Dear Mr van den Boorn, dear Mr van Elburg,

I can't attend the Stakeholder meeting on the 22th in Brussels, therefore I send you hereunder our comments. Aldes is a leading French manufacturer of ventilation units, among other products. I invite you to have a look at our website: www.aldes.com

First of all we appreciate the effort of the European Commission to revise and simplify the Fan regulation. And you have done a great job in your Discussion Document published in November. We greatly appreciate the 5 year tolerance period for spare parts and the removal of the non-final assembly procedure. We are also glad to see that you did not add a separate category for Box and roof fans, what would have endangered the level playing field between ventilation units manufacturers sourcing their fans by oem and those producing their own fans.

However they are some points in the report we are not happy with:

1/ Two more tiers are too much

You propose one tier in 2018 and another one in 2010. We propose there is only one tier in 2020 the soonest. Development and payback periods for fan and ventilation units are much longer than for consumer goods. For instance, TV manufacturers launch new models every year and facing new sets of requirements every two year is perhaps not an issue. In our industry some products are sold during more than 10 years. The reason is that development is complex, sold quantities of each individual model are low, and technological progress is slow. Thus it is unacceptable for our industry to face with new requirements every 2 years. Too frequent new requirements would endanger the wealth of European SME. We are currently hard working on products for ErP ventilation 2016 and 2018: we have to redesign our full portfolio of ventilation units what is a huge work and investment for us. The revised fan regulation will be published too late to be taken into consideration simultaneously with the requirements of lot 6 and its really unreasonable to impose us more stringent requirements before 2020.

2/ The proposed limits for centrifugal fan in the report are far too high

The proposed efficiency limits for centrifugal fans in 2020 are far too high. You argue in the report that there were 4 points increase between 2013 and 2015 and thus if we keep the trend, we have 4 more points in 2018 and again 4 more points in 2020. It sounds nice but is it "technologically" consistent? May you detail which technological improvements will lead to these efficiencies? Have you checked if it is achievable for each application? You argue that it is easier for fans than for compressors to reach high efficiencies. Is it really true? I suppose it is the opposite: fan working at higher pressures have often better efficiencies and probably so do compressors have. Nevertheless, the level you propose may be acceptable for fans in large Air Handling Units working in the range 700 – 1200 Pa. But for other specific application like decentralized ventilation or low pressure ventilation (commonly used in retrofitting of shaft natural ventilation in collective housing), this requirement would be unreachable, although fan operating at lower pressure consume less energy for the same amount of air moved.

It would have been an option to take into account pressure, airflow, speed, part load (…) in setting requirements, but it would have been complex. For the sake of simplicity the approach of the regulation is acceptable but low pressure applications with the best available technologies must be kept on the market.

We propose a 2 points increase in 2020 compared to 2015 instead of the 8 points you propose

3/ No specific limit for forward curved fans may be acceptable under certain conditions

As far as our propositions in points 1/ and 2/ are respected, i.e only a slight increase compared to 2015 levels and only one Tier in 2010, a single requirement for centrifugal fans may be acceptable.

That would ban forward curved fans from the market in 2020 and ensure high energy savings in most of the case.

We hope you will take our remarks in consideration and we stay at your disposal for any further information.

Best regards,

François-Yves PRÉVOST