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Eurovent Position Paper on CBAM scope extension

In a nutshell

CBAM should cover final HVACR products, not only components. Otherwise EU manufacturers face higher input costs while imported finished equipment avoids equivalent carbon costs, weakening the level playing field and undermining EU objective to manufacture net-zero technologies in Europe.

Introduction

Eurovent welcomes the opportunity to provide feedback on the Proposal for a Regulation amending Regulation (EU) 2023/956 as regards the extension of the Carbon Border Adjustment Mechanism to downstream goods and anti-circumvention measures.

Eurovent supports the objective of extending CBAM to downstream products to strengthen carbon leakage protection, close circumvention risks and improve the level playing field for European manufacturers. This paper sets out Eurovent's position on the proposed scope extension, with a focus on heat pump, ventilation, air conditioning and refrigeration (HVACR) products.

Our ask

Heat pump, ventilation, air conditioning and refrigeration (HVACR) products should also be included in the list of downstream products covered by CBAM in Annex I.

Our reasons

Many HVACR products contain large quantities of steel and aluminium. EU-based manufacturers therefore face higher material costs due to EU carbon pricing.

Extending CBAM to final HVACR products would help level the playing field between EU and non-EU manufacturers, prevent carbon leakage and protect the competitiveness of European manufacturing.

The same reasoning used in the Commission proposal to include other downstream products, such as household appliances, applies equally to HVACR equipment.

This reasoning is even more relevant for HVACR equipment, given the EU's ambition to manufacture net-zero technologies such as heat pumps in Europe. CBAM should support this by including them in scope, not create further disadvantages for EU producers.

Our concerns

The current Commission proposal includes certain HVACR components but not final products. This risks making the situation even worse.

EU manufacturers will face even higher costs for materials and components than they already do, while imported finished equipment will continue to avoid carbon costs.

Our proposed additions to the table in Annex I, paragraph 2

CN code	Greenhouse gas
<i>CN 8414 59 – Other fans</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8415 10 – Air-conditioning machines, of a kind designed to be fixed to a window, wall, ceiling or floor, self-contained or “split-system”</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8415 81 00 – Air-conditioning machines incorporating a refrigerating unit and a valve for reversal of the cooling/heat cycle (reversible heat pumps)</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8415 82 00 – Air-conditioning machines, incorporating a refrigerating unit, other than those of subheading 8415 81</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8415 83 00 – Air-conditioning machines, not incorporating a refrigerating unit</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8418 50 00 – Other refrigerating or freezing chests, cabinets, display counters, showcases and similar refrigerating or freezing furniture</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8418 61 00 – Heat pumps, other than air-conditioning machines of heading 8415</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8418 69 00 – Other refrigerating or freezing equipment.</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8419 50 – Heat-exchange units:</i>	<i>Carbon dioxide and perfluorocarbons</i>
<i>CN 8479 89 97 – Machines and mechanical appliances having individual functions, not specified or included elsewhere in this chapter — other</i>	<i>Carbon dioxide and perfluorocarbons</i>

About Eurovent

Eurovent is the voice of the European Heating, Ventilation, Air Conditioning and Refrigeration (HVACR) industry, representing over 100 companies directly and more than 1.000 indirectly through our 16 national associations. The majority are small and medium-sized companies that manufacture indoor climate, process cooling, and cold chain technologies across more than 350 manufacturing sites in Europe. They generate a combined annual turnover of more than 30 billion EUR and employ over 150.000 Europeans in good quality tech jobs.

Mission

Eurovent's mission is to bring together HVACR technology providers to collaborate with policymakers and other stakeholders towards conditions that foster fair competition, innovation, and sustainable growth for the European HVACR industry.

Vision

Eurovent's vision is an innovative and competitive European HVACR industry that enables sustainable development in Europe and globally, which works for people, businesses, and the environment.

→ For in-depth information and a list of all our members, visit www.eurovent.eu

Who is behind this position?

Eurovent uses fair and transparent decision-making procedures. Every member is given a chance to voice their opinion, and reasonable efforts are made towards compromise and the accommodation of disagreements. Votes are only held as a last resort.

1. Who receives which number of votes?

At Eurovent, the number of votes is never determined by organisation size or membership fee level. Whether SME or large multinational, each member receives the same number of votes.

2. Who has the final decision-making power?

Eurovent Working Groups decide on matters within their remit. They are open to all members. Eurovent's committee of national associations is tasked with mediating in case of conflicts.

3. How European is the association?

Eurovent members manufacture across more than 350 sites in Europe, generate a combined annual turnover of more than 30 billion EUR, and employ over 150.000 Europeans in good quality tech jobs.

4. How representative is the organisation?

Eurovent represents over 100 companies directly, covering well over 80% of the market in most segments, and more than 1.000 companies indirectly through our 16 national associations.

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.