

Product Group 'Cooling Towers', Position Paper, PP – 2015-01-14

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Proposed Eurovent amendment concerning cooling towers and the EU Fan Regulation

Background

In a [position paper published on 18 November 2014](#) and the respective [extended version published on 11 December 2014](#), Eurovent and its members are calling for an exemption of Cooling Towers from the revised [Commission Regulation \(EU\) No 327/2011, which sets Ecodesign requirements for fans driven by motors with an electric input power between 125 W and 500 kW](#) (hereinafter referred to as 'EU Fan Regulation') and outline in-depth why they hold this to be of very high importance.

Proposed amendment

Following a consultation process among Eurovent member associations and manufacturers of cooling towers, evaporative condensers and evaporative fluid coolers including the consultation of a legal expert, Eurovent would like to propose the following amendment to the current Regulation 327/2011 to be implemented within its revised version.

According to the current 'EU Fan Regulation' in place, a cooling tower is defined as a fan system as multiple critical parts of the fan system are the evaporative cooling tower itself.

Therefore we propose to add new point e under paragraph 3 in Article 1 of EC/327/2011:

Article 1 § 3 e

3. This Regulation shall not apply to fans which are:

designed specifically to operate as evaporative heat rejection devices, which mix water to air for purpose of evaporation to transfer heat from a process to the atmosphere

Alternative proposal

Alternatively, a new point could be added under paragraph 3 c:

Article 1 § 3 c

3. This Regulation shall not apply to fans which are:

(c) designed specifically to operate:

As evaporative heat rejection devices, which mix water to air for purpose of evaporation to transfer heat from a process to the atmosphere

Thank you very much for taking the needs of our European industry seriously. If you have any further question or remarks, our Team remains at your disposal.

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



Eurovent - The European
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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:

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