



CEIR Contribution to Report Task 1-2-3-4 - Study for an update of the Ecodesign Working Plan Amended Ecodesign Working Plan

Brussels, 14.09.2011

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.

CEIR welcomes the opportunity to comment on the ongoing study for a new ecodesign working plan.

1. Emissions to air

In the “taps and showerheads” category, there is inconsistency between several environmental aspects that are described in subtask 4.1 (chapter 1.2), i.e. emissions to air and noise, and the overview in table 12 (page 17). The following aspects are deemed relevant for taps and showerheads in table 12, while these are nowhere listed in corresponding categories detailed in chapter 1.2:

- GHG section (p. 9, table 3)
- Acidification section (p. 10, table 4)
- NMVOC (p. 10, table 5)
- POP – PAH (p. 12, table 6)
- Particulate matter (p. 12, table 8)
- Noise (p. 15, table 9)

These environmental aspects are more linked to boiler/water heaters than to taps / showerheads. This point should be clarified, also taking into account interaction with the Boiler Lot 1 study / measure and the Water Heater Lot 2 study / measure under the Ecodesign Directive.

2. Final list of energy-related product groups

Chapter 1.4.1.2, “taps & showerheads” (p.144)

1.4.1.2 Taps and showerheads

Subtask 4.1 - Other environmental impacts

The qualitative environmental assessment indicates a possible relevance of water consumption, presence of precious (copper, bronze, etc.) and hazardous substances (chrome plating) and presence of plasticizers (phtalates in flexible plastic components?) and a possibility for marking of plastics which may be improved. (score: positive)



The first paragraph indicates the possible presence of hazardous substances, illustrated by “chrome plating”. Such a statement is too vague and could lead to misunderstanding. Only chromium in its metallic form is present in the product after plating. There are no chromium acids in the finished product as chromium is only used during the plating process, and is totally transformed. Additionally, chrome plating has an important impact on extending the lifespan of the product, which should score as a positive impact. This should be stated explicitly. The statement about the presence of phthalates and the marking of plastics is very general and could apply to almost any product using plasticizers.

Subtask 4.2 - Suitability for other complementary measures

Ecolabel and GPP criteria have been developed. The industry has developed voluntary tools that resemble the EU Energy Label. A follow-up study into these aspects might be useful. (score: positive)

Ecolabel and GPP criteria are under development. The statement that these already exist should be corrected. Resemblance between the existing voluntary tools and the energy label is not explicit and could lead to confusion. However there are initiatives, as described in Draft report task 1-2-3, which use labels to display efficiency criteria of taps and showerheads.

Subtask 4.2 - Absence of Community legislation

As indicated above, in absence of Community legislation the relevant stakeholders have developed an initiative with relation to the environmental performance of products: Flow rate labelling. (score: neutral).

There are several initiatives in place as described in Draft report task 1-2-3, and others are in development. These may not tackle energy since taps and showerheads are not energy-using products. They mainly concentrate on the flow rate which results in water savings and consequently energy savings.

Subtask 4.2 - Other Community policies

The consideration of other Community policies identified the relevance of EPBD, GPP and a large number of other related initiatives in achieving the savings indicated. The consideration has not resulted in a justified cause for revision of ranking. (score: neutral)

Industry is not aware of any relevant data linking taps and showerheads with EPBD. Again, GPP criteria relating to taps and showerheads are under development.

Therefore the total score is:
positive: 3; neutral: 2; negative: 0

This result is incorrect and should be positive : 2 and neutral : 3. This should be corrected and, in the light of the above comments, ranking should be adapted.



3. Conclusion

CEIR members appreciate that it is not the purpose of this study to evaluate the energy consumption and improvement potential of taps and showerheads in detail. They do not wish to understate the need to address potential energy savings with relation to the products that CEIR represents. However it is crucial to base this study on accurate preliminary findings in order to ensure that the final ranking of products truly reflects where energy saving measures should be taken.

CEIR reiterates that the greatest improvement potential of taps and showerheads relates to water use, or rather reducing water waste. Improvements in flow rate will trigger energy savings, but an “energy related product” interaction with boiler/water heater efficiency must be carefully considered to evaluate the energy saving potential of taps and showerheads.

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