

## Stakeholder commenting form

### Preparatory study for the Ecodesign and Energy Labelling Working Plan 2020-2024

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#	Report's task #	Page #	Topic	Comment	Proposed change
1	2	15-16	Task 2 methodology and scoring matrix.	<p>The long list of products and measures would have totalled some 160 entries. All 160 entries would have received an eligibility scoring. The scoring matrix has not been made available to the stakeholders.</p> <p>Eurovent requested the inclusion of cooling towers in the preparatory study. It is not known to Eurovent how cooling towers scored, and why it was decided not to include them in Task 3.</p> <p>Eurovent reiterates its request to properly assess cooling towers and requests that the complete scoring matrix be made available to stakeholders as soon as possible.</p>	
2	2	15	Horizontal solutions to facilitate improved market surveillance	<p>As a matter of course, the preparatory study focusses on covering new products and introducing additional requirements for already covered products under Ecodesign and Energy Labelling. Although improved market surveillance is stated as an eligibility criterion, very limited consideration is given to this point in the draft reports. Introducing ever more requirements for ever more products, without enforcing existing requirements means that the energy savings due to Ecodesign and Energy Labelling are grossly overstated. This was confirmed by the European Court of Auditors Special Report 01/2020 that showed that up to 25% of products sold on the EU market do not comply with the relevant Ecodesign and Energy Labelling requirements.</p> <p>Eurovent requests that the working plan focus much more on measures that could help market surveillance for products already covered by an Ecodesign and/or Energy Labelling implementing measure.</p> <p>It would be worthwhile that the preparatory and revision studies would consider the enforcement of</p>	

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				the regulations to avoid unfair competition. Rather than opting for an horizontal initiative, each regulation could be accompanied Commission Guidelines for Market Surveillance Authorities. This would provide for clarity to the market (consumers, manufacturers, authorities).	
3	3.2	20-25	New product groups: Cooling towers	Eurovent wants to reiterate its request to consider cooling towers for inclusion in the upcoming ED/EL Working Plan.	
4	3		New product groups: Cooling towers	<p>Eurovent has conducted an extensive study, which has simulated, on a year-round base, the typical behaviour of a refrigeration system using an air-cooled condenser and a water-cooled condenser using wet cooling towers. This study has resulted in average CO<sub>2</sub> emission savings at the system level of about 15,5% for industrial applications and 16% for HVAC applications.</p> <p>The average installed base of air-cooled chillers (cooling capacity &gt;1.000 kW) in the EU28 is about 530 units, by converting it into water-cooled chillers, it is possible to conclude that by using evaporative cooling equipment, a CO<sub>2</sub> emission savings at the system level of about 56.000 tons of CO<sub>2</sub>/year is fully achievable.</p> <p>Thus, Eurovent wants to reiterate its request to consider cooling towers for inclusion in the upcoming Working Plan.</p>	
5	3	111	Air curtains energy savings potential	Eurovent welcomes the inclusion of air curtains and the acknowledgement that the design parameters of an air curtain have a significant impact on heat losses of the building. Ecodesign requirements at the product level for air curtains would result in much higher energy savings at the building level. Eurovent requests that an attempt is made to quantify these savings potentials.	
6	3	153-170	Lightweight design	Eurovent suggests considering the following points while assessing lightweight design requirements:	

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				<ul style="list-style-type: none"> <li>- Lightweight products tend to require higher investment costs (also in the design phase) than traditional solutions</li> <li>- Products where low weight has no functional benefit will be more expensive</li> <li>- Lightweight design could indirectly lead to a reduction of the the amount of recycled material that goes into the manufacturing of a new product</li> </ul> <p>Eurovent holds that any introduction of lightweight design requirements in the product's energy label should be carefully assessed also with the involvement of the consumer organisations.</p>	
7	3	171-182	Post-consumer recycled content	Eurovent wants to stress that any future policy should clearly define how MSAs should assess the recycled content of a plastic component and this should not result in additional administrative burden.	
8	3	204-213	Ecological profile	<p>The ongoing consultation on the inception impact on the environmental performance of products points out that there is a proliferation of methods to assess their environmental impacts.</p> <p>Eurovent wants to stress that the introduction of possible ecological profile requirements shall be in line with the ED framework Directive and support the EU single market.</p> <p>As one example Eurovent suggests looking at the French Environmental Product Declaration (PEP Performance Environmentale Produit) that might become mandatory under the French EPBD transposition (RE2020).</p>	