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Eurovent Position Paper on the smart readiness indicator draft act

In a nutshell

Eurovent supports the concept of a common calculation methodology for the SRI and would wish to see harmonised uniform implementation by the Member States that wish to make use of the option to introduce the SRI.

Eurovent supports the modernisation of the EPBD. The transposition by the Member States has seen a proliferation of EPBD calculation models. Because physics are the same across the globe, it would have been preferable to have a harmonised EPBD calculation method complemented by objective parameters to account for local conditions.

Eurovent supports the concept of a common calculation methodology for the SRI and would wish to see harmonised uniform implementation by the Member States that wish to make use of the option to introduce the SRI.

Eurovent welcomes the in-depth consideration in the SRI calculation methodology of the specific features of HVAC system controls that contribute to energy efficiency and comfort. Eurovent believes that taking into account the actual performance of a building in the assessment would be most beneficial.

Eurovent regrets that Article 6 of the delegated act allows that Member States may decide to modify, adapt, or terminate the implementation of the scheme at any time without providing any justification to that end. This would mean that the calculation of the SRI could vary across the EU.

The possible adaptation of the standard calculation process is even further described in the Annex VII.

While there may be valid reasons to include the options to adapt and modify the calculation methodology of the SRI, these options do undermine the concept of the Single Market, and may lead to proliferation of different requirements and understanding of the SRI across the EU.

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.