Environment, Nature Conservation and Nuclear Safety is the owner of the label. It regularly provides information on the decisions taken by the Environmental Label Jury.



The German Environmental Agency with its specialist department for "Ecodesign, Eco-Labeling and Environmentally friendly Procurement" acts as office of the Environmental Label Jury and develops the technical criteria of the Basic Criteria for Award of the Blue Angel.



The Environmental Label Jury is the independent, decision-making body for the Blue Angel and includes representatives from environmental and consumer associations, trade unions, industry, the trade, crafts, local authorities, academia, the media, churches, young people and the German federal states.



The RAL gGmbH is the awarding body for the Environmental Label. It organises the process for developing the relevant award criteria in independent expert hearings – which involve all relevant interest groups.

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This document is a translation of a German original. In case of dispute, the original document should be taken as authoritative.

1 Introduction

1.1 Preface

In cooperation with the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety, the German Environmental Agency and considering the results of the expert hearings conducted by RAL gGmbH, the Environmental Label Jury has set up these Basic Criteria for the Award of the Environmental Label. RAL gGmbH has been tasked with awarding the Environmental Label.

Upon application to RAL gGmbH and on the basis of a Contract on the Use of the Environmental Label to be concluded with RAL gGmbH, the permission to use the Environmental Label may be granted to all products, provided that they comply with the requirements as specified hereinafter.

The product must comply with all the legal requirements in the country in which it is to be marketed. The applicant shall declare that the product meets this requirement.

1.2 Background

Air conditioners are designed to control the thermal comfort of living and working rooms and are especially used in those countries that regularly experience high outdoor temperatures. In those countries with very high outdoor temperatures, air conditioners are responsible for around one third of the greenhouse gas emissions (IEA 2008). Yet an increased use of air conditioners in Germany, in parallel with more frequent hot spells, is also expected. The number of days on which the air temperature reaches 30 degrees Celsius or more has already increased today by eight days since 1950 (German National Meteorological Service, Annual Report on Climate and Environment). The number of hot days will continue to increase in the future due to progressive global warming. In order to guarantee productive working conditions, it is considered necessary to keep indoor office temperatures below 26 degrees Celsius¹, with employers expected to achieve this through the increased use of air conditioners.

Air conditioners contribute to climate change in two respects: firstly through their electricity consumption and the greenhouse gas emissions associated with energy generation (indirect emissions) and secondly through direct emissions of refrigerants that themselves often have a very high global warming potential (GWP).

Against this background, the use of environmentally friendly and energy efficient air conditioners could reduce greenhouse gas emissions. The key focus is placed here on the use of natural refrigerants and increasing the efficiency of the devices. An indicative life cycle assessment, completed as part of the development process for these Basic Award Criteria for the use of air conditioners in Germany, illustrated that environmentally friendly and energy efficient air conditioners using the refrigerant propane (R290) generate around 30% less greenhouse gas emissions than conventional devices using the refrigerant R410A. This savings potential is significantly higher in those countries with higher outdoor temperatures and an energy generation system based primarily on fossil fuels – as is the case for example in Asia.

¹ Limit for the operative room temperature in air-conditioned buildings, class B according to DIN EN ISO 7730, also see the German Technical Rules for Workplaces ASR A3.5.

1.3 Objective of the environmental label

Climate protection, a reduction in power consumption, the minimisation of greenhouse gas emissions and the avoidance of pollutants are key objectives of environmental protection.

The Blue Angel ecolabel for "stationary air conditioners" may be awarded to products featuring the following environmental properties:

- High energy efficiency
- Low emissions of greenhouse gases
- Low noise emissions
- Reduced pollutant contents

In addition, the requirements set by the environmental label should ensure that suppliers of air conditioners provide services of a high professional quality.

Therefore, following benefits for the environment and health are stated in the explanatory box:



1.4 Compliance with legal requirements

The observance of relevant existing laws and legal requirements is a prerequisite for those products awarded with the environmental label. In particular, the following legal requirements are observed:

- Commission Regulation (EC) No. 206/2012² for air conditioners and comfort fans
- Commission Delegated Regulation (EU) No. 626/2011 on the energy labelling of air conditioners³
- Commission Implementing Regulation (EU) 2015/2067⁴
- Operational Safety Ordinance (BetrSichV)⁵

² Commission Regulation (EC) No. 206/2012 of 6 March 2012 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for air conditioners and comfort fans

³ Commission Delegated Regulation (EU) No. 626/2011 of 4 May 2011 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of air conditioners

⁴ Commission Implementing Regulation (EU) 2015/2067 of 17 November 2015 establishing, pursuant to Regulation (EU) No 517/2014 of the European Parliament and of the Council, minimum requirements and the conditions for mutual recognition for the certification of natural persons as regards stationary refrigeration, air conditioning and heat pump equipment, and refrigeration units of refrigerated trucks and trailers, containing fluorinated greenhouse gases and for the certification of companies as regards stationary refrigeration, air conditioning and heat pump equipment, containing fluorinated greenhouse gases

⁵ Ordinance on safety and health protection in the use of working materials (BetrSichV), Operational Safety Ordinance from 3 February 2015 (BGBl. I p. 49), which was changed by Article 1 of the Ordinance from 13 July 2015 (BGBl. I P. 1187)

- Technical Rules for Operational Safety (TRBS)⁶
- Technical Rules for Hazardous Materials (TRGS)⁷

In addition, building regulations in the German federal states must be complied with.

1.5 Definitions

- **Air conditioner** means a device capable of cooling and/or heating indoor air, using a vapour compression cycle driven by an electric compressor, including air conditioners that provide additional functionalities such as dehumidification, air-purification, ventilation or supplemental air-heating by means of electric resistance heating, as well as appliances that may use water (either condensate water that is formed on the evaporator side or externally added water) for evaporation on the condenser, provided that the device is also able to function without the use of additional water, using air only.⁸
- **Seasonal energy efficiency ratio (SEER)** is the overall energy efficiency ratio of the unit, representative for the whole cooling season and is calculated as the reference annual cooling demand divided by the annual electricity consumption for cooling.⁹
- **Seasonal coefficient of performance (SCOP)** is the overall coefficient of performance of the unit, representative for the whole designated heating season (the value of SCOP pertains to a designated heating season) and is calculated as the reference annual heating demand divided by the annual electricity consumption for heating.⁹
- **Rated capacity (P_{rated})** means the cooling or heating capacity of the unit at standard rating conditions.⁹

2 Scope

These Basic Award Criteria are valid for air conditioners for stationary use with the following characteristics:

- The air conditioners must be fitted with an electrically driven compressor.
- The devices must have a cooling function or both a cooling and a heating function.
- The rated capacity of the devices must not exceed a value of 12 kW.
- The devices must fall under the scope of validity of EU Regulation No. 206/2012⁹.

The following do not fall under the scope of these Basic Award Criteria:

- Monoblock devices, meaning air conditioners that are described as "single duct air conditioners" or "double duct air conditioners" in Regulation (EU) No. 206/2012, and window air conditioners ("window type" and "through-the-wall" devices).
- Air conditioners that exclusively provide the functions of dehumidification, air-purification, ventilation or air-heating according to Regulation (EU) No. 206/2012.
- Air conditioners for use in vehicles.

⁶ <http://www.baua.de/de/Themen-von-A-Z/Anlagen-und-Betriebssicherheit/TRBS/TRBS.html>

⁷ <http://www.baua.de/de/Themen-von-A-Z/Gefahrstoffe/TRGS/TRGS.html>

⁸ Definitions in accordance with: Regulation (EC) No. 206/2012.

⁹ *Commission Regulation (EC) No. 206/2012 of 6 March 2012 implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for air conditioners and comfort fans*

3 Requirements

3.1 Energy efficiency

3.1.1 Seasonal energy efficiency ratio

The air conditioners must have a seasonal energy efficiency ratio (SEER) for an average climate that fulfils the following requirements:

$$\text{SEER} \geq 7$$

Compliance verification

The applicant shall declare compliance with the requirements in Annex 1 to the Contract and submit the corresponding pages of the product documentation in accordance with Regulation (EU) No. 206/2012, Annex 1 Number 3(c) as Annex 6 to the Contract, in which the SEER value for an average climate is documented. In addition, the applicant shall submit a test report from a testing institution accredited according to DIN EN ISO/IEC 17025 as Annex 2, which demonstrates the calculation of the SEER value in accordance with the stated measurement guidelines in Regulation (EU) No. 206/2012. Test reports completed by the applicant are recognised as being of an equivalent standard when the testing laboratory used for the measurements is accredited by an independent body as an SMT laboratory (supervised manufacturer testing laboratory).

It is possible to provide compliance verification based on product families ("Basic Model Groups") according to the Eurovent Certification¹⁰.

3.1.2 Seasonal coefficient of performance

If the air conditioner also has a heating function, the seasonal coefficient of performance (SCOP) for an average climate must comply with the following requirements:

$$\text{SCOP} \geq 4.6$$

Compliance verification

The applicant shall declare compliance with the requirements in Annex 1 to the Contract and submit the corresponding pages of the product documentation in accordance with Regulation (EU) No. 206/2012, Annex 1 Number 3(c) as Annex 6 to the Contract, in which the SEER value for an average climate is documented. In addition, the applicant shall submit a test report from a testing institution accredited according to DIN EN ISO/IEC 17025 as Annex 3, which demonstrates the calculation of the SCOP value in accordance with the stated measurement guidelines in Regulation (EU) No. 206/2012. Test reports completed by the applicant are

¹⁰ According to the Eurovent certification, product families ("Basic Model Groups" or BMG) are defined by units which are essentially the same in terms of their cooling and heating performance (+/-10%) and function (cooling or heating) and which are the same or comparable in terms of their basic components, specifically fans, heat exchangers, compressors and motors, according to EUROVENT (2015) Operational Manual for the Certification of Air Conditioners, http://www.eurovent-certification.com/fic_bdd/en/1435237711_OM-1-2015_AC.pdf (accessed on: 18.05.2016).

recognised as being of an equivalent standard when the testing laboratory used for the measurements is accredited by an independent body as an SMT laboratory (supervised manufacturer testing laboratory).

It is possible to provide compliance verification based on product families ("Basic Model Groups") according to the Eurovent Certification¹¹.

3.2 Refrigerant

The air conditioner must be free of refrigerants containing halogens. In addition, it is not permitted to use ammonia as a refrigerant.

Compliance verification

The applicant shall declare compliance with the requirements and state the ODP value, the GWP value and the chemical name of the refrigerant used in Annex 1 to the Contract.

3.3 Air filter

The indoor units of the devices (evaporator) must be fitted with air filters that can be easily cleaned. The cleaning process can either be completed by an automatic cleaning function or manually by the user themselves. Cleaning of the heat exchanger in the outdoor units (condenser) should be carried out by qualified personnel and this process should be possible without the use of special tools. The cleaning process (indoor units) must be described in the operating instructions, while they should also refer the user to corresponding trained specialists for cleaning the heat exchangers in the outdoor units.

Compliance verification

The applicant shall declare compliance with the requirements in Annex 1 to the Contract and submit the corresponding product documentation which describes the cleaning of the filter as Annex 6.

3.4 Noise emissions

The noise emissions of the devices must comply with the following requirements:

Rated capacity (P_{rated}) in cooling or heating operation	Requirements for the sound power level at rated capacity	
	Indoor units	Outdoor units
$\leq 4.5 \text{ kW}$	$\leq 50 \text{ dB(A)}$	$\leq 58 \text{ dB(A)}$
$4.5 \text{ kW} < P_{\text{rated}} \leq 6 \text{ kW}$	$\leq 55 \text{ dB(A)}$	$\leq 62 \text{ dB(A)}$
$6 \text{ kW} < P_{\text{rated}} \leq 12 \text{ kW}$	$\leq 58 \text{ dB(A)}$	$\leq 68 \text{ dB(A)}$

The noise emissions must be stated in the product documentation.

Compliance verification

The applicant shall declare compliance with the requirements in Annex 1 to the Contract and submit the corresponding pages of the product documentation or the EU energy efficiency label as Annex 6 to the Contract, in which the sound power level in cooling and, where relevant, heating operation is documented for both indoors and outdoors. In addition, the applicant shall submit a test report from a testing institution accredited according to DIN EN ISO/IEC 17025 as Annex 4, which demonstrates the calculation of the sound power level in accordance with the

stated measurement guidelines in the EU regulation for air conditioners. Test reports completed by the applicant are recognised as being of an equivalent standard when the testing laboratory used for the measurements is accredited by an independent body as an SMT laboratory (supervised manufacturer testing laboratory).

It is possible to provide compliance verification based on product families ("Basic Model Groups") according to the Eurovent Certification¹¹.

3.5 Material requirements

3.5.1 Exclusion of hazardous substances

The EU Directive 2011/65/EU¹² (ROHS Directive) must be complied with. This refers to the substances lead, mercury, hexavalent chromium (chromium VI), polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE).

Compliance verification

The applicant shall declare compliance with the requirement in Annex 1 to the Contract and submit a declaration of conformity with the ROHS Directive as Annex 5.

3.5.2 Plastics used in the housing and housing parts

The plastics used in the housing and housing parts may not contain as constituent parts any substances classified as:

- carcinogenic in categories 1A or 1B according to Table 3.1 of Annex VI to EC Regulation 1272/2008¹³
- mutagenic in categories 1A or 1B according to Table 3.1 of Annex VI to EC Regulation 1272/2008
- reprotoxic in categories 1A and 1B according to Table 3.1 of Annex VI to EC Regulation 1272/2008

¹¹ According to the Eurovent certification, product families ("Basic Model Groups" or BMG) are defined by units which are essentially the same in terms of their cooling and heating performance (+/-10%) and function (cooling or heating) and which are the same or comparable in terms of their basic components, specifically fans, heat exchangers, compressors and motors, according to EUROVENT (2015) Operational Manual for the Certification of Air Conditioners, http://www.eurovent-certification.com/fic_bdd/en/1435237711_OM-1-2015_AC.pdf (accessed on: 18.05.2016).

¹² Directive 2011/65/EC of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment

¹³ Regulation (EC) No. 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, as well as amending Regulation (EC) No 1907/2006, Annex VI on harmonized classification and labelling of hazardous substances, Part 3: Harmonized classification and labelling, Tables, Table 3.2, – List of harmonized classification and labelling of dangerous substances from Annex I to Directive 67/548/EEC, short: GHS Regulation http://www.reach-info.de/ghs_verordnung.htm, each as amended.

The GHS Regulation (Global Harmonization System) that came into force on 20 January 2009, replaces the old Directives 67/548/EEC and 1999/45/EC. According to the said regulation, substances are classified, labelled and packed until 1 December 2010 according to Directive 67/548/EEC (Dangerous Substances Directive) while mixtures are classified, labelled and packed until 1 June 2015 according to Directive 1999/45/EC (Dangerous Preparations Directive). Notwithstanding this, the classification, labelling and packaging of substances and preparations may be performed according to the provisions of the GHS Regulation already before 1 December 2010 or 1 June 2015, respectively. In such cases, the provisions of the Dangerous Substances Directive or Dangerous Preparations Directive shall not be applicable.

- particularly alarming for other reasons according to the criteria of Annex XIII to the REACH Regulation, insofar as they are included in the List (so-called "list of candidates"¹⁴) set up in accordance with REACH, Article 59, Paragraph 1.

Halogenated polymers shall not be permitted. Neither may halogenated organic compounds be added as flame retardants.

The following shall be exempt from this rule:

- process-related, technically unavoidable impurities
- fluoroorganic additives (e.g. anti-dripping agents) used to improve the physical properties of plastics, provided that they do not exceed a proportion of 0.5 percent by mass
- plastic parts with a mass of less than or equal to 25 g

Compliance verification:

The applicant shall declare compliance with the requirements in Annex 1 to the Contract and submit a written declaration from the plastics manufacturer or guarantee the provision of these documents to RAL gGmbH. The declaration shall confirm that the excluded substances have not been added to the plastics and provide a chemical description of the flame-retardant materials used including the CAS number and its rating (H Phrases) (Annex P-M to the Contract). When first applying for the Blue Angel ecolabel, the submitted declaration must not be older than 6 months. If one applicant submits additional applications for the labelling of products that contain the same plastics, the submitted declarations may be presented unchanged during the term of the Basic Award Criteria. Notwithstanding this, RAL shall be entitled to ask for an updated version of the declarations if the Federal Environmental Agency (Umweltbundesamt) finds that product-relevant substances have been added to the list of candidates.

3.6 Environmentally friendly product design

Unless there are compelling technical reasons to the contrary, the following principles for the recyclable design of technical products must be observed and declared in writing:

- The avoidance of non-detachable material connections between different materials
- The avoidance of composite materials
- Components that are easy to dismantle, also for the purpose of repair
- Reduction in the diversity of the materials used

In addition, the manufacturer must provide a written declaration of compliance with the following requirements when applying for the environmental label:

- Product components made of plastic with a weight of more than 25 g must be labelled with an abbreviated term in accordance with DIN EN ISO 1043-116 or DIN ISO 162917 (rubber) or DIN ISO 207618 (chemical fibres).

Compliance verification

The applicant shall declare compliance with the requirements in Annex 1 to the Contract and submit a list of product components made of plastic with a weight of more than 25 g together with the associated information in accordance with Annex P-L to the Contract.

¹⁴ The version of the list of candidates at the time of application is valid (new applications). Link to the list of candidates of Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH): <http://echa.europa.eu/web/guest/candidate-list-table>

3.7 Sales/Distribution

The air conditioners may only be installed and serviced by qualified specialist companies in accordance with Article 6 of the "Ordinance on climate protection against changes caused by release of certain fluorinated greenhouse gases" (Chemicals Climate Protection Ordinance – ChemKlimaschutzV). The installation must be carried out by a certified air conditioning and refrigeration technician in accordance with Category I of Regulation (EC) No. 303/2008¹⁵ or in accordance with the Commission Implementing Regulation (EU) 2015/2067¹⁶.

Compliance verification

The applicant shall declare in Annex 1 to the Contract that the device is only delivered to certified companies in accordance with Article 6 of ChemKlimaschutzV.

3.8 Services

The applicant themselves or a contractually affiliated service partner must offer services that enable the environmentally friendly planning and reliable and energy efficient operation of the air conditioners.

The following services must be offered:

- Professional planning, installation, maintenance and disposal of air conditioners by a specialist company in accordance with Paragraph 3.7.
- Provision of maintenance services at standard customer service times.
- Availability of equivalent spare parts for the repair of the air conditioners for at least 10 years after the devices are launched on the market.

Compliance verification

The applicant shall declare compliance with the requirements in Annex 1 to the Contract.

3.9 Product documentation

3.9.1 Operating instructions

The operating instructions are designed for the user of the air conditioner and must contain clear and understandable statements on the environmentally friendly operation of the device. The operating instructions must contain at least the following information:

- Information on the energy saving operation of the air conditioner, such as via the temperature settings, the avoidance of heat sources in the room and avoiding open windows or doors
- All product specific information in accordance with Regulation (EU) No. 626/2011, Annex IV.

¹⁵ Commission Regulation (EC) No. 303/2008 of 2 April 2008 establishing, pursuant to Regulation (EC) No 842/2006 of the European Parliament and of the Council, minimum requirements and the conditions for mutual recognition for the certification of companies and personnel as regards stationary refrigeration, air conditioning and heat pump equipment containing certain fluorinated greenhouse gases

¹⁶ Commission Implementing Regulation (EU) 2015/2067 of 17 November 2015 establishing, pursuant to Regulation (EU) No 517/2014 of the European Parliament and of the Council, minimum requirements and the conditions for mutual recognition for the certification of natural persons as regards stationary refrigeration, air conditioning and heat pump equipment, and refrigeration units of refrigerated trucks and trailers, containing fluorinated greenhouse gases and for the certification of companies as regards stationary refrigeration, air conditioning and heat pump equipment, containing fluorinated greenhouse gases

- Information on the refrigerant used (see Paragraph 3.2) and, where necessary, special information about codes of conduct in the event of leakages, as well as the required maintenance cycles.
- Information that the air filters should be cleaned regularly and a description of the process for manual or automatic cleaning of the air filters (see Paragraph 3.3)
- Information that the heat exchanger in the outdoor unit (condenser) should be regularly cleaned by trained specialists
- Information that the installation, annual service, maintenance and disposal of the device should only be carried out by a specialist company in accordance with Article 6 of the Chemicals Climate Protection Ordinance (ChemKlimaSchutzV) (see Paragraph 3.7)

In addition, the operating instructions must be published on a freely accessible website that is easy to reach via the website of the manufacturer or supplier.

Compliance verification

The applicant shall declare compliance with the requirement in Annex 1 to the Contract, state the website where the operating instructions can be accessed and submit the corresponding pages of the operating instructions on which the relevant information is provided as Annex 6.

3.9.2 Installation and Service Manual

The Installation and Service Manual is designed for qualified specialists and must contain clear and unambiguous statements for the correct installation, servicing, maintenance and disposal of the air conditioners by qualified specialists. It must be clearly labelled as a guide "for qualified specialists". The Installation and Service Manual must contain at least the following information:

- Information before and during the installation:
 - ♦ The suitability of rooms for the installation of air conditioners (e.g. taking into account existing electrical installations)
 - ♦ Information on the required room sizes depending on the filling volume of the refrigerant in the air conditioner, taking into account the installation height of the indoor unit
 - ♦ Information on checking the completeness of all components and accessories for the air conditioner
- Information on professional leak testing during routine services or repairs
- Information on ensuring that measures to prevent a potentially explosive atmosphere remain effective after maintenance work
- Information on the professional removal/disposal of the refrigerant when dismantling the air conditioner
- Information on work safety (avoidance of explosive atmospheres)
- Information on the required tools
- Information on relevant standards and norms (e.g. DIN EN 378, DIN EN 13313),
- Information on the qualification of specialist personnel for the handling of flammable refrigerants

- Information on reducing energy and refrigerant losses
- Instructions for the professional cleaning of the device, filter and heat exchanger.

Compliance verification

The applicant shall declare compliance with the requirement in Annex 1 to the Contract and submit the corresponding pages of the Installation and Service Manual on which the relevant information is provided as Annex 7.

3.10 Outlook

The following requirements will be examined or, if necessary, supplemented in future revisions of these Basic Award Criteria:

- Information on energy efficiency during operation (e.g. a meter for the volume of electricity and heat, data on the compressor speed).
- Reduction in the requirements for noise emissions for outdoor units to a sound power level of less than 60 dB(A).
- Interfaces for connecting the devices to home automation systems.

4 Applicants and Parties Involved

Manufacturers or distributors of final products according to Paragraph 2 shall be eligible for application.

Parties involved in the award process are:

- RAL gGmbH to award the Blue Angel Environmental Label,
- the federal state being home to the applicant's production site,
- Umweltbundesamt (German Environmental Agency) which after the signing of the contract receives all data and documents submitted in applications for the Blue Angel in order to be able to further develop the Basic Award Criteria.

5 Use of the Environmental Label

The use of the Environmental Label by the applicant is governed by a contract on the use of the Environmental Label concluded with RAL gGmbH.

Within the scope of such contract, the applicant undertakes to comply with the requirements under Paragraph 3 while using the Environmental Label.

Contracts on the Use of the Environmental Label are concluded to fix the terms for the certification of products under Paragraph 2. Such contracts shall run until December 31, 2027. They shall be extended by periods of one year each, unless terminated in writing by March 31, 2027 or March 31 of the respective year of extension.

After the expiry of the contract, the Environmental Label may neither be used for labelling nor for advertising purposes. This regulation shall not affect products being still in the market.

The applicant (manufacturer) shall be entitled to apply to RAL gGmbH for an extension of the right to use the ecolabel on the product entitled to the label if it is to be marketed under another brand/trade name and/or other marketing organisations.

The Contract on the Use of the Environmental Label shall specify:

- Applicant (manufacturer/distributor)
- Brand/trade name, product description
- Distributor (label user), i.e. the above-mentioned marketing organisations.

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