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CEMEP Position Paper on Ecodesign requirements

CEMEP wants to make a significant contribution to energy efficiency, supported the three steps of the Ecodesign requirements for Motors and Drives in the years 2011, 2015 and 2017 given in the regulation 640/2009. Today the main question is: "What about future Ecodesign requirements for Motors?" All market partners need transparent and clear statements about future regulations on Motors and Drives to avoid misunderstandings and a situation of uncertainty.

In the Ecodesign Workplan of 30 November 2016 from the European Commission (EC) is written that the EC will review many product groups like Electric Motors. In the field of Electric Motors so far a preparatory study (Lot 30) was finished in July 2014 and the EC internal phase of the impact assessment is still ongoing.

In different requests from CEMEP to the EC we got the answer that **no time schedule for the future regulation on Electric Motors and Drive is planned**. One reason is that, the EC has concerns about the Lot 30 report, because the evidence base has not yet been found satisfactory. Furthermore, the EC wants to prepare the future Ecodesign regulation under the framework of the new initiative on Circular Economy.

Today the standardization organization CENELEC has started the work on the Mandate/M543 Material Efficiency from the EU-Commission. The aim is to release horizontal standards on Circular Economy by March 2019. From CEMEP's perspective it seems logical that no new regulations are published at least until then and the still pending mandates M 470 and M 476 shall be closed before with a debriefing, as these would not be developed or fit under the concept of Circular Economy.

In general, the industry needs longer lead times to adjust to new legal requirements. The reason for this is not only product development but also especially the change of production. Production lines have to be modified with a high effort. In times of lean production, the entire logistics are highly optimized. Every change is associated with high effort and expense and has to be planned properly. As a result the industry needs planning dependability and transparent requirements with a sufficient lead-time.

The EC promised that, as soon they are ready to proceed with further details they will communicate with CEMEP. At the moment the decision-making process is still ongoing, thus **for sure no new Ecodesign requirements for motors and drives come into effect in year, 2018**.