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Position Paper

In a nutshell

Further to the online meeting that took place on 28 January 2021, Eurovent would like to provide the European Commission Consultant with additional input.

Background

With the Position Papers dated 2019-05-28 and 2020-05-13, Eurovent has already provided a set of input to the revision of the Commission Regulations (EU) No 811/2013, 812/2017, 813/2013 and 814/2013. The comments at these Position Papers remain.

Assessment of the last VHK proposal

Eurovent has carefully assessed the proposal presented by the EC Consultant during the online meeting on 28 January 2021.

The Eurovent major comments/position are reported below.

Scope extension to 1 MW

Eurovent supports the Consultant's proposal to have heating-only heat pumps and reversible heat pumps in the range of 400 to 1000 kW to be tested under the new Lot 1 Ecodesign regulation.

Temperature regime heat pumps

Eurovent does not support the introduction of any indication of performance and seasonal efficiency at High Temperature regime also as an optional part of the product information.

Eurovent holds that this would increase the confusion in the market and in this respect asks to keep the status quo.

Capacity test regime heat pumps

Eurovent holds that before introducing a new testing method in an Ecodesign regulation, the method must be as robust, reproducible and repeatable as possible.

Based on the experience of Eurovent members involved in the RRT campaign it is to be stressed that the impact on testing time seems to be quite large.

It is also to be pointed out that the ongoing RRT campaign does not reflect the full scope of Lot 1 and impact on high-capacity units has not been assessed yet.

As the results of the ongoing RRT campaign were not shared yet, Eurovent has not enough evidence for supporting the introduction of any new testing method.

Sound power

As a general remark, Eurovent holds that Ecodesign requirements must not be mixed-up with national requirements.

Eurovent would also like to remind that ECC (Eurovent Certita Certification) use the below-reported approach in its certification program:

'The settings of the unit shall be such that the resulting capacity is the same as the declared capacity at a bin temperature of 7°C (part load C) for average climate according to EN 14825'.

The EC Consultant might want to consider this path (which is the same as in the current EN 12102), thus Eurovent suggests keeping the current approach and requirements (for ensuring products comparability).

Hybrids

Eurovent supports the hybrid category as introduced by the Consultant but asks to stay consistent with the present standard (EN 14825). We ask keeping the current definition as in the EN 14825 and allow both combined and separate method (many laboratories are not able to test boilers and heat pumps together).

Temperature controls

Eurovent would like to stress that the F(1) factor relates to the buildings' legislation and not to the products' legislation. These two pieces of legislation should not be mixed up.

Furthermore it is to be stressed that the rationale behind the increase of the F(1) from 3% to 8% is not clear enough and in this respect **Eurovent asks keeping the (F1) as currently set.**

Ecodesign minimum energy efficiency limits

As a general consideration, Eurovent would like to confirm its support to the introduction of the proposed PEF correction for the minimum limits.

Eurovent understands that according to the Consultant proposal the energy efficiency threshold values will be based on:

- an efficiency value (η_{son}), supposed to be equivalent to SCOPon, but expressed in primary energy (%)
- no consideration of the auxiliary consumptions of standby, thermostat-off, crankcase heater and and off modes
- no consideration of F(1) and F(2) correction factors

At the same time the energy efficiency classes will be still determined according to the energy efficiency η_s as today, with the updated F(1) value (and including additional factors for temperature controls ?).

The benefits or interest in having two different indicators for the threshold values and for the energy classes are not clear enough to Eurovent, thus it is not possible to support the proposed approach and Eurovent asks to keep the status quo.

Eurovent asks keeping an aligned approach between threshold values and the energy classes.

Concerning the proposed minimum limits for hybrid electric heat pump & fuel boiler (MT), it is not clear how they have been set.

As most of the heating is done by the heat pump (if TOL is -7°C or lower) **Eurovent holds that the minimum limits for hybrid electric heat pump & fuel boiler (MT) should be the same as the ones for electric heat pump (MT) ($\eta_s = 130\%$).**

Energy label class limits

Eurovent would like to suggest avoiding any kind of double transition.

Specifically, Eurovent would like to suggest the following approach:

- Only a one tier rescaling to A-G within this revision
- Reduction of the confusion on the market
- Avoiding any kind of double transition

Delivery annotation

Recipient	Mr Renè Kemna, VHK, r.kemna@vhk.nl
Concerns	Revision of the Commission Regulations (EU) No 811/2013, 812/2017, 813/2013 and 814/2013
Other comments of relevance	

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.