Team member	Phone	Email	Date
Francesco Scuderi	+32 (0)466 90 04 01	francesco.scuderi@eurovent.eu	2020-05-12

Position Paper

In a nutshell

Within the framework of the stakeholder consultation for the revision of the Commission Regulations (EU) No 811/2013, 812/2017, 813/2013 and 814/2013, further to the WG2 'Testing' online meeting that took place on 2 April 2020, Eurovent would like to provide the EC Consultant with its written input.
Specifically, this PP aims to answer to the set of questions listed in the EC Consultant's discussion document for the 1st WG2 meeting.

Background

The discussion document for the 1st WG2 meeting lists a set of questions, with this PP Eurovent aims to provide the EC Consultant with its written input.

Question 1a 1b

- What should test temperature regimes reflect? The average real-life temperature applications or test temperatures that are optimized for the product under test? Are there alternative suggestions?
- If test temperatures should reflect real life situations, what are the actual seasonal average system temperatures for new built and existing dwellings? Do they differ from the ranges indicated in Table 1

Eurovent answer 1a & 1b

High temperature heat pumps supplying 65°C water temperature represent a niche market and do not represent the vast majority of systems and applications. The proposal to increase the testing temperature results is not in line with the goals of the Energy Performance of Building Directive (specifically Article 8 of the Directive 2018/844/EU). Furthermore, MT heat pumps are needed for renovated homes with lower heating demand.

Eurovent suggests keeping the MT regime testing as specified in the existing testing standard EN 14825 (at a rated T_{supply}=55°C).

Question 2a 2b

- Do experts in principle agree that the dynamic test method better represents the real-life performance of the heat pump?
- Do experts agree that this dynamic test method must be further developed by standardisation bodies and eventually introduced as the new test method?

Eurovent answer 2a & 2b

Eurovent holds that the dynamic test method is not mature enough. The industry must be sure that the proposed approach is fully repeatable and reproducible. For the time being, the proposed method cannot be considered as a valid alternative to the EN 14825. Furthermore, it is suggested to have a coordinated approach with the LOT10 testing methods.

Eurovent suggests keeping the testing method as defined in the EN 14825.

Question 3

- Should heat pump settings be defined? Do experts agree?
- Which conditions should be used regarding product settings according to the experts, and how to define them?

Eurovent answer 3

The EN 14825 does not define any particular setting mode. This could be of some relevance only for the dynamic test method.

Eurovent thinks that, also according to the above Q2a and Q2b answers, it is too early to introduce any heat pump setting mode, especially because this would not be in line with the EN14825

Question 4

Display η_s on Energy Label, Do experts support the approach proposed here?

Eurovent answer 4

By adding the η_s on the Energy Label, consumers will be able to distinguish between products in the same energy efficiency class. This would result in a more transparent market.

Eurovent supports the proposed approach

Questions 5-6-7-8

- Do experts agree that there is no valid argument for using different test temperatures and load conditions for assessing the energy performance of a fuel boiler to heat the same dwelling with the same emitters (compared to a heat pump heating this dwelling)?
- Do experts agree that a comparison between heat generators becomes more realistic and clearer for consumers and installers when harmonized test conditions are used?
- Is it acceptable to limit boiler testing to the suggested 4 points and derive the missing points through inter-/extrapolation? Any suggestions for alternatives?
- Which conditions should be used regarding product settings according to the experts, and how to define them?

Eurovent answer 5-6-7-8

Set of questions not relevant to Eurovent.

Questions 9

What are experts opinions on the adjustments needed regarding verification tolerances?

Eurovent answer 9

Eurovent suggests keeping the tolerances and uncertainties at their current level

Questions 10 -11

- Do experts agree that third party conformity assessment should also become mandatory for the other (electric) appliances in the scope of the Ecodesign of space heating and water heating appliances?
- If yes, an assessment will be required (according to the Framework Directive art. 8.2) indicating that the proposed changes are duly justified and proportionate to the risk. Any suggestions from experts as to what should be evaluated and how to address this?

Eurovent answer 10-11

A well-functioning market surveillance system in every Member States is crucial and essential for the HVACR industry.

Eurovent calls for an effective market surveillance. Article 9 of the Regulation (EU) 2019/1020 introduces the concept of joint activities to ensure compliance. An effective cooperation between MSAs and competent third-party certification bodies can support market surveillance.

Article 9 - Joint activities to promote compliance

1. Market surveillance authorities may agree with other relevant authorities or with organisations representing economic operators or end users on the carrying out of joint activities that have the aim of promoting compliance, identifying non-compliance, raising awareness and providing guidance in relation to the Union harmonisation legislation with respect to specific categories of products, in particular categories of products that are often found to present a serious risk, including products offered for sale online.

2. The market surveillance authority in question and the parties referred to in paragraph 1 shall ensure that the agreement on joint activities does not lead to unfair competition between economic operators and does not affect the objectivity, independence and impartiality of the parties.

3. A market surveillance authority may use any information resulting from joint activities carried out as part of any investigation regarding non-compliance that it undertakes.

4. The market surveillance authority in question shall make the agreement on joint activities, including the names of the parties involved, available to the public and shall enter that agreement in the information and communication system referred to in Article 34. At the request of a Member State, the Network established under Article 29 shall assist in the drawing up of the agreement on joint activities.

Questions 12

Do experts agree that extension of the scope to 1 MW boilers is a feasible method to address the currently not considered product group of virtually indestructible jet-burner boilers (80% oil-fired) in mainly public non-residential buildings and thereby addressing the huge saving potential in that sector?

Eurovent answer 12

This proposal could result in an overlap with Regulation 2016/2281. Before providing its final position, Eurovent would like to ask the EC Consultant to further assess the point.

Questions 13-14

- Do experts agree that heat-emitters play a crucial role in achieving lower system temperatures in existing buildings and that there is insufficient knowledge and understanding as regards to how adequate radiator types and designs (including their hydraulic and temperature controls) can help lowering system temperatures?
- Do experts agree that a new ErP group 'Emitters and Controls' and related preparatory study can help further identifying bottlenecks and opportunities in achieving this large energy saving potential related to heat-emitters and their controls, for the existing building stock?

Eurovent answer 13-14

Eurovent holds that this issue should be dealt within the EPBD framework and not within the Ecodesign one.

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.

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 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 EUR, 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 the 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.