

Industrial and tertiary product Testing and Application of Standards (INTAS)

Power Transformers and Industrial Fans: Summary of findings form the INTAS project

EVIA as the European industry association representing manufacturers of fans in Europe welcome the publication by INTAS of its [final recommendations](#) to enhance the effectiveness of market surveillance for large fans. Indeed, EVIA would like to note the receptiveness of INTAS to comment from industry throughout the project.

With a view to the future consideration of the recommendations by EU regulators, EVIA wishes to take the opportunity to publish a final commentary highlighting areas of agreement, those where there may be room for improvement and those that are not considered a fit for the industry.

Overall, EVIA would like to stress that the inclusion of recommendations within the current scope of Ecodesign regulations should be done after proper consultation with stakeholders, in line with the European Commission's Better Regulation Agenda. Some INTAS recommendations were said to be included in the revision of Regulation No 4/2014 by Member States without any previous official consultation of stakeholders and some others could be potentially included in the currently delayed revision of Regulation 327/2011. In this context, **EVIA would like to highlight that any reopening or extension of an Ecodesign Impact Assessment scope to include provisions not integrated into the original draft should involve full consultation with implicated stakeholders.**

EVIA's Response to policy recommendations

1.2.1 Set up a dedicated European market surveillance Task Force for fans

EVIA agrees with this proposal. The INTAS project notes there is a 'lack of expertise', 'lack of interest' and 'lack of clear procedures' when it comes to market surveillance. A dedicated Taskforce would assist in addressing these shortcomings.

EVIA proposes that a Taskforce's effectiveness would be further enhanced through the inclusion of industry. Industry representatives could assist in formulating policy and providing valuable knowledge and experience to public authorities when it comes to market surveillance of their specific products. There are a number of Pan-European industry associations that represent EU fan manufacturers. Volunteers from these associations could participate in such a Task Force.

EVIA's proposed membership of this Taskforce could include:

- Market Surveillance Authorities (MSAs)
- Industry Associations representatives
- User Associations representatives
- NGOs representatives
- Importers

1.2.2 Include definitions of 'large fans' in Commission Regulation 327/2011

EVIA agrees with this proposal. Such a definition could be added to FprEN17166, the standard developed to support Regulation (EU) 327/2011.

1.2.3 Establish a mandatory notification to MSA's

EVIA is concerned in regard to the extra burden that mandatory notification would place on SMEs. Many manufacturers of large and extra-large fans in the EU are SMEs.

This requirement could place a disadvantage on EU based manufacturing companies and could encourage the transfer of manufacturing and jobs outside of the EU to avoid that burden. To prevent such an unsatisfactory situation mandatory notification should not be enforced until the EU has in place agreements with non-EU countries to undertake pre-export controls requiring importers to submit notifications to MSAs.

Declaration could be made less onerous if it were to be incorporated into the existing requirements to declare energy performance. The exact mechanism could be defined by the Taskforce.

1.2.4 Foster cooperation with national market actors

The EU fan industry welcomes this proposal and would suggest that the market surveillance Taskforce is the body where MSAs, manufacturer associations, contractor associations and end-user groups could collaborate.

Member State customs authorities would need to participate to give full visibility on the market surveillance process and ensure imports of fans are also included in discussions.

1.2.5 Allow MSA's to conduct market surveillance and actions at manufactures and to witness test

MSAs are always welcome at manufacturers' premises. However, MSAs will need to ensure that their presence does not impede the fulfilment of contractual obligations by manufacturers. MSAs will need to fit in with production schedules and delivery requirements in order to minimise disruption. A delayed delivery in many cases results in penalty charges.

A Factory Acceptance Test (FAT) is a contractual agreement between a supplier and a customer. The MSA will need to obtain the agreement of the customer to their presence during an FAT.

FATs do not always include a performance measurement test, approx. 2% include a performance test. Alternatively, a check of documentation and review of previous tests and/or calculations to determine the performance could be used.

A visit to a manufacturer is an interruption and cost to them. Currently MSAs do not have the legal authority to visit facilities located outside of the EU's economic area. In order to ensure a level playing field between manufactures in the EU and in third countries MSAs must be authorised to visit customs points to check documentation and to make other basic checks to ensure the compliance of imported fans. This may delay shipment and custom procedures, but is necessary to attempt to apply enforcement evenly and fairly.

1.2.6 Allow and clarify alternatives to full-size, full load testing and verification options

This is a good proposal that reduces the impact on both manufacturers and MSAs. Further importers can provide evidence of such methods in their notification to MSAs. Measurement using scale models has been included in the draft FprEN17166 and the international fan standard committee ISO TC117 is currently updating the methodology.

Computational Fluid Dynamics cannot be used as an alternative to measurement of full size, part load, scale or other semi-analytical methods.

1.2.7 Improve fan standards for eco-design

EVIA agrees that there are well established international standards, which are harmonised EN standards, describing how to determine the performance of the fan including its efficiency. EN ISO 5801 *Fans – Performance testing using standardized airways* is the globally accepted standard.

A new EN standard will be published in 2019 that builds on ISO5801 and clarifies the peculiarities of Regulation 327/2011. The final draft currently out for vote by Member State organisations is FprEN17166 *Fans – procedures and methods to determine the energy efficiency for the electrical input power range of 125 W up to 500 kW*.

Great care should be taken when in-situ testing using EN ISO 5802. Situations where a fan has been installed in a manner where this standard can be applied effectively and without deviation are rare. It would be preferable if the MSA undertake an engineering assessment of the manufacturer's documentation, including their methodology to define the fan performance and to ascertain compliance.

1.2.8 Insert clauses to deter circumvention in 327/2011

EVIA supports this recommendation.