

## **Eurovent comments to the First Stakeholder meeting concerning the revision of VU Regulation**

Following the first Stakeholder Meeting of the review study for ventilation units on 29 May 2019 in Brussels, herewith Eurovent provides additional comments and answers to the questions addressed in the course of the meeting.

### **1. Clarification to Eurovent Position Paper and supplementary information**

- Referring to the question about the number of hours considered in calculations reasoning the Eurovent proposal for consideration the enthalpy recovery (table on slide 58 of the meeting presentation), we confirm the computation included the entire year (8760 hours). We are available to provide a modified calculation for different operating schedule.
- Eurovent has carried out a survey among members on the estimated EU market size of multifunctional residential ventilation units. The collected figures were passed on to the Association Platform on Multifunctional Units and will be shared with the Study Consultant by the Platform on behalf of Eurovent.
- Eurovent abstains from taking a stand on the need of including electric preheating in energy calculation for NRVU (slide 60 of the meeting presentation). Products impacted by this kind of design were not concerned by our members.

### **2. Comments to the discussed topics - Residential Ventilation Units**

- **Include actual Working Point** (Slide 11).  
The second, alternative Eurovent proposal tabled in our Position Paper was not presented during the meeting. As an option, we proposed to modify the definition of the nominal air flow rate for VUs of the maximum flow rate between 250 m<sup>3</sup>/h and 1000 m<sup>3</sup>/h and declared by the manufacturer as intended for exclusive use in a residential ventilation application. The reasoning was that for VUs of higher capacity, the external pressure difference generally exceeds 50 Pa and, in most cases, amounts to much higher values (typically 150 Pa). Thus, the SEC evaluation referring to 50 Pa might be not accurate and misleading for larger Residential Ventilation Units.
- **Inclusion of VUs with an electric power input < 30 W per air stream.**  
Eurovent considers these products should be also regulated. This would level the playing field, even though the 'energy' impact might be not significant. The current exclusion makes possible to place on the market low energy-efficient products without observing the ecodesign requirements.
- **BVU Internal leakages** (Slide 26)  
As an additional argument in support to our proposal for defining a new and consistent pressure based test method for internal leakages, we would like to point out that many manufacturers carry out numerous internal (in-house) tests for quality check and R&D purposes. The usefulness of the tracer gas method for these needs is very limited.
- **Verification Tolerances** (Slide 30)  
Eurovent suggests adding to the revised Regulation an unambiguous explanation that the Verification Tolerances shall not be allowed for by a manufacturer in the product development and the product performance declaration as allowed values to communicate better performance. The tolerances should only be used to take account of measurement errors in the tests performed by Market Surveillance Authorities.

## 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 amount of votes?

At Eurovent, the number 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 ('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.

### We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), 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. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn Euros, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level-playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy-efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.