



CEIR POSITION

on

EU Ecolabel / GPP criteria for sanitary tapware

Brussels, 7 December 2011

CEIR is the European Committee for the Valve Industry and represents a majority of European manufacturers of industrial, building and sanitary taps and valves in EU countries, Switzerland, Russia, Ukraine and Turkey.

CEIR welcomes the opportunity to comment on the ongoing ecotapware study for the establishment of EU Ecolabel and GPP criteria for sanitary tapware.

In the light of the discussions during the stakeholders' meeting held in October 2011, and the important changes which have been suggested for the draft criteria, CEIR would very much welcome the opportunity to discuss these further in another stakeholders' meeting before final proposals are submitted to the EU Ecolabelling Board and the GPP Advisory Group.

1. Ecolabel for sanitary tapware – CEIR Position

1.1. General comments

Potential environmental improvement to taps and showerheads

The use phase of taps and showerheads is by far the most relevant to address potential environmental improvement. Taps and showerheads are identified as “end of the pipes products”, explaining a limited influence on water and energy consumption. The greatest environmental benefit which can be achieved with regard to taps and showerheads 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 showerheads.

Scope and Definitions

CEIR calls for clarity of the scope, definitions and exclusions in order to ensure common understanding and consistency. All Ecolabel and GPP proposed criteria must be carefully considered against this scope to avoid difficulties in meeting the agreed criteria. Extending the Ecolabel and GPP criteria to shower systems at this stage calls for a full re-evaluation of all findings. Speciality products should be clearly excluded.



Assessment and Verification Procedures

In general, CEIR supports self-declaration. Existing test results should be accepted as a general principle.

Hygienic requirements

Products in contact with drinking water must comply with national regulations if these exist. Meeting these requirements is the responsibility of manufacturers when putting products on the relevant national markets. Due to the complexity of the issue and the lack of harmonisation in Europe, CEIR strongly recommends excluding specific criteria relating to this issue.

Consumer comfort

Products must meet consumer needs and deliver water so that it can be used efficiently. This is a very important factor which needs to be balanced against water savings objectives.

Consumer needs call for reasonable flow rate levels, which can be different for private consumer products and commercial products.

Technology neutrality and innovation

All criteria being developed should be totally technology-neutral and should not impose a particular technological solution. Criteria should not describe the behaviour of a product as such, but the objectives. It is then up to manufacturers to offer adequate solutions. This will avoid creating competitive issues on the market, and will leave the door fully open for developing further innovative solutions for water savings.

Eligibility for Ecolabel and GPP

All criteria and their scope should be checked against feasibility and affordability for candidate manufacturers, whatever their size and capacity. The objectives of excellence of the Ecolabel and GPP should be maintained, but criteria should not be burdensome for companies and particularly for SMEs. For example, using the BREF on metal treatment or extending the warranty period to 10 years would create substantial barriers and/or costs for companies when considering applying for Ecolabel and GPP.

1.2 Specific comments

Criterion 1 – Maximum water flow rates

These flow rates should apply to all types of product and should be technology-neutral. This allows for 'normal' performance of products to be ranked on an equal basis, while allowing features that may or may not be useful to a particular installation to be marketed rather than incorrectly perceived as 'better' due to the structure of the Ecolabel documentation. This also allows for greater development potential of Best Next Available Technology (BNAT).



Criterion 2 – Minimum water flow rates

If minimum flow rates are to be set, these must meet specific practical constraints. For example, they must be high enough to meet hygiene requirements of the water supply but, at the same time, they must be low enough to match low pressure water supply systems and allow most eco products currently on the market to be eligible for the Ecolabel and GPP.

Criterion 3 – Temperature management

Showerheads alone and pillar taps cannot meet this criterion. Showerheads cannot be excluded, nor can pillar taps as they may also qualify as eco products, and as their replacement by mixers involves higher costs as the basin may also need to be replaced. Again, this criterion must remain technology-neutral.

Criterion 4 – Time limit/Volume limit for non-domestic basin taps and showerheads

This criterion is only relevant for taps installed in non-domestic premises for multiple users and high frequency use (e.g. in schools, hospitals) thus possibly for GPP only. Such a criterion applied generally will hamper the private user's comfort.

Criterion 5 – Manufacturing processes – surface treatment

Surface treatment, if performed by the manufacturer, is only one part of the manufacturing process, and it is difficult to isolate from other parts in order to assess it. BREFs are applied in the context of the Industrial Emissions Directive 2010/75/EU (IED) and sanitary tapware manufacturers are generally not covered by the IED. The Best Available Techniques for the Surface Treatment of Metals and Plastics BREF is a very extensive and complex document, and very few sanitary tapware manufacturers if any could apply it. This criterion is totally disproportionate and would exclude most if not all manufacturers from complying with the Ecolabel and GPP. Being certified/registered under EMAS or certified under ISO 14001 seems a much more pragmatic proposal.

Criterion 6 – Materials

Criterion 6a – Chemical and hygienic characteristics of materials

Currently only a few EU Member States have national requirements for materials in contact with drinking water. For those countries that do have requirements, it would appear that they have an additional burden over those countries that do not. It would therefore seem sensible to stipulate the countries in which products are intended for sale, to ensure that where there is legislation it is complied with and where there is no legislation the manufacturer can verify (in some way) that water quality will not suffer. This could be done using a declaration for materials and experience and 'grandfathered' rights on the use of materials in that country.

Criterion 6b – Exposed surface condition and quality of Ni-Cr coating

Compliance with EN 248 is a minimum requirement that all products should meet.



Criterion 7 – Product quality and lifetime extension

Criterion 7a – General requirements

Criterion 7b – Reparability and availability of spare parts

Criterion 7c – Warranty

Some countries that have regulations in place must take into account the local regulations as a priority over the existing EN standards. In these cases the national requirements cover all of the 'Essential Requirements' and possibly more in terms of leaktightness and durability and, as such, should be deemed equally acceptable for that country. It stands to reason that if the intended sale of the product is in a country without existing regulations, compliance with the EN standards is paramount.

Although accepting that reparability and availability of spare parts and warranty period in general could be stricter under Ecolabel/GPP than under standard legislation, this should be workable for manufacturers, especially SMEs. National legislation on product liability and warranty must be taken into account.

A ten- and five-year requirement would effectively prohibit SMEs or innovative companies from applying for Ecolabel/GPP. Five years for spares and three years for warranty could be acceptable.

Criterion 8 – Packaging

CEIR encourages the use of recyclable packaging materials where possible.

Criterion 9 – User information and Criterion 10 – Information appearing on the EU Ecolabel

These criteria are important, but they should be applied reasonably and not lead to extensive literature and printing. Manufacturers should be allowed to provide minimum information in printed and/or electronic format.

2. GPP criteria for sanitary tapware

Detailed comments on GPP must reflect possible changes to the current draft Ecolabel criteria.

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