



Ms. Stella Kyriakides

European Commissioner for Health and Food Safety  
European Commission  
Rue de la Loi 200  
1049 Brussels  
BELGIUM

Brussels, Tuesday, 07 April 2020

Dear Commissioner,

I am writing to you on behalf of the industry associations ADC3R, ASERCOM, EHI, EHPA, EPEE and EVIA, representing the heating, cooling and ventilation industry (HVACR<sup>1</sup>) as well as ECSLA and Transfrigoroute International, representing the cold storage and temperature-controlled logistics sector.

With this present letter, we would like to ask the European Commission's guidance to ensure a more unified approach within the EU Single Market on critical infrastructure and essential goods and services. To support this unified approach, we suggest fast actions for a better implementation and enforcement of Single Market rules as indicated in the Commission Communication 2020/94 from March 10<sup>th</sup>, 2020.

We have reached a crucial moment, when decisions are taken to define which facilities and services are critical for a country's operation. HVACR services and manufacturing sites as well as the entire cold chain are part of such critical infrastructure and should therefore be allowed to keep running. It is crucial that all EU Member States adopt a unified approach.

Our industries have an essential role:

- For the continued distribution of heat-sensitive medicines and medical devices
- For the transport, delivery and storage of food, including fresh (perishable) and frozen food
- For the operation of key facilities such as datacentres
- For the health and well-being of people that need cooling, heating and ventilation for a comfortable and healthy indoor air environment

Our sectors produce, install, service and use systems for heating, cooling and ventilation. Heating, cooling and ventilation systems are even more essential today to ensure that health measures can be safely implemented, in hospitals, supermarkets, or caring homes, but also to ensure that citizens across Europe, staying at home, have functioning heating, cooling and ventilation systems and hot water supply. Likewise, the cold storage and refrigerated transport industry continue to be critical services to ensure the continuity of the cold chain and allow for example shops and supermarkets to be replenished on a daily basis. For these reasons, it will be essential that HVACR technicians are allowed to intervene in case of required equipment installation, maintenance or failure, especially in critical infrastructures; and that the cold chain is able to work continuously without being interrupted.

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<sup>1</sup> HVACR = Heating Ventilation Air Conditioning Refrigeration



Through this difficult time, more than ever, our industries remain committed to maintain the health, safety, productivity and comfort of employees and all citizens, and support the measures governments are taking to contain the spread of the COVID-19 virus.

Sincerely,

Laurent Guégan,  
ADC3R President

Wolfgang Zaremski,  
ASERCOM President

Christine Weiker,  
ECSLA Secretary General

Federica Sabbati,  
EHI Secretary General

Thomas Nowak,  
EHPA Secretary General

Andrea Voigt,  
EPEE Director General

Joan Miró Ramos  
EVIA Chairman

René Moeijes,  
Transfrigoroute International  
President

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## ABOUT ADC3R

Our association, ADC3R, promotes the interests of the companies which cumulatively carry out the activities of distribution, filling, recovery and reclaiming of refrigerant in France, major actors in the refrigeration and air conditioning sector. Our members are also key actors in Europe. As such, we represent more than 400 supply points and 90% of the natural and synthetic refrigerants in distribution in France. Through our industrial network, we also guarantee the collecting and treatment of all fluorinated refrigerants and are therefore an essential part of the environmental policy for refrigerants. Therefore, we are the key players in the process of substitution of chlorinated and then fluorinated greenhouse gases with the implementation of the Montreal and Kyoto protocols. We have always been pro-active in the different phases of this substitution, taking care to promote the most effective actions to reduce emissions while always having the safety of operators and users as a concomitant concern.

Please see our website (<http://www.adc3r.com>) for further information.

## ABOUT ASERCOM:

ASERCOM, the Association of European Component Manufacturers is the platform for dealing with scientific and technical topics and their challenges. Our aim is to promote standards for performance rating, methods of testing and product safety. We focus on improved environmental protection, supporting the HVAC & R industry and its customers. One of the strengths of ASERCOM is the cross-company cooperation of the member company's delegates and the resultant knowledge transfer. In five different areas of activities ASERCOM is dealing with the following key topics: certifications, standards, technologies, policies and regulations, and communications.

Contact: ASERCOM President: Wolfgang Zaremski, [zaremski@asercom.org](mailto:zaremski@asercom.org)

ASERCOM Secretariat: [office@asercom.org](mailto:office@asercom.org)

## About EHI

The European heating industry brings together companies that are leaders in the production of efficient heating systems. Our engineers develop the heating solution for every building need, from boilers to solar thermal systems, from heat pumps to fuel cells, from radiators to underfloor heating. Whether it is a cottage in Sweden, a skyscraper in Frankfurt or a guesthouse in Sicily, we make it work. For tomorrow's changed energy system, our members are innovating in hybrid and digital solutions. They develop high-efficiency and renewable-based systems. These innovations will improve Europe's homes and our environment. Please visit our website ([www.ehi.eu](http://www.ehi.eu)) for further information.



## About ECSLA

ECSLA is the European umbrella association for the temperature controlled logistics sector. We represent food business operators who deal in particular with foodstuff that needs to be stored, transported and distributed in temperature controlled conditions.

Our members daily business is to take care of frozen and fresh (perishable) food and to provide the temperature controlled storage capacity to safely freeze, store and distribute raw materials such as fruit and vegetable as well as meats and fish products, essential ingredients such as milk and dairy products and all finished frozen food like ice-cream, readymade dishes, etc.

ECSLA member companies and national associations are a crucial link in the food supply chain connecting producers and processing companies with retailers and ultimately with the consumer. Our members run public cold stores across the EU with a capacity of more than 60 Mio. Cubic meters.

## About EHPA

The Brussels based European Heat Pump Association (EHPA) represents the majority of the European heat pump industry. It has currently 123 members from all parts of the industry's value chain: heat pump and component manufacturers, research institutes, universities, testing labs and energy agencies. Its key goal is to promote awareness and proper deployment of heat pump technology in the European marketplace for residential, commercial and industrial application. EHPA coordinates the European Quality label for heat pumps and the EUCERT education and training scheme for heat pump installers. It compiles the annual sales statistics and market outlook. For more information, please visit: [www.ehpa.org](http://www.ehpa.org)

## About EPEE

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of over 50 member companies as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment. Please see our website (<http://www.epeeglobal.org>) for further information.

## About EVIA

The European Ventilation Industry Association (EVIA)'s mission is to represent the views and interests of the ventilation industry and serve as a platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States. Our membership is composed of 42 member companies and 6 national associations across Europe, realising an annual turnover of over 7 billion euros and employing more than 45,000 people in Europe.



EVIA aims to promote highly energy

efficient ventilation applications across Europe, with high consideration for health and comfort aspects. Fresh and good indoor air quality is a critical element of comfort and contributes to keeping people healthy in buildings.

## About Transfrigoroute International

Transfrigoroute International is the specialist independent umbrella association for the temperature-controlled road transport sector. Founded in 1955, Transfrigoroute International is the only organization active at the EU level which represents the temperature-controlled transport sector. TI members include haulage companies, involved with transport at controlled temperatures of foodstuffs and other goods in solid or liquid form, manufacturers and technical testing organisations. TI membership is also open to service companies which provide technical assistance, insurance and damage assessment services, legal assistance and en-route support and patrons who support the association's objectives.