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EPEE & CECED DRAFT – NOT FOR CIRCULATION

**Position on the Working Documents for Ecodesign ENER Lot 30 (motors)**

**EXECUTIVE SUMMARY**

EPEE and CECED call upon the European Commission and Member States to carefully consider the provisions set out in the current Working Document for minimum Ecodesign requirements with regard to motors included in other products and information requirements for motors which are exempted.

EPEE and CECED believe that motors, which are integrated into equipment already covered by Ecodesign requirements, should be excluded from the scope of this measure in order to avoid unnecessary double regulation.

Furthermore, information requirements should be deleted as they create an unnecessary administrative burden and could result in the publication of commercially sensitive data.

Lastly, we call upon the European Commission and Member States to revise the timing of the various implementation tiers to allow for sufficient preparatory time for manufacturers to adapt to the new requirements.

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## Double-regulation is unnecessary and should be avoided

Working Documents for ENER Lot 30 (motors) in Article 1 states:

*“This Regulation establishes ecodesign requirements for the placing on the market and for the putting into service of motors,* ***including where integrated in other products*** *and variable speed drives.”*

EPEE and CECED call upon the Commission to delete Ecodesign requirements for motors incorporated into products, if these products already need to comply with ecodesign requirements (e.g. air-conditioners). In the worst case, such double-regulation would increase the cost of products without increasing their energy efficiency, thereby reducing the use of energy-efficient products by consumers.

Double-regulation is unnecessary and should be avoided for the following reasons:

* Double regulation increases the economic burden for users and manufacturers without necessarily leading to more efficient products: the energy efficiency value of a final product does not simply represent the sum of its components’ efficiencies.
* Ecodesign requirements at product level are based on the analysis of the Ecodesign preparatory study, which takes into account the components’ efficiencies and their improvement potential when incorporated into the final product.
* Regulating motors incorporated into products will represent a significant burden for market surveillance authorities as additional testing at component level would be required. EPEE and CECED believe that adding such testing obligations will further hamper effective market surveillance.
* Double regulation will be counter-productive. In practice, manufacturers optimize the efficiency of their products by making trade-offs between various options within a cost envelope dictated by the market price, derived from the Least Cycle Cost based on Ecodesign requirements for the complete product. Among the trade-offs, manufacturers can use specific components subject to ecodesign regulation, but can also choose different options not subject to such regulations (e.g. improved thermodynamic cycles). Imposing specific components through double regulation narrows the manufacturer’s choices to optimize complete – and complex - products. It can only result in overall higher cost or lower efficiency. This is undermining the very principle of LCC analysis of complete products.
* Furthermore, double-regulation would result in a misalignment of the various implementation tiers, for instance if requirements for a component come into force in 2015 and additional requirements for the overall product in 2016. This would result in complications with regard to the redesign cycle of products. Manufacturers require time to redesign their products, with a partial redesign taking around 18 months and a full redesign approximately 30 months. A misalignment of implementation tiers for component requirements and product requirements would significantly distort these redesign cycles.
* In most of the cases, when motors are incorporated into final products, such as air conditioners, these motors are produced by original equipment manufacturers (OEMs) and sold to product manufacturers, without the component being placed on the market. Consequently, components to be integrated into products, should be exempted from the scope.
* In order to create a clear understanding of which products are outside the scope of the Ecodesign measure on motors, EPEE and CECED suggest developing a list of products for which independent testing is impossible and which are consequently outside of the scope of Ecodesign requirements.

## Information requirements for exempted products should be deleted

The Working Document sets out that products, for example motors which are completely integrated into a product whose energy performance cannot be tested independently, are exempted from the scope.

Nevertheless, according to Art. 1(2), these products should fulfil a number of information requirements such as operating conditions, model number, etc. which will have to be published on:

1. the technical documentation of motors;
2. the technical documentation of products in which motors are incorporated;
3. free access websites of manufacturers of motors;
4. free access websites of manufacturers of products in which motors are incorporated.

EPEE and CECED call upon the Commission to delete information requirements for exempted motors, particularly if they are integrated into other products.

As most of these requirements are already displayed on or near the rating plate of the motor, they would present an additional administrative burden for manufacturers that does not add any value for consumers and users.

In addition, the publication of information requirements on public website would result in revealing commercially sensitive data.

## Timing of the tiers

EPEE and CECED call upon the European Commission to revise the implementation tiers as set out in the current Working Document in Art. 3.

According to the Working Document, the first requirement would already apply as of the entry into force of the Regulation, which does not allow manufacturers to prepare for the requirements early enough. As stated above, the redesign cycle for a product can take up to three years. Consequently, a longer time period for Tier 1, i.e. two years after entry into force should hence be introduced.

Additionally, EPEE and CECED call upon the Commission to adapt the timing of the additional tiers to be consistent and to set out the number of years after entry into force instead of the concrete date, i.e. 1 January 2015. This will ensure that potential delays of the entry into force of the Regulation will not impact the preparation time required for manufacturers.

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**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 40 member companies, national and international associations.

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.

EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market.

As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. Please see our website ([www.epeeglobal.org](file:///\\GBE-SRV02\ARCHIVES\Grayling\Data\Clients\Current\EPEE\3.%20F-Gas%20Working%20Group\1.F-gas%20Review\EPEE%20positions\F-Gas%20position\2013\www.epeeglobal.org)) for further information.

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**About CECED:**

CECED represents the household appliance manufacturing industry in Europe. Its member companies are mainly based in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Bosch und Siemens Hausgeräte GmbH, Candy Group, Daikin Europe, De’Longhi, AB Electrolux, Gorenje, Indesit Company, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. GmbH & Co., Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe.

CECED’s member Associations cover the following countries: Austria, the Baltic countries, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom.

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