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Eco design requirements for motors, fans, pumps and circulators: eceee's comments

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eceee welcomes the proposed eco-design requirements for motors, fans, circulators, and water pumps. In general we support that the regulations take the form of implementing measures and we approve of the staged approach where applicable.

Much of the comments given before and during the consultation forum were of a highly technical nature, and sometimes dealt with issues of product categorisation and definitions. Although important, we will refrain from commenting on the technical details, but wish to provide a few specific comments on motors and pumps respectively.

Specific comments on motors

Scope and definitions

eceee supports the extension of the scope from 0,75 - 200 kW to 0,75 - 370 kW, since this will clearly boost electricity savings in EU and neighbouring economies.

When IE3 efficiency level becomes mandatory in the proposed second stage, the scope should be kept to cover the range 0,75-370 kW motors. Thus, there should be no exemptions for the smaller-size products. We have learned that these smaller motor sizes can be produced cost-effectively today at the IE3 efficiency level.

Costs and benefits

The motor study has clearly shown that more stringent motor standards would be cost effective even at rather low operating hours (2000 h/yr) and low electricity prices. The calculations presented by the industry at the Forum were clearly misleading and inaccurate. E.g. aggregate EU investments over a long time period were compared with savings for just a short period of time. These calculations must not be used to justify a *laissez faire* approach.

Ambitions of the proposal

EU lags behind the US and China when it comes to motor standards and would still be behind the US for a number of years with the current proposal from the Commission. The proposed Implementing Measures would require that motors meet or exceed the IE2 efficiency level from 1 January 2011 onwards and the IE3 efficiency level from 1

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

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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.

eceee promotes the understanding and application of energy efficiency in the energy research, policy and commercial organisations. It offers membership for both individuals and organisations.

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January 2015 onwards, three years after the same IE3 efficiency level is mandatory in the US. We find this unacceptable and would like to see EU set its goals higher to reach the same efficiency level as the United States, which is a comparable economy.

Apart from not taking the opportunity to show leadership, the slowness in strengthening the standards in EU also increases the risk that less efficient motors that cannot be sold elsewhere are dumped in the EU.

We propose to align the timing of the levels with the USA: requiring IE3 from 1 January 2012. In that case the IE2 efficiency level should be introduced *earlier* than 1 January 2011.

Specific comments on pumps

The requirements for pumps appear to be sound in principle. However, we strongly question the method of selecting which pumps to be covered by the regulation and which to be left out. Any analysis should be based on commonly accepted LCC analysis methods.

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