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Position of ECOS (on behalf of Environmental NGOs)

on the new draft Ecodesign measure for fans (documents of March 2010)

Contact:

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ECOS is surprised that none of its comments and suggestions submitted in February 2010¹ have been taken into account in this new draft.

Some of the content is even worse now, for instance with an increased number of fan categories included. This not only leads to sub-optimal savings, but also to more tricky market surveillance.

At this point, ECOS considers that there are too many shortcomings in this Ecodesign measure and does not support it.

Comments reiterated from our February position paper:

- We believe that **the overall level of ambition is insufficient** and not challenging enough for the industry, if compared to current benchmark models available on the market.
- We also regret the lack of a steady effort to **limit the number of fan categories**. The proposed categories should be merged into 2 or 3, so that the various fan technologies can compete with each others within a category. This would trigger more energy savings and really transform the market. Some of the existing fan technologies (cross flow fan, box fan, roof fan) should not stay on the market if they cannot reach as good an energy performance as axial and backward curved fans. **These two latter technologies should set the standard for the 2nd stage.**
- We also call for **limiting the use of cross flow fans** to a maximum power of 20 kW in the 1st tier, and 10 kW in the 2nd tier.
- Another concern is that the proposed formulas result in several curves crossing between 0.1 and 10 kW. This does not seem to be an ideal solution. We propose the following adaptation to the first formula for the target efficiency: $4.50 \cdot \ln(P) - 10.36 + N$.
- We insist that these Ecodesign measures for fans within 125 W – 500 kW power range should be complemented by **similar measures for the large market of small fans below 125 W** (For fans above 500 kW, the need for a regulation is maybe less obvious).

Additional remarks are available in our previous position paper (link below).

END.

¹ http://env-ngo.eup-network.de/fileadmin/user_upload/ENGOS_Intern/Position_Papers/Env_NGO_comments_on_fans_03-02-10.pdf