



**EUROPE'S INDUSTRY ASSOCIATION  
FOR INDOOR CLIMATE, PROCESS COOLING  
AND FOOD COLD CHAIN TECHNOLOGIES**

# STATEMENT OF PRINCIPLES

# EUROVENT STATEMENT OF PRINCIPLES: JOINT VIEWS ON AN INDUSTRY THAT THINKS ‘BEYOND HVACR’

## PREFACE

Eurovent is Europe’s Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. It represents Europe’s leading, national associations active in this industry and the more than 1.000 organisations within their networks directly at a European and international level.

Since 1958, Eurovent’s member associations have been united in their goal to ensure an ever-closer European economic area and a free movement of goods without unfair trade barriers. Together, these organisations represent 20+ countries, covering the European Union (EU), CIS countries, and Turkey. The wider association scope also includes direct members

from the Middle East and Africa, reflecting today’s market realities.

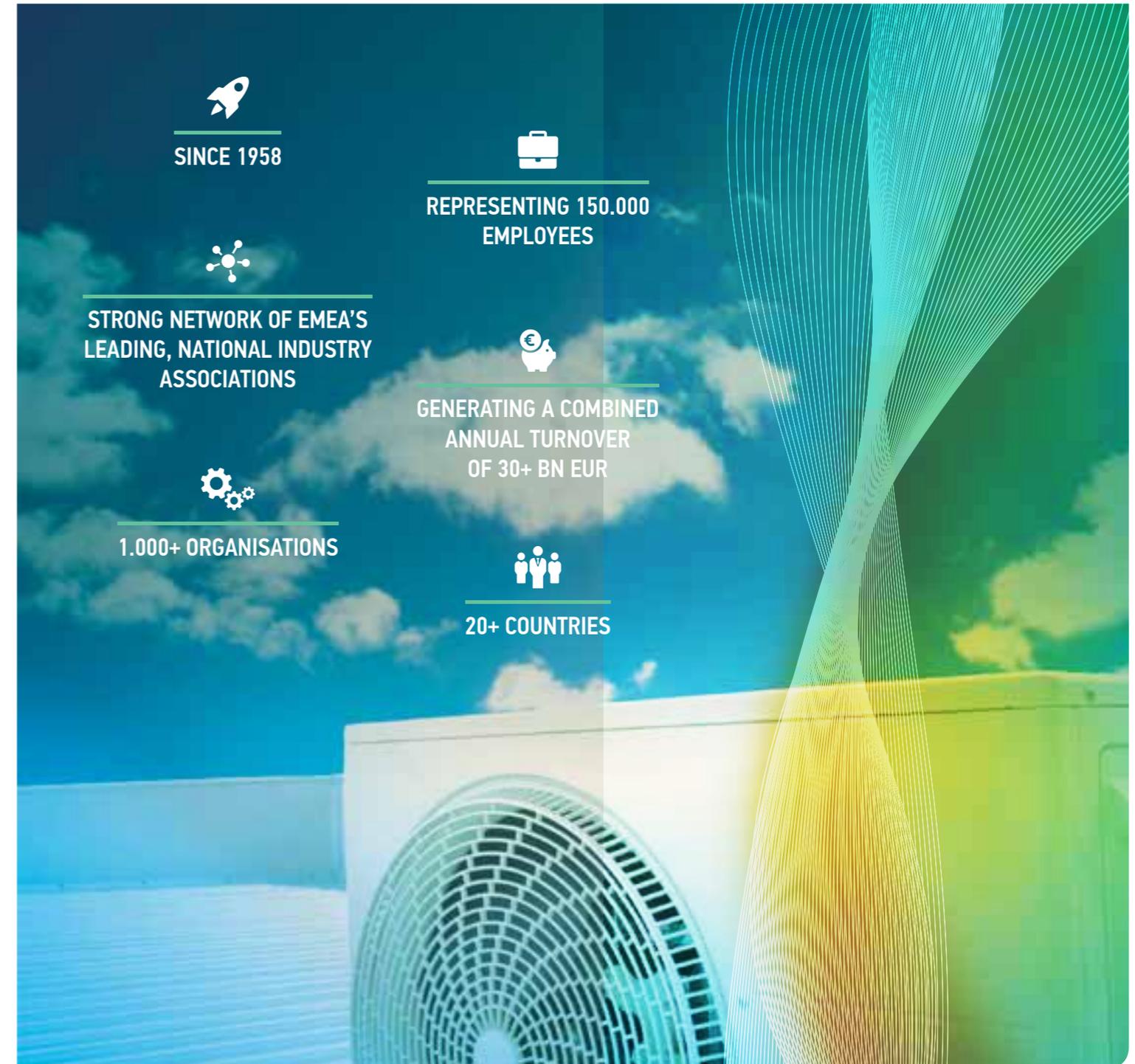
Eurovent and its national associations represent their members in an equal, fair and democratic manner – independent from the level of company’s membership contributions or the size of a country. They work towards common European and international positions that are forward-looking and driven by an overall passion for state-of-the-art technologies that match highest standards in terms of quality, energy efficiency, indoor air quality, health and safety.

With this document, Eurovent and its member associations have defined joint views on an industry that thinks

‘Beyond HVACR’<sup>1</sup>. They acknowledge these positions as a Statement of Principles that shall act as a basis for decisions taken by the Eurovent association and recognised by its member associations on a national level. It shall incorporate wider industry perspectives, statements on key policy issues, and visions that help to ensure a true level-playing field.

This Statement of Principles is regularly being reviewed by the Eurovent Commission in cooperation with the Board and, whenever necessary, updated in order to reflect the state of the art, technology and science.

<sup>1</sup> HVACR refers to Heating, Ventilation, Air Conditioning, and Refrigeration



# **EUROVENT – EUROPE’S INDUSTRY ASSOCIATION FOR INDOOR CLIMATE, PROCESS COOLING AND FOOD COLD CHAIN TECHNOLOGIES**

## **1.1 MISSION**

Eurovent, Europe’s Industry Association for Indoor Climate, Process Cooling, and Food Cold Chain Technologies, is a fully service-oriented, not-for-profit organisation – admiring its members and their innovative, energy-efficient and sustainable solutions that enable a better quality of life to people across the globe. Our multinational Team thinks ‘Beyond HVACR’, acknowledging the term’s various components by approaching them from a wider application perspective. As a cross-regional association, we value and understand regional

diversity, but also recognise a global environment that reinforces the need for an ever-stronger cooperation and the ability to speak with one voice based on democratic decision-making processes. Eurovent constantly encourages a level-playing field for the entire industry, ranging from many small and medium-sized enterprises to international corporations. The association enables members to profit from its more than five decades of experience in technical and political cooperation on a national, regional and international level.

## 1.2 CORE VALUES

### 1.2.1 DEMOCRATIC DECISION-MAKING ISN'T JUST A TERM.

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. In an environment of growing complexity, proliferation of activities and actors, our association provides an effective platform for the consolidation of industry positions and market information. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we strongly believe in our setup as an industry association with manufacturers directly participating in Eurovent activities, and national associations acting as horizontal guidance, mediation and national support bodies. This allows for an effective handling of issues while acknowledging wider industry views.

### 1.2.2 DIVERSITY IS AN OPPORTUNITY AND NOT A BURDEN.

Eurovent is an industry association with members from Europe and the Middle East. Covering this area not only reflects industrial realities with many manufacturers grouping their enterprises accordingly, but also brings together different climate zones and business practices. While we value and live this diversity, making use of the wide-ranging expertise resulting from it, Eurovent needs to ensure a level-playing field in which manufacturers are able to secure and expand their businesses. Thus, when representing markets that increasingly grow together, we do see a need for a strong cross-national and regional cooperation in order to effectively align policies and standards.

### 1.2.3 FOCUS ON THE MEMBERS AND DO IT REALLY WELL.

Eurovent's environment is defined by its members, with manufacturers constituting its heart and the centre of attention. Within its capacities, the Eurovent Team ensures that members' interests drive everyday work. While the association's environment is shaped by a strong demand of legislators for energy efficiency that we generally support, our industry makes us realise that there is more to it than just efficiency. Accordingly, we advocate a holistic approach that also integrates health, life and work quality, as well as environmental and safety aspects. We support our industry in its call for a sensitively regulated market that ensures sufficient breathing space and respects industrial realities.

AT EUROVENT, WE HAVE A CLEAR MISSION OUTLINING WHAT WE STAND FOR. THIS MISSION IS BEING INCORPORATED THROUGH CORE VALUES THAT ARE BEING REFLECTED IN OUR EVERYDAY WORK.

## 1.3 GOOD GOVERNANCE

### 1.3.1

#### FAIRNESS AND TRANSPARENCY – QUESTIONS FOR POLICY-MAKERS

The structure of Eurovent structure rests upon achieving a consensus. Where this is not possible, By-Laws define democratic decision-making procedures. Manufacturers count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers' questions regarding our association's representativeness and decision-making processes as follows:

#### 1. Who receives which amount of votes?

At Eurovent, the amount of votes is never related to organisation sizes, country sizes, or membership fee levels. No matter if SMEs or large organisations, each company receives one vote within our technical working groups. In our General Assembly or Eurovent Commission (supervisory body), our national member associations receive equal votes per country.

#### 2. Who has the final decision-making power?

The Eurovent Commission acts as the association's supervisory body. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within working groups. The Commission consists of national association Members, receiving equal votes per country independent from its size or economic weight.

#### 3. How European is the association?

More than 90 per cent of manufacturers within Eurovent manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the secondary sector. Our structure as an umbrella enables us to consolidate manufacturers' positions across the industry, ensuring a broad and credible representation.

#### 4. How representative is the organisation?

Eurovent represents more than 1.000 companies of all sizes spread widely across 20+ European countries, which are treated equally. As each country receives the same amount of votes, there is no 'leading' country. Our national member associations ensure a wide-ranging national outreach also to remote locations.

### 1.3.2 TRUSTWORTHINESS – BEHIND THE CURTAINS

Everybody can check on Eurovent in the European Union Transparency Register under identification no. 89424237848-89. This Register provides for basic information including, for example, the number of persons involved in lobbying-related activities and finances.

Together with our national associations, we advocate for an extension of the Transparency Register to incorporate more detailed data on organisations active at the European Union level. We hold that political decision-makers have a right to know how decisions are being made and by whom, and whether or not, for example, certain decisions are taken within independently-financed projects in which the financing and voting structure is not straightforward.

### 1.3.3 REPRESENTATIVENESS – 'CO-SIGNING' OF POSITION PAPERS

Throughout their activities, Eurovent wants to ensure that their decisions and political actions are based on a wide-ranging representativeness following democratic-decision making principles while respecting the general positions of this document.

We believe that this representativeness shall also be guaranteed when it comes to the cooperation with external organisations. When co-signing position papers of and with other organisations, or participating in so-called 'Joint Industry Expert Groups', it needs to be ensured that this is in accordance with the principles of Eurovent.



## TECHNOLOGIES – ABOUT AN INDUSTRY THAT THINKS ‘BEYOND HVACR’

Eurovent represents more than 1.000 organisations. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association’s geographic area. Our members are active within one or more of the following four key technology areas:

- › Indoor Climate (HVAC),
- › Process Cooling,
- › Food Cold Chain,
- › Industrial Ventilation.

This scope reflects the actual structure, development and ideals of our industry. By incorporating it, we think ‘Beyond HVACR’, acknowledging the term’s various components by approaching them from a wider applica-

tion perspective. A broader aim is to make our industry more attractive for younger generations, presenting it in a more tangible manner.

The technologies provided by our members enable a better quality of life to people around the globe. While these innovations are often taken for granted and not directly visible, it needs to be reinforced that many essential processes would not function without them. They are in fact a necessity without which our many of our societal achievements would not be conceivable.

Key technology areas are outlined in the following sections. These areas should not be treated independently from each other, but seen from a holistic approach as they often interlink.



**INDOOR CLIMATE (HVAC)**



**PROCESS COOLING**



**FOOD COLD CHAIN**



**INDUSTRIAL VENTILATION**





## 2.1 INDOOR CLIMATE (HVAC)

The pillar 'Indoor Climate' covers technologies in the area of heating and cooling (e.g. air conditioners, chillers, fan coil units, heat pumps) as well as ventilation and indoor air quality (e.g. residential and non-residential air handling units, air filters/cleaners/humidifiers, fans, energy recovery components).

Members of Eurovent set global benchmarks in the indoor climate arena. While manufacturers not only reach unmatched efficiency and quality levels supported by a forward-looking regulatory and standardisation framework, they also incorporate technologies that contribute to a better indoor air quality and health – an issue of ever-increasing importance as outlined in Chapter 3.1.



## 2.2 PROCESS COOLING

The second pillar, 'Process Cooling', covers industrial cooling processes, which play an essential role within many industrial sectors (e.g. oil and gas, metallurgy and chemicals). Industrial process equipment is, for instance, being used to cool, refrigerate, extract heat, or maintain temperature during manufacturing.

Eurovent members are leading in the production of state-of-the-art process cooling technologies. This includes, for instance, chillers (e.g. industry, process, water cooled), evaporative cooling equipment (e.g. cooling towers, evaporative condensers), as well as dry and fluid coolers.



## 2.3 FOOD COLD CHAIN

The third pillar covers technologies that can be found within the 'Food Cold Chain', mainly industrial technologies that are used to process, preserve, transport, and display foodstuff. Food processing industries, food warehouses (chilled and frozen), refrigerated vehicles and supermarkets are thus elements of the same chain.

'Food Cold Chain' reflects a field with an ever-increasing importance in which European manufacturers are offering leading, state-of-the-art solutions that ensure the optimal preservation of foodstuff and minimisation of food weight drop. This includes, for example, cold rooms, bottle coolers, supermarket refrigerated display cabinets, and ice cream freezers.



## 2.4 INDUSTRIAL VENTILATION

The fourth and final pillar covers 'Industrial Ventilation' technologies, which have been shaping the Eurovent association since its foundation.

Ventilation is in many cases an integral part of industrial and commercial processes. Industrial ventilation manages the transport of air, other gases, mist, dust, aerosols or separates particles. Woodworking, building material processing, chemistry, working tool machines, textile industries, paper, rubber, plastics processing, waste treatment, recycling technologies, and cooling technologies are only a few examples of applications for ventilation purposes.

Ventilation not only keeps industrial and commercial processes running, but also provides workers health or environmental protection in numerous appliances. Thus, industrial ventilation is essential for well-developed industrialised societies all over the world.

## CORE ISSUES – THERE IS MORE TO IT THAN JUST ENERGY EFFICIENCY

Throughout the activities of Eurovent and its members, several core issues prevail that receive particular attention. These are being outlined in the following.

### 3.1 INDOOR AIR QUALITY (IAQ)



Firstly, we regularly highlight the importance of ensuring a good indoor air and the central role state-of-the-art ventilation and filtration technologies play in this respect. Eurovent and its national member associations do so in close cooperation with REHVA<sup>2</sup> as well as leading European universities and research institutes.

Throughout the past decades, there has been a wide-ranging scientific debate on IAQ in Europe and beyond. Private and public organisations have tackled this issue through various initiatives and reports. While energy efficiency receives a strong attention of the public and policy-makers throughout Europe thanks to measures such as Energy Labelling and Ecodesign, IAQ is not yet there.

Given that people spend around 90 percent of their time indoors, we believe that this situation should be changed. This is also being supported by the following arguments – to name just a few:

- ▶ The short, mid and long-term cost savings and health-related benefits through providing healthy indoor air are unneglectable and have been proven through multiple academic contributions.
- ▶ Reducing the energy demand of a building or product saves costs on the energy side. Providing a healthy indoor air results in positive impacts on, for example, human health or work performance. These effects deserve more attention in life cycle cost calculations and legislation.

- ▶ We see ourselves confronted with a growing world population that is ageing rapidly. The global costs for healthcare are projected to increase exponentially. Ensuring healthy indoor spaces can slow down this increase.

It is our joint aim to raise awareness on the importance of a healthy indoor air among the public and policy makers, emphasising that IAQ pays off. Eurovent and its members work towards IAQ finding its way into national, European, and international legislation.

The overall goal is to make IAQ a topic that does not need to hide behind other core issues, such as energy efficiency, which is being outlined in the following.

<sup>2</sup> REHVA is the Federation of European Heating, Ventilation and Air Conditioning Associations representing a network of more than 100.000 engineers from 26 countries.





## 3.2 ENERGY EFFICIENCY

Manufacturers within the Eurovent network set global benchmarks in the development of highly energy efficient Indoor Climate (HVAC), Process Cooling, Food Cold Chain and Industrial Ventilation Technologies. They are supported by a forward-thinking framework of legislation and standards, in whose development Eurovent and its members play an important and proactive role.

Accordingly, energy efficiency is and will remain one of our core issues. Throughout our activities, we support measures that, for instance,

- ▶ Help the EU to reach its 2020 and 2030 energy efficiency targets,
- ▶ Make old and new buildings more energy efficient,
- ▶ Ensure a validity of energy efficiency levels stated by manufacturers,
- ▶ Act as a driver for our industry to maintain the leadership in terms of energy efficiency,
- ▶ Advocate our energy efficiency ideals internationally.

Our association closely follows the development and evolution of legislation such as Ecodesign Regulations, which require manufacturers to decrease the energy consumption of their products by establishing minimum energy efficiency requirements.

While Eurovent and its members generally support these and related activities, we also point out within Section 4.1 that energy efficiency is not an all-purpose answer.



## 3.3 DIGITISATION

At Eurovent, we represent manufacturers of Indoor Climate (HVAC), Process Cooling, Food Cold Chain, and Industrial Ventilation Technologies. By speaking about Technologies, we adapt industrial realities and recognise the ever-increasing 'Digitisation' of our sector. We understand that our industry produces more than just equipment. This has multiple reasons, including:

- ▶ Smart technologies are becoming essential for each sector of our industry and its consumers.
- ▶ Eurovent members are designing Industry 4.0 solutions that allow customers to remotely monitor each single parameter of the thermodynamic cycle, to manage their systems from remote, and to manage the energy consumption in an easy and user-friendly manner.
- ▶ The Internet of Things is no longer a visionary idea, but available instantly on our smartphones. It enables, for example, the remote control of indoor climate systems.

Eurovent realises that the industry it represents needs to be as much as possible receptive towards all kinds of digital developments. We understand that this could involve new levels of cooperation, and an opening up of the association scope beyond manufacturing – following our lead ideal of thinking 'Beyond HVACR'.



## 3.4 ENVIRONMENTAL CHALLENGES

The world sees itself confronted with various 'environmental challenges' such as

- ▶ Climate Change (Global Warming),
- ▶ Emissions that contaminate the atmosphere,
- ▶ Indoor and outdoor air pollution,
- ▶ Food safety, and
- ▶ Water shortages.

Eurovent and its members are fully aware of these challenges. In fact, we acknowledge that Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies, as a major consumer of energy and fluorinated gases, play an essential role in tackling them.

We do not regard this as a burden, but a motivation to further innovate while contributing to a green thinking throughout all sectors of our industry and the end-users. It thus goes without saying that our association network supports measures such as

- ▶ The global phase-down of refrigerants with a high Global Warming Potential (GWP), a move towards low-GWP alternatives including natural refrigerants,
- ▶ The implementation and development of credible minimum energy performance requirements such as the Ecodesign framework,
- ▶ Legislation that incorporates credible air quality requirements,

- ▶ Global advocacy efforts that carry on these environmental ideals in an effective manner.

For decades, Eurovent and its members have been developing codes of good practice ('Eurovent Recommendations') to meet environmental challenges. These are being regularly updated to reflect the state-of-the-art and are being used across the globe.

## POLICY AREAS

### 4.1 ECODESIGN



Ecodesign is a forward-thinking concept whose regulations require our members to decrease the energy consumption of their products by establishing minimum energy efficiency requirements. By setting these requirements at European level, manufacturers do not have to navigate through multiple national regulations when placing their products on the market. Customers are provided with an effective tool to choose the right product in a comparative manner.

While Eurovent is strong supporter of the Ecodesign framework and regards it as a driver for innovation and environmental responsibility, it also acknowledges various challenges.

#### 4.1.1 IT IS GETTING COMPLEX

Europe's manufacturers of Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies see themselves confronted with an

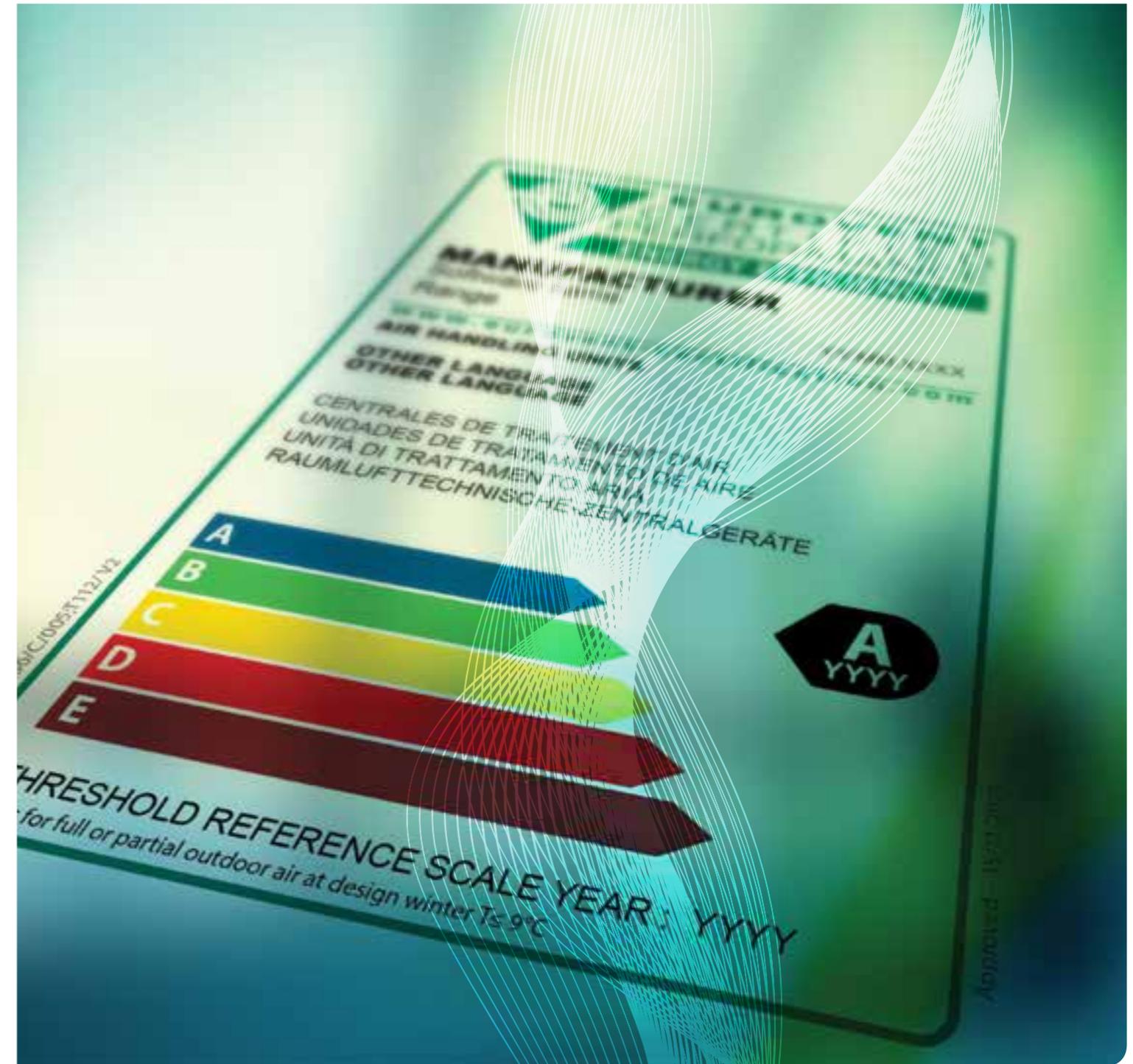
One of the key tasks of Eurovent is to represent its industry vis-à-vis public decision-makers at a national (through its member associations), European, and international level. In the following, we elaborate on some key policy areas that we are regularly dealing with.

increasing amount of Ecodesign measures with which they have to comply.

- This includes, for instance:
- ▶ Ecodesign Regulation 327/2011: 'Ventilation fans'
  - ▶ Ecodesign Regulation 206/2012: 'Room air conditioning appliances, local air coolers and comfort fans'
  - ▶ Ecodesign Regulation 813/2013: 'Space and combination heaters'
  - ▶ Ecodesign Regulation 1253/2014: 'Residential and Non-Residential Ventilation Units'
  - ▶ Ecodesign Regulation 2015/1095: 'Refrigerating and freezing equipment'
  - ▶ In development: 'Air heating products, cooling products, high temperature process chillers and fan coil units'
  - ▶ In development: 'Commercial refrigerators and freezers'
  - ▶ In development: 'Central heating products using hot air to distribute heat'
  - ▶ In development: 'Smart Appliances'

What frequently comes along with Ecodesign measures are Energy Labelling Regulations as well as horizontal legislative requirements such as EPBD (Energy Performance of Buildings Directive), F-Gas Regulation, Low Voltage Directive, Machinery Directive, Pressure Equipment Directive, RoHS (Restriction of Hazardous Substances), WEEE (Waste of Electric and Electronic Equipment), or REACH.

In addition, many Ecodesign Regulations do not just apply to one product only, but often two (energy-related products integrated into other energy-related products), or sometimes even more. These Regulations again are not always coherent. The entering into force of minimum energy efficiency requirements ('Tiers') of different energy-related products is not consistently coordinated either.



All of this leads to a growing complexity. Following up with all legislative development marks a major challenge for our industry, and especially SMEs.

Accordingly, Eurovent and its members strongly recommend EU decision-makers to

- ▶ Maintain the equipment-focus of Ecodesign,
- ▶ Align the dates for the coming into force of the requirements within different regulations,
- ▶ Avoid overlapping or conflicting legislative requirements for the same products,
- ▶ More strongly harmonise national and European legislation.

#### 4.1.2 GOOD THINGS TAKE TIME

Our association also asks to reconsider the pace and timing with which Ecodesign measures are being tackled by EU regulators. Often, these are not in line with industrial realities. While our industry is ready to innovate, it has product and innovation cycles to follow that should be respected.

That said, for example, a product is commonly being developed to be sellable for a longer period of time,

and the time for it to be market-ready tends to be around three years. The short cycle in which minimum energy efficiency requirements enter into force, and the non-alignment of different implementing measures create challenges for product developers.

Consequently, we see a necessity to

- ▶ Increase the length of legislative development cycles in order to align it with industrial realities,
- ▶ Allow for a reasonable amount of time between each minimum energy efficiency requirement ('Tiers') enters into force,
- ▶ Align the dates for the coming into force of the requirements within different regulations,
- ▶ Always develop an impact assessment with each regulatory revision,
- ▶ Make all impact assessments publically accessible to increase the overall transparency.

#### 4.1.3 EFFICIENCY IS NOT AN ALL-PURPOSE ANSWER

The overall approach of Ecodesign to decrease the energy consumption by establishing minimum energy efficiency standards is being very much

appreciated by Eurovent. However, we also realise that there are certain limitations attached to this approach.

In general, energy efficiency also has physical limits based on thermodynamic laws. It deserves to be assessed until which stage it makes economic and ecologic sense to further improve product efficiencies.

An increase in energy efficiency should take into account industrial realities, consumer demands, and other important requirements. Ecodesign deserves to be developed further – beyond a sole energy efficiency focus, considering requirements such as IAQ, size, health, noise, or food safety.

#### 4.1.4 PRODUCTS INTEGRATED INTO PRODUCTS

Several Regulations adopted under the 'EU Ecodesign Directive' apply to products integrated into other products (e.g. fans and motors). These products may also be sold as 'stand-alone' products.

Eurovent and its national member associations represent manufacturers of components, of products incorpo-

rating these components, and manufacturers offering solutions for entire system. The opinions of members differ on whether or not energy-related products integrated into other energy-related products should be regulated, with each side bringing up its specific arguments.

Aside from this, Eurovent and its members share the following view:

- ▶ The technical neutrality and the equipment-focus of Ecodesign should be maintained, not diluting it with system measures.
- ▶ Any additional Ecodesign measure on components should be carefully evaluated in order to avoid adding additional complexity to an already complex framework.
- ▶ Decision-makers should act cautiously when adding any additional layer of legislation (e.g. on systems) that might increase complexities even further.
- ▶ An alignment of all related Ecodesign implementing measures is necessary and overdue in terms of, for example, 'Tiers' and content.

## 4.2 ENERGY LABELLING

A+++

A key policy area closely related with Ecodesign is Energy Labelling. While minimum energy efficiency standards aim to ensure the compliance of products with Ecodesign requirements, Energy Labelling visibly promotes a product's energy efficiency. It can thus constitute a powerful tool to ensure a level-playing field.

For products that fall under an Ecodesign measure, it is possible to calculate their energy consumption based on harmonised EN standards that provide for the necessary calculation

methods. Eurovent and its members hold that, where appropriate, Energy Labelling requirements should be issued together with Ecodesign measures for these kinds of products.

As for energy-related products integrated into other energy-related products, we are of the opinion that only the final product should be covered by Energy Labelling. This is because the final energy consumption, from the end-user point of view, is the one related to the final product.

## 4.3 ENERGY PERFORMANCE OF BUILDINGS



The Energy Performance of Buildings Directive (EPBD) is changing the way in which Europe looks at new buildings and renovations. It marks a key policy area of high relevance to our industry.

Eurovent and its members share the ambitious goals to improve energy efficiency in the building sector, which accounts for 40 per cent of the total energy consumption in the European Union.

### 4.3.1 BACKGROUND

The first EPBD from 2002 required Member States to define a framework for a methodology of calculation of energy performance of buildings (EPB). It introduced minimum requirements on EPB of new buildings and major renovations by 2006. This was coupled with an Energy Performance Certificate that is mandatory when a building is constructed sold or let. A regular inspection of heating and air-conditioning systems was introduced.

To fit within the context of the ambi-

tious climate and energy package by 2020, the EPBD was revised. The second EPBD of 2010 introduced the calculation of cost-optimal levels of minimum energy performance requirements, and requirements to document the feasibility of using energy from renewable sources mandatory. The major ambitious novelty is that all new buildings should be 'Nearly Zero Energy Buildings' (NZEB) by 2021.

### 4.3.2 CALL FOR HARMONISED CALCULATION MODELS

In order to achieve the EPBD's goals, we believe that the use of harmonised EPB calculation models across Europe, rather than national and regional models, would more effectively contribute to energy-saving and emission reductions. This has multiple reasons, including:

- ▶ The laws of physics are the same across Europe,
- ▶ Objective parameters that account for the local particularities exist,
- ▶ An integration into European harmonised calculation standards will stimulate a Single Market that can benefit of the effects of scale while

realising energy efficiency and a move towards renewable energies at lower costs.

The national and regional transpositions of the EPBD by Member States not only represent significant administrative burdens, but also technical ones as European product legislation, in particular Ecodesign requirements, are insufficiently taken into account. It ultimately contradicts the idea of a single European market and level-playing field.

### 4.3.3 ALIGNMENT WITH ECODESIGN REQUIREMENTS

The efforts by the European Commission to integrate EPBD with Ecodesign requirements in harmonised European standards are fully supported by Eurovent and its members. This issue should be tackled as soon as possible.

We suggest that the EPBD takes into account the buildings' benefit and energy saving related to the use of products that are still not covered by any Ecodesign measure. In many

areas, sufficient standards or codes of good practice exist that can be made use of. By all means, it should be avoided to add additional national requirements that go beyond the ones set within Ecodesign Regulations.

The move towards NZEB provides challenges for product design and development. Our industry is responding with new products. These need to find their way into the calculation methods in a quick manner within Member States as long as no European approach is available.

### 4.3.4 TECHNOLOGICAL NEUTRALITY NEEDS TO BE ENSURED

The means applied to reach the targets of the EPBD should be chosen by the customer. We regard it as essential in this respect that the Directive maintains a technological and energy neutrality. Certain technologies should not be given advantages over others as this goes counter a level-playing field, distorts the market, and can hinder new innovations.

### 4.3.5 THE IMPORTANCE OF PROVIDING A HEALTHY INDOOR AIR

Eurovent strongly believes that energy efficiency and the use of renewables, even where quantitative targets are put forward, should not go at the expense of providing a safe and healthy environment for buildings' citizens.

Ensuring a good Indoor Air Quality (IAQ) goes beyond the individual insulation, heating, cooling and ventilation requirements. It is the main motive why Eurovent and its members advocate that IAQ should be given a key priority when moving towards NZEB and the third revision of the EPBD. It should also be an integral part of the EU strategy for Heating and Cooling.

## 4.4 F-GASES



The reduction of emissions from fluorinated greenhouse gases (F-Gases) constitutes another major and widely debated policy area affecting our industry.

At Eurovent, we see ourselves as a representative of refrigerant users. We prepare our members for upcoming realities related to the phase-down of refrigerants with a high global warming potential.

### 4.4.1 BACKGROUND

The low-carbon roadmap developed by the European Commission sets out the strong ambition to cut greenhouse gas emissions by 2050 by 80-95% compared with the levels from 1990. The aim of the 'EU F-Gas Regulation' is to achieve the objectives by cutting the EU's F-Gases emissions to one-fifth of 2014 sales levels by 2030. This will be the main driver of the move towards more climate-friendly technologies.

### 4.4.2 ALTERNATIVES ARE ALREADY IN PLACE

Eurovent and its members fully support the F-Gas phase-down initiated by the European Union. We hold that the responsible freedom of choice of refrigerants can contribute to innovation and sustainable growth over time. Already today, Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies can make use of a wide range of available refrigerant solutions that fulfil the 2030 requirements.

### 4.4.3 CHALLENGES

Eurovent holds that training and certification of persons working with refrigerants is an essential part for safe and responsible handling of refrigerants both in production plants and on-site.

## 4.5 MARKET SURVEILLANCE



Energy-related products covered by Ecodesign and Energy Labelling are subject to market surveillance, which marks another key policy area.

### 4.5.1 MARKET SURVEILLANCE IS NECESSARY

To Eurovent and its members, market surveillance constitutes a key tool to verify the coherence from what is declared by manufacturers and what is sold. Market surveillance is necessary to guarantee a level-playing field and we generally support a stronger and more visible market surveillance and inspection.

Conformity assessment is within the responsibility of the National Market Surveillance Authorities. Limited financial resources of the Member States and the limited availability of accredited laboratories represent challenges that should be tackled. If this is not the case and unless other methods of conformity assessment are being found, it will make little sense to revise and further tighten Ecodesign requirements.

### 4.5.2 ACCREDITED THIRD PARTY CERTIFICATION AND VERIFICATION

Voluntary and mandatory third-party certification and verification does not replace market surveillance. However, Eurovent and its members hold that proven certified and verified product information can provide a support to market surveillance activities – in particular where this information can be publicly accessed and results from accredited testing processes.



## 5.3 GLOBAL COOPERATION WITH INTERNATIONAL ASSOCIATIONS

Eurovent holds in-depth partnerships with sector associations around the globe.



### 5.3.1 ICARHMA

Our association is a founding member of ICARHMA, the International Council of Air-Conditioning, Refrigeration, and Heating Manufacturers Associations, and representing the European industry within this network.

We advocate a harmonisation of policy areas and standards within ICARHMA whenever possible in order to ensure a global level-playing field, acknowledging that markets often have different characteristics that cannot be ignored. This concerns, for example, market, climatic and testing conditions.

Having made significant experiences with the integration of European countries over the past decades and having to deal with many countries within our association network, we hold that a 'one-size-fits-all' approach is not the best way forward. At Eurovent, we support other markets to develop themselves and actively share our best industry practices and experiences.

In general, Eurovent encourages ICARHMA members from around the globe to think beyond refrigerant-related issues that have dominated this association's discussions over the past years. This is also reflected in our industry values.



### 5.3.2 REHVA

REHVA is the Federation of European Heating, Ventilation and Air Conditioning Associations representing a network of more than 100.000 engineers from 26 countries. REHVA is the professional pan-European organisation dedicated to the improvement of health, comfort and energy efficiency in all buildings and communities.

For several decades, REHVA has been a key partner of Eurovent and both associations have been working closely together on key issues of our relevance for our industry. Eurovent and its members support the activities of REHVA whenever possible.

## 5.4 EUROPEAN INDUSTRY VALUES AND INNOVATION LEADERSHIP

Eurovent and its members share and integrate these principles in their positions.

Our association is not shy in acknowledging that manufacturers within our network play a leading role in the development of state-of-the-art Indoor Climate (HVAC), Process Cooling, Food Cold Chain, and Industrial Ventilation Technologies. Their products are unique in a sense that they are at the forefront of technological developments.

## MEMBER ASSOCIATIONS



## MEMBER TYPES



### MEMBERS (NATIONAL ASSOCIATIONS)

Leading national sector associations from Europe representing manufacturers in the area of Indoor Climate (HVAC), Process Cooling, and Food Cold Chain technologies.



### AFFILIATED MANUFACTURERS

More than 1.000 manufacturers that are part of Eurovent through a national association, and directly participate in Eurovent activities.



### CORRESPONDING MEMBERS

Manufacturers from Europe, the Middle East and Africa, which do not yet have a national association representing Indoor Climate (HVAC), Process Cooling, and Food Cold Chain technologies.



### ASSOCIATE MEMBERS

Organisations that are engaged in activities related to sectors covered by Eurovent, such as associations of engineers and consultants, exhibition organisers, laboratories, and universities.

## EVENTS

### EUROVENT SUMMIT

Europe's major gathering for key decisionmakers in the area of Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies.

- Organised by the Eurovent association, Eurovent Certita Certification, and Eurovent Market Intelligence
- Provides a unique platform that thinks Beyond HVACR
- Connects on average more than 300 industry leaders from Europe, the Middle East, and Northern Africa throughout close to 40 meetings, seminars, and events

[www.eurovent-summit.eu](http://www.eurovent-summit.eu)

### EUROVENT DELEGATIONS

Eurovent organises high-ranking industry delegations in the course of sector exhibitions in emerging markets across the globe.

Delegations have already taken Eurovent members to Abu Dhabi, Dubai, Istanbul, Jakarta, Jeddah, Moscow, Shanghai, and Tehran.

By participating in Eurovent Delegations, members profit from:

- In-depth networking opportunities
- Market insights that go deeper than simple reports
- An increased brand recognition
- Opportunities to expand business and sales
- The ability to present during our Eurovent seminars

### PARTNER EXHIBITIONS



**BEYOND HVACR**

# EUROVENTSUMMIT

27-30 SEP 2016, KRAKOW

powered by **WIKAI**<sup>®</sup>

- + **REHVA Seminars**
- + **Polish 'Indoor Climate 2030' Symposium**

[eurovent-summit.eu](http://eurovent-summit.eu)

## CONNECT WITH US

Eurovent is Europe's Industry Association for Indoor Climate, Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe, the Middle East and Africa represent more than 1.000 companies, the majority small and medium-sized manufacturers.

### INDEPENDENT SUBUNITS

Eurovent's two independent subunits Eurovent Certita Certification (ECC) and Eurovent Market Intelligence (EMI) bring additional value to the market.



### EUROVENT CERTIFIED PERFORMANCE

ECC is known for its globally-recognised 'Eurovent Certified Performance' mark.

[www.eurovent-certification.com](http://www.eurovent-certification.com)



### BECOME A MEMBER

Apply now for membership  
[apply.eurovent.eu](http://apply.eurovent.eu)

### FOLLOW US ON LINKEDIN

Receive most up-to-date information on Eurovent and our industry.  
[linkedin.eurovent.eu](https://www.linkedin.com/company/eurovent)

### ADDRESS

Diamant Building  
80 Bd. A. Reyers Ln  
1030 Brussels, Belgium

### PHONE

+32 466 90 04 01

### EMAIL

[secretariat@eurovent.eu](mailto:secretariat@eurovent.eu)





EUROPE'S INDUSTRY ASSOCIATION  
FOR INDOOR CLIMATE, PROCESS COOLING  
AND FOOD COLD CHAIN TECHNOLOGIES

DIAMANT

60 REYERS

[eurovent.eu](http://eurovent.eu)