Position Paper PP – 2024-07-11

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Eurovent comments on the ICF Technical Analysis (Phase 1.1) with regard to RVU aspects

Introduction

The follow up study of the review of the Ecodesign and Energy Labelling regulations on ventilation units (1253/2014 and 1254/2014) being carried out by the ICF consultancy, was launched at the beginning of 2024. Its first phase – technical analysis – resulted in a draft report that was published on 12 June 2024, and which was followed by a Stakeholder meeting on 1 July 2024.

Eurovent appreciates very much the work done by the Commission and ICF.

With this document, we would like to present comments of the Eurovent Product Group 'Residential Ventilation Systems' (PG-RVS) on recommendations made in Phase 1.1: Technical Analysis (Draft) document and further clarifications made at the Stakeholder meeting, as well as the draft revised Regulations (working documents) of 01 March 2021 for the Consultation Forum in 2021.

1 Product label versus System label, split label between UVUs and BVUs, revised CTRL factors

Reference: ICF Phase 1.1 draft analysis. Section 1.1, Section 1.2 and Section 1.3

Eurovent supports the labelling requirements which would only consider product related features and performance. Eurovent has never supported a system label, as written in section 1.1.2.2 of the ICF report and we request to rectify this statement.

Eurovent strongly opposes the recommendation in section 1.2.4 to apply a constant ηe value of 50% for UVUs. In our view, this proposal has not a reliable and eligible technical justification.

Eurovent is in favour of the current concept of the SEC formula, including the simple CTRL factor table. However, we consider that it requires further adjustments.

Eurovent is developing a comprehensive proposal for the needed adjustments of the SEC formula and other aspects addressed in Sections 1.1 to 1.3 and will submit it to the Commission and ICF.

We would also like to emphasise the need to consider re-examining the scaling and adjustment of energy classes in a further ICF study. In the opinion of Eurovent members, the currently proposed class A will not be able to be populated by any technology in the future. Additionally, we believe that the scaling of energy classes cannot be built in such a way that the most energy-efficient UVU technologies will only be able to reach the lower classes.

Furthermore, given objectives of Directive 2024/1275 (EPBD recast) and the specific considerations related to the renovation of ventilation in old buildings, Eurovent members invite the Commission and the Consultant to develop appropriate legislative measures in the revised Regulation to support RVUs for retrofitting of ventilation systems in existing residential buildings to facilitate the fundamentally important improvement of indoor air quality and well-being of occupants.
If appropriate measures are not taken to foster products for retrofitting, which face more technical challenges to meet energy efficiency requirements than products for new buildings, the Directive's

objective of renovating the existing stock of residential buildings in terms of improving indoor air quality may be difficult to reach.

2 Ventilation performance index

Reference: ICF Phase 1.1 draft analysis. Section 1.4

Eurovent appreciates and strongly supports the recommendation to remove all references to the VPI metric in the Regulation.

3 Correction factor 'w'

Reference: ICF Phase 1.1 draft analysis. Section 3.3.3 and 3.3.4

Eurovent appreciates and strongly supports the recommendation made in sections 3.3.3 and 3.3.4.

4 Definition of 'ventilation controls' and 'RVU-package'

Draft working document (Review EU 1253/2014), Annex I (20)

Eurovent emphasises the need to amend the definition of 'ventilation controls' and in particular its 'RVU-package' component in such a way that it takes into account existing sales and distribution models in the markets of all Member States in an appropriate and fair manner. RVUs as mass-produced units are typically distributed through wholesalers. In some Member States it is common that control devices are purchased together with the RVU as the 'RVU-package', while in other the RVU is purchased first and the installer completes control devices afterwards. A statement in the current definition '*purchased together with the RVU*' disregards the second distribution model. A more detailed explanation of the problem is given is section 3 of our PP-2020-06-03.

5 Q_{defr} factors in SEC Formula

Draft working document (Review EU 1253/2014), Annex VI, Table 4

Further to our position paper PP-2021-04-30 (section 2.4) and our answer to the ICF questionnaire of 27 February 2024 (response to question 4), we reiterate our request to include in Table 4 all applicable defrosting strategies based on the guidance being currently developed by CEN/TC 156 WG 2.

6 Filter(s) velocity – information requirements

Draft working document (Review EU 1253/2014), Annex IV 1 (t)

Eurovent suggests changing the **filter velocity**, probably meant as the face velocity, to the **effective filter area** in the information requirements. The effective filter area better reflects its ability to fulfil the required function and its expected lifetime. In addition, we invite the Consultant to consider including the impact of filter by-pass leakage on energy efficiency and IAQ.

7 Other Eurovent's standing comments

Draft working document (Review EU 1253/2014)

In addition to the current comments made above, Eurovent reiterates the comments made in previous position papers, in particular:

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- Item 2.2: Maximum internal and external leakage rates
- Item 2.5: All BVUs shall have a thermal by-pass facility
- Item 2.7: Maximum L_{WA} for non-ducted RVUs
- Item 3.2: Information displayed on the label

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- Item 9: Including humidity recovery

Eurovent and transparency

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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'

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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.