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Position Paper

In a nutshell

With this paper, Eurovent provides its feedback after the Consultation Forum for the revision of the Energy Labelling Regulation on air-to-air conditioners and heat pumps, local space heaters and comfort fans, held by DG ENERGY on 24 June 2022.

Working Document: Draft elements of possibly merged labelling regulations for room heaters, room air conditioners and comfort fans

Eurovent would like to thank the European Commission for hosting the Consultation Forum held on 24 June 2022.

Merged energy label and lack of granularity

The European Commission's proposal has generated a wide debate within the industry as well as within the Member States. This was reflected in the positions presented during the Consultation Forum.

Within Eurovent, it has not been possible to have a common view on the proposed merged energy label. Eurovent invites the European Commission to carefully assess the different positions presented during the Consultation as well as the possible impact on the final user/customer.

Eurovent also holds that it is of the most importance to ensure the proper granularity for different products both in heating and cooling functions.

Without considering the layout of the label or the choice of one or multiple labels/scales, the width of the scales should be designed to allow the best products of each technology to reach a higher-class respect than others of the same technology.

If the Commission, to ensure the granularity, will decide to set up different energy labels between split, single duct and double duct air conditioners, then alternative names for Fixed Double Ducts and Single Ducts should be suggested by the Commission to guarantee a proper differentiation among these technologies for the end consumers.

Eurovent would also like to stress that the conversion to primary energy (for both cooling and heating function) and the indication of the scale on the label remain essentials.

Ecodesign and Energy Labelling requirements, formulas and calculations

Eurovent understood from the Consultation Forum that all the studies conducted so far will be properly taken into account, so we expect that the Ecodesign minimum requirements will be revised accordingly (e.g., airflow limitations for air conditioners, outcomes of the addendum study on double ducts etc.).

Up to date, the industry has attended different meetings, started in 2019, with different conclusions and proposals on each one. Therefore, it is not clear what will be the requirements for the different products in the new Regulations.

According to this, Eurovent asks the Commission to align Ecodesign and Energy Labelling formulas, include all the findings from the studies conducted so far into one final draft and circulate it among the stakeholders before the next steps of the Regulations' approval and publication.

Furthermore, the Ecodesign limits should be set after a decision on labelling has been made, this is to ensure consistency among the two regulations. The timing of Ecodesign and Energy labelling should also be aligned.

The Single Duct issues

Eurovent on several occasions stated that the Single Duct technology could be phased out from the market if the Ecodesign requirements proposed in 2019 are not changed.

Despite the requests from the industry, a specific study on Single Ducts has not been carried out so far, so in our understanding the Ecodesign minimum requirements set for Single Ducts in 2019 are still in place, phasing out the 99% of the appliances. Eurovent asks the Commission to provide clear feedback on this topic.

The proposed energy label also does not guarantee the granularity within the single duct technology, because the testing method that has been developed does not allow to show any improvement, and all the products remain in the very same class, which will also be an issue in the context of comfort fans and local space heaters.

The inclusion of the infiltration of air as proposed has a so huge impact on the final efficiency that the differences between different products will be of few percentage points. The result is that all the single ducts, cooling function only, will be confined together at the very bottom energy class, without any possibility to access the upper ones.

Having considered that single ducts:

- are responding to specific market segments with specific consumer needs;
- are a unique solution where other product categories cannot be installed,

being the proposal Commission lacking in granularity and differentiation for single ducts, a separate scale is proposed in the Annex I. Eurovent Members are ready to discuss with the European Commission's consultants a new possible testing method in line with the proposed scale.

Exclude from the scope units not designed for the comfort of human beings

Eurovent welcomes the Commission's consideration that this group of products needs to be regulated by another Ecodesign and Energy Labelling regulation, with specific adapted requirements, tests conditions and efficiency calculation methods.

As stated with our previous position papers, one has to consider that the units' intended are always presented in the related instruction manual, this means that the exclusion of such units from the scope of the Regulations would not result in any loophole. The product applications are given in combination tables stating if the product is designed for human comfort or for technical cooling. Additionally, such technical cooling products are sold through independent sales channels. Therefore, we do not see a risk of creating loopholes.

Thus, Eurovent supports the Commission's consideration for computer room air conditioners and asks to apply the same to any other unit not designed for the comfort of human beings.

Delivery annotation

Recipient	[Mr Philippe Riviere, EC Policy Officer, DG-ENERGY, philippe.riviere@ec.europa.eu]
Concerns	Eurovent comments on Air conditioners and heat pumps, local space heaters and Comfort Fans after the CF of 24 June 2022
Other comments of relevance	

Annex I to the Eurovent Position Paper

Separate scale and revised methodology for computing performances for single ducts

Method:

A possible method has been developed basing on testing conditions that the Eurovent Members are ready to discuss with the European Commission’s consultants, the current one doesn’t provide granularity.

Classes:

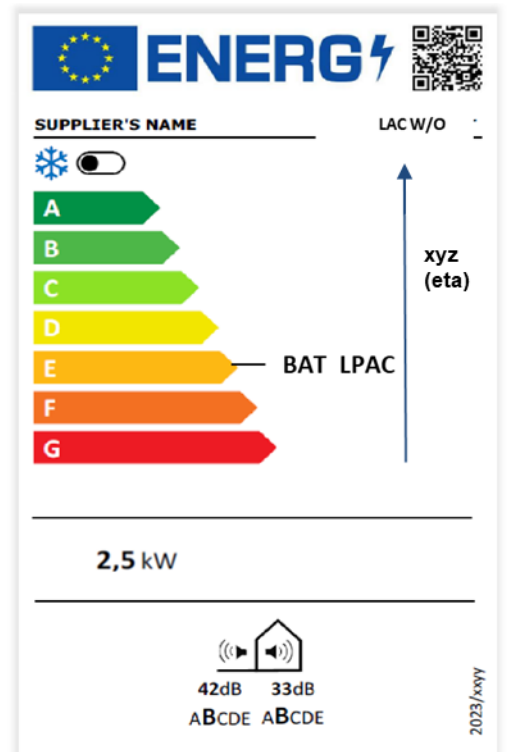
Modified Commission proposal CF 24/06/2022

SD only in 3 classes (E-F-G)

SD Pictogram



	PROPOSAL			
	SEER		η_c	
A	5,8	≥	272	
B	5,1	5,8	236	272
C	4,5	5,1	205	236
D	4,0	4,5	179	205
BAT — E	3,4	4,0	155	179
F	3,0	3,4	135	155
G	<	3,0	<	135



Efficiency	eta
BAT	Class E

METHOD (ASSUMPTIONS)		
Testing point	35/24	
Infiltration	YES	30°C - 40°C

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.

Annex I to the Eurovent Position Paper

Separate scale and revised methodology for computing performances for single ducts

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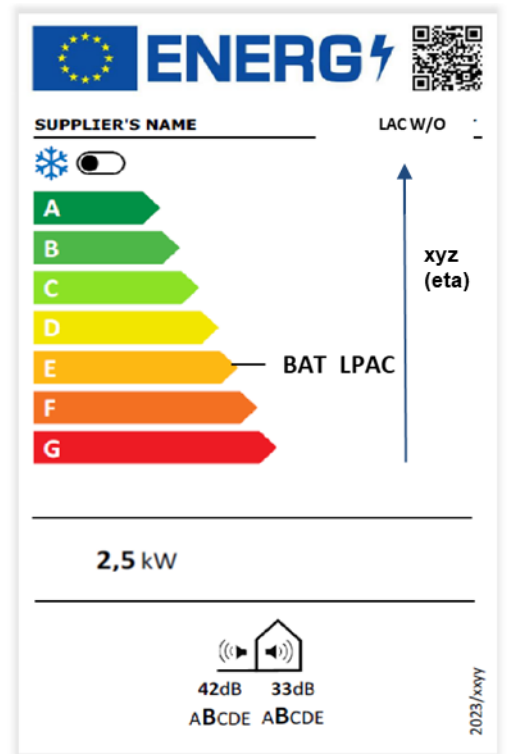
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About Eurovent

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Our Member Associations

Our Member Associations are major national sector associations from Europe that represent manufacturers in the area of Indoor Climate (HVAC), Process Cooling, Food Cold Chain, and Industrial Ventilation technologies.

The more than 1.000 manufacturers within our network (Eurovent 'Affiliated Manufacturers' and 'Corresponding Members') are represented in Eurovent activities in a democratic and transparent manner.

→ For in-depth information and a list of all our members, visit www.eurovent.eu