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Position Paper

In a nutshell

With this paper, Eurovent provides its feedback following the Call for Evidence for an Impact Assessment on Ecodesign and energy labelling (review) – air-to-air air conditioners, air-to-air heat pumps and comfort fans.

Background

Eurovent has already provided the EC with its comments on the review of the Commission Regulations (EU) 206/2012 and (EU) 626/2011 with the following Position Papers:

- PP - 2017-08-04 - CECED & EUROVENT comments on tasks 1 and 2 of Airco and comfort fans study
- PP - 2018-02-12 - Joint CECED-Eurovent comments on tasks 3-7 review EU 206/2012 & 626/2011
- PP - 2019-03-08 - Eurovent Position Paper proposal combination local space heaters and heat pumps Energy Label
- PP - 2019-09-03 - Joint Eurovent APPLiA comments on Airco and Comfort Fans in view of the CF of 9 September
- PP - 2019-10-08 - Joint Eurovent APPLiA comments on Airco and Comfort Fans following the CF of 9 September
- PP - 2020-02-06 - Joint Eurovent APPLiA input on FDD and SD air conditioners
- PP - 2020-07-29 - Eurovent input review Regulations EU 206 2012 and 626 2011
- PP - 2021-09-15 - Eurovent comments on Airco and Comfort Fans following the CF of 06 July 2021

The comments and positions at the above-cited Position Papers remain.

Eurovent Positions (already presented and here reiterated)

Eurovent would like to reiterate and reinforce its positions as already presented at the above-cited Position Papers, the below (non-exhaustive) list summarises them (we recommend to carefully re-assess our past position papers):

- Single and double duct units (both fixed and portable):
 - o Keep the actual testing method as defined in the EN 14511 to measure cooling/heating capacity of single and double duct ACs (both fixed and portable).
 - o Dedicated ED requirements for SD/DD fixed units as well as for SD/DD portable
 - Minimum requirements for single/double duct fixed unit: EER: 2,6; COP 2,6
 - Minimum requirements for single/double duct portable unit EER: 2,7; COP 2,2
 - o The Seasonal efficiency approach for portable SD, fixed SD, portable DD and fixed DD is not justified
 - ED and EL requirements to be based on COP and EER
- Energy labelling
 - o Define separate energy label scales for split units, double ducts unit (both fixed and portable) and single duct units (both fixed and portable)
- Load-based testing methods
 - o Keep the current testing approach and avoid any load-based testing method

- The load-based testing methods cannot be applied before the next review; an early review 3 years after the publication of the revised regulation might be too optimistic considering the current status of repeatability and reproducibility of the mentioned testing methods.
- Implementation timing
 - o The implementation period is to be at least two years after the publication. The implementation date should start in January, this will allow for an easing pairing of the products' seasonality
- Thermal human comfort
 - o The same maximum airflow limitations for both heating and cooling it is to be considered. This should provide the industry with stability, and not change with each review
- Scope
 - o Units which are not designed for the comfort of human beings (e.g. close control units) are to be excluded from the scope of the regulations

Review of the Energy Labelling Regulation for local space heaters

The title of this initiative is "Ecodesign and energy labelling – air-to-air conditioners, air-to-air heat pumps and comfort fans (review)"

Eurovent shares the objectives and policy options outlined. However, the last sentence under this item B. refers to the assessment of a further option, namely, to have a single energy label for the heating function of reversible air conditioners and local space heaters.

This aspect has not been considered under item A/ Political context, problem definition and subsidiarity check.

Eurovent holds it is not appropriate to address the merging of the labels that are covered by two separate regulations under this (single?) call for evidence.

The Eurovent Position Paper of 8 March 2019 and 15 September 2021 are enclosed.

Eurovent holds that the consumer study carried out at the time was and is insufficient to motivate the merger of the two labelling schemes. During the 2nd Consultation Forum held on 6 July 2021 the Chair asked why efficiency was not investigated as one of the possible ways to allow more granularity on a merged label. The authors of the study, CENTERDATA, explained that this was not within the contract for the study.

Before advancing with the idea of merging both labels, Eurovent recommends undertaking a new study to understand the consumer comprehension of a label that would range from a wood or coal fired stove to an electrical heat pump.

Once such a study would have been conducted, and in line with the better regulation principles Eurovent would recommend a new and separate call for evidence is launched with a clear statement in the title of the product ranges covered. This would only be fair with regards to stakeholders of local space heaters, that may or may not be aware of the present call for evidence.

Enclosed documents

- PP - 2017-08-04 - CECED & EUROVENT comments on tasks 1 and 2 of Airco and comfort fans study

- PP - 2018-02-12 - Joint CECED-Eurovent comments on tasks 3-7 review EU 206/2012 & 626/2011
- PP - 2019-03-08 - Eurovent Position Paper proposal combination local space heaters and heat pumps Energy Label
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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.