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Eurovent position paper complementary to PP- 2023-06-20 on Lot 1-2 revision

In a nutshell

With this paper, Eurovent wants to complement its position paper dated 20 June 2023 with additional information and suggestions for the proposed cooling requirements for reversible units.

Scope

The reversible heat pumps to be considered are up to 1 MW heating capacity.

Purpose of the review

The Commission revision proposal never aimed to exclude from the market any electric heat pump.

Eurovent position and suggestions

As stated in the previous Eurovent positions, reversible units should be covered by heating requirements only up to 1 MW heating capacity.

In addition, Eurovent suggests to only declare the cooling efficiency in the manufacturer's documents for the period to come, considering also that not all low-capacity units are tested for the cooling requirements so far. In this case the Commission can collect useful data for developing proper requirements.

In case the Commission still wants to change from its previous position, a first internal assessment based on the Eurovent Certita Certification database shows that a proper minimum seasonal space cooling energy efficiency threshold will be 170 (CC=1,9).

The Commission consultant as always has access to the publicly available Eurovent Certita Certification data.

In this case, if a hybrid unit is capable of providing cooling, it should also be covered by cooling requirements as the reversible units.

It must be noted that the proposed values relate to units working with commonly used refrigerants and the efficiencies of the units working with refrigerants in line with the future F-Gas requirements are indeed not yet available.

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.