Position of ECOS (on behalf of environmental NGOs) on the EC Working Document regarding the Ecodesign of small, medium and large power transformers

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Overall comments

Environmental NGOs welcome the revised Working Document on small, medium and large power transformers. As the preparatory study has shown, there is a significant potential for energy savings related to this product group, which coupled with the fact that products put on the market will be in use for the next decades, makes regulating these all the more important. **We therefore strongly support the fast adoption of implementing measures on these products, in order to bring about the related energy savings.**

Ecodesign requirements

We welcome the opportunity given to stakeholders to comment on the draft Impact Assessment (IA). While we welcome the results of the draft IA, we question why 2019 has been set for tier 2 instead of 2018 as proposed initially. In order to bring about the related energy savings as soon as possible, **we urge the Commission to keep tier 2 at 2018.**

Small transformers: We welcome the alignment of the timelines for small transformers with those proposed for the other transformer types (tier 1 in 2014, tier 2 in 2018). We also support the level of ambition for these.

Medium power transformers (MPTs): We applaud the bold level of ambition in the Commission's working document. The Impact Assessment clearly supports a high level of ambition for reduced losses of transformers. The concerns raised during the meeting concerning the electricity prices used for the calculation of the LLCC should be based on concrete evidence and not claims. Even if these are revised downward, **Tier 2 should be maintained at the LLCC leve**l.

Concerning pole mounted transformers, the inclusion of a specific reference for this in the preamble is a step in the right direction. However, we are concerned that this category – even though they need to be labelled as such – could create a significant loophole in the regulation. **We therefore strongly support the Commission's proposal to definitely phase out this category in tier 2.** These transformers have been already dealt with in other parts of the world, it is therefore essential that Europe acts without delays.

Regarding the increased loss levels for transformers with specific combinations of winding voltages in tables I.4 and I.7, reference to specific evidence supporting these high additional

losses should be given. The same applies to transformers equipped with tapping (section b.3 of the WD). Neither the preparatory study nor the draft impact assessment justify the need for higher losses of the specific transformers. Similarly to statements raised by other stakeholders during the consultation meeting, we are of the impression that these "additional allowances" might be too high; to this effect we fully support comments made by CLASP during the meeting concerning these allowances and the pole mounted transformers.

Large power transformers (LPTs): We welcome the ambition of the Commission to set efficiency requirements also for large power transformers and appreciate the efforts which the technical working group has dedicated to this issue. Despite this, we believe that the proposed levels for large power transformers that were presented during the CF meeting could be more ambitious, as only a very limited number of products on the market would be actually banned.

Regarding the presented options concerning the timing of requirements for large power and other transformers, we believe that further delays to requirements - especially for medium power transformers - are not acceptable. Therefore, we clearly reject option B (*"Wait for sufficient/reliable data to be available for LPTs and push ahead then with one regulation for minimum requirements for MPTs and LPTs."*). Option C (*"Move ahead with minimum requirements for MPTs and product information requirements only (peak efficiency) for LPTs. Establish minimum requirements for LPTs as of the review of the regulation (not earlier than 2020)."*) is also not the best way forward, if it is possible (which seems to be the case) to complete the work on efficiency of large transformers earlier. Since there are various open issues with the proposal on LPT, option A is also not really feasible, for the moment. **We therefore support Option D to move ahead swiftly with minimum requirements for MPTs only (and information requirements for LPTs)**. The collection of data concerning the preparation of a separate regulation on LPTs should be prioritised and a timetable set up to facilitate the preparation of this future regulation.

Finally on p. 3 of the WD, it is stated that *"products falling under the definitions of paragraph "Definitions" above shall meet the ecodesign requirements (...)"*. Instead of referring to the paragraph "Definitions", the concerned products should be mentioned here. Otherwise, e.g. a "winding" could also be considered as a product to be compliant with the requirements. In addition, the list on p. 3-4 is incomplete: a bullet point referring to the requirements for small power transformers seems to be missing.

Information requirements

We welcome the inclusion of other environmental aspects in Recital 2, such as raw material use; the working document could elaborate further on these. Understanding that the end of life market of these appliances is well developed, we would nevertheless call for the inclusion of some **generic information requirements as has been the case with other regulations with regard to disassembly, recycling and end of life of components/materials for treatment facilities**. This would systematise the process further and ensure recovery to the fullest extent possible. Further consideration could be given to the inclusion of other issues in the information requirements, such as the inclusion of noise levels at a specific load (SEEDT project report 2008, p. 61) as well as disposal of mineral oil.

Moreover, among some groups of market actors (smaller industries and electricity companies etc.) there seems to be a lack of awareness of energy losses in transformers, so

more **comprehensive information about characteristics and energy saving operating instructions** could be useful. This concerns also the circumstances under which transformers may be "switched off", i.e. completely disconnected in order to avoid no-load losses. Such requirements would ensure optimal life expectancy as regards installation, use and maintenance of transformers.

Energy labelling and GPP

We regret that no energy labelling requirements are being proposed for any type of transformers. The lack of an assessment concerning possible savings through an energy label in the preparatory study is of course a shortcoming but should not prevent further action in this area. On the contrary, for smaller transformers purchased by industrial site or building owners, who may have short return on investment requirements or simply lack knowledge concerning energy losses in transformers (stated in the preparatory study e.g. p. 348), an energy label would be essential. It would specifically help these parties in identifying energy efficient products and include this in their purchasing decisions, allowing at the same time for innovation and differentiation within the market. While we are aware that the load factor is essential for the overall efficiency of transformers, we believe that this is not a reason not to consider energy labelling. The scheme would, of course, have to differ slightly from the usual energy label layout; for instance, it could be considered to design an energy label consisting of three different typical transformer load profiles (low, medium, high). An energy label for transformers is also supported by the conclusions of the SEEDT project (cf. SEEDT project report section 4.1.5 and SEEDT guide). **We therefore call for the elaboration of an energy label for -at least- small power transformers.**

Besides Energy Labelling, we encourage the development of Green Public Procurement rules for transformers. Since transformers are often purchased by public entities, this is an additional opportunity to boost energy efficient transformers, as discussed briefly in the preparatory study (Task 7). This is also in line with the SEEDT project recommendations, which suggest a combination of different policies, including mandatory requirements and "soft" measures.

END

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