



**General recommendation:** The IA needs to justify the scope of the proposed regulation, in particular for those types of fans where average energy efficiency already provides least life-cycle costs. Potential substitution effects between different fan categories should be analysed. The IA also needs to discuss the impact of setting minimum requirements for motors on the market structure. The analyses of impacts on jobs and on administrative burden need to be strengthened.

**(1) The scope of the regulation requires further justification.** Firstly, the IA should explain why it focuses on fans in the power range of 125W-500kW. Secondly, the report should justify the rationale for regulating those types of fans for which the least life cycle costs are already at average efficiency levels (centrifugal FC, cross-flow, box, and roof, p.12). Increasing efficiency levels for these fans would result in raising life cycle costs which could be in contradiction to the requirement of article 15.5. In this context the IA report should include a brief discussion on possible substitution effects between different fan types.

**(2) The IA should analyse the impact of setting minimum requirements for motors on the fan market structure.** While the impact on the overall improvement of energy efficiency is analysed in section 6.2, the IA report should clarify to what extent the regulation of motors (and notably the effect on prices) will lead to change of the market share of different types of fans, and if so what the consequences of this would be for the baseline scenario.

**(3) The analysis of impacts on employment needs to be refined.** The IA should present the major assumptions underlying the analysis of employment effects more transparently and better distinguish between short and long term effects. The IA report currently seems to assess employment impacts as a function of total turnover of the industry manufacturing fans, assuming at the same time the same labour intensity and nearly full ability to pass the costs through. In consequence the higher overall costs, the higher the increase in employment (see table 5.5 p.36). This seems to be at odds with the discussion on p.35 regarding difficulties for SMEs in finding skilled labour. The IA report should strengthen the analysis of impacts on SMEs by referring to more specific cases and by better integrating the feedback received from the stakeholder consultation.

**(4) Assessment of administrative burden should be aligned with the requirement of the IA guidelines.** The IA report should follow more closely the methodology of administrative burden assessment. For instance, neither transposition, nor testing costs should be counted as administrative burden. The IA should be clear what new, if any, information obligations the proposed regulation will introduce, and what the costs of these would be.

**(D) Procedure and presentation**

Procedural and presentational requirements have been met.

**2) IAB scrutiny process**

Reference number	(comitology)
Author DG	TREN
External expertise used	No
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