

The Voice of the European Air-Conditioning, Refrigeration, Air handling, Heating and Ventilation industry

Brussels, January 27th 2011

POSITION PAPER
on a COMMISSION REGULATION
implementing Directive 2009/125/EC of the European Parliament and of the Council with regard
to ecodesign requirements for domestic ventilation units and range hoods

Eurovent thanks the Commission for receiving the Work Document, version December 12th 2010. We understood that this document includes the results/conclusions of the additional study done afterwards by the Fachinstitute Gebouwde-Klima e.V (FGK).

Eurovent likes to mention that the FGK-study never has been sent as an official document to be considered by the Lot 10 stakeholders during the Stakeholder meetings. This means that the agreed methodology has not been followed by the Commission as stated in page 5 sub 2 of the Working Document.

Eurovent understood that the FGK-study isn't incorporated completely in the Work Document and still the study is discussed by the group under whose responsibility the study was carried out. They questioned the outcome.

Eurovent in general welcomes the fact that the thermal effects are included now and after receipt of the updated Work Document we will provide you with our remarks and suggestions.

Conclusion:

There are too many technical questions to be discussed amongst fan specialists. This is the reason that Eurovent calls for an extra stakeholder meeting before we start with the Consultation Forms.

Yours faithfully,

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Executive Director
Eurovent

Who is Eurovent?

Eurovent, the European Committee of Air Handling and Refrigeration is the representative of the European refrigeration, air conditioning, air handling, heating and ventilation industry and represents trade associations from European and non-European countries.

Eurovent represents over 1,000 companies in 14 European countries, employing 150,000 employees who jointly generate more than € 25 billion of annual output. Eurovent was initially founded in 1958 and has been functioning under its current name since 1964. Eurovent has become over the years a well-known and respected stakeholder in all industry related matters and, in particular, in climate change and energy efficiency.

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