

Dear Mr. van Elburg and Mr. van den Boorn,

I cannot attend the 2nd stakeholder meeting this week, but Fläkt Woods have contributed to the process through our involvement in the comments document from EVIA. I confirm that Fläkt Woods fully supports the comments in this document.

In particular, we endorse the modified efficiency levels for axial fans. The industry has experienced quite a challenge to meet the tier 2 targets for 2015 and is struggling to identify practical solutions to comply with the proposals for 2018 & 2020. Whilst we recognise and agree with the need for continual improvement, we consider the proposed levels to be too much of a stretch in the timeframe under consideration.

We would also reinforce the need for an additional allowance for reversible fans. Reversible fans are used in dual use normal / emergency applications where there is already a proposed 5% allowance. This allowance goes some way to address the inherent loss in performance due to the increased clearances required for the high temperature condition. However, reversible fans cannot employ the efficiency improvement technologies that are available to unidirectional fans, such as aerofoil blade sections and guide vanes, since to do so would render them non-reversible. Therefore, without an additional allowance for reversible fans, such products will progressively become non-compliant. This will then lead to an increase in energy consumption. Such a counter intuitive scenario arises from the main requirement behind the demand for reversible fans. The applications are typically underground or retrofit, where there is insufficient space to accommodate two complete installations for separate extract and supply. It has long been apparent that, when two unidirectional fan installations are fitted into the space of a single reversible one, the adverse installation effects far outweigh the potential gains in the catalogued fan efficiency.

Since I cannot be there on Thursday, I take this opportunity to congratulate you on the progress that has been achieved in the review so far. The fan Regulation 327 must be one of the most complex cases and presents quite a challenge to achieve the right balance for all stakeholders.

Best regards from

Iain Kinghorn
Director of Technology

Fläkt Woods Ltd.