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Eurovent feedback on the roadmap for the RED review

In a nutshell

Eurovent supports the further reliance on renewable energies. While outlining the future Renewable Energy Directive (RED) the implementation of the National Energy and Climate Plans (NECPs) of the member must be assessed to check if the national 2020 renewable energy targets have been achieved.

Deployment of future measures in transport, heating and cooling in industry and buildings would push the development of renewables to contribute to the 2050 climate ambitions and greater greenhouse gas reductions.

Preamble

Eurovent is the European Industry Association for Indoor Climate, Process Cooling, and Food Cold Chain Technologies.

Implementation is key

The analysis of NECPs shows that there is a gap to meet the 2020 RED I targets. While the 2020 targets are binding, the transposition is lacking in some Member States. The European Commission could consider monitoring closely the policy measures taken at national level, beyond the assessment of the NECPs and RED.

It must be pointed out that the 2018 RED II is not yet fully implemented and thus cannot yet be assessed.

The ongoing assessment by the Commission of the NECPs that outline the Member States objectives for 2021-2030 may provide elements to improve the RED.

Contribution to security of energy supply

Industry and households rely on the security of energy supply. The further development of renewable energy may not harm the reliability of the energy supply. Stability in the electric and gas networks must be guaranteed. Wind and solar provide for intermittent renewable electricity productions that impacts the stability of the electrical network. Similarly, the injection of biogas provides for fluctuations of the gas quality delivered to the consumers and may disturb production processes and use of gas fired household equipment.

Synergies between RED, EED, EPBD, energy system integration and the case of buildings

Synergies among the different pieces of legislation would very much contribute to reach the RED targets.

The preparation of the Energy System Integration can provide additional insights.

The potential for RED and energy efficiency in the building sector has been identified since many years. It is one of the sectors that could benefit from renewable heating and cooling decarbonisation, at

individual level or at the level of district heating and cooling. It may be noted that heating and cooling equipment is available, even though the uptake is still slow. Guidance and recommendations are available in the many EU funded projects that could benefit from implementation.

Inclusion of health in EE

The Covid-19 outbreak has highlighted that buildings should have a healthy indoor environment. When making use of renewables, the health aspects that often have been neglected in the past, must be addressed, this would very much apply when considering the use of biomass.

Sustainable production of renewables

The use of biomass must be carefully considered in light of preserving the biodiversity. It is the renewable that produces pollution and may need additional attention. It must be pointed out that biomass is not carbon neutral and that forestry cultivations have impacts beyond the land use as trees are major contributors to balance climates.

Cost efficiency of renewables

When developing the future RED, it is important to consider the cost-effective deployment of renewable energy sources.

The recovery from the Covid-19 situation may offer opportunities to temporarily incentivise investment in renewables. A careful choice of such investments is a must, keeping the long-term view towards 2030-2050 in mind.

The investments in renewable capacities must consider the impact on the cost of energy to industry and households. For industry the international competitiveness is an issue, while for households affordability is the issue.

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:

<p>1. Who receives which number of votes?</p> <p>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.</p>	<p>2. Who has the final decision-making power?</p> <p>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.</p>
<p>3. How European is the association?</p> <p>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.</p>	<p>4. How representative is the organisation?</p> <p>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.</p>

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.