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Orgalime comments on EuP Consultation Forum of 27 May 2008 on Possible Eco Design Requirements for Motors

Following the debate held at the EuP Consultation Forum of 27 May 2008, Orgalime expresses its concern over the possible negative consequences of the proposed draft eco-design requirements for electrical motors: in terms of materials, the proposed energy efficiency requirements would induce a very significant increase of copper content (estimated by CEMEP to around 20%) so as other raw materials, such as aluminium, magnetic steel or cast iron, which against the background of soaring prices for materials, would cause serious impacts for European motor manufacturers and their competitiveness.

While for all other materials (e.g.: oil) the commonly agreed strategy is to reduce consumption and dependency vis-à-vis suppliers, the approach proposed in the Commission's working document would force industry to increase its consumption. Such an effect in the frame of an ecodesign directive is a strong contradiction since the reduction of material consumption is one fundamental pillar of any ecodesign strategy.

In response to industry's concerns on that point, the Commission said that this question would be considered during the upcoming impact assessment. We encourage the Commission to seriously take into account this point.

We particularly contest the following views expressed during the debate at the Forum for the following reasons:

- *Statement 1: Considering the recyclability of copper, European industry should not be faced with problems.*

Orgalime comment: Notwithstanding the existence of directive 2002/96/EC on Waste Electrical and Electronic Equipment, it is a reality that such waste appliances with high metal content do not enter the foreseen official waste stream. An ever increasing fraction of materials are recycled outside the EU. As a result, as it is the case for virgin copper, recycled copper must then be purchased from non European suppliers at very high prices. European manufacturing industry has no right or power to keep such materials from WEEE under control. EEE producers have no right to ask all actors to return their WEEE to them, nor can they prevent WEEE recyclers from selling materials to any other recycler around the world. The high recyclability of copper by itself can therefore not justify the present proposal.

- *Statement 2: European industry has to compete more strongly against US and Asian industries in copper/raw materials purchasing to address the issue of resources scarcity.*

Orgalime comment: Competition on raw materials today is harsh and considering that without raw material input no manufacturing activity can take place, it is a company's primary task to get hold of the input that it needs. However, the given argument disregards and even runs counter the question of sustainable management of scarce resources. It conflicts with the idea

of sustainable management of resources as described by the Commission in its recent public consultation on a “raw material initiative”.

This follows the Council of Ministers (Competitiveness) request made to the Commission on 21 May 2007, i.e.: to *‘develop a coherent political approach with regard to raw materials supplies for industry, including all relevant areas of policy (foreign affairs, trade, environmental, development and research and innovation policy) and to identify appropriate measures for cost-effective, reliable and environmentally friendly access to and exploitation of natural resources, secondary raw materials and recyclable waste, especially concerning third-country markets’*. EuP implementation should be coherent with this political request and the upcoming initiative.

- *Statement 3: Engineers’ inventiveness has proven being effective and solutions will be found.*
Orgalime comment: If alternatives for copper were available, they would already be in place since the conductivity of all materials is a basic physical property well known for decades. However, no substitute for copper has been found to date. We reject a strategy that would put substitution of copper or other raw materials at the core of its approach. We question that such a way forward would be in line with the criteria established in the EuP Directive or other relevant EU legislation, i.e.: the REACH regulation that fixes the boundaries for substitution of substances/preparations in the EU.

Orgalime calls upon the Commission to take a cautious and coherent way forward that would not jeopardize both, European industry’s competitiveness and environmental protection.

Regarding possible ecodesign requirement on motors, Orgalime consequently recommends that any such requirement would not force a disproportionate increase of copper or other raw material input, which would cause an adverse environmental effect so as undermine the functionality and affordability of products for consumers.

Speaking for European engineering, ORGALIME represents 3 industrial branches (electrical & electronic, mechanical engineering and the metal articles & metalworking) that manufacture over 27% of total EU manufacturing output and has 35 member trade federations in 23 European countries. The industry accounted for some 1813 billion euro in 2007. The industry not only represents more than one quarter of the output but also a third of the exports of the EU’s manufacturing industries.



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