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Eurovent comments on stakeholder meeting of refrigerating appliances

In a nutshell

Eurovent in this paper gives to the Study Team some first reactions to the most relevant aspects presented during the meeting on 20 March 2025. Particular attention should be given to a proper stakeholders' involvement, correct standard reference and to the establishment of clear definitions.

Background

Eurovent believes that any type of Stakeholder meeting (including informal ones), especially those within the new ESPR framework, must be called well in advance to ensure the proper participation of the industry.

In this particular case, the meeting was announced only 10 calendar days in advance, which is not acceptable.

Stakeholder organisations identified so far

Please include Eurovent also among the organisations representing ice-cream freezers and beverage coolers.

Evidence sources identified so far on commercial refrigeration

Eurovent suggests that the Study team should not reference or base its assessment on non-EU legislation or studies, especially those that do not refer to the same testing conditions as EN/ISO 23953-2 (e.g. US DOE final rule of December 2024).

Key issues to be considered in the review: General requirements

Net/gross volume is not a performance indicator for supermarket equipment. The metric used for supermarket equipment, according to EN/ISO 23953-1 and EN/ISO 23953-2, is the TDA. Performance data based on Net/gross volume assessments are not available, as these metrics are neither included nor mentioned in EN/ISO 23953-1 and EN/ISO 23953-2 standards. If the study team would make use of Net/gross volume instead of TDA, this would result in a serious lack of supporting data for assessing of the Best Available Technology and Best Not Available Technology.

In general, it's difficult to comment on generic statements that are not yet detailed proposals. For example, when discussing the impact of specified temperature ranges, it is important first to make a distinction between T of food, T of air, T of package for the testing method.

Key issues to be considered in the review: scope of regulations

Food lockers

The market is still limited, and the standard is expected to be published in 2026. Therefore, data availability is limited. As is happening with other products (e.g., the revision of the Ecodesign Regulation (EU) 2281/2016), we suggest that these products be subject only to information

requirements initially, to allow adaptation to the methodology and to start collecting data for the next revision.

Supermarket cabinets with opaque lids

These products function more as storage than display cabinets. To avoid confusion between professional and commercial regulations, it is important to develop a clear definition.

Smart (Internet-connected) vending machines

Internet-connected display cabinets also exist on the market. It's important to understand whether the proposal concerns an entirely new category or it applies to all products with internet connectivity. Care must be taken to avoid that display cabinets with an associated payment system and an internet connection is confused with a vending machine able to mechanically deliver a product.

Supermarket cabinets cooled by chilled water loop or 'fitted with incorporated liquid cooled condensing unit'

These appliances are covered by the standard EN/ISO23953:2023 and Eurovent has always considered them included within the scope of the Regulation. Please refer to the Eurovent [Recommendation 14/6](#), question 62 in the FAQ chapter.

Sustainability Requirements

Eurovent is committed to developing sensible sustainability requirements (e.g. durability, recyclability, etc.) for HVACR products under ESPR. In general, such requirements should not be set at horizontal level. Product- and sector-specific characteristics must be taken into account, and the trade-offs between sustainability parameters (e.g., durability v. ease of disassembly and recyclability) must be carefully assessed product group by product group. There is no one size-fits-all solution.

For professional B2B markets however, the average lifetime and the maintenance activities differ greatly from those of consumer products. Therefore, many provisions related to repairability are unnecessary.

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.

About Eurovent

Eurovent is the voice of the European 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