

Team member
Stijn Renneboog

Phone
+32 (0)466 90 04 01

Email
stijn.renneboog@eurovent.eu

Date
2025-10-15

Eurovent feedback on EPBD Delegated Act on LC-GWP

Eurovent welcomes the draft Delegated Act and supports its objective to ensure the comparability of lifecycle GWP calculations across Member States. The reference to EN 15978 and the inclusion of technical building systems are important steps towards a coherent and harmonised EU framework.

For HVACR manufacturers, harmonising product-level data is essential. Manufacturers cannot be required to provide different data based on different standards for use in diverging national systems. To ensure a level playing field and reduce administrative burden, product-level data used in building GWP calculations must be harmonised at EU level.

Eurovent therefore strongly welcomes the reference in the draft Delegated Act to data available under Ecodesign and Energy Labelling legislation. This is an important step toward harmonisation in the environmental data for technical building systems such as heating, cooling, and ventilation equipment.

Looking ahead, forthcoming Ecodesign measures on carbon and environmental footprints for technical building systems are expected provide the necessary harmonised product data to support EPBD lifecycle calculations. Eurovent therefore calls for full alignment between these Ecodesign measures and the EPBD framework. Specifically, data generated under Ecodesign and ESPR should be explicitly recognised as harmonised sources for lifecycle GWP calculations.

Eurovent also recalls that under Article 6 of the Ecodesign Directive and Article 3 of the ESPR, Member States may not impose additional or divergent sustainability information requirements once these aspects are harmonised under Ecodesign. Eurovent recommends to explicitly restate this principle in the draft Delegated Act to ensure uniform implementation across the EU.

Eurovent supports the overall goal of a harmonised, transparent, and practical EU framework for lifecycle GWP calculations. Achieving this will depend on consistent and interoperable product-level data across all relevant EU legislation.

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.

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

Who is behind this position?

Eurovent uses fair and transparent decision-making procedures. Every member is given a chance to voice their opinion, and reasonable efforts are made towards compromise and the accommodation of disagreements. Votes are only held as a last resort.

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.

Check on us in the [European Union Transparency Register](https://ec.europa.eu/eurovent/) under identification no. 89424237848-89.