

Position Paper for Member State Representatives of the Ecodesign Consultation Forum

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Additional input concerning Eurovent Position Paper on evaporative cooling equipment from 14 April 2015

On 14 April, Eurovent has published [Input for the Consultation Forum on the fan review from evaporative cooling equipment manufacturers](#) (please find attached).

This document elaborates in further depth on the amendment request stated within that Position Paper and specifically addresses questions concerning loopholes.

The Eurovent Position Paper from 14 April 2015 states:

Accordingly, **we reinforce our call for an exemption of evaporative cooling equipment from the future 'EU Fan Regulation'**. As we would like to prevent any loophole resulting from an exemption, Eurovent proposes to add the following definition of evaporative cooling equipment to Art. 1, paragraph 3:

'This regulation shall not apply to fans which are specified to exclusively transport gases consisting of a mixture of liquid water and air having a relative humidity consistently larger than 90%.'

This definition offers a concrete solution to the proposal stated in Art. 4.4.2 in the final report 'Ecodesign fan review' of VHK dealing with 'fans handling gases/vapours'.

As also indicated, this definition proposed by Eurovent only excludes fans for evaporative heat transfer equipment and does not cause any loopholes or an artificial division of the market, which is being further outlined in the following.

Regarding air humidifiers and adiabatic coolers

Fans in evaporative heat transfer equipment transport a mixture of LIQUID water and air. It is a proven and tested fact that a minimal amount of LIQUID water droplets get through the drift eliminators reaching the fan and are blown outside. This differs from air humidifiers and adiabatic coolers. Humidifiers and adiabatic coolers only transport a vapour with a high relative humidity not containing any kind of water droplets.

Regarding dry coolers, fan coil units

In our proposed definition, CONSISTENLY was added to 'a relative humidity consistently larger than 90%' in order to eliminate the erratic influence of weather conditions like rain. Dry coolers and fan coil units are specified to transport ambient air which does not have CONSISTENTLY a relative humidity higher than 90%. Evaporative heat transfer equipment transport gases which have CONSISTENTLY a relative humidity larger than 90%.

These products are not designed nor specified to EXCLUSIVELY transport a mixture of liquid water and air. They only transport ambient air. Evaporative heat transfer equipment is designed to EXCLUSIVELY transport the mixture of liquid water and air.

We hope that these explanations further clarify our standpoints and remain at your disposal for any further questions or remarks.

About Eurovent

Eurovent, the European Committee of HVAC&R Manufacturers, is the representative of Europe's major national associations in the industry of heating, ventilation, air conditioning and refrigeration. Based on objective and verifiable data, its 24 members from 18 European states represent more than 1000 companies, the majority small and medium-sized. In 2013, these accounted for a combined annual turnover of around 25bn euros and employed more than 120.000 people – making Eurovent one of the largest industry committees of its kind.

Eurovent's roots date back to 1958. Over the years, the Brussels-based umbrella association has become a well-respected and known stakeholder that builds bridges between companies it represents, legislators and standardisation bodies on a EU and international level. The association favours a level-playing field for the entire industry and strongly supports energy-efficient and environmental-friendly solutions. 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 the EU's BUILD UP initiative.

Eurovent possesses two subunits. With Eurovent Certita Certification (ECC), it majority owns an independent certification company, which holds the ISO 45011 (17065) accreditation – fulfilling highest independency, reliability and integrity standards. Open to any company, it is known for its globally-recognised brand 'Eurovent Certified Performance'. Activities are complemented by Eurovent Market Intelligence (EMI), the association's second independent unit. Its Europe-wide data sets are frequently being used to support the development of EU regulation.

Members of Eurovent

Europe's major, national HVAC&R associations and their more than 1000 manufacturers



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Corresponding Members

Manufacturers in European countries with no national HVAC&R association representing them



Independent Subunits

Organisations with own structures that guarantee a full independency from the Eurovent association



Enclosed:

Files linked within this documents can be found within the 'Attachment' section of Adobe Acrobat.