

## Position Paper, PP – 2014-09-30

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## Eurovent Position on 'Box and Roof Fans'

### Background

In the course of the Regulation 327/2011 revision process, certain stakeholders have indicated to extend the Regulation scope to also include 'box and roof fans'. To them, the benefit would be that fans inside a product need not be removed for the purpose of compliance testing.

### Position

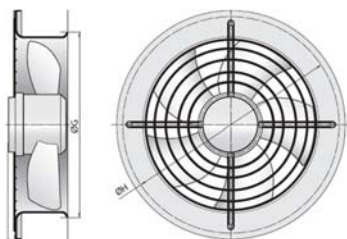
Eurovent holds that the current number and definition of fan categories as defined in the 'EU Fan Regulation' 327/2011 is correct and shall remain. We believe that an exemption of box and roof fans from the Regulation on Ventilation Units and adding these to the scope of the revised 'EU Fan Regulation' would prove counterproductive.

### Reasoning

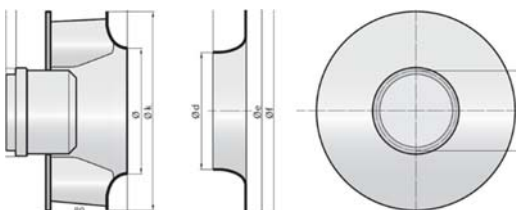
The 'EU Fan Regulation' was established for fans consisting of components essential for fulfilling the function of an air-moving device. The definition of what constitutes the components of a fan according to Regulation 327/2011 is made by the CEN mandate M500 by the CEN/TC 156 (see also [Extended Eurovent Position on 'Fan Definitions' and the Regulation Scope](#) for in-depth analysis and definitions).

In simple terms, the individual fan categories consist of the following components:

- Axial fans = Motor + impeller + inlet nozzle (see graphic below)



- Radial fans with forward curved blades = Motor + centrifugal impeller + scroll housing, inlet nozzle
- Radial fans with backward curved blades, without scroll housing = Motor, impeller, inlet nozzle (see graphic below)



- Radial fans with backward curved blades, with housing = Motor, impeller, scroll housing, inlet nozzle

The basic and primary function of fans as defined in EU Regulation 327/2011 is the handling of air. This function is, in principle, independent of the way the fan is eventually being used. To test the function and determine the point at which efficiency is optimal, testing facilities as per ISO 5801 are preferably being used. The suitability and optimal selection of fans for later use is not to be defined within the 'EU Fan Regulation'

Concerning box and roof fans, but also in-line duct fans, they incorporate fans as per Regulation 327/2011, which are being upgraded in such a way as to meet the requirements of their later application. To do so, specifications such as air guidance, housing and air intake geometry get modified and changed. The range of their manifold design options is so wide that assessment criteria taking into account the application rather than the optimal operating point might be better suitable for these products. Any attempt to define requirements for these extensive ranges of products, according to the same principles currently adopted for fans, would lead to an unreasonably wide extension of the existing 'EU Fan Regulation'.

Accordingly, Eurovent is of the strong opinion that the revised 'EU Fan Regulation' shall not cover the subsequent application. The case is similar to the 'EU Electric Motors Regulation' 640/2009. In this particular Regulation, the subsequent use of the motor does not have an impact on its assessment.

## About Eurovent

Eurovent, the European Committee of HVAC&R Manufacturers, is the representative of Europe's major national associations in the industry of heating, ventilation, air conditioning and refrigeration. Based on objective and verifiable data, its 20 members from 18 European states represent more than 1000 companies, the majority small and medium-sized. In 2013, these accounted for a combined annual turnover of around 21 billion euros and employed more than 120.000 people – making Eurovent one of the largest industry committees of its kind.

Eurovent's roots date back to 1958. Over the years, the Brussels-based umbrella association has become a well-respected and known stakeholder that builds bridges between companies it represents, legislators and standardisation bodies on a EU and international level. The association favours a level-playing field for the entire industry and strongly supports energy-efficient and environmental-friendly solutions. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA and contributor to the EU's BUILD UP initiative.

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