

Brussels, 8 March 2019

Europump¹, the European Pump Industry Association and EUSA, the European Union of Swimming Pool and Spa Associations² have adopted jointly the following position paper:

**Comments on “Ecodesign Pump Review -
Study of Commission Regulation (EU) No. 547/2012 (Ecodesign requirements for
water pumps – final version dated December 2018)**

Europump, the voice of the European pump industry since nearly 60 years, has been a keen supporter of the European Commission in actively bringing into focus legislation concerning energy, the environment and beyond. However to fully understand our commitment to the latest review of “Regulation (EU) No 547/2012”, It is important to understand where we have come from.

Europump engaged fully with the original LOT 11 study: when that initial study was first completed, it was assessed by the European Commission and its consultants that only some 5TWh of energy saving would be available from the products in scope at that time. The decision of the Commission then was that this level of saving could not justify legislation and that the impact of such legislation would be too great for both manufacturers and users alike. However, Europump persisted by introducing the concept of an extended product approach (EPA) where we estimated that for LOT 11 some 60 TWh of savings could exist. Eventually Europump and the Commission worked together to bring into effect a product legislation “Regulation (EU) No 547/2012” for water pumps with a 0.4 MEI cut-off designed to remove the worst performing pumps. This agreed maximum product cut-off was made on the understanding that Europump would apply an EPA to water pumps.

Europump has been working towards the EPA, investing many years of time and a considerable financial investment, working with independent bodies such as the University of Darmstadt.

Europump truly believes the Extended Product approach (EPA) is the way forward to ensure that optimum electrical energy savings are made with water pumps.

¹ Europump, the European Association of Pump Manufacturers, was established in 1960. It represents 17 National Associations in 14 EU Member States, Turkey, Russia & Switzerland. Europump members represent more than 450 companies with a collective production worth more than €10 billion and employing 100,000 people in Europe.

² EUSA represents approx. 2,500 companies from all areas along the supply chain, adding value to swimming pool and spa businesses. It represents craftsmen, wholesalers and manufacturers and the industry of the swimming pool and spa businesses in across Europe. Currently, thirteen national swimming pool and spa associations are members of EUSA.

Europump has now subsequently fully reviewed the final report dated December 2018 which it believes to be a very comprehensive and well written report with logical and explained derivations of conclusions. It shows an excellent understanding of pumps, applications and the Extended Product Approach

As part of our review, we provide detailed technical, editorial and general comments within the document attached to this position.

In summary, we would like to highlight the following selected concerns and comments:

1) Scope

- a) Europump understands that the recommendation is to only regulate clean water pumps. Europump supports this recommendation.
- b) Possible further studies, as suggested, for waste water pumps regulation will be supported by Europump.
- c) EUSA understands that the recommendation is not to regulate swimming pool pumps. EUSA supports this recommendation.
- d) Further studies, as suggested, for possible swimming pool pumps regulation will be supported by EUSA.
- e) Europump understands that the recommendation is to include Multistage Horizontal (MS-H) pump units up to 40 bar. Europump only supports this inclusion, but only up to 25bar.
- f) Europump understands that the recommendation is to extend the scope of Multistage Vertical (MS-V) pump units up to 40 bar. Europump does not support this extension.
- g) Europump understands that the recommendation is to include all multistage borehole pump units smaller or equal 6". Europump does not support this recommendation. Europump supports to include MSSB from 2.5" up to 6" into regulatory scope. The standardisation work inside CEN on EN17038-4 is ongoing.
- h) Single-phase motors in a pump unit under a possible EPA-regulation are an open issue. The upcoming revision of Motor regulation of EC No. 640/2009 is expected to be IE2 as minimum class for these kind of motors. This needs to be aligned for a future EEI methodology.
- i) Europump understands that the recommendation is to include Booster sets. Europump does support this recommendation. The standardisation work inside CEN on EN17038-3 is ongoing.
- j) Europump is open to discuss detailed technical definitions to the recommended scope in order to avoid future loopholes.

2) Timeline

- a) Europump believes that a timeline of 2021 is too ambitious. A first tier should not come into force earlier than 2 years after the adoption of the regulation.

3) Threshold values

- a) Europump understands that the vast majority of possible energy savings comes from Policy Option 1 in the report. Europump fully supports this statement. Appropriate EEI threshold values will bring these savings.

Europump understands that the use of "Average Efficiency" was due to the absence of

an EEI methodology at the time when writing the study. Europump supports implementing measures based on EEI values only.

- b) Europump supports the recommendation not to change the MEI requirements from EU Regulation No. 547/2012.
 - c) The reference motor efficiency for EPA is IE3. Europump suggests to have separate threshold values for single phase motor driven pumps under the extended product approach to align these products with the upcoming motor regulation.
- 4) Europump supports the policy options shown within Annex 13. If required Europump experts are willing to discuss this further to ensure the extensive electrical energy savings within the Extended Product Approach are not lost.