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Eurovent feedback on Net-Zero Industry Act secondary legislation

In a nutshell

Eurovent would like to provide feedback to the European Commission on the Implementing Act listing the net-zero technologies' final products and main specific components. We welcome the inclusion of the heat pump industry as a net zero technology and would like to include additional primarily used components.

The Net Zero Industry Act aims to scale up the manufacturing of technologies which are key to achieving climate neutrality. To achieve this goal, the NZIA provides several measures that address the current barriers, increase competitiveness, attract investments, and improve market access.

The NZIA does not only focus on the final product of net-zero technologies but also on the components primarily used for the manufacturing of these final products. The proposed Implementing Act listing the net-zero technologies' final products and main specific components, will provide clarification in the way of an annex on what the recognised final products and components are for each recognised technology.

Eurovent suggests considering the addition of the following primary components to the heat pumps final products' category. The changes can be found in red:

Sub-categories of net-zero technologies	Final products	Primarily used components
Heat pump technologies	Heat pumps	- Heat pumps - Four-way valves - Valves (expansion, Schrader, shut-off etc.) - Fans (according to EU 2024/1834) - Compressors - Heat exchangers - Inverter technology - Pumps

Valves ensure optimal performance and energy efficiency. Expansion valves are primarily used components, specific to heat pumps. They ensure the regulation of the refrigerant cycle within heat pumps. Electronic pressure-independent valves with energy monitoring and dynamic hydraulic balancing are also essential for heat and cooling network technologies. In the distribution systems, hydraulic balancing has the greatest influence on the dimming of the generator and the energy efficiency and comfort of the whole system.

Fans are a primary used component of heat pumps. They convey air through the heat pump, mainly via the heat exchanger, overcoming the internal pressure losses of the heat pump. Fans play a critical role in optimizing the heat transfer within heat pumps, specifically the air source systems.

Compressors are predominantly used in heat pumps and refrigeration technologies as a key component for controlling the refrigerant cycle in heat pumps.

Heat exchangers are critical to the operation of heat pumps. While it may not be exclusively used in heat pumps, it is a critical part of heat pumps.

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.

About Eurovent

Eurovent is the voice of the European HVACR industry, representing over 100 companies directly and more than 1.000 indirectly through our 16 national associations. The majority are small and medium-sized companies that manufacture indoor climate, process cooling, and cold chain technologies across more than 350 manufacturing sites in Europe. They generate a combined annual turnover of more than 30 billion EUR and employ over 150.000 Europeans in good quality tech jobs.

Mission

Eurovent's mission is to bring together HVACR technology providers to collaborate with policymakers and other stakeholders towards conditions that foster fair competition, innovation, and sustainable growth for the European HVACR industry.

Vision

Eurovent's vision is an innovative and competitive European HVACR industry that enables sustainable development in Europe and globally, which works for people, businesses, and the environment.

→ For in-depth information and a list of all our members, visit www.eurovent.eu