

Europump comments on :
"Working document on possible ecodesign requirements for single stage end suction, vertical multistage and submersible multistage pumps"

General Remarks

Europump has worked productively and substantially with the European Commission consultants, AEA Future Energy Solutions, to finalise all technical content in their report correctly and professionally. After finalisation and publication, it would appear that numerous corrections have not been incorporated and, moreover, new scenarios have been developed (cut-off 70%) and added to the report in chapter 8. This is not acceptable for Europump as a major stakeholder in the process of LOT 11 EuP.

Chapter: Subject Matter

The paper deals with water pumps and not circulators, as mentioned in line 2 on page 2.

Chapter: Measurement and calculation method

- During the preparatory study, the need for a specific mandated European standard (*Method for the Qualification of Rotodynamic Water Pumps in Respect to Minimum Required Efficiency*) became apparent. Europump was asked by the representative of the European Commission to elaborate a draft for such an EN standard. It was agreed that this document would be ready when the implementing measures come into force. Reference to this new standard should at least be made in the legal document.
- As far as technically possible, the current standard EN ISO 9906 will be referenced in the new standard.
- As soon as the new standard is available, the reference to EN ISO 9906 should be legally removed.
- EN ISO 9906-1999 class 2 is not referenced in the standard. "Class 2" should be "Grade 2".
- A revision of EN ISO 9906 is prepared for the DIS stage, hence a dated reference is not reasonable.

Chapter: Information requirements for components and sub-assemblies

- The title of this chapter is misleading since two completely different subjects are treated: Components and Product Units (Motor, Control and Pump=Extended Product Approach – see below)
- Components and sub-assemblies (as the pump industry understands them with respect to their influence on eco-design and eco-impact) are fully within the sole responsibility of the pump manufacturer and need no reference in this legal text.
- Expected energy savings – independent of the borderline level set in future – are not expected to be as high as those achieved with the Extended Product Approach.
- Expected and published savings are:

	Consumption [TWh / pa]	Savings [TWh / pa]		
		Product Approach	Ext. Prod. Approach	System Approach
Water Pumps	137	4.45 *	35	18

* According to the LOT 11 Water Pumps study, AEA, April 2008, cut-off is 30% assuming that all old pumps are replaced 10 years after introduction; if all old pumps are not replaced, only 2.7 TWh/pa are saved.

- Europump also supports a holistic system approach as a stable tripod for energy savings.

Chapter: Market Surveillance

The reference to ANNEX II is not linked. No explanatory text about the verification procedure for market surveillance is given.

Chapter: Benchmarks

It must be understood that the 'best product' does not necessarily mean the best product for the specific application. This can only be found by individual consideration of the energy consumption in the application.

Chapter: Annex I: Ecodesign requirements

General Remark:

References to the so-called 'House of Efficiency' methodology and the part and overload conditions approach for pumps have not been included. The methodology is based on and includes such an approach but it is totally missing. It fosters the development of pumps that demonstrate good efficiency not only at best point, and hence is a fundamental contribution to energy savings.

Part b) Second staged minimum energy efficiency requirement

Cut-Off %	Dev. Costs [M€ / step]	Dev. Costs [M€] cumulative	Savings [TWh/y] Product Approach	Savings [TWh/y] Extended Product Approach
10	43,2	43,2	1,90	35
20	77,7	120,9	3,25	
30	105,9	226,8	4,45	
40	140,0	366,8	5,67	

- A high cut-off prevents rapid implementation of a fundamentally more efficient Extended Product Approach due to binding of the investment in the product approach.
- An additional 150 Mio€ have to be invested for only 1.2 TWh savings per year. This additional investment can be used more efficiently for an extended product approach.

Chapter: Annex I: Ecodesign requirements

Part c) Product information requirement

There are several reasons to refuse HEP-Labeling:

- With the introduction of such labelling, the customer is encouraged to buy these labelled pumps. However a possibly oversized pump is perhaps not the right choice for the intended application. Such a pump consumes more energy than a correctly sized pump with no label. Since the purpose of such labelling is to save energy, this aim will not be achieved.
- Eco-labelling in accordance with Council Regulation N° 1980/2000 and Council Regulation EEC N° 880/92 needs third party certification instead of self-declaration. This contradicts the EuP Directive which foresees binding to CE-marking and self-certification. Therefore Europump cannot accept such a proposal.

Chapter: Annex II

- Add to first sentence: '*... or the EN standard "Method for the Qualification of Rotodynamic Water Pumps in Respect to Minimum Required Efficiency" when it becomes available*'.
- Reference to 'EN ISO 9906-1999 class 2' → see above.

Explanatory Notes

Scope

Circulators are NOT within the scope of this paper - to be corrected.

Eco design requirements

- The second paragraph is misleading. The focus of EuP is energy savings and hence the energy efficiency of products. The LCC approach requires additional parameters of a system which is not within the scope of EuP. A 70% cut-off level would lead to very high development costs (>1 billion €). As shown before, the amount of money to be spent on such an approach would be much better used on the development of the extended product approach. Finally, these development costs will lead to higher product costs for the consumer but with an even better relationship between energy savings and costs. This issue has been discussed several times with the European Commission consultant.
- 5th paragraph - please change the last sentence as follows: 'No additional installation requirements referring to efficiency are identified for the pump itself.'

Energy Labelling

Second paragraph: the last sentence makes no sense and does not follow the explanations given in the previous two sentences (see above – HEP labelling).

Measurement Methods

See above

Market structure of the products covered

- Commodity pumps are not necessarily low price pumps.
- The pump market is a price-sensitive market. If market surveillance is not fast and effective, the risk of a high cut-off is that European manufacturers drop out and that low-cost imported products enter the European market. If that happens, European products will be replaced by imported products with the risk that energy will not be saved, and may even be increased. This proposal involves a very high risk for the European pump industry, the user and the objective of energy savings.

Impact on other EU legislation

- This paragraph applies to circulators in buildings and not to water pumps.
- Substantial energy savings in commercial buildings with water pumps can mainly be achieved with the proposed extended product approach.

International dimension

Europump agrees with the elaboration of a European Energy Efficiency Pump Standard '*Method for the Qualification of Rotodynamic Water Pumps in Respect to Minimum Required Efficiency*'. Please refer to comments made for "Market structure of the products covered".

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