

European Commission
DG-TREN
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Comments of Austria regarding the working documents on possible eco-design requirements for 0,75 – 200 (370) kW electric motors and ventilation fans

Austria supports the initiative of eco-design requirements for fans and motors as a very useful approach to minimize future energy consumption.

Working document on possible eco-design requirements for ventilation fans

If possible the product categories should be minimized (e.g. cancel box and roof fans could be cancelled) and MEPS for different technological approaches should be harmonized as much as possible in the longer term.

The third timeline for MEPS for 2020 should be brought forward to 2015, with adaptation of the MEPS values.

Austria would suggest to include the following information requirements in the working document as mentioned in the “EuP Lot 11 Final Report: Fans” page 159f:

- Requirement that products are designed and constructed in such a way that they can be dismantled easily at the end of life so that materials used can be recycled. Plastic materials should be marked with the relevant logos.

- Requirement to prepare the material input into the products as defined in the eco design spread sheet model as presented in chapter 5.
- Requirement to deliver the information in a standardised form to the commission which collects the data from all manufacturers and make them available via an internet based data base.

The database could be structured like the already existing database for chillers on:
<http://www.thelcon.gr/Selector.aspx>

Therefore the necessary parameters for the database should be minimized, static efficiency should be highlighted. The translation process of the above mentioned database was very easy to implement. Especially fans for industrial applications, and fans for buildings applications bought within public bidding processes should be included.

The Eco-Labeling of fans should be considered, especially for fans for industrial applications and buildings. This label could be used as a criteria for bidding processes for buildings renovation or construction or for purchasing guidelines.

Working document on possible ecodesign requirements for motors:

Austria supports the upper limit of 370 kW (instead of 200 kW).

The possibility to tighten minimum requirements for the power range below 7,5 kW for 2015 onwards should be rechecked.

All values and definitions should be in line with the IEC Standard 60034-30.

Austria would suggest to include the following design requirements in the working document as mentioned in the “EuP Lot 11 Final Reports Motor”, page 106:

- Motors should be easily assembled and disassembled;
- a reduction of the diversity of materials used should be sought;
- a reduction of non-recyclable parts, namely plastic, should be sought;
- windings should be easily removed.

The EuroDeem database should be updated regularly with data from manufacturers.

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(on behalf of the Austrian Ministry of Economics and Labour)