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## Eurovent comments on GWP calculation for space heaters

### In a nutshell

**Eurovent presents with this paper the different points of view about the Commission proposal to include the GWP calculation within the information requirements for the revised Ecodesign Regulation for space heaters and the possibility of extending it to other Regulations currently under revision. The feedback is in general not against the proposal, but many concerns must be addressed carefully.**

### Background

During a joint association roundtable meeting held on 22 January 2025, Mr Philippe Rivière, the Policy Officer in charge of the revision of the Ecodesign and Energy Labelling Regulations 811/2013 and 813/2013, presented a proposal to include the GWP information among the Information Requirements for the products in the scope of the Regulation, along their lifetime.

He then asked to collect the reactions of the companies, which are reported below divided between against and not against the proposal.

Eurovent is always at disposal for any clarification or further debate on the topic.

### Comments against the proposal

Among the Eurovent members who replied to our internal consultation, the following reasons were the supporting arguments against the proposal. Even if the majority of companies were not against the proposal, we think that it is relevant to address also the comments from those who are clearly against it:

- The reliability of the calculated value. It can change a lot regarding the considered working conditions of the unit, the operation hours, etc.
- The complexity of the calculation. To obtain an “accurate value” considering all the possible parameters changing the GWP, the calculation should be very complex.
- The lack of information. We do not have today details about the calculation methodology and the additional new data we should generate. In consequence, it is difficult to have a clear view of the topic.
- Which criteria can we use to properly evaluate the impact of technical building systems in a time span of 50 years? HVAC equipment lifetime can be estimated around 15-20 years and the technological development can heavily affect the GWP of the replacing equipment. Just consider how less efficient heat pumps were 20 years ago and how much lower the renewable share in the electricity production mix. It would be unfair and unrealistic to consider a fixed GWP for HVAC equipment across the entire building life.
- EPDs contain around 35 environmental indicators; it would be a huge burden to develop such declarations just for reporting one of them among the information requirements of Ecodesign regulation

- EPBD will address GWP only of new buildings that will be suitable only for a small portion of the companies product portfolio. On the other hand, including the requirement in the Ecodesign regulation will impact all the products in scope, even those that will never be installed in new zero-emissions buildings.

### **Comments not against but with concerns or suggestions**

The comments from the other participants to the internal consultation were not against the Commission's proposal right now, but there are some concerns that must be addressed before finalising the new Regulations.

### **Need for a harmonised European approach**

Today, there is no unique way to produce an EPD, and each Operator involves different requirements. The convenience of using one of these depends on the product's market, as well as the type and Country of the building project.

The companies who disclosed the information reported that currently are using EPD Hub, EPD International, and PEP Ecopassport. But surely many others are involved.

The PEP Ecopassport seems to offer highly comprehensive PCRs for chillers, heat pumps, and fan coils. Furthermore, having EPDs published on the INIES portal is crucial for operating in the French market.

Each manufacturer is free to choose the Program Operator, however, if a manufacturer decides to register with multiple Program Operators, it is crucial to harmonize the PCRs across all of them to avoid the need for separate LCA studies and verifications for each publication.

This would be unsustainable for the companies and therefore a European Regulation which harmonises the different methodologies for the EPD calculation is welcomed.

However, to develop a harmonised approach, several points would need to be discussed and resolved in the appropriate tables:

- The methodology should be harmonised at the EU level (if some parameters need to take into account national electricity carbon intensity for instance, this should be further assessed and discussed).
- Manufacturers should be involved in the standardisation process for the methodology.
- National schemes: it is crucial that national EPD obligations are either paused/cancelled, to avoid double regulation.
- The methodology should ensure that the use phase and efficiencies of the equipment are well covered and accounted for. All the products should have a similar approach, for example, the standardized product life, to prevent unfair competition among different technologies.

### **Time is a crucial factor**

Developing an LCA is a highly complex and time-consuming process. Currently, it takes up to six months to complete an entire EPD (including LCA study, verification, and publication). Therefore, an appropriate period of time is essential to allow manufacturers to adapt their product catalogues.

Considering what above, if the decision will be to include this information requirement in the revised Regulation for space heaters, ideally it should apply with a second Tier to give the market enough time to develop.

Moreover, the standardization process to create a common European method/rule will also require time, and it appears impossible to apply the new method to all the products immediately. It's of the utmost importance to have a harmonized methodology available before the requirement from the Regulation applies.

We suggest that a transitional period is foreseen of about 4/5 years where the EPDs developed before the publication of the official standardized method/rule are considered valid; in other words, EPDs already published should remain valid (and should be recognised) even after the new regulations come into force. The new method should be then applied to new models only (and not models already on the market).

It must be considered that all the EPDs and PEPs are published on the official website of the third party who has certified them. Therefore, it's easy to determine which EPDs had already been published at the time of the introduction of the harmonised method.

If this does not happen, the risk is to create a bottleneck which will strongly penalize the manufacturers, and therefore the industry can't support a similar proposal.

### **Similar approach for other Regulations**

As already discussed during the joint association roundtable, such requirements should also be introduced for the other HVAC Regulations currently under revision (such as 206/2012, 626/2011, 2016/2281).

Regarding Regulations 206/2012 and 626/2011, it's important to mention that "plug and play" products, such as portable air conditioners, are out of the scope of the EPBD, being not installed appliances. Therefore, the GWP requirement would not be applicable to these product categories. These product categories must report, according to the relevant Ecodesign and Labelling Regulations, the following designations: "local air conditioner", "This product is only suitable for well insulated spaces or occasional use".

### **Financial incentives**

If European Commission will include this requirement as mandatory, considering the effort required to the industry to adapt, it could be evaluated to foresee some financial help (i.e. investment in such direction might be deducted from taxes, etc...) and/or some simplification of the bureaucracy to reduce the impact on SMEs.

## Eurovent and transparency

### When assessing position papers, are you aware whom you are dealing with?

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. 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 can answer policy makers' questions regarding our representativeness and decisions-making processes as follows:**

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

At Eurovent, the number of votes is never determined by organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission ('steering committee'), our national Member Associations receive two votes per country.

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

The Eurovent Commission acts as the association's 'steering committee'. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two 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 number of votes, there is no 'leading' country. Our national Member Associations ensure a wide-ranging national outreach also to remote locations.

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.

## About Eurovent

Eurovent is the voice of the European HVACR industry, representing over 100 companies directly and more than 1.000 indirectly through our 16 national associations. The majority are small and medium-sized companies that manufacture indoor climate, process cooling, and cold chain technologies across more than 350 manufacturing sites in Europe. They generate a combined annual turnover of more than 30 billion EUR and employ over 150.000 Europeans in good quality tech jobs.

### Mission

Eurovent's mission is to bring together HVACR technology providers to collaborate with policymakers and other stakeholders towards conditions that foster fair competition, innovation, and sustainable growth for the European HVACR industry.

### Vision

Eurovent's vision is an innovative and competitive European HVACR industry that enables sustainable development in Europe and globally, which works for people, businesses, and the environment.

→ For in-depth information and a list of all our members, visit [www.eurovent.eu](http://www.eurovent.eu)