

Memorandum of Understanding between CAPIEL and CEMEP

CAPIEL and CEMEP underline their good cooperation in a spirit of partnership. The two sector associations are aware of their responsibility for the correct energy-efficient design of drive system. With this MoU, they want to contribute to ensuring that the legal requirements for motors and drives laid down in the Ecodesign directive are not misinterpreted and that the drive system is optimally and energy-efficiently designed for the process.

IE2 + VSD or IE3 option

Article 3: Ecodesign requirements

CAPIEL and CEMEP underlines that the options “IE2+VSD” or “IE3” are not in-line to the “extended product approach”, therefore the emphasise shall be based on the correct application in order to avoid “rebound effects”.

Rebound effects on this option can cause adversely higher energy consumption than was intended by the implementing measure. For the option IE2+VSD or IE3 we have to take into account that those drive components are just components and sub-assemblies which may also be misapplied in terms of energy saving in the B2B-business case, therefore are addressed in Article 2, point 2 of EU 2009/125.

The applied genesis in B2B moves the CO₂-responsibility from the component suppliers to the distributors, the OEMs and the system integrators up to the final end user of a production site.

The final user is the only one in the entire chain, who could create the full effect on the CO₂-emissions with the regulated components and will benefit from the energy cost savings when deciding on the right application. The components manufacturers have in contrary in most cases no idea where and to which final use or application the component will go after selling to a distributor or whether the component will be finally exported outside Europe embedded in some machinery.

For this reason CEMEP and CAPIEL propose, that the implementing measure should be amended adding the following sentence at the end of Article 3, Paragraphs 1(b), 3(a) and 4 (b): **“The choice of IE2+VSD or IE3 shall be based on an analysis of the energy efficiency of the overall application. EN 61800-9-2 can be used for this purpose.”**

In addition, CEMEP and CAPIEL support also the Commission proposal to include this additional explanation in the Guidelines accompanying “*Commission Regulation (EU) No 640/2009 of 22 July 2009 implementing Directive 2005/32/EC with regard to ecodesign requirements for electric motors*” and “*Commission Regulation (EU) No 4/2014 of 6 January 2014 amending Regulation (EC) No 640/2009*”.

Examples for rebound effects on this implementing measure are e.g.:

- Adding a VSD driven motor (IE2 + VSD) to applications which only request a nominal fixed speed
- Adding a high efficient motor (IE3) to an application which repetitively and dynamically accelerates or decelerates or works with intermittent duty.