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Eurovent feedback on the cost-optimality framework

This paper sets out the Eurovent feedback on the draft Delegated Regulation revising the rules on calculating cost-optimal levels of minimum energy performance requirements, in accordance with the Directive 2024/1275/EU on energy performance of buildings.

Environmental and health externalities

Eurovent fully supports the inclusion of environmental and health externalities in the global cost calculation at macroeconomic level. That said, the proposal only considers the monetary value of the health and environmental damage caused by emissions of PM2.5 and NOx related to the energy consumption in buildings (i.e., the combustion of fuels in boilers or for energy generation).

This fails to consider that energy efficiency measures do not just avoid negative health externalities of fuel combustion but can actively reduce exposure to harmful pollutants and create better indoor environmental quality, which in turn is associated with reduced healthcare costs, improved productivity, and enhanced quality of life. If these health-related economic benefits are counted in the cost-optimality calculation, energy efficiency measures would be shown to be even more cost-effective.

Although preamble 8 states that Member States can include the monetisation of multiple benefits of energy efficiency measures in their cost-optimal calculations, the European Commission could further promote this in the Delegated Regulation, e.g. by making available clear guidance and data for how to calculate the annual, quantified, monetised benefits of energy efficiency measures that improve indoor environmental quality.

Furthermore, Member States should be encouraged to adopt the macroeconomic perspective, to avoid that health and environmental externalities are excluded from the analysis altogether.

About Eurovent

Eurovent is the voice of the European Heating, Ventilation, Air Conditioning and Refrigeration (HVACR) industry, representing over 100 companies directly and more than 1.000 indirectly through our 16 national associations. The majority are small and medium-sized companies that manufacture indoor climate, process cooling, and cold chain technologies across more than 350 manufacturing sites in Europe. They generate a combined annual turnover of more than 30 billion EUR and employ over 150.000 Europeans in good quality tech jobs.

Mission

Eurovent's mission is to bring together HVACR technology providers to collaborate with policymakers and other stakeholders towards conditions that foster fair competition, innovation, and sustainable growth for the European HVACR industry.

Vision

Eurovent's vision is an innovative and competitive European HVACR industry that enables sustainable development in Europe and globally, which works for people, businesses, and the environment.

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Who is behind this position?

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1. Who receives which number of votes?

At Eurovent, the number of votes is never determined by organisation size or membership fee level. Whether SME or large multinational, each member receives the same number of votes.

2. Who has the final decision-making power?

Eurovent Working Groups decide on matters within their remit. They are open to all members. Eurovent's committee of national associations is tasked with mediating in case of conflicts.

3. How European is the association?

Eurovent members manufacture across more than 350 sites in Europe, generate a combined annual turnover of more than 30 billion EUR, and employ over 150.000 Europeans in good quality tech jobs.

4. How representative is the organisation?

Eurovent represents over 100 companies directly, covering well over 80% of the market in most segments, and more than 1.000 companies indirectly through our 16 national associations.

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