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## Joint Industry Position Paper (CECED, DIGITALEUROPE, EPEE, JBCE & JRAIA)

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

#### EXECUTIVE SUMMARY

CECED, DIGITALEUROPE EPEE, JBCE and JRAIA call upon the European Commission to carefully consider the provisions set out in the current Working Document for ecodesign requirements for ENER Lot 30, especially with regard to motors included in other products and information requirements for motors which are exempted.

We believe that motors in products, which are already covered by existing ecodesign requirements, should be excluded from the scope of this Lot in order to avoid unnecessary double-regulation.

Furthermore, information requirements for exempted products should be deleted for motors fully integrated into products that are outside of the scope of Lot 30, as they create an unnecessary administrative burden and could result in the publication of commercially sensitive data.

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

#### 1. 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.”*

CECED, DIGITALEUROPE, EPEE, JBCE and JRAIA 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.



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

1. 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.
2. 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 according to the Least Life Cycle Cost principle.
3. Double regulation will be counter-productive. For equipment already covered by ecodesign measures, manufacturers, in order to meet the requirements, optimise the efficiency of their products by making trade-offs between various options within a cost envelope dictated by the market price and based on the Least Life Cycle Cost (LLCC) 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 regulation on specific components narrows the manufacturers' choices to optimize complete – and complex – products. It may result in overall higher cost or lower efficiency. This is undermining the very principle of LLCC analysis of complete products.
4. The minimum requirements for motors are based on the rated power. Nevertheless, motors have several working points, for instance washing machines and vacuum cleaners. Therefore, a requirement based on the rated power makes very little sense and could be counterproductive. In the case of tumble dryers or washer dryers, for example, the motor power input losses are converted into heat, in accordance with the first law of thermodynamics, which adds up to the power of the heaters to heat the air. Therefore, any saving in the input power of the motor will require an equivalent addition in the power of the heaters. The sum of both will be exactly the same, and the energy benefit will be exactly zero.
5. Regulating motors incorporated into products will represent a significant burden for market surveillance authorities as additional testing at component level would be required. We believe that adding such testing obligations will further hamper effective market surveillance.
6. Motors completely integrated into a product of which the energy performance cannot be tested independently from the product are excluded. In order to create a clear understanding of which products are outside the scope of the ecodesign measure on motors, we suggest developing a list of products for which independent testing is impossible and which are consequently outside of the scope of Ecodesign requirements.
7. 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



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months. A misalignment of implementation tiers for component requirements and product requirements would significantly distort these redesign cycles. The vacuum cleaner is a good example: the next stricter general ecodesign requirements will come into effect in September 2017. With this step, different motors and improved design will be necessary for many models of vacuum cleaners. If in the time up to 2017 new requirements on single motors will appear, it would disrupt the design process of manufacturers. The introduction of motor requirements will lead to double costs for development without real improvement or much earlier adoption of the overall ecodesign product requirement with particular burden on SMEs.

8. 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. For motors not produced under OEM agreements, an issue related to double placing on the market could arise. They will be first placed on the market (POM) by the motor manufacturers when sold to the equipment manufacturers and a second time when POM by the manufacturers of the final product. When a manufacturer buys motors (that are compliant), they cannot always foresee when they will be integrated into the appliance and thus placed on the market once more. The double regulation will imply that manufacturers of the final products will be obliged to put on the market all motors (integrated into their equipment) before the entry into force of the motor requirements to avoid that their use is forbidden. The double POM of a product, compliant at the first POM and not compliant at the time of the second POM would create additional burden for manufacturers and surveillance authorities.

## 2. 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:

- (a) the technical documentation of motors;
- (b) the technical documentation of products in which motors are incorporated;
- (c) free access websites of manufacturers of motors;
- (d) free access websites of manufacturers of products in which motors are incorporated.

We call upon the Commission to delete information requirements for exempted motors.

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 without adding any value for consumers and users.



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

### 3. Timing of the tiers

We 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, we call upon the Commission to be consistent with the timing of the additional tiers by stating the number of years after entry into force instead of a 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 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.

#### **CECED - European Committee of Domestic Equipment Manufacturers**

Boulevard Brandt Whitlock, 114

1200 Brussels

Tel : +32 (0) 2 738 78 10

Email: [secretariat@ceced.eu](mailto:secretariat@ceced.eu)

Website: [www.ceced.eu](http://www.ceced.eu)

#### **About DIGITALEUROPE:**

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 58 corporate members and 36 national trade associations from across Europe. Our website provides further information on our recent news and activities: [www.digitaleurope.org](http://www.digitaleurope.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 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](http://www.epeeglobal.org)) for further information.

**EPEE – European Partnership for Energy and the Environment**



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Avenue des Arts, 46

1000 Brussels

Tel : +32 (0) 2 732 70 40

Email: [secretariat@epeeglobal.org](mailto:secretariat@epeeglobal.org)

Website: [www.epeeglobal.org](http://www.epeeglobal.org)

Follow us on Twitter @EPEESecretariat

#### **About JBCE:**

Created in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of almost 70 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, railway, textiles and glass products. Together, our member companies represented in 2013 global sales of 1.4 trillion euros. Building a new era of cooperation between the European Union (EU) and Japan is the core of our activities.

[www.jbce.org](http://www.jbce.org)

#### **About JRAIA:**

JRAIA, the Japan Refrigeration and Air Conditioning Industry Association, was originally established in February 1949 as the Japan Refrigerating Machine Manufactures Association which was thereafter reorganized in February 1969 to become an incorporated association and renamed as it is at present.

JRAIA is the trade association representing over 100 manufacturers of refrigeration and air-conditioning equipment in Japan. We, the members of JRAIA, have so far been dedicated to offering quality products to the markets of EU. JRAIA aims to promote and improve production, distribution and consumption of refrigeration and air conditioning equipment and their applied products, as well as auxiliary devices and components, automatic controls and accessories and thereby contribute to the steady development of HVAC&R industry and the improvement in people's standard of living.

For more information, please see our website [www.jraia.or.jp](http://www.jraia.or.jp)