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Paul Hodson
Energy Efficiency & Intelligent Energy
DG Transport and Energy
European Commission

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By email

Dear Paul,

1. Please find below comments from the UK on the European Commission's (EC) proposed amendments to Commission Regulation 641/2009, with regard to eco-design requirements for glandless standalone circulators and glandless circulators integrated in products.
2. The UK welcomes the EC's proposed amendments, with respect to the action taken to close the loophole in scope. The UK commends the EC for ensuring that this Eco-design regulation can meet its intended purpose and for preserving the savings potential of the circulator market. The recommendations of Europump appear to add the necessary clarity to Article 2 and Annex I of Commission Regulation 641/2009.
3. The UK thanks the EC for the timely completion of required standardisation work (Article 7 of the Regulation). We have two small comments on the proposed revision:
 - i. We advise that Europump submit information to the Consultation Forum to support the value of the compensation factor included in calculations. They should also confirm that the compensation factor is the same for both solar thermal and heat pump systems. This information would ensure that recommendations are based on robust evidence.
 - ii. Where standalone circulators are referenced in the Explanatory Note, we assume that product-integrated circulators are also intended to be covered.

Yours sincerely,

Lucy Johnson

