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Eurovent input for the European Commission technical assistance study on 'points system' methodology

In a nutshell

With this paper, Eurovent provides input for the European Commission technical assistance study on 'points-system' methodology.

Eurovent suggests that in the framework of this study, the Commission shall carefully analyse and address the following points:

- Definition of system/complex product
- Ecodesign calculations – Market Surveillance
- Interaction between other EU Regulations.

Background

This Position Paper relates to European Commission technical assistance study on 'points-system' methodology.

Since the advent of the 2012-2014 Ecodesign work plan, the analysis and investigations of complex energy-related products and systems for prospective Ecodesign and Energy Labelling implementing measures have significantly increased. These complex products and systems have degrees of heterogeneity that complicate their assessment against common metrics and measurement methods. In this respect, Eurovent and its members welcome the technical assistance study.

General comments

Eurovent has participated to the first 'point system' stakeholder meeting on last 30 June 2016 and would like to provide the EU Commission with input to this study.

Scope of the assistance study

It is not clear to our members whether this study will assess only a new methodology within the current MEErP (Methodology for the Ecodesign of Energy-related Products) or whether it aims to define a new methodology that will replace the current one. Thus, Eurovent considers a clarification as necessary.

Definition of system/complex product

The Project's task 2 defines as complex products and/or product systems, products which are complex in that:

1. They may have more than one functional unit (i.e. the quantified performance of a product system for use as a reference unit in a life cycle assessment study), due to the variety of functions the product is capable of performing,
2. The functional units may be inherently difficult to assess due to measurement or methodological difficulties.

Here, one has to consider that the above definitions could lead to a misleading interpretation of the products in the scope of this study.

The case of the remote refrigerated display cabinets for commercial refrigeration (RRDC) constitutes an example of this difficult interpretation. According to the proposed definitions, RRDCs represent a product system (more than one functional unit due to the variety of functions the product is capable of performing: fans, heat exchangers, heaters, etc.). However, RRDCs are de facto just terminal units of another complex product: the refrigeration system.

It is the same for many other HVAC products (e.g. Air Handling Units - Ventilation Units, Fan Coil Units, Air Curtains Units).

In the light of the above considerations, Eurovent would like to point out that a clear definition of the products (systems) in the scope of this study is necessary.

Ecodesign calculations – Market Surveillance

In order to ensure a level-playing-field, Eurovent would like to point out that this project shall lead to a methodology that will allow for accurate Ecodesign calculations without any distortion of the market surveillance measures and conformity assessment. It goes without saying that any Ecodesign measure must be measurable.

Interaction between other EU Regulations

It is not clear to Eurovent and its members how this methodology could take into account the interactions between different EU Regulations. Eurovent would like to suggest to the Project Consortium to analyse this point and especially the interaction between the 'points system' methodology and the EU F-Gas Regulation as well as EPBD.

Conclusion

Eurovent and its members believe that above comments represent a precious support for the development of this points system study. They would lead to a simpler and more accurate methodology. We ask the Project Consortium to consider these comments and to draft accordingly the Project's tasks reports.

Best regards,

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Eurovent Secretary General

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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 association representativeness and decisions-making processes as follows:

1. Who receives which amount of votes?

At Eurovent, the amount of votes is never related to organisation sizes, country sizes, or membership fee levels! No matter if SMEs or large organisations, each company receives one vote within our technical working groups. In our General Assembly or 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 association Members, 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 amount 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.

We are Europe's Industry Association for Indoor Climate, Process Cooling, and Food Cold Chain Technologies – thinking beyond 'HVAC&R'

Eurovent is Europe's Industry Association for Indoor Climate, Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe, the Middle East and Africa represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn Euros, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level-playing field for the entire industry independent from organisation sizes or membership fees.

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 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 as well as 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.

Our Members are national associations from Europe, the Middle East and Africa that are representing manufacturers in the area of Indoor Climate, Process Cooling, and Food Cold Chain technologies.



The more than 1000 companies within their networks (Eurovent 'Affiliated Manufacturers') can directly participate in Eurovent activities in a democratic and transparent manner.

Member types



For in-depth information on all our members, visit members.eurovent.eu

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