

Brussels, 21 January 2011

Orgalime answer to the European Commission consultation on the list of products covered by the proposed future definition of the scope of the Gas Appliances Directive

In line with the ORGALIME draft positive list (dated 8 November 2010) already sent and discussed within the “Working Group GAD Revision”, we would like to submit to the attention of the European Commission the following comments and additions as Orgalime contribution to this consultation:

Appliances

1. COOKING

- Boiling pan: Orgalime would like to include this appliance under category “Cooking” since this is its main functionality.
- Orgalime asks for the inclusion under category “Cooking” of the following appliances:
 - Rotisserie;
 - Salamander;
 - Fry top;
 - Pasta cooker.
- Coffee machine: Orgalime would like to keep the specification “*even if the water temperature in a short period exceeds 105° C*”.

Orgalime would like to ask for the deletion of the whole sentence “Exceptions: industrial baking ovens (when used industrially)”: in accordance with Article 1.7 of the new draft text of GAD, appliances and components specifically designed for use in industrial process carried out on industrial premises should be excluded from the scope of the Directive. Therefore this kind of appliance should be excluded from the positive list by definition and there is no need to keep an explicit exception which could be misleading.

2. HEATING

- Boiler including combustion air supply and combustion product evacuation ducts certified as an assembly with the appliance: following the discussion on this point held on the “WG

Orgalime, the European Engineering Industries Association, speaks for 32 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 22 European countries. The industry employs some 10.6 million people in the EU and in 2009 accounted for some €1,427 billion of annual output. The industry not only represents some 28% of the output of manufactured products but also a third of the manufactured exports of the European Union.

GAD Revision” meeting of 22 November 2010 and in view of the special meeting to be organized to clarify the status of these appliances, Orgalime would prefer to leave this point in the positive list at least until this issue is clarified.

3. HOT WATER PRODUCTION

- Hot water heaters for beverage: Orgalime would like to include this appliance under category “Hot water production”.
- Café boiler: Orgalime would like to keep the specification “*even if the water temperature in a short period exceeds 105° C*”

4. WASHING

- Orgalime would like to ask for the deletion of the whole sentence “Exceptions: industrial laundry equipment (when used industrially)”: in accordance with Article 1.7 of the new draft text of GAD, appliances and components specifically designed for use in industrial process carried out on industrial premises should be excluded from the scope of the Directive. Therefore this kind of appliance should be excluded from the positive list by definition and there is no need to keep an explicit exception which could be misleading.

5. POWER GENERATION UNITS (NOT LIMITED TO ELECTRICITY)

- Orgalime would like to ask the Commission for more information on this category, especially regarding the specification under brackets “*not limited to electricity*”. Which kind of appliances might fall within this category? Are they not already covered by “*co-generation appliances*” which appear in category “Tools, Equipment and various products”?
- Orgalime would request to clearly exclude from this category “low power generator sets” (electrical power is less than 10 KW), which are mobile machinery and are supposed to supply electrical power to tools or other electrical equipment but not to single/multi family(ies). In addition, we assume that the examples listed in the EC positive list (combustion engines, sterling engines, turbines) are mentioned only in order to provide examples of the possible different drive systems for the power generation units and will not be included as such (regarding their individual application) in the positive list. Therefore, in order to avoid any misinterpretation, Orgalime proposes to change the title of this category as follows: “POWER GENERATION UNITS (P el > 10 kW, powered by combustion engine, sterling engine or turbine and not limited to electricity). As regards the specification “*not limited to electricity*”, the previous consideration applies.

6. POWER GENERATING EQUIPMENT (GAS DRIVEN)

- Only for the sake of clarity, Orgalime would suggest to modify the name of this category into “GAS DRIVEN POWER GENERATING EQUIPMENT”.

7. TOOLS, EQUIPMENT AND VARIOUS PRODUCTS

- Cutting/Brazing equipment: according to our interpretation, this kind of equipment refers to a gas torch fuelled usually by oxygen and acetylene supplied from transportable bottles, the purpose of which is either to cut with a flame, iron, steel or other metallic material or to join

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the same by welding or brazing. When dealing with softer materials like copper, brass or lead, propane or butane gas may be used instead of acetylene, which produces a much higher flame temperature. Therefore, for the sake of clarity, Orgalime would like to ask for the addition of the word “metal”: “Metal cutting/brazing equipment” fits in with the Orgalime interpretation of this kind of equipment and would help to avoid any misinterpretation. The aim of the positive list is to have a clear and detailed picture of appliances and components falling within the new scope of GAD: therefore the more information is provided to describe them, the better and the more chances there will be to avoid misinterpretation.

- Grass cutting machines: according to the standard EN 836 “Garden equipment – Powered lawnmowers – Safety”, a “powered lawnmower” is “a grass-cutting machine or a machine with grass-cutting attachment(s) where the cutting means operates in a plane approximately parallel to the ground and which uses the ground to determine the height of cut by means of wheels, air cushion or skids, etc. and which utilises an engine or an electric motor for a power source”. In our opinion powered lawnmower should not be included in the scope of the new GAD Directive; therefore Orgalime kindly asks to delete the whole point “Grass cutting machines” from the positive list in order to avoid any misinterpretation and any reference to powered lawnmower or other equivalent machines covered by EN 836.

In case the European Commission decides to keep this kind of machine in the positive list, Orgalime would like to have a better definition and a clear explanation of the meaning “grass cutting machines”, in order to provide a detailed picture and description of these machines and avoid any kind of misinterpretation.

8. COMPONENTS

- Components for appliances/Gas line controls: Orgalime would suggest to include “limiters/modulators” under the product category “valves”:

Gas line controls

- valves (solenoid, ball, needle, **limiters/modulators**, etc.)

- Components for end user installations: Orgalime would suggest the following modifications (underlined in bold) to the EC draft positive list:

Components for end user installations

- valves

- pressure regulator (?)

- shut-off valve

- flexible gas tubing and gas hose assemblies **including their connectors**

- connectors

- change-over device

- thermally activated shut-of valve

- **excess flow valves**

- Components for fuel cell, hydrogen, biogas, etc:

For CHP:

Flexible Tubing (metal and rubber)

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