

Draft Ecodesign Regulation for Motors

EXECUTIVE SUMMARY

APPLiA, EHI and EPEE have carefully reviewed the draft Ecodesign Regulation for Motors that the Ecodesign Regulatory Committee will discuss on 14 January 2019.

Our associations would like to emphasise two remaining concerns that have not been addressed and that need to be taken into consideration in view of the setting of an optimal framework for ecodesign requirements for motors:

- ‘Cascading’ is endangering freedom to innovate without any benefit for either consumers or the environment – Alternatives to cascading exist;
- Spare parts should be exempted from the requirements to guarantee longer product lifetimes and prevent waste generation.

1. Cascading’ is endangering freedom to innovate without any benefit for either consumers or the environment – Alternatives to cascading exist

a. Cascading is endangering freedom to innovate without any benefit for either consumers or the environment

APPLiA, EHI and EPEE consider that regulating parts integrated into products that are already themselves covered by ecodesign measures (also known as the “cascading” or “double regulation” principle) is endangering freedom to innovate without any benefit for either consumers or the environment. Imposing the choice/use of specific parts in the design process would draw on resources that the producer could use to invest in alternative innovative and more energy efficient technical solutions. **By allocating resources where more efficiency can be achieved, the consumer receives an affordable and more efficient product.**

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| <p><input checked="" type="checkbox"/> “Technology neutrality principle” in the Ecodesign Framework Directive should be maintained: energy efficiency requirements for products and freedom for manufacturers to innovate and determine the best solutions.</p> | <p><input type="checkbox"/> An improved motor does not result necessarily in an improved product: this depends on what working point is selected, what sound level is required, which efficiency needs to be obtained.</p> |
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Dictating the selection of specific parts, for products that already comply with ecodesign requirements, does not deliver any significant additional environmental benefit. Instead it imposes constraints that will certainly add costs. In most cases, there is **no return on investment for the consumers and innovation/freedom of manufacturers to design is hampered.**

We understand that in view of making efficient use of their resources, **Market Surveillance Authorities are unlikely to test an individual part if they found the final product to be compliant with ecodesign requirements.** This could lead to a competitive advantage for product manufacturers outside of the EU as – in the absence of dedicated market surveillance – they would probably freely choose between parts and thereby focus on the final product’s energy efficiency while optimizing the most suitable and cost effective combination of parts without regard to the minimum energy efficiency requirements for those parts.

b. A potential solution: exclude bespoke motors

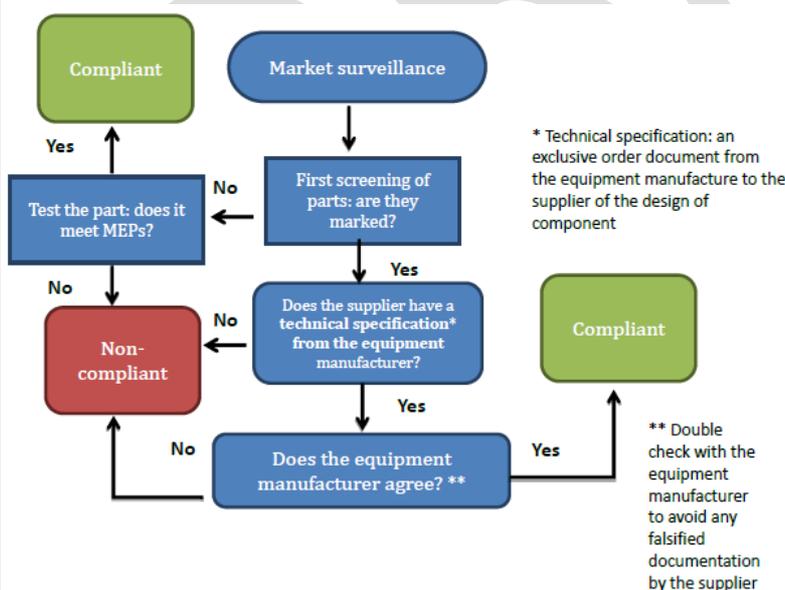
In light of the above, we believe that parts for products which are already regulated by ecodesign requirements, should be excluded from ecodesign measures. However, we appreciate that parties in favour of regulating parts fear that excluding parts integrated into other products covered by ecodesign regulations could turn into a loophole as Market Surveillance Authorities may have difficulties in assessing whether or not a part is intended to be integrated into a final product regulated under ecodesign.

APPLiA, EHI and EPEE have worked on a practical solution to address this perceived loophole, based on a distinction between “catalogue” parts – available off the shelf – and “bespoke” parts – built to fit a specific application. We propose to exclude bespoke parts integrated into products that are already themselves covered by ecodesign measures from Ecodesign Regulations, whilst catalogue parts – which represent by far the largest share of parts – would remain within the scope.

We recommend exempting a bespoke motor that has the following characteristics:

1. Is designed and manufactured to meet a detailed **environment-related specification** supplied by, or developed in conjunction with, a particular final product manufacturer or developed and produced by the final product manufacturer itself and indelibly and univocally marked for this purpose
2. Is **not placed on the market** as a general product
3. Is the **result of a unique commercial relationship** between the part manufacturer and the final product manufacturer or is developed and produced by the final product manufacturer itself
4. Is integrated into final products that are **regulated under Ecodesign**
5. Is clearly **marked** as bespoke motor
6. Is assessed in **reviews of regulation** and **preparatory studies of products integrating motors** and it is demonstrated that the improvement potential is limited or not existing.

+ Bespoke motors made according to the specifications of an equipment manufacturer generally carry the **brand name of the equipment manufacturer**



The loophole can be prevented:

- ✓ Marking of motors
- ✓ Technical specifications of motor manufacturer should be readily available for MSA
- ✓ Confirm technical specifications with product manufacturer

2. Spare parts should be exempted from the requirements to guarantee longer product lifetimes and prevent waste generation

According to the draft Regulation (article 4.2.(m)), "motors placed on the market not later than 1 July 2029 as substitutes for identical motors integrated in products and placed on the market no later than 1 July 2022" are exempt from the efficiency requirements.

The availability of spare parts for maintenance and repair brings significant environmental benefits as it guarantees longer product lifetimes and prevents waste generation, which is one of the core elements of the EU's Circular Economy Action Plan and the EU waste hierarchy. It is also crucial that spare parts are available for refurbishment and remanufacturing.

In order to promote resource efficiency as of now, it is key that EU product policy rules allow original spare parts on the market during the lifetime of the products they are integrated into ("repair as produced" principle).

About APPLiA: APPLiA represents the home appliance industry in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Groupe Atlantic, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Smeg, Vestel, Vorwerk and Whirlpool Europe. APPLiA's member Associations cover the following countries: Austria, Baltics, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom. www.applia-europe.eu

About EHI: EHI, the association of the European Heating Industry, represents 90% of the European market for heat and hot water generation, heating controls and heat emitters, as well as 75% of the hydronic heat pump market. Our Members produce advanced technologies for heating in buildings and renewable energy solutions including: heat pumps, solar thermal, biomass heaters, boilers, heating systems, burners, components and system integrators, radiators, surface heating & cooling. In doing so, we employ directly more than 160.000 people in Europe and invest about 700 million euro a year in energy efficiency. www.ehi.eu

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 48 member companies, national and international associations from three continents (Europe, North America, Asia). 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) for further information.