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Position Paper

In a nutshell

With this Position Paper, Eurovent would like to provide its considerations on the proposal for combining the Ecodesign and Energy Labelling regulations for local space heaters (Regulation (EU) 2015/1186) and for air conditioners ≤ 12 kW (Regulation (EU) 626/2011).

Eurovent understands the background of this proposal (e.g. EU Commission's goal towards decarbonisation), however, holds that it is not possible to provide a clear feedback on the proposed new label until the air conditioners revision study has assessed it properly.

Background

Eurovent and its Members hold that the EU Ecodesign and Energy Labelling regulations are a powerful tool to achieve the European Union energy saving targets and to ensure the level-playing field. We do not regard these measures as a burden, but as a motivation to further innovate while contributing to progressive thinking throughout all sectors of our industry.

Eurovent has already provided several comments on both the revision studies of the EU Regulation 2015/1186 and the EU Regulation 626/2011 (PP - 2017-08-04 - Jointly CECED and Eurovent, PP - 2018-02-12 - Jointly CECED and Eurovent, PP - 2018-12-07 - Eurovent, PP - 2018-06-14 - Eurovent comments on tasks 1-2 review EU 2015/1188, PP - 2018-10-24 - Eurovent comments on revised tasks 1-2 review EU 2015/1188).

The revision study of the Ecodesign and Energy Labelling for air conditioners and comfort fans started in February 2017 and was finished mid 2018. The revision study for local space heaters is still ongoing.

The proposal for combining the Ecodesign and Energy Labelling regulations for local space heaters (Regulation (EU) 2015/1186) and for air conditioners ≤ 12 kW (Regulation (EU) 626/2011) was circulated by the Project Manager in charge of the review study of the Ecodesign Regulation for local space heaters in late January 2019.

As an additional background, it should also be considered that in Lot 1, boilers and heat pumps have the same label, although they are different products.

Key arguments

Involvement of the stakeholders

It must be pointed out that this proposal was not assessed within the review study of the Energy Labelling requirements for air conditioners and comfort fans. Furthermore, it should also be considered that the involved stakeholders did not have the possibility to properly analyse this proposal, nor to elaborate on it at any of the past stakeholder meetings.

Considerations

The very first analysis of the proposed label lead to the below considerations (considerations that should be further assessed and analysed within the air conditioners review study):

- The products covered by the Regulation (EU) 2015/1186 and the Regulation (EU) 626/2011 have the same functionality: Space heating by means of air heating of one or more rooms in residential and commercial buildings.

- This approach would be valid if the objective is to support the move towards electrification of heating of buildings. This move would need to be accompanied by an assessment of the security of supply of energy within the European Union.
- Heat pumps and local space heaters represent different kinds of products and they are not interchangeable for the customers: They have different costs, different functionalities, different heating capacity ranges, and different installation requirements, so the added value of comparing them on the same scale could be very limited.
- It is to be remarked that one set of the products concerned only have a heating function and another set both a heating and cooling function. This may render the comparison difficult.
- With the new proposal, air conditioners can be seen as highly efficient products, but there is no more differentiation between heat pumps. All heat pumps will be in B or C class, and this could lead into less competitive products.
- With the new proposal, manufacturers are less challenged to improve the efficiency in heating mode. Therefore, only improvements in cooling mode will be favoured. This could have a serious impact on the future Ecodesign revisions and in achieving the EU energy saving targets.
- The proposed approach would hamper the technological innovation, which, as a principle, should be pushed by the energy labelling.
- Air conditioners working in both heating mode and cooling mode will have energy labels based on different approaches/principles, which could lead into misleading considerations at the consumers' level
- The proposed C class is rather large and includes efficiencies that are below the minimum requirement for heat pumps.
- Heat pump efficiencies are declared based on the effective input and output of the appliance. This is not the case for some other technologies such as biomass solid fuel local space heaters.
It is proposed that the C label begins with 136% which is the BAT for solid fuel local space heaters and refers to the efficiency of a closed fronted local space heater with pellets. The effective efficiency for the BAT is actually 94%, whilst the declared efficiency, based on the established calculation is 136%. As such the label will show mixed approaches of declared values, which is to our understanding difficult for a consumer to understand and compare. A label that is misleading the consumer should be avoided.
- The proposed label would make more sense if the first top classes (from A to D) were allocated only to air conditioners, the E class represented the BAT of solid fuel local space heaters, and the F Class represented the BAT of gas/oil fuel local space heaters. This would require a consensus among the industries, both manufacturers and energy suppliers, concerned.
- An appreciation of this labelling approach by consumers would also be appropriate.
- It may also become necessary to consider if the proposed labelling is in line with the labelling for space heaters used central heating (Regulations 2013/811 and 2015/1187)

Conclusions

Eurovent understands the background of this proposal (e.g. EU Commission's goal towards decarbonisation), however, holds that it is not possible to provide a clear feedback on the proposed new label until the air conditioners revision study has assessed it properly. The above listed considerations could be used as (non-exhaustive) guidelines for the Consultant in charge of the air

conditioners revision study. Eurovent and its members would be more than happy to support the Consultant in the future analysis and assessment.

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 amount of votes?

At Eurovent, the number of votes is never related to organisation sizes, country sizes, or membership fee levels. No matter if SMEs or large organisations, each company receives one vote within our technical working groups. In our General Assembly or 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, the Middle East and Africa 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 Euros, 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 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.

