

European Ventilation Industry Association Position Paper

ECODESIGN REGULATION 327/2011 – June 2018



A successful regulation is under threat

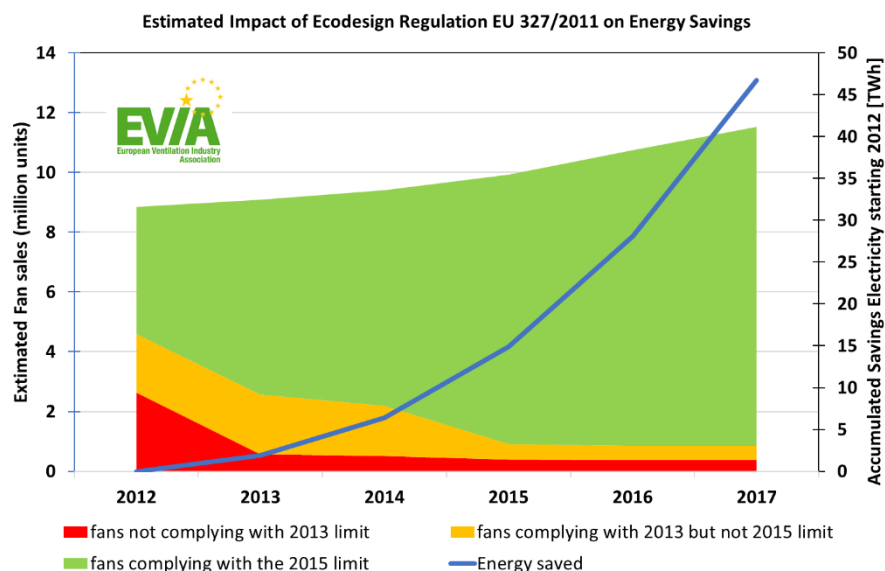
Ahead of the upcoming Regulatory Scrutiny Board's meeting on the Impact Assessment supporting the revision of the Fans Ecodesign Regulation 327/2011, EVIA, the voice of the ventilation industry in Europe, would like to show its support for the revision of this critical piece of legislation.

46,800 GWh of energy savings or 0.5% of the EU's total CO₂-Emissions (based on 2017) are currently potentially in jeopardy. We know that the Regulatory Scrutiny Board is meeting on 11 June and risks being directly lobbied by groups that fully reject regulations aimed at 'parts intended to be incorporated into energy-related products', so called cascading regulations, and which are pushing for an unfavourable review of the Impact Assessment on the Fans Ecodesign Regulation 327/2011.

EVIA asks that the European Commission supports the draft revision of the Ecodesign requirements for fans and balances the debate against a total ban of cascading regulations.

Regulation 327/2011 sets Ecodesign requirements for fans driven by motors with an electric input power between 125 W and 500 kW. The regulation set minimum energy efficiency limits on 1st January 2013 for a range of fan types. Those limits were increased on the 1st January 2015. The European Ventilation Industry Association (EVIA) has calculated that at least 46,800 GWh have been saved since 2012.

The Impact Assessment which will be submitted in June 2018 to the Regulatory Scrutiny Board to support the draft revision is likely to be under the pressure of anti-cascading groups. In the past these groups have managed to push for the removal of 'parts intended to be incorporated into energy-related products'. This part of the scope of the overarching Ecodesign Directive 2009/125/EC has allowed the realisation of significant energy savings and associated reduced impact on our environment.



The regulation has worked, it has transformed the market by incentivising the uptake of more energy efficient fans, generated investment, instigated innovative solutions and employed people in Europe.

The Fan Industry supplies fans to many other industries beyond the Ventilation and Building Services sector. **A fear of the industry is that a straight forward ban on regulating fans will jeopardise the gains achieved in many industries.** Changing the regulation to prevent the application of any cascading

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approach would remove too many product families from the Fan Regulation's scope and prevent future energy efficiency gains.

However we acknowledge that the cascading principle may be problematic for a number of ErP products for which a challenging Ecodesign regulation already exists. Therefore a compromise should be found through providing exclusions for some specific clearly defined regulated Ecodesign products where a challenging minimum energy performance limit has already been set or where specific other non-energy performances are essential (for example acoustics, safety and security etc.).

There are examples where the limits of the regulated Ecodesign product are set sufficiently high to ensure a good level of energy savings such as the Ventilation Regulation 1253/2014. In these clearly defined circumstances, a compromise is possible with a specific exclusion. The Fans Regulation should not lead to a ban of specific fan designs or restrict the product manufacturer's freedom to choose the fan design needed. The Fan Industry is willing to work with other stakeholders and policy officers to agree on such circumstances moving forward.

Furthermore the administrative burden of the ErP regulation framework should be streamlined, to especially ensure that SMEs do not suffer from complex procedures and products in product declarations. This includes ensuring that a suitable timing for new and revised regulations is agreed to avoid short term redesign of products including fans.

The argument to date has been one-sided. **EVIA asks that you allow for a balanced debate and put forward to the Regulatory Scrutiny Board an alternative view: Regulation 327/2011 with fans integrated in some other energy-related product has been a success.** We trust that you can support our point of view. The revision will continue this success if the scope is carefully adapted.
