



CEIR Contribution to Report Task 1-2 - Study for an update of the Ecodesign Working Plan Amended Ecodesign Working Plan

Brussels, 12 April 2011

CEIR is the European Committee for the Valve Industry and represents the vast majority of European manufacturers of industrial, building and sanitary taps and valves in EU countries, Switzerland, Russia, Ukraine and Turkey. Its priorities include the quality and innovation of its products and the harmonisation of technical, safety and environmental requirements on the EU market.

Taps and shower heads are mentioned as examples of energy-related products by Recital 4 of Directive 2009/125/EC establishing a framework for the setting of ecodesign requirements for energy-related products. The VHK report task 1-2 dated 18 February 2011 refers to taps and shower heads as being "Products that affect losses by building installations (especially for heated water) (page 19), and "passive products" (page 32) that influence the energy use of the 'active ErP'.

They are also listed in Table 5: Suggested product grouping for Amended Working Plan (page 49) under tertiary/domestic applications for sanitary heated and cold water.

In view of these findings, CEIR would like to provide the following elements for consideration of VHK and the Commission.

1. Ongoing studies and projects affecting directly or indirectly ecodesign of taps and shower heads

a. Lot 1 Boilers and Combi-boilers (DG Energy)

In May 2006, VHK started an ENER Lot 1 study on Eco-design of Boilers and Combi-boilers; the conclusions were published in September 2007. An implementing measure on boilers is still awaited. Taps and shower heads are end products of the sanitary hot water distribution system, and allow consumers to control the temperature of the water they use. They have an intermediary function between the consumer's need for a specific temperature and the heating unit (boiler). Taps and shower heads themselves have limited impact on potential energy savings. However substantial savings could be triggered at the level of the heating unit. CEIR believes that any potential measure affecting taps and shower heads cannot be a substitute for boiler efficiency, and insists that the planned ecodesign measure on boilers should be considered here.

b. Ecotapware Pilot Project (DG Environment)

In May 2010, EC DG Environment commissioned the Joint Research Centre Institute for Prospective Technological Studies (JRC-IPTS) to conduct a pilot project on taps and shower heads. The purpose of this pilot project is to develop a joint evidence base from which EU policy making in the area of water using products can be developed. In fact, the pilot project is clearly aimed at delivering ecolabel and public procurement criteria to be put in place most probably at the end of 2011. The project follows the MEEUP developed in accordance with and used in the context of the Ecodesign framework directive implementation.



In the latest project documentation dated March 2011, it is clearly stated that “the evidence base will gather information and data to assist the potential future development of other environmental policy instruments such as Implementing Measures under the Ecodesign Directive”. Since the project is following the applicable methodology for preparatory studies under the Ecodesign directive, CEIR wishes to obtain clarification on the exact relationship between the JRC pilot project and the identification of taps and shower heads under a working plan 2. CEIR would also like confirmation that the JRC pilot project will not preclude a specific study in accordance with the ecodesign process and procedures in the event that taps and shower heads fall under a working plan 2.

In any case, the preliminary findings of the JRC pilot project show that the use phase of taps and shower heads is by far the most relevant to address potential environmental improvement. Taps and shower heads are identified as “end of the pipes products”, explaining their limited influence on water and energy consumption. It is also made clear that the highest environmental benefit which can be achieved with regard to taps and shower heads relates to water use, or rather reducing water waste. Additionally, users’ behaviour and comfort are recognised as being critical factors which substantially influence the environmental efficiency of taps and shower heads.

c. DG Environment building blocks in water efficiency

Following the 2007 Commission Communication on water scarcity and droughts, and the establishment of “building blocks” for further actions in 2010, last year DG Environment published an invitation to tender for a study on the water efficiency of buildings. This study is ongoing. It actually follows another study conducted by Bio Intelligence Service and concluded in June 2009 which already identified taps and shower heads as offering potential for water savings. Additionally, in 2009, DG environment completed a study on efficiency standards for water using products which will feed into the project on water efficiency of buildings. We understand that based on these studies, DG Environment also intends to present a policy review and possible legislative proposals

2. Other relevant legislation and policies

CEIR wishes to draw particular attention to the applicable European and national sanitary and hygiene regulations which could impose limitations on potential improvements in terms of water flow and temperature. Although industry would very much favour harmonisation of legislation in this area, national divergences exist and they have to be carefully studied before considering water flow or temperature reduction for the sake of environmental performance of sanitary products.

3. Conclusions

CEIR invites VHK to take due consideration of the various factors summarised above before recommending the identification of taps and shower heads as ErPs under a future working plan 2. Most importantly, and in view of parallel policy developments, CEIR urges the European Commission to clarify its policy approach towards water using products such as taps and shower heads. The valves sector already faces major difficulties due to a lack of harmonisation of national sanitary requirements, it needs coherence and predictability.

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