



Position Paper on Ecodesign regulation 327 on fans

Our Key policy ask:

- Alignment on indications included in the 2015 Review study
 - Fan efficiency limits calculated on the base of static or total pressure for Axial fans should not be lowered.
- Swift publication of the revised regulation is needed to ensure business certainty
- Grant at least 24 months between publication in the official journal and entry into force
- Cascading principle is a key cornerstone of Ecodesign and should be maintained

Align with the indications included in the [2015 Review study](#)

EU AMCA agrees with energy requirements proposed at the consultation forum in 2015 and in the 2015 [review study](#) with a few minor changes:

- Fan efficiency limits calculated on the base of static or total pressure for Axial fans should not be lowered

EU AMCA agrees with the fan efficiency limits calculated on the base of static or total pressure for Axial fans (category A and C) proposed in the regulation and in consequence, requests the consultant team and the European Commission to keep the limits at 10% or more.

To ensure business certainty and give enough time to the industry to adapt, we recommend to speed up the publication of the revised regulation and to grant at least 24 months between publication in the official journal and entry into force

EU AMCA would like to have the draft proposal approved as soon as possible in order to give a positive signal to the market and ensure business certainty.

EU AMCA recommends having enough time between the publication of the regulation in the official journal and the entry into force, in order for the fan manufacturers to have sufficient time to adapt to the requirements. EU AMCA would like to highlight that the development of new or modified products require a two-step process. First, the development of new fans and then ventilation units, which include the new developed fans. At least 24 months would be a convenient time of adaptation especially for smaller companies with fewer resources.



Cascading principle as key cornerstone of Ecodesign proposition

EU AMCA reiterates its strong support towards the cascading principle, a vital component in delivering energy savings in the European Market and ensuring a level playing field within the Heating, ventilation, and air conditioning (HVAC) sector.

[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.

In recent years, Regulation 327 has been successful in changing the landscape of the HVAC market in the last years, driving European fan manufacturers to produce fans that exceed Energy related Products (ErP) requirements and are highly energy efficient. Since the approval of the regulation in 2011, electricity consumption is estimated to be reduced by 306 TWh/a (-9%) in 2020 and 317 TWh/a (-18%) in 2030.¹

Clearly, this is not a universal trend: there is still a consistent, price-sensitive part of the market, which is adopting the “minimum-legal” level, but the awareness of the economic advantages of using energy-saving components, and particularly fans, is spreading due to the regulation. Significant economic benefits have been outlined since the adoption of the regulation and therefore a careful approach to the amendment is desirable.

By eliminating cascading from regulation 327, this will have a negative impact on the competitiveness of the European manufacturers who invested heavily in R&D and production to deliver highly energy efficient fans. European market would make way for cheap, inefficient fans used in products not covered by Ecodesign regulation 327, causing a split in the EU fan market:

- A market for fans used in products not covered by Ecodesign and complying with 327
- A market for fans used in products covered by Ecodesign where any fan can be incorporated even if less efficient

If the second scenario occurs, European manufacturers of products incorporating fans will be incited to move production outside of Europe, resulting in huge loss of jobs, producers, investment and overall reduction in the size of the HVAC industry in Europe.

Larger manufacturers have the capabilities and resources for the production of customer-specific components (bespoke products), and therefore the proposal to exempt these products from the regulation will be an advantage for these manufacturers. On the other hand, smaller or start-up players, having to rely on commercially-available “catalogue” components, will have to comply with the regulation, and will be put at a cost disadvantage.

¹ https://ec.europa.eu/energy/sites/ener/files/documents/eia_ii_-_overview_report_2016_rev20170314.pdf



About European AMCA

The European Air Movement and Control Association is the European branch of AMCA International, a not-for-profit association of manufacturers of fans, louvers, dampers, air curtains, airflow-measurement devices, ducts, acoustic attenuators, and other air-system components. AMCA has 75 members (all fan manufacturers) either based in Europe or controlled by European entities.

AMCA is a truly global association, with operations in Europe (Brussels), Asia, North America, the Middle East, and Latin America, and almost 400 member companies.

The AMCA mission is to advance the knowledge of air systems and uphold industry integrity on behalf of its members worldwide.

AMCA provides global services for verification of compliance, development of standards, and advocacy for model codes, regulations, and utility incentive programs promoting efficiency and life safety.