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Eurovent: Clarifying questions from manufacturers of energy recovery components concerning the Technical Assistance Study for the Ventilation Units Product Group

In a nutshell

Humidity recovery and latent efficiency is an essential part of reaching the European Commission's targets for energy saving in buildings. With this document, the Eurovent Product Group 'Energy Recovery Components' asks the European Commission and the Danish Technical Institute to clarify questions posed within this document concerning the common interpretation of the Commission Regulation (EU) No 1253/2014 of 7 July 2014 on ventilation units.

Background

This Position Paper is related to the Technical Assistance Study for the Ventilation Units Products Group that is currently ongoing. It represents the opinion of the Eurovent Product Group 'Energy Recovery Components', which represents all major manufacturers active in this field in Europe, including Turkey and Russia. The Eurovent association's independent subunit Eurovent Certita Certification runs a globally-known performance certification programme on 'Air to Air Plate Heat Exchangers' and 'Air to Air Regenerative Heat Exchangers'.

Legislative text and related questions

COMMISSION REGULATION (EU) No 1253/2014	Questions by the Eurovent Product Group
(7) The preparatory studies show that the energy consumption of products subject to this Regulation can be significantly reduced. The combined effect of the ecodesign requirements set out in this Regulation and in Commission Delegated Regulation (EU) No 1254/2014 (3) is expected to result in an aggregate increase in savings by 1 300 PJ (45 %) to a level of 4 130 PJ in 2025.	<p>1. In subtropical climate zones (southern Europe), an important ratio of ventilation units' energy consumption is used for cooling. Is the estimation of energy saving potential not missing in the energy consumption for cooling and dehumidification? Should this not be considered?</p> <p>In these areas the energy consumption can be reduced significantly by using heat recovery with humidity transfer (total energy recovery). For cooling capacity (relevant to electric capacity need and investment need), dehumidification consists of up to 30-50 % of the cooling capacity need.</p>
...	
— The minimum thermal efficiency η_{t_nrvu} of all HRS except run-around HRS in BVUs shall be 67 % and the efficiency bonus $E = (\eta_{t_nrvu} - 0,67) * 3\ 000$ if the thermal efficiency η_{t_nrvu} is at least 67 %, otherwise $E = 0$.	<p>2. Is the energy consumption for cooling an important ratio used for dehumidification. The thermal efficiency has only a partial influence on the total energy saving. How can the latent (humidity bound) energy saving be considered?</p>

<p>— The minimum thermal efficiency η_{t_nrvu} of run-around HRS in BVUs shall be 63 % and the efficiency bonus $E = (\eta_{t_nrvu} - 0,63) * 3\ 000$ if the thermal efficiency η_{t_nrvu} is at least 63 %, otherwise $E = 0$.</p>	<p>3. Ventilation units with a humidifier require a relevant part of the energy for humidifying – the sensible efficiency is only one part of the energy saving. How can the latent efficiency be considered?</p>
<p>...</p>	
<p>— The minimum thermal efficiency η_{t_nrvu} of all HRS except run-around HRS in BVUs shall be 73 % and the efficiency bonus $E = (\eta_{t_nrvu} - 0,73) * 3\ 000$ if the thermal efficiency η_{t_nrvu} is at least 73 %, otherwise $E = 0$.</p> <p>— The minimum thermal efficiency η_{t_nrvu} of run-around HRS in BVUs shall be 68 % and the efficiency bonus $E = (\eta_{t_nrvu} - 0,68) * 3\ 000$ if the thermal efficiency η_{t_nrvu} is at least 68 %, otherwise $E = 0$.</p>	<p>See questions 2. and 3. above</p>

Eurovent trusts that this input to the technical assistance study will support the implementation of this Regulation. If you have any questions or remarks, please do not hesitate to contact our Team.

Respectfully submitted on behalf of the Eurovent Product Group 'Energy Recovery Components',

Morten Schmelzer, 29 September 2015

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 association representativeness and decisions-making processes as follows:

1. Who receives which amount of votes?

At Eurovent, the amount 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 equal 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 working groups. The Commission consists of national association Members, receiving equal 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 amount of votes, there is no 'leading' country. Our national member associations ensure a wide-ranging national outreach also to remote locations.

We are Europe's Industry Association for Indoor Climate, Process Cooling, and Food Cold Chain Technologies – thinking beyond 'HVAC&R'

Eurovent is Europe's Industry Association for Indoor Climate, 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.

Our Members and 'Affiliated Manufacturers'



Our Members are national associations from Europe, the Middle East and Africa that are representing manufacturers in the area of Indoor Climate, Process Cooling, and Food Cold Chain technologies.



The more than 1000 companies within their networks (Eurovent 'Affiliated Manufacturers') can directly participate in Eurovent activities in a democratic and transparent manner.

Our Corresponding Members

CORRESPONDING MEMBER EUROVENT Manufacturers from EMEA countries, which do not yet have a national association Member within the Eurovent network. Examples include:



Our Associate Members

ASSOCIATE MEMBER EUROVENT Organisations that are engaged in activities related to the sectors the Eurovent association covers. Examples include:

