



# A SUSTAINABLE HVACR INDUSTRY FOR A SUSTAINABLE EUROPE

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# AT EUROVENT, WE BELIEVE THAT AN INNOVATIVE AND COMPETITIVE EUROPEAN HVACR INDUSTRY IS ESSENTIAL TO SUSTAINABLE DEVELOPMENT IN EUROPE, WHICH WORKS FOR PEOPLE, BUSINESS AND THE ENVIRONMENT.

## HVACR FOR QUALITY OF LIFE

HVACR technologies improve the quality of life and wellbeing of people. They create healthy indoor environments, facilitate mass data storage and computation, ensure global distribution of fresh food and medicine, and play an important role in climate change adaptation.



Healthy **indoor environments**



Mass **data storage** and **computation**



Cold chain for **fresh food** and **medicine**



## HVACR FOR DECARBONISATION

HVACR technologies hold the key to decarbonisation of the built environment and enable important industrial processes, including for example hydrogen and battery production. Our sector continues to innovate to make products more energy efficient, durable, repairable, recyclable and to reduce environmental impacts.



**Decarbonisation** of buildings



Enabled **industrial processes**



**Innovation** for sustainable products



## HVACR FOR PROSPERITY

The HVACR sector contributes to prosperity, growth and employment in Europe. It is a sector with many small and medium-sized companies and a strong manufacturing footprint in Europe, with more than 350 manufacturing sites. These companies generate a combined annual turnover of more than 30 billion EUR and employ over 150.000 people in good quality jobs.



**350+** manufacturing sites in Europe



**30+ bn EUR** annual turnover



**150.000+** European jobs



To unlock the full potential of the European HVACR industry to contribute to a sustainable future, Eurovent has prepared three essential recommendations to policy makers from the European Commission, European Parliament and 27 Member States for the 2024-2029 legislative term.



# 1 CREATE A FRICTIONLESS SINGLE MARKET FOR SUSTAINABLE PRODUCTS

The Single Market is an essential foundation of European prosperity. By defining a common set of rules and standards applicable across the EU, superseding what would otherwise be a clutter of different regulatory regimes, it lifts internal barriers and allows compliant goods to circulate freely. An elaborate acquis of requirements, compliance and enforcement exists that ensures that HVACR products placed on the Single Market already meet the highest levels of product safety and energy efficiency.

## THE FRAGMENTATION OF SUSTAINABILITY REQUIREMENTS

However, as product sustainability concerns extend beyond energy use, national regulators are stepping in to fill regulatory gaps. National rules related to the durability, repairability, recyclability, and lifecycle environmental impacts of products and their packaging are proliferating. This creates an unmanageable regulatory burden on companies, with little benefit in terms of sustainability.

## A EUROPEAN FRAMEWORK OF REQUIREMENTS BASED ON A EUROPEAN METHODOLOGY

A new wave of harmonisation is needed to restore the Single Market and create a true level playing field for sustainable products. Requirements on sustainability aspects of products (and their packaging) must be set at EU level, superseding existing national requirements and closing any room for additional national initiatives that would undermine the Single Market. These requirements should be based on a methodological framework for assessing sustainability aspects common across Europe. The legal basis for this has been provided by the **Ecodesign for Sustainable Products Regulation (ESPR)**. It is now a matter of implementation. In the absence of EU harmonised legislation, the principle of mutual recognition could be used to allow the free movement of sustainable products, provided these comply with important safety requirements.

## EVIDENCE-BASED REQUIREMENTS

That said, it is important that this urgent harmonisation does not lead to automatism in the adoption of sustainability requirements. European regulators must carry out full impact assessments for sustainability requirements, considering product specificities, and show that these would be meaningful and provide real added value for consumers, businesses, and the environment. This must be done in close consultation with the relevant industry bodies and stakeholders.

## MORE AND BETTER MARKET SURVEILLANCE

These regulatory ambitions must be matched by more and better market surveillance, to ensure that market players that do not follow the rules are penalised. This requires factoring in potential challenges to market surveillance when setting or reviewing requirements, better funding for market surveillance authorities, and closer cooperation with industry bodies.

# 2 FOCUS ON THE IMPLEMENTATION OF EUROPEAN GREEN DEAL POLICIES

The Fit-for-55 package adopted in the previous term defines ambitious decarbonisation targets and framework policies. The political priority should now be to turn this ambition into reality. The European Commission should work together closely with Member States, industry bodies and civil society, to accompany the process of transposition, implementation, and enforcement.

## PROVIDE INFORMATION AND FINANCE TO TRIGGER ACTION ON THE GROUND

This should include mobilising unprecedented financial support, including private finance, to trigger building renovations and upgrade energy infrastructure repowered with renewables, with a strong focus on energy efficiency and integration. It should further include guidance and information hubs to help businesses and homeowners navigate the landscape and overcome information deficits.

## HARMONISED TRANSPOSITION OF THE EPBD

The national implementation of the **Energy Performance of Buildings Directive (EPBD)** should be harmonised, to prevent additional obstacles for HVAC solutions providers, such as additional product performance verifications to demonstrate compliance or access incentives. Products compliant with Ecodesign and Energy Labelling requirements and tested and verified according to recognised European standards and certification programmes should be presumed compliant towards national schemes. These products must be appropriately valorised in the national energy performance calculation methodologies.

## IMPLEMENT ADEQUATE INDOOR ENVIRONMENTAL QUALITY STANDARDS TO DELIVER HEALTHY BUILDINGS

It is also essential that the safeguards for **Indoor Environmental Quality (IEQ)** included in the EPBD are now properly transposed and implemented. A potential crisis looms if renovation policies are going to make building envelopes better insulated and airtight without appropriately addressing ventilation. The Renovation Wave must deliver healthy buildings, which can be done by implementing appropriate IEQ standards not just for new buildings but also for renovations, and by making financial support available also for ventilation improvements in the context of an energy renovation.

## PROVIDE LEGAL CLARITY AND PREDICTABILITY ON THE REFRIGERANT TRANSITION

The European Commission should keep cooperating closely with relevant industry bodies on the implementation of the F-Gas Regulation. It is especially important that legal clarity is provided on the safety exemptions foreseen in the **F-Gas Regulation** and that these provisions are uniformly implemented

and enforced. Moreover, certainty must be provided on the proposed **PFAS restriction** under the REACH Regulation. Without clarity on this, the contours of the design space available to manufacturers of RACHP equipment remains undefined and the industry cannot timely adapt and make the necessary investments to develop, scale production, and bring to market the decarbonising technologies that will heat our buildings in the future.

## LEVERAGE DATA AND DIGITAL TECHNOLOGIES TO DELIVER CLIMATE AND ENERGY OBJECTIVES

The EU should aim to be at the forefront of digital innovation and the data economy. These are important enablers of the energy transition, as recognised in the smart buildings and data exchange provisions of the EPBD as well as other legislation. It is important to resolve data exchange, interoperability and cybersecurity standards, to enable smart controls and demand-side flexibility.

# 3 DEVELOP A REAL AND FORCEFUL EUROPEAN INDUSTRIAL STRATEGY

The EU needs to signal its commitment to economic growth and restore a climate of business confidence. In this context, a real **European Industrial Strategy** with teeth is needed, to unlock the ability of European manufacturing to contribute to green growth and face up to unfair competition. Among the challenges that a European Industrial Strategy must address are better access to talent, capital, markets, energy and material inputs, properly understood in their global economic context.

## A BETTER BETTER REGULATION AGENDA

Unlocking the ability of European manufacturing to contribute to green growth requires a sensibly regulated playing field that is predictable, with minimal administrative burden, and plenty of room for innovation and private initiative. The EU needs an **improved Better Regulation agenda** that ensures that regulations are lean, technology neutral, mindful of their potential impact on the competitiveness of industry, and always demonstrate their added value.

## EASE REPORTING OBLIGATIONS

The European Commission should follow up on its ambition to minimise reporting obligations, not as a one-off initiative but continuously. Special attention should be paid to **non-financial reporting** and **supply chain due diligence requirements**. Furthermore, the European Commission should improve the implementability of the **Taxonomy** and its useability especially for small and medium-sized companies.

## ADDRESS SKILLS AND LABOUR CHALLENGES

Although it is understood that this primarily a national competence, the EU institutions should also assess possible policy pathways to address the challenges related to labour shortages and skills gaps. Industry, public authorities, and educational institutions will need to cooperate to invest in vocational training, re-training, apprenticeships and upskilling programmes, update curricula to align with industry needs, and finding ways to make technical jobs in industry more attractive to a younger workforce.

## TAKE INTO ACCOUNT EUROPE'S ROLE AS MAJOR EXPORTER

Finally, the EU should integrate the export dimension into its competitiveness strategy and recognise the role of European industry as a major technology provider for third markets especially in the Middle East, Africa and India. By reducing administrative burdens at home and promoting its standards and sustainability agenda also in export markets, the EU can help to keep Europe in a leading role as exporters of machinery and industrial goods.

## ABOUT

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, business, and the environment.

#### ADDRESS

80 Bd A. Reyers Ln  
1030 Brussels, Belgium

#### PHONE

+32 466 90 04 01

#### EMAIL

secretariat@eurovent.eu

[www.eurovent.eu](http://www.eurovent.eu)

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## MEMBER ASSOCIATIONS



## ASSOCIATE MEMBERS



# CORRESPONDING MEMBERS

