



Europump Guide

Guideline on the application of Commission Regulation 641/2009/EC and the amendment 622/2012/EC with regard to ecodesign requirements for circulators

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Introduction

Commission Regulation (EC) 641/2009 and its amendment (EU) 622/2012 implement the EuP/ErP Directive by specifying ecodesign requirements for glandless standalone circulators and glandless circulators integrated into products. The ecodesign requirements imply that only standalone circulators with an Energy Efficiency Index (EEI) of not more than 0.27 are allowed after 2013 and only circulators with an EEI of not more than 0.23 are allowed after August 1, 2015. The aim of this guideline is to clarify possible questions when implementing these requirements.

- **Interpretation of placing on the market**

In April 2014 the European Commission published a revised version of its Blue Guide on the implementation of EU product rules – mainly to reflect changes for the New Legislative Framework. Due to the publication of the Blue Guide it became necessary to adapt this Guideline to changes in the Blue Book. The following list of definitions describe some of the terms used in the legal texts and are copied out of the Blue Guide 2014 or the directive itself:

- **Making available:** *A product is made available on the market when supplied for distribution, consumption or use on the Union market in the course of a commercial activity, whether in return for payment or free of charge." "Supplying a product is only considered as making available on the Union market, when the product is intended for end use on the Union market.*
- **Use:** *'Use' refers to the intended purpose of the product as defined by the manufacturer under conditions which can be reasonably foreseen. Usually, this is the end use of the product.*
- **End Use:** *The use of a product as a component to be built into a new product that again is placed on the market is not considered "end-use". The concept of "end use" by a professional or a consumer is intrinsically related to the concept of "intended use"*
- **Placing on the market:** *According to the EuP/ErP directive 2009/125/EC, placing on the market means making an EuP/ErP available for the first time on the Community market with a view to its distribution or use within the Community, whether for reward or free of charge and irrespective of the selling technique.*

Europump interprets the above said as follows:

- A circulator supplied to an OEM customer for integration into a product (i.e. boiler, heat pump etc) is **not** made available for the first time and therefore **not** placed on the market.
- A circulator integrated into a product is placed on the market when the product is placed on the market.

- **CE marking and declaration of conformity:**
 - Circulators in the scope of this Regulation cannot be CE marked if they do not fulfill the ecodesign requirements.
 - Circulators outside the scope of this Regulation can be CE marked if they fulfill the requirements of other directives.
 - Circulators outside the scope of this Regulation can be CE marked without reference to this Regulation, if they fulfill the requirements of other directives (except for the product information requirement, i.e. drinking water circulators and spare part circulators for integration in products).
- **Circulators in scope:** The ecodesign requirements in this Regulation are independent of the application and follow the scope of the EuP/ErP directive. This means that circulators in all applications except transportation (ships, trains etc.) are covered.
- **Standalone circulators for Solar and heat applications:** Standalone circulators specifically designed for primary circuits of thermal solar systems and heat pumps are exempted from the energy efficiency requirements until 1 August 2015. Europump interprets the intention of the legal text such that an EEI should not be indicated on the name plate and in the technical documentation for these circulators before the requirements come into force. Europump recommends that these types of circulators are clearly indicated for their specific application.
- **Specific speed correction:** For circulators integrated into products and specifically designed for primary circuits of thermal solar systems and heat pumps, the EEI calculation includes a correction for specific speed. This correction does not apply to standalone circulators in these applications.
- **Benchmark value:** Europump interprets the intention of the legal text in Amendment, Annex I, 2. (b) such that the Benchmark should be in the documentation of the pump and not on the pump itself.
- **Reference to standard EN16297:** The EEI value on the name plate should be followed by an indication of which part of EN16297 was applied for the determination of the EEI (i.e. 'EEI < 0.23 – PART2').
- **Replacement of circulators integrated in products**
In *Article 1* point 2 (b) in COMMISSION REGULATION (EC) No 641/2009 and its amendment COMMISSION REGULATION (EU) No 622/2012 it is stated that:

This Regulation shall **not** apply to:

*(b) circulators **integrated** in products and placed on the market no later than 1 January 2020 as replacement for **identical** circulators **integrated** in products and placed on the market no later than 1 August 2015, except as regards the product information requirements of Annex I, point 2(1)(e).*

A circulator integrated in a product is defined *Article 2 (5)* of COMMISSION REGULATION (EU) No 622/2012 as:

(5) “circulator integrated in a product” means a circulator designed to operate as part of a product carrying at least one of the following design details:

- (a) the pump housing is designed to be mounted and used inside a product;*
- (b) the circulator is designed to be speed controlled by the product;*
- (c) the circulator is designed for safety features not suitable for standalone operation (ISO IP classes);*
- (d) the circulator is defined as part of product approval or product CE marking;*

Product information requirement in Annex I point 2(1) (e) states

*(e) for circulators integrated in products and placed on the market no later than 1 January 2020 as replacement for identical circulators integrated in products and placed on the market no later than 1 August 2015, the replacement product or its packaging shall **clearly indicate** the product(s) for which it is intended.*

For a circulator to be exempted from the eco-design requirements due to *Article 1* point 2 (b) it must be:

- A **circulator integrated in product** by the definition above
- A replacement for an **identical circulator integrated** in a product placed on the market no later than 1 August 2015
- **clearly indicate** the product(s) for which it is intended