



**ECOS on behalf of European environmental NGOs
Comments on the way forward for Compressors (Lot 31)
following the Horizontal Consultation Forum**

June 2014

We strongly support the Commission's conclusion to continue the development of an implementing measure for standard air applications (possibly covering labelling), while carrying out the further analysis of other compressors, including the two main compressor application ranges (i.e. low pressure and oil-free).

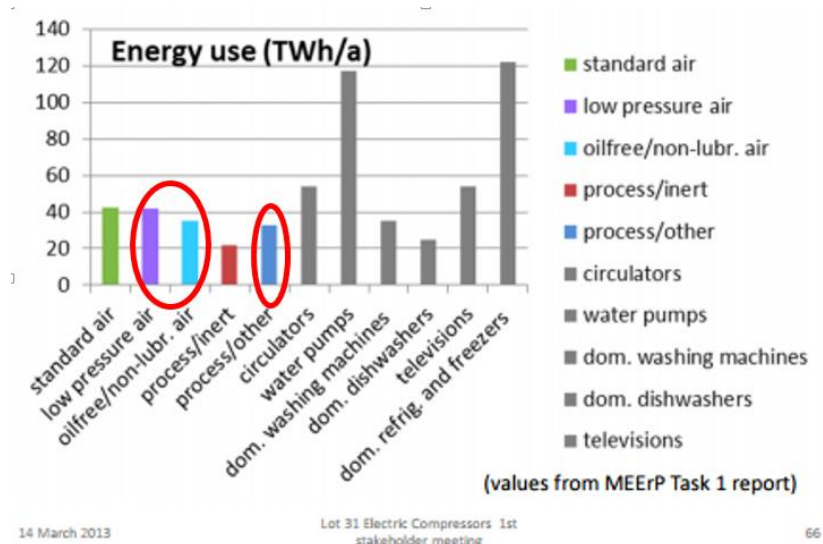
The purpose of a preparatory study is to establish a solid evidence base for a product group, upon which future possible legislative work is undertaken. The data gathered until now mainly focused on standard-air compressors. As expressed while the preparatory study was being carried out, the rest of the product group needs to be analysed and dealt with. The preparatory study indicates (Table 3-19) that a rough saving potential of up to 3.9 TWh/year in 2030 for low pressure and oil free compressors could be added to the 1-2 TWh estimated savings from standard air compressors:

Table 3-19 Estimate of savings in other application ranges:

Application range	change in consumption of new models compared to 'BAU/freeze' (% of energy cons.)		BAU/Freeze electricity consumption (TWh/yr)		difference to 'BAU/freeze' (TWh/yr)	
	2017	2021	2020	2030	2020	2030
Low pressure	98%	96%	41 *	56 *	-0,32 *	-2,4 *
Oil-free	98%	96%	36	43 *	-0,20	-1,5 *
Process / inert	99,5%	99%	20	22	-0,02	-0,1
Process / other	99,5%	99%	30	32	-0,03	-0,2

*: values have changed with respect to presentation on 27 February 2014

The below diagram presented during the first stakeholder meeting confirms that the energy consumption of other compressor applications is certainly not negligible (see bars circled in red).



Between the two options submitted to the Consultation Forum, we strongly support Option 2 (and the respective conclusion by the Commission) for the following reasons:

- Data and test methods on standard air-compressors are already available. Going forward with an implementing measure straight away will send the right signal to the whole compressors industry, while reaping up to 2TWh/year savings by 2030 in the meantime. These are comparable to the savings from washing machines, dishwashers and just under standard water pumps (3TWh/year by 2020).
- The EU has to keep up to speed with related developments in other major countries like China¹ or the USA² that have respectively adopted mandatory requirements on compressors or are in the process of doing so. Should no initiative be taken at the EU level in this area, we fear that the number of inefficient compressors may increase. The EU should not become a dumping ground for inefficient products.
- We welcome the idea of setting information requirements for low pressure and oil-free compressors together with the requirements on standard-air compressors. This would send a clear signal to manufacturers of a possible upcoming regulation in the low pressure and oil-free compressors area, foster innovation, and provide useful data, upon which future legislative work could be based.
- To the contrary, Option 1 would postpone the savings related to standard-air compressors for an undetermined period of time, with the risk that the development of requirements for other compressors gets stuck since these products are known to be more complex. The absence of any comparative assessment of these compressors under the two different standards (ISO 1217 and 5389) could also lead to further delays, by the time a mandate is issued and taking into account the 3 year timeline for the publication of European harmonised standard.

We therefore call upon the Commission to continue with the development of an implementing measure (possibly including energy labelling) for standard air applications, in parallel with the further analysis of the rest of the product group.

END.

¹ As described in the preparatory study on page 68 and onwards.

² See: http://www1.eere.energy.gov/buildings/appliance_standards/product.aspx/productid/78