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## Position Paper

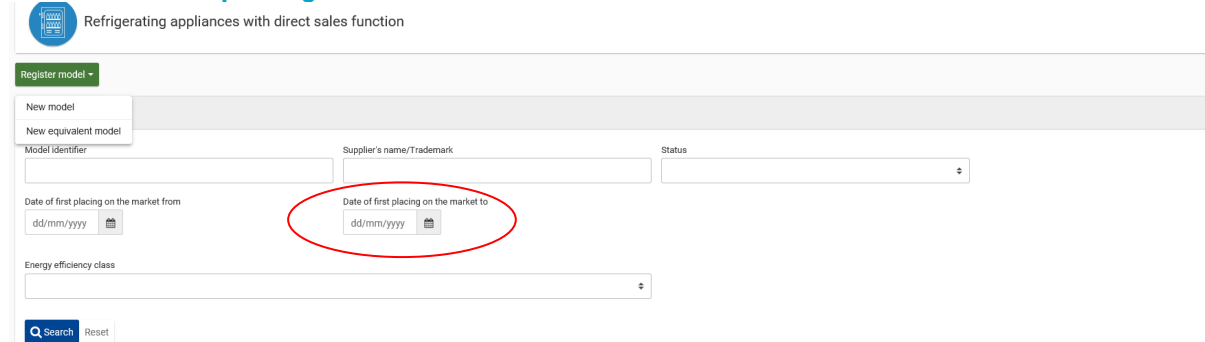
### In a nutshell

**Eurovent and its members have performed testing in the EPREL acceptance area.**

**Concerning the Commission Delegated Regulation (EU) 2019/2018, Eurovent would like to provide the European Commission with a set of questions, feedback and suggestions for possible improvements of the EPREL database.**

## Eurovent questions and feedback

### Q1. Date of first placing on the market to



Refrigerating appliances with direct sales function

Register model -

New model  
New equivalent model

Model Identifier  Supplier's name/Trademark  Status

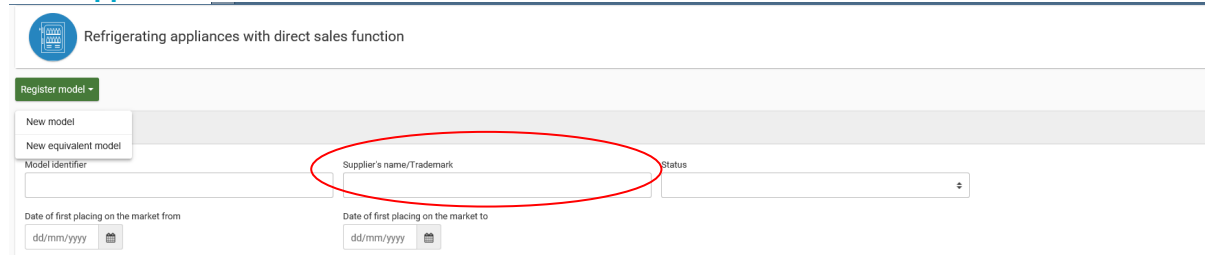
Date of first placing on the market from  Date of first placing on the market to

Energy efficiency class

Search Reset

What does the field 'Date of first placing on the market to' refer to? Is this the possible end of the production of the product? If yes, it relates to the manufacturers' product strategy and cannot be defined.

### Q2. Supplier's name/Trademark



Refrigerating appliances with direct sales function

Register model -

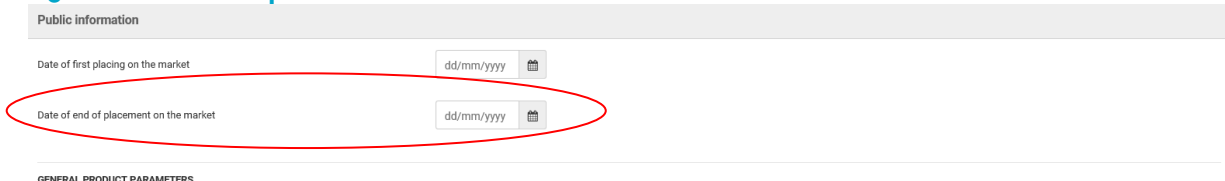
New model  
New equivalent model

Model Identifier  Supplier's name/Trademark  Status

Date of first placing on the market from  Date of first placing on the market to

Does a product have to be registered twice if the identical product is sold under two different brands?

### Q3. Date of end of placement on the market



Public information

Date of first placing on the market

Date of end of placement on the market

GENERAL PRODUCT PARAMETERS

See Q1 above.

### Q4. Energy Efficiency Index and Energy Class

Refrigerating appliances with direct sales function Delegated Regulation (EU) 2019/2018		Eprel registration number Status	79555 Incomplete (Missing fields)	Model identifier Supplier's name/Trademark	Test Model 2 Carrier
<b>Navigation</b> Public Information Label / Fiche Technical Documentation Equivalent Models Contacts Access Log Versions	<b>Public Information</b> Date of first placing on the market: dd/mm/yyyy Date of end of placement on the market: dd/mm/yyyy <b>GENERAL PRODUCT PARAMETERS</b> Annual energy consumption (kWh/annum) Energy efficiency index (EEI) Energy Efficiency Class				
<b>Actions</b> Back    Delete					

It looks like the automatic calculation routine (both for the EEI and the Energy Class) does not work in the test environment. Can the European Commission confirm that this applies only to the test environment?

### Q5. Light source parameters

<b>Light source parameters</b>	
Light technology used	<input type="text"/>
Non-directional or directional	<input type="text"/>
Mains or non-mains	<input type="text"/>
Connected light source (CLS)	<input type="checkbox"/>
Colour-tunable light source	<input type="checkbox"/>
High luminance light source	<input type="checkbox"/>
Anti-glare shield	<input type="checkbox"/>
Dimmable	<input type="text"/>
Energy efficiency class	<input type="text"/>
<b>+ Add</b>	

Light sources are covered by a different Ecodesign regulation ((EU) 2019/2020). The requested parameters are not available to the Commercial Refrigeration Equipment manufacturers, are not directly related to this industry and are not requested by the customers.

**Therefore, Eurovent asks the European Commission to remove this section.**

### Q6. Cabinet family code

TYPE OF REFRIGERATING APPLIANCE	Supermarket cabinet
<b>Cabinet family code</b>	<input type="text"/>

Does the field 'Cabinet family code' refer to the product classification according the related product standards (e.g. EN/ISO 23953-1)?

### Q7. Recommended temperature(s) for optimised food storage

<b>Add compartment</b>	
<b>Compartment 1</b>	
Total display area (m²)	<input type="text"/>
Temperature class	<input type="text"/>
<b>Recommended temperature(s) for optimised food storage (°C)</b>	<input type="text"/>

Does this field refer to the product temperature according to the related product standards (e.g. EN/ISO 23953-2)? If yes, this is already addressed in the field 'Temperature class'.

If not, this information is not available to the Commercial Refrigeration Equipment manufacturers, and **Eurovent asks for removal of this field.**

## **Additional comments and suggestions**

### **1. Additional documents**

Eurovent suggests adding the field 'Additional documents' in the 'Technical documentation' section. This field could be used to upload additional documents providing further information on the product energy consumption, performance, etc.

### **2. Data entries**

Based on internal analysis, it is possible to estimate that approximately 500.000 data entries will be uploaded to EPREL. Therefore, it is crucial to make sure that the European Commission IT system will work properly with this large amount of data and will not be subjected to any bug.

### **3. Additional test sessions**

Eurovent regards as very useful the possibility to perform additional tests in the EPREL test environment, and in this respect asks the European Commission to define possible slots for performing these tests.

## 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:

<p><b>1. Who receives which number of votes?</b></p> <p>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.</p>	<p><b>2. Who has the final decision-making power?</b></p> <p>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.</p>
<p><b>3. How European is the association?</b></p> <p>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.</p>	<p><b>4. How representative is the organisation?</b></p> <p>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.</p>

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.