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Eurovent feedback on the roadmap for the EED review

In a nutshell

Eurovent supports the energy efficiency (EE) first principle. While outlining the future EE requirements the implementation of the National Energy and Climate Plans (NECPs) of the member must be assessed and enforcement of the NECPs be strengthened so that the EED may reach its targets.

EE in the building sector can provide a major share of EE but health and cost aspects should be borne in mind.

Preamble

Eurovent is the European Industry Association for Indoor Climate, Process Cooling, and Food Cold Chain Technologies.

Energy efficiency first

Eurovent supports this principle that should apply from energy generation to energy end-use consumption. The EED does not stand on its own and should be coordinated with other directives and regulations, both energy and environmentally related. An ambitious EE target can support the efforts to reduce greenhouse-gas emissions and contribute towards carbon neutrality by 2050.

Implementation is key

The analysis of NECPs shows that there is wide gap to reach the 2030 EE targets. The transposition and implementation of future raised ambitions must rely on binding commitment of the Member States. The European Commission could consider monitoring closely the policy measures taken at national level, beyond the assessment of the NECPs.

The ongoing assessment by the Commission of the NECPs that outline the Member States objectives for 2021-2030 may provide elements to improve the EED.

Synergies between EED, RED, EPBD, Ecodesign, energy system integration and the case of buildings

Synergies among the different pieces of legislation would very much contribute to reach the EE targets.

The potential for EE in the building sector has been identified since many years. It is one of the sectors that is expected to improve most in EE. The strategies to improve the building envelope and heating and cooling systems have been discussed at various levels. Within the Green Deal, the Renovation Wave initiative is set to improve the enforcement of the Energy Performance of Buildings Directive and to ensure Long Term Renovation Strategies by Member States. It may be noted that better heating and cooling equipment has become available through binding efficiency requirements under Ecodesign, complemented by Energy Labelling. While these products can circulate in the European Union, the uptake is still slow. Building (EPBD) and product requirements should be orientated toward a reduction in greenhouse gas emissions.

Specific heating and cooling technologies can further support the decarbonisation of the building industry to achieve climate-neutrality by 2050. Guidance and recommendations are available in the many EU funded projects that could benefit from implementation.

Inclusion of health in EE

The Covid-19 outbreak has highlighted that buildings should have a healthy indoor environment. When addressing EE, the health aspects that often have been neglected in the past, must be addressed.

Cost efficiency of EE

When developing the EED, it is important to consider the costs to invest in EE.

The recovery from the Covid-19 situation may offer opportunities to temporarily incentivise investment in EE. A careful choice of such investments is a must, keeping the long-term view towards 2030-2050 in mind.

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