



## eceee's comments on the proposed self-regulatory initiative (SRI) for machine tools

eceee appreciates the initiative of the European Machine Tool Industries interest organisation CECIMO to propose a so-called self-regulatory initiative (SRI) for machine tools well ahead of any results from the preparatory study for possible eco-design requirements. It is our sincere hope that the early action and interest showed by CECIMO will be integrated with the process of the preparatory study to find solutions to many of the problems involved in regulating a group of products as complex as machine tools.

eceee wishes to make the following specific comments:

- Machine tools represent an extremely complex group of products with differing size and configurations. Several of the product characteristics are determined by the configuration and system set-up and will vary greatly among individual machines and systems. It is likely, however, that there are common features for all or groups of machine tools that could be more easily regulated or agreed upon. We envisage stand-by energy consumption to be such a feature.
- The strength of CECIMO's proposal is the outlined process and the suggested methodologies as to how different machine tools can be assessed and evaluated from a life-cycle perspective. The Commission is about to launch a preparatory study to determine this and other questions. It is our hope that CECIMO and the machine tools industry will contribute to find answers to some of the open issues.
- A number of components used in machine tools are or will be regulated under separate eco-design requirements. Given the complexity of machine tools as systems, it is important that components are strictly regulated with stringent energy performance criteria.
- The greatest energy saving potential for machine tools can be achieved within the area of system integration, which makes it difficult to reach full potential through policy instruments. More knowledge about the characteristic use of the most important types of machine tools is needed. Furthermore, the most typical energy efficiency measures should be documented and visible in a calculator.

### **About the European Council for an Energy Efficient Economy (eceee)**

eceee is a non-profit, membership-based European NGO. The goal of eceee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, eceee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of eceee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 participants from a wide range of backgrounds. eceee and its summer study offer governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.



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- CECIMO represents a large share of the market (reportedly 86% of machine tool manufacturers). This is an important precondition for a successful self-regulation, but this is in itself not a necessary condition for a successful agreement. Lacking results of the study, eceee does not want to rule out binding eco-design requirements for machine tools, or for specific tools, system or features in the future.

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