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Europump position paper on the review of “Regulation (EU) No 547/2012”

Europump have been keen supporters of the European Commission in actively bringing into focus legislation concerning energy, the environment and beyond but to fully understand our commitment to the latest “Regulation (EU) No 547/2012” review, It is important to understand where we have come from.

Europump engaged fully with the original LOT 11 study and when that initial study was first completed, it was assessed by the European Commission and its consultants that only some 5TWh of product 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. Europump persisted however 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 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 circulating pumps and later to water pumps.

Since then we have succeeded in bringing circulators (up to 2500W) into the scope of an EPA with supporting legislation and standards, creating a major technology shift and vast investment programme producing estimated savings of some 24TWh. We have helped also to bring about product legislation and standards to apply the 0.4 product cut-off for water pumps, again as agreed.

Since then Europump has been working towards the EPA, investing many years of time and a considerable financial investment, often working with independent bodies such as the University of Darmstadt and the Berlin University. We also engaged with the new LOT 28 and 29 studies which although difficult and despite small savings potential were eventually referred for incorporation into the now active “Regulation (EU) No 547/2012” review, the very review where Europump agreed to launch the EPA.

Completion of the EPA has to be the main aim of the “Regulation (EU) No 547/2012” review, with the potential to find the last 35TWh of saving potential from the water pumps. To achieve this, Europump has made available a limited budget and has many working groups actively set to complete this work within the very short time scale available, including dealing with the draft legislation and complex standards etc.

If we are being honest then the additional work created by the inclusion of the LOTS 28 and 29 are a major distraction, especially given the very broad scope and minimal saving opportunities which emanated from the studies. Despite this Europump has been investing in some of these areas and is doing all it can to bring additional products into legislation both to further improve the savings potential and to deal with loop holes in the original legislation.

Our proposal is simple, under the “Regulation (EU) No 547/2012” review:

1. We will finalise the EPA to cover the water pumps, achieve the 35TWh of savings, and have in place an EPA methodology which can be adapted for each of the pump types under future studies.
2. We will further bring into scope new products and some products from LOTS 28 and 29 to include: Horizontal Multi-Stage Pumps, Booster Sets, Submersible Waste Water Pumps and All Bore-Hole Pumps up to 12” all of which we expect to add in excess of 5.5TWh of potential savings not including the horizontal multi-stage pumps.

It is very important that stake-holders appreciate the gravity of this proposal not just in terms of the energy saving potential but in the light of the financial investment, work load and commitment required from the companies and national associations affiliated to Europump at a technical and commercial level.

We ask that all the other identified products from LOTS 28 and 29 be delayed such as swimming pool pumps, and slurry pumps from the review scope including further pre-studies and repetitive data collection exercises. Many of these products are already accepted as having zero saving potential, some are ‘Engineered’ products already brought to market with the highest levels of energy efficiency for both design and operation. We will be happy to take those products suggested into the scope of future studies or LOTS as required.

Europump believes that this proposal of co-operation not only guarantees that we maximise the realistic savings potential from the LOT 11 review but provides more time and space for other products to be brought into scope at a future date, benefiting from the groundwork the “Regulation (EU) No 547/2012” review will lay down.

For the benefit of the environment and economic success including jobs and growth we ask that you support the Europump proposal.