

Air Conditioners
Air Handling Units
Commercial Refrigeration Equipment
Liquid Chilling Packages and Heat Pumps
Residential Air Handling Units

Team member
Francesco Scuderi

Phone
+32 (0)466 90 04 01

Email
francesco.scuderi@eurovent.eu

Date
2021-05-12

Position Paper

In a nutshell

The Eurovent Product Groups 'Air Conditioners', 'Air Handling Units', 'Commercial Refrigeration Equipment', 'Liquid Chilling Packages and Heat Pumps', and 'Residential Air Handling Units' did assess the DG ENER Lot 38 tasks reports.

The above mentioned Eurovent Product Groups regard as fundamental a clear understanding of the scope and aims of the LOT 38. In this respect, before providing the EC with its comments/position, Eurovent would like to have further clarification on the scope of this Lot.

Background

The proposed Ecodesign requirements for Building Automation and Control Systems (BACS), as presented in the draft Task 7 report, are made separately at the packaged product level and at the installed product level.

According to the draft Task 1 report (Scope) and the draft Task 7 report (Policy options), it seems to Eurovent that the integrated controls which are part of products covered by Ecodesign regulations (e.g. Lots 1, 2, 6, 10 or 12) and able to be connected to BAC/BM/EM systems, are classed as packaged systems and therefore in the scope of the ENER Lot 38 BACS.

Technical Buildings Systems (TBS), such as HVACR products, can be bundled with BACS functions.

Eurovent holds that TBS products bundled with BACS functions are products that are covered by existing policy applicable to the TBS product itself.

Open Questions

The Eurovent Product Groups 'Air Conditioners', 'Air Handling Units', 'Commercial Refrigeration Equipment', 'Liquid Chilling Packages and Heat Pumps', and 'Residential Air Handling Units' jointly regard as fundamental a clear understanding of the scope and aims of the LOT 38.

At the package product level, the responsibility for the compliance is not clearly defined.

Based on the current definition of 'Placing on the market', before providing the EC with its comments/position, ***Eurovent would like to better understand to which products the future regulation on BACS will apply.***

Conclusion

We would like to thank in advance the EC Consultant for considering our question and providing us with clear indications allowing us to present our consolidated position.

Delivery annotation

Recipient	To: Paul Van Tichelen (VITO) [4bacs@vito.be] Cc: Georgios.TAKOUDIS@ec.europa.eu
Concerns	Preparatory study for BACS
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.