POSITION PAPER

CEIR comments on the JRC Study developing an evidence base and related product policy measure for "Taps and Showers" - Third questionnaire on Policy Options

Date: 10.02.2014
Referring to: ErP Study for Taps and Showers - policy options
Contact person: **Stéphanie Uny** CEIR General Secretariat Tel: 03227068252 E-mail: stephanie.uny@orgalime.org **Christophe Bochaton** CEIR Technical Secretariat Tel: 0033147176296 E-mail: cbochaton@profluid.org
Pages: 4
Transparency Register ID no: 54018122087-6

CEIR MEMBERS FAVOUR A SIMPLE, UNIQUE, VOLUNTARY LABEL

In the context of the *JRC study developing an evidence base and related product policy measure for "Taps and Showers",* and following the third questionnaire on policy options, CEIR, the European Taps and Valves Association, wishes to take the opportunity to comment on these policy options and express the following important thoughts and concerns. In summary:

- A majority of CEIR members support a voluntary label that shows water usage as a main criterion, supplemented with an energy criterion.

- If taps and showers are CE-marked for conformity with possible ecodesign criteria (generic or specific) but not for safety aspects (which is the case today because no harmonisation exists), the consequences of foreseen abuses and confusion will be detrimental to the sector.

The European Taps and Valves Association (CEIR) was formed in 1959 as the European federation of national manufacturer associations. CEIR gathers together a large number of European manufacturers in the field of valves and fittings. CEIR supports the principles of a free economy and private enterprise in Europe as well as on a global basis. CEIR represents the common economic, technical and scientific interests of the European valve industries, in particular towards international authorities and economic and commercial circles.

- **Possible option 1: Resource efficiency label (water / energy / water and energy / other resources)**

A majority of CEIR members support a voluntary label that shows water usage as a main criterion, supplemented with an energy criterion.

In general, CEIR members prefer to have a limited number of parameters to allow effectiveness, readability and understanding by consumers.

If voluntary, for effectiveness and enforcement, an audit system needs to be put in place together with the label.

The expected benefit would be to allow consumers to make an informed choice without systematic banning of otherwise efficient technology, or forcing water efficiency to a level which will result in consumer discomfort.

The existing energy label (and ecodesign) tools are structured around sectors that have relatively known and standardised energy infrastructure delivery. This is not the case with water supply delivery systems throughout Europe, or even within a single country. These energy label and ecodesign tools will not deliver the expected energy and water savings for taps and showers.

- **Possible option 2: generic ecodesign requirements (example: "a device for improving water efficiency and/or controlling temperature/time shall be implemented in all/certain products/product sub-groups by 20XY")**
  And
  Possible option 3: specific ecodesign requirements (example: "the maximum water flow of product A or product sub-group B shall be X L/min from 20YZ")

Generic ecodesign criteria seem too vague an option at this stage for taps and showers. They may provide some flexibility by setting a legal framework while leaving the parameters to be determined in, for example, an associated voluntary measure. However there is a great risk of lack of harmonisation of specific criteria in the different Member States for similar products, of diverging interpretation when these criteria are implemented by manufacturers and/or when enforced by authorities, or of maintaining different labels or measures on the EU market leading to consumer confusion.

Specific ecodesign criteria may seem adapted because specific parameters could be developed and applied for specific tap and shower models. However, the level of specificity may be extremely difficult to enforce in view of the lack of market surveillance for current ecodesign measures. It may also not offer the required flexibility to adapt the criteria to technological developments. All criteria would need to be carefully considered before implementation in order to avoid consumer discomfort (especially water flow), and possible manipulations at the time of installation would compromise both the safety of users, and the actual water and energy efficiency of products. One must also bear in mind that the uses made of the same product are so different (private vs. public buildings; countries or regions with water shortages vs. those without; distribution and water systems; prices…) that it is impossible to accurately aggregate the efficiency potential of that product.

CEIR, THE EUROPEAN TAPS AND VALVES ASSOCIATION
Diamant Building - Boulevard Auguste Reyers 80 - B-1030 Brussels
Tel: +32-2-7 06 82 37 - Fax: +32-2-7 06 82 50
www.ceir.eu

Another very important aspect of concern relates to CE marking: if generic or specific ecodesign requirements are developed or any legal requirement which leads to the affixing of CE marking on the product for conformity purposes, CEIR is very concerned about the possible misuse and abuse of the CE marking on these specific products.

For more than 15 years CEIR has been involved in discussions with the European Commission, Member States authorities, and other industry counterparts and stakeholders to find ways to harmonise the safety aspects of taps and showers with regard to hygienic and drinking water requirements. Despite all efforts, these discussions have failed. If CE marking is to be used with regard to water and energy efficiency requirements, CEIR is extremely worried that rogue traders will use this marking as a false claim that their products also conform with all specific national hygienic and safety requirements. In view of the serious lack of market surveillance on such detailed levels of conformity, this would simply create disastrous unfair competition on the EU market.

As already stated above, the existing (energy label and) ecodesign tools are structured around sectors that have relatively known and standardised energy infrastructure delivery. This is not the case with water supply delivery systems throughout Europe, or even within a single country. These energy label and ecodesign tools will not deliver the expected energy and water savings for taps and showers.

In general, CEIR wishes to stress that it supports self-declaration. Third party certification is costly and offers no additional guarantee that products placed on the EU market are compliant if market surveillance is lacking.

Finally, if ecodesign requirements were to be the chosen option, sufficient time would be needed for design and production adaptation before implementation, because sanitary ware technologies are varied and the sector includes many SMEs.

- **Possible option 4: Self-regulation/voluntary agreements by industry instead of implementing Ecodesign measures**

  And

  Possible option 5: Harmonisation, development and implementation of standards and measurement methods

  And

  Possible option 6: Consumer information and education on performance / installation / use / disposal of the product

A majority of CEIR members support this option. CEIR supports the Water Label (www.europeanwaterlabel.eu) as a unique, simple, flexible, informative, cost-effective yet enforceable voluntary label of which the aim is primarily to inform consumers. This label actually evolves with the gradual inclusion of various tap and shower technologies as well as their accessories. An energy criterion will soon be added to the label to show both the energy consumption and the water consumption of taps and showers.

The market coverage of the label is still limited but it is being actively promoted amongst manufacturers as well as distributors.

CEIR, THE EUROPEAN TAPS AND VALVES ASSOCIATION
Diamant Building - Boulevard Auguste Reyers 80 - B-1030 Brussels
Tel: +32-2-7 06 82 37 - Fax: +32-2-7 06 82 50
www.ceir.eu

As the backbone of harmonisation and the internal market for industrial goods, standards and harmonised measurement methods must be the basis of any measure relating to water and energy efficiency of taps and showers. The lack of harmonisation in hygiene requirements is an excellent example of how inefficient and costly diverging national measures are for industry, and for the end consumer.

Finally, user behaviour and comfort are recognised as being critical factors which substantially influence the efficiency of taps and showers. Consumer information and education, possibly via a product label on the model of the water label, as well as other wider public and private actions on water and energy savings, are essential. Water and energy savings are obviously also in the interest of consumers in terms of cost savings.

CEIR, THE EUROPEAN TAPS AND VALVES ASSOCIATION
Diamant Building - Boulevard Auguste Reyers 80 - B-1030 Brussels
Tel: +32-2-7 06 82 37 - Fax: +32-2-7 06 82 50
www.ceir.eu