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Joint European AMCA-Eurovent Position Paper

In a nutshell

In a position paper published on 3 November 2023, European AMCA and Eurovent have provided final comments on the Energy efficiency – ecodesign requirements for industrial fans (review).

Key arguments

We appreciate the work being done by the EU Commission to finalize the revised Regulation (EU) No 327/2011, which sets Ecodesign requirements for fans driven by motors with an electric input power between 125W and 500KW.

Accordingly, after collecting feedback from our members, we would like:

- *Article 2 (15) variable speed drive* – ref 327 Annex 1 1 (16) „327/2011/EU: excluding variable voltage controllers where only the supply voltage for the motor is varied, is deleted in the current document. Are Voltage control allowed again? We demand more clarity on this issue.
- Page 14/15 in the equation for the **efficiency of jet fans** the Term „Tm"is called „measured" thrust. This point must be clarified, if it is the „measured "or „converted "thrust (same then for electric Power…). The measurement is usually done at a certain density but converted to the density of 1,2 (ISO 13350 and AMCA 250). Is it measured values or converted values?
- We would like to have the calculations based on the *shaft Power for jet fans* included in the regulation.
- *Annex II 3. 1*, we request to remove tolerances from part load calculations.
- *Article 2-point 15 (page 7) clarification text on VSD*: 'variable speed drive' (VSD) means an electronic power converter that continuously adapts the electric power supplied to a single motor, or multiple motors, to control the motor's mechanical power output according to the torque-speed characteristic of the load driven by the motor, by adjusting the variable frequency to the motor, including all integrated protection devices and auxiliaries.
- It seems there is an erratum in the formula of point **7 of Annex III**. Correct answer below:

$$\sigma_{BEP} = \pi \cdot \frac{2 \cdot \sqrt{\pi \cdot q_{v,BEP}}}{\left(2 \cdot \frac{p_{f,BEP}}{\rho}\right)^{0.75}}$$

- *Regarding Axial fans > 4m diameter*: Request to exclude these fans that are integrated into products such as cooling towers. The construction of these fans is integral to the structure of the units they are integrated into, and testing their efficiency separately, as postulated in Recital 20, is not feasible.

Further proposals

- We require a *'Part load operation'* definition to be included in the regulation.
- We require a *'Fan integrated into another product'* definition to be included in the regulation.
- *Inherent speed*: Inherent speed' means the rotation speed of the fan when the fan is operated at nominal or rated supply conditions of the motor. We require more clarification on this point.
- Annex II, 1. 4. „Fan efficiency acc. point 3 of Annex III "is the wrong reference -> Please refer to point 1.
- *Type error Annex V* Table 4. Indicative benchmarks, minimum Efficiency on Jets, needs to be corrected to 50 (draft shows 60)

About Eurovent

Eurovent and transparency

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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.
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We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

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Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality and safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.

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.

More information can be found on our website here: https://www.amca.org/