

**Geoff Lockwood is Chairman of the Fan Working Group of the European Ventilation Industry Association (EVIA):**

## **“The regulation of fans works!”**

**By adopting the Kyoto Protocol, the European Union has undertaken to reduce CO<sub>2</sub> emissions by at least 20 per cent by 2020. To achieve this climate goal, the EU adopted ErP Directive (Energy Related Products Directive) and set down binding limit values for fans. Geoff Lockwood has seen through the development of ErP regulation of the EU from the start. He claims that its' success is now at stake.**

### **1) What's ErP all about?**

The “Regulation 327/2011 eco-design requirements for fans driven by motors with an electric input power between 125 W and 500 kW” was published in the Official Journal of the European Union on 6th April 2011 and since then it has had a big impact. It has caused problems but found to actually work: It is estimated that 46,800 GWh of energy or 21,5 Mt CO<sub>2</sub> has been saved since 2012 as a result.

### **2) What kind of problems did the regulation cause?**

Until then, standards defining energy efficiency limits were not in existence. The naivety and fragmented voice of the fan industry resulted in regulations that are not clearly defined and have unnecessary exclusions. There is one exception in that the regulation retained an important aspect discussed and heavily lobbied against during the study and drafting stage – that the scope includes fans ‘integrated in other energy related products’.

### **3) Why is this aspect so controversial?**

Integrated fans are components that are incorporated inside other products such as ventilation units, air-handling units, refrigeration and air-conditioning units. The opposition claims that this cascading or double regulation of parts and products causes unnecessary burden to their development without any benefits. They claim that efficient components do not make efficient products.

Now they are suggesting that this could be clarified by regulating fans shown in catalogues and not regulating fans that are ‘bespoke’. A bespoke fan is one that is different to a catalogue fan. Just painting a fan pink will make it bespoke and a loop hole will exist to avoid regulation.

### **4) And what's the position of the fan industry?**

To exclude integrated fans from the regulation adds an opportunity to avoid the requirement to comply. It would add confusion and multiple developments, e.g. for product lines to make efficient designs where they are seen to be within the scope of the regulation and less efficient ones where they are included within other energy-related products.

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#### **5) What would happen, if integrated fans would be excluded nevertheless?**

A large portion of the mentioned savings comes from fans integrated in other energy-related products. In some industry sectors more than 90 percent of the fans placed on the market are integrated in other energy related products. A change of the scope to exclude integrated fans will be a step back to 2012, an increase in energy consumption, a loss of investment and jobs and a return to using old inefficient machinery.

#### **6) How does the process to discuss these topics on EU level look like?**

There is a legal requirement to review regulations. This occurred for 327/2011 from April 2014 until the Consultation Forum of April 2015. There are some specific requirements of the review including investigation of raising the minimum energy efficiency limits. The forum is a meeting of member states, NGO's and other stakeholders to see the proposed revision presented by the Policy Officer of Department General (DG) Energy. It had a positive effect with many changes in the revision coming from the fan industry.

#### **7) At the moment you are observing the next review ...**

Yes, the review process has restarted. There is a new Policy Officer in DG Energy responsible for regulation 327/2011 and its review. This has meant going over old ground as the Policy Officer has reviewed the old files. However the fan industry was in a good position with the EVIA fan WG to answer the questions and to balance the pressure from the anti-cascading groups against the inclusion of integrated fans.

#### **8) How did this work out?**

In June 2018, the Regulatory Scrutiny Board (RSB) rejected the impact assessment. It was rejected on two points: insufficient evidence of the impact relating to large fans, with more than 100 kW, and of the impact on manufacturers of products where a fan is integrated.

This is most worrying: The objective of the eco-design regulation is to reduce our impact on our environment and most of the achieved reduction came from fans integrated in other products! If the rejection remains, we would fall back to the level of 2012.

#### **9) And how will you continue?**

The battle is not over, and the fan industry will be pragmatic in its response via the Policy Officer. He plans to re-submit to the RSB in fall with more evidence from stakeholders. Hopefully people will see the true picture and retain the current scope and continue to reduce our impact on our environment.

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*Geoff Lockwood is Chairman of the Fan Working Group of the European Ventilation Industry Association (EVIA) and Technical Director at ebm-papst UK Ltd.*

*In 2005 I became Chair of the Fan Manufactures Association. One year later the Lot 11 study, that eventually formed the Energy related Product Regulation for fans, was started. In February 2011 the European fan industry managed to organize itself into a European voice with the formation of the Fan Working Group of the European Ventilation Industry Association (EVIA fan WG) — with me as chairman — just before the publication in March 2011 of regulation 327/2011.*

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Selection: Geoff Lockwood in interview.

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Characters approx. 5,300, including headings and sub-headings  
Tags ErP, regulation 327/2011, cascading regulation, fans, energy savings  
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#### About ebm-papst

The ebm-papst Group is the world's leading manufacturer of fans and motors. Since it was founded, the technology company has continuously set global industry standards: from the digital interconnection of electronically controlled EC fans to aerodynamic improvements for fan blades to the use of eco-friendly materials.

In fiscal year 2017/18, the company achieved sales of over € 2 billion. ebm-papst employs over 15,000 people at 27 production sites (e.g. in Germany, China and the US) and in 48 sales offices worldwide. Fans and motors from the world market leader are used in many industries, including ventilation, air conditioning and refrigeration, household appliances, heating, automotive and drive engineering.

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