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COMITÉ EUROPÉEN DES ASSOCIATIONS DE CONSTRUCTEURS
D'ENGRENAGES ET D'ÉLÉMENTS DE TRANSMISSION
EUROPÄISCHES KOMITEE DER FACHVERBÄNDE DER
HERSTELLER VON GETRIEBEN UND ANTRIEBSELEMENTEN
EUROPEAN COMMITTEE OF ASSOCIATIONS OF
MANUFACTURERS OF GEARS AND TRANSMISSION PARTS

Mr. Michael J. Bennett
European Commission
Directorate-General for Enterprise
and Industry
Avenue
d'Auderghem/Oudergemselaan 45
B-1040 Bruxelles/Brussel

O/Ref. : DD / KiT

Frankfurt, 12th July, 2016

EUROTRANS comment: Study for the assessment of the feasibility of using "points system" methods in the implementation of Ecodesign Directive - Comments on Initial draft report Task 2

Dear Mr. Bennett,

EUROTRANS, the European Committee of Associations of Manufacturers of Gears and Transmission Parts, represents the interests of more than 600 enterprises, with a collective annual production of more than 34 billion Euro. Within Europe at least 160.000 people are employed by this sector.

As supplier of many complex products, e. g. machine tools we will be indirectly concerned by Ecodesign requirements based on a "points-system" methodology. Representatives of our member associations took part very actively in the work of ISO/TC 39/WG 12, as experts, to build the ISO 14955-1 standard.

We ask you and the contracted consultants to take the following comments on the initial draft report Task 2 into account:

Clause 4.12 ISO 14955-1: Machine tools -- Environmental evaluation of machine tools -- Part 1: Design methodology for energy-efficient machine tools

We support the comments of ISO/TC 39/WG 12 especially that machine tools are broken down into machine tool functions, not into machine tool components (1st paragraph)

Clause 4.13 Machine tools points scheme proposed in the Impact Assessment and Ecodesign working document

For component and subsystem design, we insist on the principle of technology neutrality. The selection of technology is influenced by many factors. Energy efficiency is one amongst many others like power density, service life and robustness. Rating the MT design in its entirety solely by single energy efficiencies of subsystems, does not provide an objective comparability of the overall system.

In the context of the consultation forum on 6th May 2014 related to ENTR LOT 5 we already expressed that intension. On table 9 (category of measures: Motor and drives controls), we strongly recommended to change the discriminatory measure so-called "Helical gears instead of less efficient worm gears" into "Full consideration given to the appropriate selection of gear type, based on application." An updated version of the working document has not been provided.

Furthermore we would like to bring to your attention that the point scheme regarding the energy savings for measures is taken mainly from the draft standard ISO/DIS 14955-1. The responsible working group ISO/TC 39/WG 12 decided to delete the points and percentages as they are misleading. Thus, they do not exist in the published standard ISO 14955-1 anymore.

We support the statement on page 56, 5th item - also made by Mr. Akkerman (German government representative) during the Consultation Forum - pointing out that the percentages cannot be added easily to achieve the targeted energy saving. One measure can influence the other and may, under certain circumstances, deteriorate energy efficiency. This means that also the assumption that the efficiency gains "would be expected to be multiplicative" is also not correct for several cases.



Dirk Decker
General Secretary EUROTRANS

Laurence Chérillat
Technical Working Group EUROTRANS

EUROTRANS represents the following member associations:

AGORIA (Belgium), ARTEMA (France), ASSIOT (Italy), BGA (UK), FFTI (Finland), SWISSMEM (Switzerland) and VDMA Power Transmission Engineering (Germany)

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