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Date
2026-04-06

Eurovent feedback on EU Taxonomy Climate Delegated Act

In a nutshell

The Taxonomy Climate Delegated Act recognises that the manufacture of energy efficient HVACR equipment is a sustainable activity that contributes to climate change mitigation. However, many HVACR products do not have Substantial Contribution Criteria because not covered by an EU Energy Labelling measure. Alternative energy efficiency benchmarks should be included for products not covered by an EU Energy Label, so they can be assessed for Taxonomy-alignment as well.

Background

Eurovent welcomes the opportunity to provide feedback on the draft revision of the EU Taxonomy Climate Delegated Act. This paper sets out our proposed amendments to the technical screening criteria, with a specific focus on Annex I (Climate Change Mitigation), section 3.5 "*Manufacture of energy efficiency equipment for buildings*", based on practical experience with the application of the current framework.

Our input focuses on targeted improvements to enhance usability of the criteria and improve alignment with other legislation, while preserving the overall structure and intent of the Taxonomy.

Challenges using CCM 3.5

First, the list of activities is incomplete. Relevant NACE codes such as C28.21 and C28.25 are not explicitly listed, even though Substantial Contribution Criteria are defined for these activities.

Second, the scope assumes equipment is installed only in buildings. In reality, technologies covered in this section are also used in industry, data centres and other sectors. The efficiency metrics are largely the same, even if the end use differs.

Third, the reliance on the EU Energy Label creates gaps. Many B2B HVACR products are not covered by energy labelling, leaving them without Substantial Contribution Criteria. Alternative efficiency benchmarks should therefore be accepted. This approach would be consistent with Annex IV of the Energy Efficiency Directive, which requires public authorities to procure products in the highest two energy label classes where a label exists, but refers to Ecodesign energy efficiency benchmarks where products are not covered by energy labelling. Similar references could be incorporated into the Climate Delegated Act, drawing on recognised sources such as Ecodesign benchmarks, EN or ISO standards, and credible third-party certification schemes.

Finally, the current criterion referring to the "highest two populated classes" of the energy label is unstable. A single new product declared in a higher class could redefine the benchmark for the entire sector. Eurovent therefore support aligning the wording with Energy Labelling Regulation and refer to the "highest two *significantly* populated classes of energy efficiency."

Proposed amendments

Current text in Delegated Regulation (EU) 2021/2139	Commission proposal as regards enhancing the usability of the technical screening criteria	Eurovent proposals
<p><i>Description of the activity</i></p> <p>Manufacture of energy efficiency equipment for buildings.</p> <p>The economic activities in this category could be associated with several NACE codes, in particular C16.23, C23.11, C23.20, C23.31, C23.32, C23.43, C.23.61, C25.11, C25.12, C25.21, C25.29, C25.93, C27.31, C27.32, C27.33, C27.40, C27.51, C28.11, C28.12, C28.13, C28.14, in accordance with the statistical classification of economic activities established by Regulation (EC) No 1893/2006.</p> <p>[...]</p> <p><i>Technical screening criteria</i></p> <p>Substantial contribution to climate change</p>	<p><i>Description of the activity</i></p> <p>Manufacture of energy efficiency equipment for buildings.</p> <p>The economic activities in this category could be associated with several NACE codes, in particular C16.23, C23.11, C23.20, C23.31, C23.32, C23.43, C.23.61, C25.11, C25.12, C25.21, C25.29 C25.22, C25.93, C27.31, C27.32, C27.33, C27.40, C27.51, C28.11, C28.12, C28.13, C28.14, in accordance with the statistical classification of economic activities established by Regulation (EC) No 1893/2006.</p> <p>[...]</p> <p><i>Technical screening criteria</i></p> <p>Substantial contribution to climate change</p>	<p><i>Description of the activity</i></p> <p>Manufacture of energy efficiency equipment for buildings.</p> <p>The economic activities in this category could be associated with several NACE codes, in particular C16.23, C23.11, C23.20, C23.31, C23.32, C23.43, C.23.61, C25.11, C25.12, C25.21, C25.29 C25.22, C25.93, C27.31, C27.32, C27.33, C27.40, C27.51, C28.11, C28.12, C28.13, C28.14, C28.21, C28.25, in accordance with the statistical classification of economic activities established by Regulation (EC) No 1893/2006.</p> <p>[...]</p> <p><i>Technical screening criteria</i></p> <p>Substantial contribution to climate change</p>

<p>mitigation The economic activity manufactures one or more of the following products and their key components (97):</p> <p>[...]</p> <p>(h) space heating and domestic hot water systems rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation;</p> <p>(i) cooling and ventilation systems rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation;</p>	<p>mitigation The economic activity manufactures one or more of the following products or their key components:</p> <p>[...]</p> <p>(h) space heating and domestic hot water systems rated in the highest two significantly populated classes of energy efficiency in accordance with Article 7(2) of Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation;</p> <p>(i) cooling and ventilation systems rated in the highest two significantly populated classes of energy efficiency in accordance with Article 7(2) of Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation;</p>	<p>mitigation The economic activity manufactures one or more of the following products or their key components:</p> <p>[...]</p> <p>(h) space heating and domestic hot water systems rated in the highest two significantly populated classes of energy efficiency in accordance with Article 7(2) of Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation; or, in case not covered by delegated acts adopted under that Regulation, meeting analogous energy efficiency benchmarks specified in an implementing measure under Directive 2009/125/EC, in EN or ISO standards, by credible third-party certification schemes, or in other credible references;</p> <p>(i) cooling and ventilation systems rated in the highest two significantly populated classes of energy efficiency in accordance with Article 7(2) of Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation; or, in case not covered by delegated acts adopted under that</p>
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<p>[...]</p> <p>(k) heat pumps compliant with the technical screening criteria set out in Section 4.16 of this Annex;</p>	<p>[...]</p> <p>(k) heat pumps compliant with the technical screening criteria set out in Section 4.16 of this Annex;</p>	<p>Regulation, meeting analogous energy efficiency benchmarks specified in an implementing measure under Directive 2009/125/EC, in EN or ISO standards, or by credible third-party certification schemes, or in other credible references;</p> <p>[...]</p> <p>(k) heat pumps compliant with the technical screening criteria set out in Section 4.16 of this Annex;</p>
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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.

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