

**Standards Commission**

<i>Issued by</i> Frank Ennenbach	<i>Date</i> 22.03.2011	<i>Page(s)</i> 1(2)
<i>Receiver</i> Mr. Grönroos-Saikkala  <i>Copy to</i>	<i>Subject</i> Comments to“ <b>COMMISSION REGULATION (EC) No 641/2009 implementing Directive 2005/32/EC of the European Parliament and of the Council with regard to ecodesign requirements for glandless standalone and boiler integrated circulators</b> ”	

Dear Mr. Grönroos-Saikkala

In relation to our discussions in the past, Europump supports the revision of the regulation No 641/2009.

Apart from the revision foreseen on the basis of the Article 7, based on the industry experience after the adoption of the circulator measure, Europump stresses the importance of clarifying the wording of the regulation regarding the definition of a circulator.

In commission regulation No 641/2009 the following definition of a circulator is written in article 2.1:

*‘circulator’ means an impeller pump which has the rated hydraulic output power of between 1 W and 2 500 W and is designed for use in heating systems or in secondary circuits of cooling distribution systems*

In line with the preparatory study, the word 'circulator' refers to both circulators with and without housing, but this is not explicit from the text. The industry has realized during the last year that due to this wording, which only implicitly includes circulators without housing, there seems to be attempts to sell low-efficient circulators without housing in the 'repair' market without the need to comply with the requirements of the regulation.

To ensure that circulators without pump housing are explicitly in the scope of the regulation Europump suggests to amend the definition of a circulator in **Article 2 in commission regulation (EC) 641/2009** regulation as follows:

*1. ‘circulator’ means an impeller pump, **with or without pump housing**, which has the rated hydraulic output power of between 1 W and 2 500 W and is designed for use in heating systems or in secondary circuits of cooling distribution systems*

The harmonized standards will define how to test and measure a circulator without pump housing.

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Failing clarifying the definition of a circulator, completely undermines the intention of this regulation and creates a very uncertain market situation and due to the fact that an estimated 75% of the circulator market is replacement the huge energy savings calculated in the impact assessment report will be reduced significantly. Europump estimates that at least half of the savings of 23 TWh per year in 2020 will be lost.

To ensure that the *maintained* circulator complies with the energy efficiency requirements in **Annex I.1 in commission regulation (EC) 641/2009** Europump suggests amending Annex I.1 in this regulation as follows:

*3. In case of maintenance of a circulator out of warranty the maintained circulator shall comply with the Energy Efficiency Requirements set out in sub-clause (1.) and (2.).*

*In case of maintenance of a circulator non compliant with this regulation, it has to be replaced by a circulator including pump housing complying with this regulation.*

Europump supports the revision 641/2009 and the amendments outlined in this document

Kind Regards

Frank Ennenbach

Chairman Europump Standards Commission