



### **Eco-design regulations: cascading principle needed**

The European Air Movement & Control Association (European AMCA) supports the cascading principle, a key pillar for the success in delivering energy savings. For the following reasons the Fan Industry of Europe supports the continuation of the cascading principle in the draft revision of the motor regulation.

#### **Cascading regulations have proved to be effective in delivering energy savings**

An example is the fan eco-design regulation 327/2011 where motors are embedded in fans and the regulation includes fans integrated in other eco-design products. Since 2012 46,800 GWh of electricity or 21.5 Mt CO<sub>2</sub> has been saved. According to EVIA calculations, electrical energy saving of fans in 2017 where approximately 18.6 TWh or related to 8.6 Mt of CO<sub>2</sub>-Emission, 0.5% of total EU-CO<sub>2</sub>-Emissions<sup>1</sup>.

There are several examples on the effective functioning of cascading. For instance, industrial fan manufactures, that are typically used by Small Medium Enterprises (SMEs), must use low speed 8-pole motors, and even slower, for technical reasons. But they are struggling to purchase 8-pole motors with sufficiently high efficiency to meet the fan regulation limits. Motor manufacturers are reluctant to design higher efficient machines. SMEs need cascading regulations to ensure efficient motors are available to make high efficient compliant fans for applications in power stations, process plants, dust and material conveying, etc.

#### **The elimination of the cascading principle will give a negative signal to the market**

The awareness of the economic advantages of using energy saving components is spreading due to cascading regulations; motors, fans, and other eco-design products. With the elimination of cascading, technologies which were marked as obsolete or even forbidden would be allowed to come back to the market.

#### **The elimination of cascading will be an incentive to move production outside of Europe**

The removal of cascading will have the effect of splitting the EU fan market in two. EU manufacturers have invested large funds transforming their product range to compliant components. Non-EU manufactures still have lines for inefficient components. Removal of cascading will result in a loss of jobs, manufacturing and investment in Europe.

#### **Selective application of the cascading principle will result in market fragmentation**

The proposal to divide the market into 'catalogue' and 'bespoke' fragments the market. SMEs and start-up companies will be severely affected as they rely mostly on efficient 'catalogue' components.

Additional information on cascading in relation to fans are available in our dedicated position paper<sup>2</sup>.

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<sup>1</sup> EVIA position paper – Impact of fans ecodesign requirements. <https://www.evia.eu/wp-content/uploads/Position-Paper-EVIA-Fans-WG-Impact-of-Fans-Eco-design-Requirements-2.pdf>

<sup>2</sup> AMCA position paper - Fan Ecodesign Regulation: cascading principle needed