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EHI position paper on draft of Ecodesign measure on fans

The Association of the European Heating Industry (EHI) represents and promotes the common interests of 30 market leaders producing all kind of heating systems, burners, boilers, heat pumps, mCHP, solar thermal, geothermal, biomass and 13 national industrial associations from the EU Member States, Liechtenstein and Switzerland with approximately 140.000 people employed and a contribution of more than 20 bn € to the European Union's GDP. They today represent more than 90% of the European Market. Approximately 35% of energy consumed in the EU is used to heat buildings. As a result, the heating industry has a key role to play in helping to protect the environment and in developing energy efficient instruments.

The current draft working document's scope (chapter I, No 1) covers fans in a power range from 125 W to 500kW, *including those integrated in other products*.

The heating industry is providing heating products and burners that may include such fans and that are covered by a separate Lot (LOT 1). In the current LOT 1 calculation model the efficiency of an integrated fan is considered via the overall electricity input.

So neither does the Fraunhofer Study as basis of measures for fans cover these heating products and burners nor is it deemed necessary to include those fans that are used in heating products and burners in a separate Lot. We therefore strongly recommend to keep fans that are integrated in other products out of the scope of this working document.

If there would be no general exclusion taken into account, chapter I No 2 should be modified as follows:

2. The measure shall not apply to:

.... fans designed to operate in heating products and burners as defined in Directive 92/42/EEC and its superseding legislation.

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