

Team member
Stijn RenneboogPhone
+32 (0)466 90 04 01Email
stijn.renneboog@eurovent.euDate
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Eurovent Position Paper on ESPR product priorities

In a nutshell

Eurovent represents the European Industry of Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. With this paper, Eurovent wishes to convey four main points to feed into the definition of priorities for the new Ecodesign for Sustainable Products Regulation:

- **The review of existing implementing measures should not be deprioritised**
- **The focus for HVACR products should remain on energy performance**
- **Requirements should be set product group by product group**
- **Due diligence aspects should not be included under Ecodesign**

Background

Eurovent represents the European Industry of Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. These are already extensively regulated on energy performance – and increasingly also on circularity – aspects under the current Ecodesign Directive 2009/125/EC, including the following lots under the responsibility of DG ENER and DG GROW:

- ENER Lot 1 – Space and combination heaters
- ENER Lot 2 – Water heaters and hot water storage tanks
- ENER Lot 10 – Air conditioners and comfort fans
- ENER Lot 20 – Local space heaters
- ENER Lot 11 – Fans
- ENER Lot 12 – Refrigerators with a direct sales function
- ENER Lot 21 – Air heating and cooling products
- GROW Lot 1 – Professional refrigeration
- GROW Lot 6 – Ventilation units

The review of existing implementing measures should not be deprioritised

It is important that existing ecodesign implementing measures for energy-related products continue to be regularly reviewed and kept up to date, in line with market and technological developments. Eurovent acknowledges the European Commission's stated intention to carry out a separate initiative to prioritise requirements for energy-related products, which will take into account the progress made in implementing the Ecodesign and Energy Labelling Working Plan 2022-2024. We look forward to contributing constructively to that assessment and trust that the extension of the Ecodesign instrument will not detract from the review of existing measures.

The focus for HVACR products should remain on energy performance

For energy related products, the environmental impacts associated with energy consumption during the use phase are typically by far the largest. Lifecycle assessments show that around 80 to 90% of the environmental footprint of typical HVACR products is accounted for by energy in use¹. Even as the

¹ See Famiglietti et al. (2023): <https://www.sciencedirect.com/science/article/pii/S019689042201305X>

share of renewable energy increases, the impact of the use phase remains prevalent: renewables reduce carbon footprint but create a burden shift to other environmental impacts categories, such as resource depletion. Energy efficiency is also important to ensure that as much renewable energy as possible is secured for other sectors, e.g. green fuels based on power-to-X. Finally, material substitution potential for HVACR products is limited. Focussing on energy consumption during the use-phase is likely to remain the most effective avenue for reducing the environmental footprint of HVACR products

Requirements should be set product group by product group

Eurovent strongly favours specifying requirements product group by product group. There are essential differences between sectors, with different typical environmental impacts, business models, market players, supply chains, technological developments, R&D and time-to-market cycles, etc. Moreover, for different products, the trade-off between sustainability parameters (e.g., durability v. ease of disassembly) may look different and may have to be considered differently, to avoid undesirable design changes and impact shifts. All of this precludes one-size-fits-all solutions. It is seems extremely unlikely that sustainability requirements can be set effectively through horizontal requirements. Requirements must be tailor-made for each product group.

Due diligence aspects should not be included under Ecodesign

Although the industry is committed to full compliance with human rights and environmental protection according to internationally recognised social and labour standards, due diligence throughout the value chain is a complex topic, which should not be considered under the Ecodesign framework. Overlap should be avoided with dedicated legislation that aims to address these aspects, such as the Corporate Sustainability Due Diligence Directive and the Corporate Sustainability Reporting Directive. Any such requirements should apply at the company-level under a dedicated legal regime and not at the product-level.

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.