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Eurovent feedback on the interim Stakeholder meeting for commercial refrigeration (Aka DG-ENER Lot 12)

In a nutshell

Eurovent appreciates the constructive cooperation established with the study consultants and seeks to continue this joint work. While supporting the regulatory framework, some key messages are summarised below:

- **Market data as the baseline: The regulatory review must rely on real-world market data rather than using EPREL as an engineering analysis tool.**
- **Successful regulations: the goals have been achieved years in advance; hence, the existing structures and metrics are properly working and are fully correct.**
- **The development of new MEPS must be treated very carefully.**

A positive collaboration

Eurovent would like to first thank the study consultants for the open and positive cooperation that is taking place.

The industry is feeling involved in the evaluation studies and is willing to continue collaborating with the consultants to develop a set of measures which will respond to the European goals and promote good European manufacturers.

In the following, Eurovent provides the study consultants with its feedback. After a short note on the EPREL database, this paper has been structured according to the chapters of the briefing note distributed ahead of the stakeholder meeting.

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EPREL is an incredible instrument, but for other purposes

Eurovent would like to remark again on what was stated during the stakeholder meeting by different parties.

EPREL is a powerful resource, and it is still at the beginning of its journey. Eurovent fully supports this database and its continuous improvement, in order to make it a reliable, valid and immediate resource for the customers and market surveillance authorities.

However, the preparatory study confirmed that the database was not developed for “engineering analysis”, as correctly stated by the Italian representative during the Stakeholder meeting, and it does not reflect the reality of the market. Therefore, each analysis based on EPREL must be verified and cross-checked with the EU-27 market data; otherwise, there is a big risk of basing the regulation’s review upon misleading, not correct, and non-market-based assumptions.

It goes without saying that this mistake at the beginning of the process would create unforeseen consequences in the regulatory measures and their potential effects on the market.

A possible improvement of the EPREL database

In the past years ([Eurovent PP-2023-02-10](#)), Eurovent suggested some easy-to-implement measures that could increase the usefulness of the EPREL database. Please find a summary of these proposals below for their evaluation and possible implementation:

Improving the search engine

According to the Eurovent PG-RDC's members, there is a need to improve the search engine of the public website of the EPREL database.

In particular, it is recommended to add at least these additional filters:

- Total Display Area
- Temperature Performance Classes.

All these filters are based on details already provided by the manufacturers, so the implementation should not be difficult and should not imply too high additional costs.

Excluding models not placed on the market anymore

Currently, there is a checkbox to include products that are no longer placed on the market. This feature is penalised by the fact that manufacturers don't have the possibility to select whether a model is still placed on the market or not. There is a need to clarify this situation to make the filter really effective.

Commercial name, GTIN and model picture in EPREL

With reference to commercial refrigeration, Eurovent would like to point out that the GTIN code is not used for these products, while uploading pictures will not encourage stakeholder engagement with EPREL, and may create confusion on products that may be different in some visual aspects, but identical from the perspective of Ecodesign (colour, number of shelves).

Finally, the uploading of pictures will not help Market Surveillance Authorities in correlating the product models to the Energy labels.

Key findings of the evaluation study

Regulations that are working

It's fundamental to keep in mind the starting point correctly highlighted during the stakeholder meeting: the current regulations are effective, and the goals have been achieved years in advance.

Therefore, Eurovent suggests that the updated measures should reflect the current situation and expected future developments of the market, but there is no need for 'big changes' from the current regulation.

The industry so far has succeeded in maintaining the alignment between the increasing Ecodesign MEPS and the market's needs. This has resulted in the successful reaching of the forecasted Ecodesign energy saving goals. The increases in the MEPS proposed at the stakeholder meeting are, in general, excessively ambitious, too sharp and rapid.

We raise a serious concern that the proposed MEPS will cause major product disruptions (several product types will be banned with no possibility to comply) with inevitable big impacts on the manufacturing and the retail industry.

In fact, there are multiple products with different specificities within a single category; this must be taken into account. Applying MEPS to a general category can delete an entire segment; this is why it is better to allow freedom to the market. Just for example, vertical multideck chillers include fruit and vegetables, meat, dairy products, etc. Therefore, the needs of the retailers in each category are almost infinite; applying a general MEPS can create retail marketing gaps or disruptions and additional costs for final users.

The energy label

Manufacturers are used to labelling their products and to uploading their data to the EPREL database. Any change to this requirement would lead to confusion in the market and penalise manufacturers who invested in compliance with the Energy Label regulation.

Eurovent agrees with the conclusion of the study consultant that no overall rescaling of energy label classes is necessary since few cabinets achieve A and B classes.

It must be noted that today there is a mismatch between the behaviour of the customers and the Commission's willingness to push the market toward the best energy efficiency classes. Market data show that manufacturers invested in the development of energy efficiency improvements. Several cabinets with increasingly better energy classes have been registered in EPREL, but the market did not follow at the same speed, and this is because within each category, there are many different alternatives and often the best-performing classes cannot offer the specific configurations required by retailers; consequently, the majority of cabinets sold in the EU-27 market still belong to average energy classes.

Improvements in efficiency

The introduction of glass doors was a turning point in the overall efficiency of supermarket vertical chilled cabinets.

After that, manufacturers worked very hard to increase the efficiency of cabinets, which represent the largest share of the market, and to move the products from class G to upper classes in preparation for the elimination of class G.

Therefore, it is normal that today the improvements in efficiency are proceeding at a lower speed rate, because there is limited space for improvements in many product categories.

Key problems identified

MEPS

Complementing what is above, it must be noted that products are very different in each category, and some of them can't be replaced.

A generalised, too steep increase in the overall minimum mandatory efficiency requirements would lead to the removal of some categories from the market, like horizontal self-service and serve-over cabinets, and, in addition to that, one should also consider the already mentioned differences (vegetables, meat, etc.) in each category. It must be remembered that customers shall be free to design their shops to attract clients; they should be incentivised instead to buy more efficient products. Furthermore, any review must remain technologically neutral.

Each new measure required by the revised regulation will increase the cost of the products, and this, in conjunction with the lack of market surveillance activities, penalises the compliant manufacturers.

The summary proposal presented by the study consultant includes 3 Tiers in the space of 4 years. This is practically impossible for the industry to implement, considering that the time for developing and placing new product ranges on the market (aka time-to-market) is generally around 7 years.

Finally, the development of minimum efficiency requirements divided by category of products shall be considered carefully, because this might lead to confusion in the market.

Misleading energy labels if comparing plug-in and remote cabinets

The Regulatory measure shall aim at comparing comparable products.

Plug-ins and remote cabinets shall not be compared with each other because they are completely different; therefore, their energy class (as in the current Regulation approach) is extremely useful to identify the best product in each category.

Eurovent believes that Ecodesign measures (and the related EEI) and the energy label should continue to be used for the purpose they are defined and designed to: a comparative product reference under standardised conditions (e.g. laboratory conditions, not store installation conditions). They can be used to classify and compare products belonging to the same subcategory and, where appropriate, to incentivise those with better relative performance.

But, referring to the Swiss government studies presented as support, they should not be used as a substitute for a complete energy analysis of the installation, nor as the sole basis for concluding which refrigeration architecture is more efficient in a real store.

It is important to remember that standardised testing methods (e.g. EN/ISO 23953-2) establish, above all, a common framework for comparison. In other words, they define conditions, test criteria and conventional factors that make it possible to compare products under the same rules.

These conventions might sometimes be technically debatable, but they have one fundamental virtue: they apply in the same way to all manufacturers and to all solutions within their scope. Therefore, they

help organise the market, establish common references and enable fair and homogeneous comparisons and competitions.

In the case of commercial refrigerated display cabinets, the EEI — Energy Efficiency Index — should not be interpreted as a direct and absolute measurement of the real energy consumption of an installation in a store. The EEI is the result of a regulatory formula that combines different variables: energy consumption, total display area — TDA — correction coefficients and calculation factors. It is therefore a comparative index, not a tool for sizing refrigeration installations or a complete energy simulation of a supermarket.

From the Eurovent point of view, the discussion should focus on the real objectives of the Ecodesign Regulation, energy labelling and the EPREL database. This framework is not designed to define the best refrigeration architecture for an entire supermarket. Their main purpose is to set minimum efficiency requirements, improve market transparency, allow products to be compared within the same product category under standardised conditions, and improve the products' efficiency via the well-known push-pull effect.

For this reason, Eurovent believes that the regulatory comparison of a product should not be confused with the overall energy analysis of a store. To decide whether a supermarket should use a remote, integral, semi-integral, hybrid or centralised solution, a complete system analysis is required: cabinets, refrigeration installation, HVAC systems, heat recovery, climatic conditions, usage profile, maintenance, investment, operating cost and service strategy. The existing building infrastructure may also limit the possible refrigeration technologies. That analysis requires specific tools and calculation methods that can use the energy label as a starting base of data, but no conclusion could be drawn before having considered the whole scenario. That analysis is essential, but it belongs to a different decision-making level and has nothing in common with the Ecodesign and Energy labelling goals/approaches.

Perverse incentive to increase glazed area

The use of TDA as the reference variable in the EEI is a convention. This reflects the double useful effect of a refrigerating display cabinet: it does not only measure absolute consumption, but also the relationship between consumption and commercial display capacity, which is the main function purchased by retailers (display cabinets are intended for the primary function of sell-and-display).

Today, the market is moving to vertical combined cabinets to maximise footprint efficiency in supermarkets. Eurovent believes that the TDA is the right and only metric. TDA indicates whether cabinets are displaying more products with less or the same amount of energy compared to the older models. And this is simply a different way to increase overall efficiency.

In conclusion, as also stated at the beginning of this paper, the overall results in the reduction of energy consumption thanks to the currently in place Ecodesign and Energy Label regulations demonstrate that we are on the right track and we are using the correct measures.

No use for printed energy labels

The energy label physically provided with the product can be replaced with a QR code linking to EPREL and the technical documentation, but not at trade fairs where displaying the energy label should remain a must, an obligation. We also want to stress that more attention from the Market Surveillance Authorities is needed on this.

Additional emerging policy elements

As stated above, Eurovent recommends that the increase in the future MEPS is treated carefully, because not all the products are able to improve their efficiency considerably.

Furthermore, as already acknowledged during the meeting, some circularity provisions (like the separation of foams) are not feasible in practice.

The overall conclusion is that the positive collaboration that took place between the study consultants and the industry for the evaluation study is also recommended for the development of future policy provisions.

Eurovent supports the inclusion of food lockers and “smart refrigerators” in the scope of the regulation with information requirements to collect data for the time being.

Eurovent also supports the definition developed together with the EVA association for “smart refrigerators” and understands that a new name should be developed for these products. In this sense, probably a proposal from the legislator would be the best way forward:

“‘Smart fridge’ means a refrigerating appliance with a direct sales function designed to accept consumer payments or tokens to make available chilled foodstuffs or other items without on-site labour intervention;”.

About Eurovent

Eurovent is the voice of the European Heating, Ventilation, Air Conditioning and Refrigeration (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

Who is behind this position?

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1. Who receives which number of votes?

— At Eurovent, the number of votes is never determined by organisation size or membership fee level. Whether SME or large multinational, each member receives the same number of votes.

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— Eurovent Working Groups decide on matters within their remit. They are open to all members. Eurovent's committee of national associations is tasked with mediating in case of conflicts.

3. How European is the association?

— Eurovent members manufacture across more than 350 sites in Europe, generate a combined annual turnover of more than 30 billion EUR, and employ over 150.000 Europeans in good quality tech jobs.

4. How representative is the organisation?

— Eurovent represents over 100 companies directly, covering well over 80% of the market in most segments, and more than 1.000 companies indirectly through our 16 national associations.

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