Comments on Tasks 6 & 7 of the preparatory study for Taps & Showers

April 2014

As stated in Task 1 of the report, taps and showers present a tremendous energy saving potential, with up to 885 PJ/year in 2030, according to the study carried out by VHK[1]. They represent the highest saving potential among the products included in the priority list of the 2012-2014 Work Plan of the Ecodesign Directive. We welcome the inclusion of Taps & Showers in this Work Plan and the subsequent undertaking of this preparatory study.

We find possible Ecodesign requirements and a resource efficiency label as positive and plausible policy options for Taps and showers, and we think that, in particular for the possible ecodesign measures, they deserve a more thorough analysis. On the contrary, we have doubts that a scenario based on a voluntary label, as backed up by certain manufacturers during the meeting on 25th March 2014, will really challenge and improve the current situation for these products. Furthermore, such a voluntary policy option will maintain the existing diversity of labels, causing consumer confusion, additional costs for manufacturers and uncertain impacts in terms of savings and transforming the market towards more efficient products. In this context, we invite the study team to reinforce its investigation of certain policy options, notably documenting the possible combination of different technical improvements. For example, we do not see why flow regulator devices, and their combined use with an aerator is not considered, while these improvement options are presented with clear benefits and cost effective.

We also feel that some of the policy options selected in Task 7 and especially the distinction between the generic and specific measures make the results of the study rather vague, and fail to clearly document and identify the best policy measures. To this effect, we strongly urge the study team to clarify and quantify further the selected policy options, providing a more solid basis for any possible future measures on these products.

In addition, we invite the study team to further justify and further substantiate various quantitative statements, especially when these could lead to certain policy options being dropped.

The table below lists and further details our comments in this direction.

[1] http://www.ecodesign-wp2.eu/downloads/FINAL%20REPORT%20Task%203%2016-12-2011.pdf

Feedback form

No.	Comment from	Contact person	Reference: - document - section/task - page	Subject of the comment	Comment
Resource Efficiency Label					
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 - general	Resource Efficiency Label	We consider that having an energy and water label conveying the respective environmental impacts would be beneficial for consumers. Further elaboration/description of the label would be welcome, if possible identifying solutions for addressing the challenges of this policy option, as mentioned in the report.
Ecodesign Requirements					
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7: Section 7.2.2.1 Section 7.2.2.3	Analysis of consumers' perception	Ecodesign measures are mainly described as being perceived in a negative way by consumers. We would like to question this approach, as water-saving measures do not necessarily imply less comfort, but on the contrary, automatically lead to monetary and energy/water savings. A Eurobarometer poll published in March 2014 revealed overwhelming citizen support for governments to do more on energy efficiency. Appetite to act on climate change remains a top priority, according to the survey, that also further detailed in which Member States the most efficient products are bought most often.
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 - general	Generic vs Specific Ecodesign requirements	We consider that the distinction between generic and specific Ecodesign requirements brings confusion and should be further detailed. First of all, it is not easy to grasp the difference between the two types of measures. Moreover, in some parts of the study,

					conclusions are drawn on all generic Ecodesign measures (Section 7.2.2) which include water meters whereas in some other parts (Section 7.3.2), water meters are set apart. This tends to make the understanding and analysis more complicated. **We would therefore like to see more clarification and description of the generic vs specific Ecodesign requirements.**
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 Section 7.3.2.4 Page 23	Mandatory restrictions on water flow rates for some products (Specific ecodesign measures)	*"However, it should be pointed out that there could be some difficulties associated with the definition of market segments for which to limit the water flow rates. For instance, the key point for shower systems would be to find a definition for luxury/wellness products, for which this type of requirements should not apply. This task is apparently difficult at the moment and, even if possible, there could be still the possibility to escape the general rule (as in the case of light bulbs). A similar issue would apply also for taps, where kitchen and bathroom taps are technically the same products with the exception of the fashion design. Ecodesign measures may indeed produce undesired effects rather than benefits where filling of volumes is required."* **We question why the difficulty to define certain segments (e.g. luxury/wellness products) should lead to dropping specific ecodesign requirements for other market segments.** **We consequently urge the study team to identify criteria which could help defining these other market segments (e.g. the intended use).** In any case, we would question the need to exempt some high end products. We understand that already many luxury hotels integrate water saving devices, and that the luxury aspect is not linked to the water flow as such, but to the number of water sources in the shower cabin and other accessories. Consequently, we do not see the need to exempt parts of the market already at this stage, from possible future Ecodesign requirements.

	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 Section 7.2.2.1 Page 5	Generic and specific Ecodesign requirements	*"General flow restrictions for private use and for wellness applications would not be appropriate and it would be preferable to allow flexibility to customers."* **We strongly disagree with this statement, since this is an important assumption that requires a concrete justification of why general flow restrictions for private use are not "appropriate". If indeed this is the case, it should be further substantiated and backed up with qualitative and quantitative analysis.**
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 page 10	CE marking	"*A CE mark would be required for compliant products and there is the risk that this could be abused and/or misunderstood by claiming / understanding that the CE mark covers compliance with other aspects (e.g. health and safety or environmental requirements)*" According to the EC blue guide on the implementation of EU product rules, CE marking is an indication that products, which are subject to one or several pieces of Union harmonisation legislation providing for its affixing, conform to the provisions of all these applicable legislations. Therefore we do not see any difficulty in having also a CE marking for Ecodesign requirements. It should be kept in mind that CE Marking is a legislative requirement. It is not a mark of safety, nor a mark of quality, and has never been intended as a mark for consumers.[2] **We should not restrict the ambition of EU legislation on the hypothesis that some manufacturers will not comply with national safety requirements.** To the contrary, this could further push the EU to come up with a common legal framework for hygienic and safety requirements of taps and showers.
		Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 Section 7.2.5	Information requirements	The study recommends instructing users on: 1. how to install and use and maintain products correctly

[2] For more information, please refer to ANEC position paper on CE marking: http://www.anec.eu/attachments/ANEC-SC-2012-G-026final.pdf

			Page 8		2. how to save water 3. the related benefits associated to water and energy savings. - **We insist on the need to provide consumer operating manuals/ free access websites describing the <u>optimum use of products</u>**. Indeed, it is confirmed by the study writers that durability of taps and showers can be significantly affected by installation or maintenance, and that installation and maintenance varies according to the product. **- Maintenance/upgradability criteria should be included to avoid "lock in" situation** (e.g. not being able to easily clean or replace products) -**Information requirements relevant for <u>dismantling, recycling, recovery and disposal at end-of-life</u> should also be added to the list of policy options.** The benefits that it would bring are clearly described later in Task 7 (page 23).
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 Section 7.2.2.1 Page 4	Product life time Spare parts availability	*"Some generic requirements to discuss could for instance relate to (…)* *4. Ease of maintenance and cleaning, retrofitting, dismantling."* **We also consider that the study could look into requirements to extend the lifetime of taps and showers**, thus guarantying the expected lifetime of these (and thereby securing return on investments). This could notably include spare parts availability for at least the expected life time (10 to 16 years). The significant DIY market concerned in various EU Member States (e.g. 40% in France according to the reports) is another reason to include such requirements.
Voluntary agreements					

	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Section 7.2.3 Page 6	Voluntary agreements	7.2.3.2 Expected benefits: Voluntary agreements are described as a way "*To contribute to water and energy saving without forcing the use of uncomfortable products*." This statement is simply not correct as VA rules impose anyway a certain market coverage and thus the use of limitations. In addition, this may imply that a mandatory measure could impose the use of uncomfortable products, which is not a neutral statement, and is not supported by any evidence. ➔ We suggest deleting this sentence. 7.2.3.3 Potential challenges and drawbacks: "*Complete adoption by all companies may not be sure*." ➔ We suggest replacing the expression "may not be sure" by "is hardly possible".
Design options					
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 6 Page 1	Design options	The rationale for choosing the design options is not fully convincing, in particular those that are selected because they are "likely to increase their penetration in the future". It can be guessed from the text and table 4.5 in Task 4 why one or the other improvement option has not been chosen, but a short explanation in Task 6 would be certainly helpful. Regarding flow regulators, Task 4 (p. 9) states that "this is likely to continue being one of the main technical solutions used in the coming years for reducing water consumption" – yet it is unclear why are they not included in the improvement options. ➔ **Include flow regulators in the design options analysis.** In addition, there is no investigation of the potential savings linked to a combined use of water flow regulators and aerator for domestic taps, while these options are presented as relatively cheap and efficient in saving water and energy.

					➔ **The combined use of water flow regulators and aerator for domestic taps and its benefits in terms of savings should be investigated. If not, a clear justification should be given.** Regarding the improvement option of push taps: are there studies that indicate that these do actually save water? They automatically cut the water flow, but on the other hand the flow cannot be interrupted earlier. No source is mentioned in Task 4, which should be included.
Policy modelling					
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 Page 25	Water flow reduction	4 scenarios are tested, among which "Water flow restrictions" (for some products - specific Ecodesign requirements) & "Technology" (mandatory implementation of technical devices limiting the consumption of water and/or energy from products – generic Ecodesign). However, in the modelling of the "technology" option, reduction in water flow is not taken into account: *"In analogy with Task 3 it has been considered that the bonus in terms of water and energy saving due to the effects of water/energy saving devices alone is 5% for both taps and showers. The figure does not take into account the reduction of water flow, which is more of relevance for other measures analysed. For this reason, a saving decreasing factor expressing the potential longer use of products is not needed for this policy scenario."* The technical solutions considered in this policy scenario are precisely solutions that aim to limit the flow (e.g. water brakes, automatic shut-off) and/or solutions that seek to manage the temperature and use of hot water (e.g. hot water brakes, cold water supply in middle position, thermostatic mixing valves) (see top of p. 20). We understand that the solutions aiming at changing the temperature do not have influence on the water flow, but those aiming to limit the flow should have such an influence.

					➔ We recommend integrating the water flow reduction in the modelling of the "technology" option and reporting the changes in Section 7.3.3.7 Comparison of BAU vs. Policy.
Other comments					
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	- Task 3 - Page 74	Impact of water saving devices on time use	*"A study has highlighted that the use of lower flow rates could dilate the use of showers so that the actual saving potential would be in reality decrease by about 15%"* Based on this study, we understand that a malus factor of 15% to the savings potential is applied for water-saving taps and showers all along the study. Although the study on which this assumption is based highlights an important point, we consider that the potential increase of the use time related to water-saving devices depends very much on the product's performance and technical characteristics and that this figure cannot be extrapolated to the whole of this preparatory study. **➔ Further elaborate on the impact of water-saving devices on time use according to the different products and not extrapolate one figure to the whole study.**
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 6 Page 1	On the use of the MEErP methodology	On p. 1 of Task 6, it is stated that: "*Input to the EcoReport tool has been kept unvaried for each type of product and application (BoM, lifetime, water and energy prices and market data) except for the water and energy consumption (see Table 6.1) and product price and repair and maintenance costs (see Table 6.2) which changes for each design option.*" This means that for none of the improvement options (not even for sensors which add significant new materials such as electronics to the BC), the BOM has been changed. Result from this, and as would be expected, table 6.3 (p. 3) shows that for all improvement options related to all BC, environmental impacts are roughly cut by 23% - equal to the potential in water/energy savings (as stated on p. 1). This undermines the whole idea of the MEErP methodology,

					which is supposed to provide data on various environmental impacts in the different life cycle stages to avoid that impacts are shifted from one environmental aspect to another. ➔ **Differentiate input to the Ecoreport for the different products, when possible, and include this in the relevant calculations.**
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 6 Page 1	Saving potential	The water and energy saving potential considered for the different design options are 22%, 23% and 24%. It is unclear why the savings are so similar for all options; it is stated that the estimate is based on Task 3, but Task 3 does not relate to the specific design options.
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 - General	Measures' timing	We find that the proposed timing could be brought forward, due to the availability of better performing products already on the market. ➔ We therefore recommend the below possible timelines: - Resource Efficiency label: before 2016-2017 - Generic Ecodesign requirements: 2017-2018 - Specific Ecodesign requirements: 2016-2017
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 3 (p.67) Task 5 (p.3) Task 6, table 6.1 Throughout the report	Clarification on Energy mix	Task 3 (p. 67) states that the energy mix consists of 40% electricity; 40% natural gas; 20% oil. However, it is not clear what these shares refer to: - the share of water that is heated with each of these energy carriers - the share of primary energy that is needed to heat water with these energy carriers - something different? It is therefore unclear, in Table 5.3 (Task 5, p.3), which values are expressed in primary energy and which (if any) are not. If 40% of the water is heated by electricity, 40% by gas and 20% by oil, this would obviously translate into primary energy figures for each of the energy carriers that are different from these shares, so the given MJ numbers cannot be correct. So apparently the 40% in the energy mix e.g. for electricity are to

					be interpreted as 40% of total primary energy needed for water heating that goes to electricity production to heat a certain share (unequal to 40%) of the total heated water. More so, to improve transparency, we recommend splitting the use of water into cold and hot water. The same problems exist in other tables in the report which use the same (or similar) numbers, like in Task 6, table 6.1. ➔ Clarify in Task 3 what the energy mix of 40-40-20 refers to, and implement it throughout the study
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Throughout the report	Tables headers	➔Indicate in the tables' headers if figures are expressed in primary energy or otherwise.
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	General comment	System losses	➔Provide a chart of the system showing the system losses taken into account (for instance in Task 3 and in a later summary of the study).
	ECOS – EEB - Coolproducts	Chloé Fayole Chloe.fayole@ecostandard.org	Task 7 Section 7.3.3.7 Page 32	Quantification of other Ecodesign measures	The quantification of other Ecodesign measures is missing. ➔Like for the Resource Efficiency Label and the Water meters, we invite the JRC to provide a quantified indication of the abstracted water, primary energy and CO2 equivalent savings compared to the BAU scenario.