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Position Paper

In a nutshell

Eurovent feedback on the Green Claims Initiative

Eurovent appreciates the recognition by the Commission of the proliferation of green claims and the related measurement and assessment methods. National legislation regarding green claims exists, supported in cases by the fact that some Member States recognize specific voluntary labels. This proliferation confuses consumers and industry due to the various methods use to substantiate the claims.

Due the large variety on products subject to green claims a product specific approach would make sense.

The efforts to develop a common Product Environmental Footprint (PEF) did not progress beyond some pilot cases. Since then and even before publication of the Recommendation 2013/179/EU diverging approaches have taken place both at Member State and European level.

Products subject to Ecodesign and Energy Labelling Regulations rely on a simplified common life cycle assessment that has been adopted successfully. Progressive insights and evolving methodologies do improve the know-how on environmental impacts. To achieve and benefit from the Single Market efforts towards a common approach across national and EU legislation would be welcome.

The proliferation of various schemes does provide for diverging information on products resulting from the fact that different institutions and bodies are develop their approach in isolation. For manufacturers it is getting more difficult to meet the numerous voluntary labels that exist and that increasingly become mandatory through reference in legislation.

While the Inception Impact Assessment seems to focus mainly on consumer products, it is appropriate to considers the case of Heating, Ventilation, Air Conditioning and Refrigeration (HVAC-R) products that comply with Ecodesign and Energy Labelling legislation. However, within the national transpositions of the Energy Performance of Buildings (EPBD) one sees the emergence of reference to environmental product declarations. These references find their origin in national legislation relating to the environmental performance of construction products and do differ by country. The declarations themselves rely on different assessment but tend to refer to Life Cycle Assessment to ISO 14025. In some Member States the EPBD transposition does allow for individual and collective environmental product declarations, and while voluntary these become de facto mandatory when one does not wish to rely on default values when calculating environmental performance of buildings. Because the calculation of the energy performance of buildings is not harmonized across the European Union, additional reference to environmental declarations is likely to support further proliferation of environmental methodologies. A harmonization of environmental product declarations used within the context of the EPBD would be appropriate.

Lastly, and irrespective of the options that would be pursued, one should point out that any effort should be supported by adequate enforcement to ensure fair competition, supporting the reduction in environmental impacts.

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.

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

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe 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 EUR, 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 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 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.