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Eurovent comments to the Consultation Forum meeting on BACS

In a nutshell

With this position paper, Eurovent provides comments on the proposals of the final report of the ENER lot 38 preparatory study presented at the Consultation Forum meeting on Building Automation and Control Systems (BACS).

Background

The Ecodesign and Energy Labelling Consultation Forum meeting on Building Automation and Control Systems (BACS) was held on 15 November 2021. It was preceded by making available the final report of the Ecodesign preparatory study.

Eurovent highly appreciate the preparatory study that gave insight into the complexity of BACS and potential benefits from implementing relevant Ecodesign regulations. Since the Commission did not present a working document of the prospective regulation including proposals for the implementation of policy measures, we are not able to provide any concrete position of the HVACR industry. Instead, we would like to provide general comments on the findings of the final report, regarding packaged BACS products.

Eurovent comments on the final study report

Requirements for integrated controls

Many HVACR devices on the market are factory-fitted with integrated controls that serve both for the optimal management of internal components operation (compressors, fans etc.) and for the control of indoor climate in the building (temperature, IAQ, etc). These devices are often supplied bundled with field level hardware (sensors, thermostats etc.), which are listed as candidates for products to regulate. Elements like sensors are often fitted into the unit to ensure optimal performance.

In our understanding, the study does not give an answer to the fundamental question, whether BACS products included in factory-fitted integrated controls of HVAC devices would fall into the scope of new BACS requirements, and, if so, under the horizontal regulation (which pose the risk of double regulation) or amended ecodesign regulations for respective products.

Furthermore, If BACS requirements are implemented in amended product-related ecodesign regulations, what will be the approach to controls of HVAC products that are not subject to ecodesign (e.g., cooling towers or chilled beams)?

Requirements for interoperability

The final report proposes that BACS products support at least one open communication protocol between room controllers and other controllers.

In the opinion of Eurovent members any requirements for interoperability and open communication protocols must not hinder innovations and development of new technologies, as well as lead to market monopolization

Compatibility with EN 15232 class B or A against the EU27 benchmark building

The final report proposes that only BACS products that can demonstrate compatibility with EN 15232 class B or A against the EU27 benchmark building could be placed on the market.

In the opinion of Eurovent members, introduction of compatibility requirements with EN 15232 classes in relation to the EU27 benchmark building is questionable due to the need to consider different climate conditions. Building requirements such as building thermal mass, thermal insulation, windows etc. can differ significantly depending on the climate and affect the choice of a benchmark building.

Smart Grid requirements

Technologies for demand response smart grid are still under development. Moreover, there are many uncertainties in terms of the policy framework as well as the business case. On this basis, Eurovent members believe that addressing Smart Grid requirements at this stage under Lot 38 is questionable and premature.

Eurovent proposal

Given the complexity of BACS and the number of factors affecting energy efficiency, Eurovent suggestion would be to consider implementation of possible future requirements at the level of the product ecodesign regulation, rather than at the level of the horizontal regulation. This would allow for better considering of specifics of different Technical Building Systems and avoiding double regulation of products. Furthermore, addressing the requirements to a specific group of TBS products would facilitate the definition of methods for estimating the energy saving potential of BACS and the effective verification of the requirements by Market Surveillance Authorities.

Delivery annotation

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Other comments of relevance	

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:

<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.