

## ***Eco-design Directive (2009/125/EC)***

### ***Comments on the working document on a possible amendment of the Commission regulation 641/2009 with regard to ecodesign requirements for glandless circulators (by March 31<sup>st</sup> 2011)***

#### **1 Closing the loophole**

We welcome the proposal of closing the loophole described. It should be avoided that the components of a standalone circulator are sold separately in order to bypass the requirements. Further, replacing broken equipment by new energy efficient equipment is one of the most economically effective measures. We don't see the basis for requirements in case of maintenance of circulators as proposed by Europump; this would be outside the framework of the directive and very difficult for market surveillance to enforce. The idea of encouraging / requiring the exchange of old circulators is however worth considering in the next EPBD review.

What can be done in Ecodesign is requiring the manufacturers of components to inform the customer about the higher energy savings when the circulator is exchanged including its pump housing.

***We welcome the Commission proposal of changing the definitions in Article 2, but the scope should not be limited to standalone circulators. Integrated circulators should be efficient too, even if only part of the product is exchanged. For cases where this is technically impossible, the regulation has a transition period for spare parts.***

***An information requirement should be added to Annex I.2. for spare component parts (i.e. circulator without pump housing):***

***“5. When circulators are sold without pump housing, the following information must be visibly displayed on the packaging, in technical documentation, catalogues, on websites and other materials providing information to buyers of these components:***

***“To save maximum energy, the exchange of circulators complete with pump housing is intended” “***

#### **2 Amendment of the measurement method**

The EN Standard should be published or made available for the member states and stakeholders. Subsequently it could make sense to shift this amendment and to wait for the adoption of the methods until the measurement standards are finished. This would avoid multiple changes of the methods.

We cannot properly assess the proposed calibration for circulators used in thermal solar systems and in brine circuits of heat pumps. According to the working document, this factor may be used to compensate effects leading to lower efficiencies of small circulators; without

this calibration larger circulators would be chosen leading to higher energy consumption. It needs to be noted that a calibration itself does not reduce the actual energy consumption (adapting the requirements would have the same effect but would more straightforward). Otherwise the requirements for solar and brine circulators seem to be weakened by this procedure. More detailed explanation is necessary before we can finally assess this issue. This information may include an assessment if the load profile for central heating circulators is representative for solar and brine circulators, too, because these could have different load profiles.

*We ask the Commission*

- *to make the harmonised draft EN standards available to the member states and stakeholders*
- *to provide more information on the calibration of solar and brine circulators (Annex II, Point 2(9)).*

*We support the other proposed changes in Annex II.*

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