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Motor and VSD Regulation Review: The Fan Industry's Position Following the Second Stakeholder Meeting

In a nutshell

With this paper, the three major European fan industry associations provide feedback on the second stakeholder meeting on the review of the Motor and VSD Regulation, including observations and suggestions for improvement regarding:

- **The revision process**
- **Coherence with other legislation**

The Fan industry, represented by the three major European industry associations, AMCA Europe, EVIA and Eurovent, would like to thank the European Commission for allowing us to actively participate in the discussions on the revision of the Ecodesign delegated act on Electric Motors and Variable Speed Drives.

As we have made significant efforts to implement the latest adapted Ecodesign delegated act on Industrial Fans, we believe that the experience and insights gained in this process will be of utmost importance to the debate. We are confident that sharing this experience will allow the Commission to develop requirements for motors and VSDs that are more practical and coherent with existing legislation.

Accordingly, this paper sets out the Fan Industry's comments on the stakeholder meeting on 24 September 2026 as part of the revision of the Ecodesign delegated act on Electric Motors and Variable Speed Drives.

Two Key Aspects of the Fan Industry's Feedback

Revision process

Like many stakeholders, we regret that the impact study was not communicated to attendees prior to the meeting. To our knowledge, it still hasn't actually been published yet. The resource efficiency requirements in the Ecodesign delegated act on industrial fans are the source of countless implementation challenges, from a practical, economic and even legal perspective. Given the proposals presented during the meeting and their obvious direct transposition from the aforementioned act, we are deeply concerned that the same challenges will arise again. We therefore will withhold our detailed feedback on the propositions until we can evaluate them according to the impact study.

Besides, we were very surprised to learn that no further stakeholder meeting is planned. We consider that the discussions held on 24 September raised a significant number of questions, from the extension of the scope to the LCA methodology. We strongly recommend organising at least one further stakeholder meeting, after stakeholders have been given enough time to review the impact study.

Coherence

Whereas seeking speed and efficiency in the legislative process is a fully legitimate goal for the Commission, we would like to point out that this cannot happen at the expense of coherence between existing legislation.

A coherent horizontal taxonomy is strongly recommended. This would avoid practical difficulties when applying requirements across different Regulations. As an example, the term 'stator' is defined completely differently across product groups.

In parallel with this, we would kindly ask the Commission to review the proposals on product information and online data communication under the Cyber Resilience Act and the Data Act, respectively, as overlaps and potential implementation conflicts may arise.

It is our firm conviction that the success of the revision of the Ecodesign delegated act on Electric Motors and Variable Speed Drives -carried out within the ESPR Framework- will most critically depend on its practicability. By the time it is published, the Industrial Fans and Water Pumps product groups will have made significant efforts to implement their respective Ecodesign Regulations. For all three product groups to further be successful, we recommend keeping any regulatory interference between them to an absolute minimum.

The next steps

Eurovent, AMCA and EVIA are joining their voices in a call to the Commission to further keep the fan industry at the revision table and pursue an open and constructive dialogue. Our industry associations will remain available at any time to answer questions and provide further technical or industrial expertise.

We would appreciate the Commission taking our comments into consideration in the further review process.

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

About AMCA

AMCA is a not-for-profit association of manufacturers of fans, louvres, dampers, air curtains, airflow-measurement devices, ducts, acoustic attenuators, and other air-system components. AMCA is a truly global association with operations in Europe (Brussels), Asia, North America, the Middle East, and Latin America, and nearly 400 member companies. AMCA provides global services for verification of compliance, development of standards, and advocacy for model codes, regulations, and utility incentive programs promoting efficiency and life safety.

→ For more information, visit www.amca.org

About EVIA

The European Ventilation Industry Association (EVIA) represents the views and interests of the ventilation industry and serves as a platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States. Our membership is composed of 39 European mechanical ventilation manufacturers and 6 national associations across Europe, realising an annual turnover of over EUR 7 billion and employing more than 45,000 people in Europe.

Mission

EVIA advocates for the development and implementation of sustainable, energy efficient ventilation solutions that enhance indoor air quality in buildings, promoting a healthier and more circular built environment.

Vision

We envision a world where every individual has access to healthy indoor air, fostering well-being and productivity in every living and working space.

→ For more information, visit www.evia.eu

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