



European Committee of Manufacturers of Electrical
Machines and Power Electronics

 **02nd CEMEP CONFERENCE**

/ 7th and 8th July 2022 in Milan, Italy

CEMEP sustainable products, systems & services



European Committee of Manufacturers of Electrical
Machines and Power Electronics







“CEMEP position on the EU Sustainable Products Initiative”

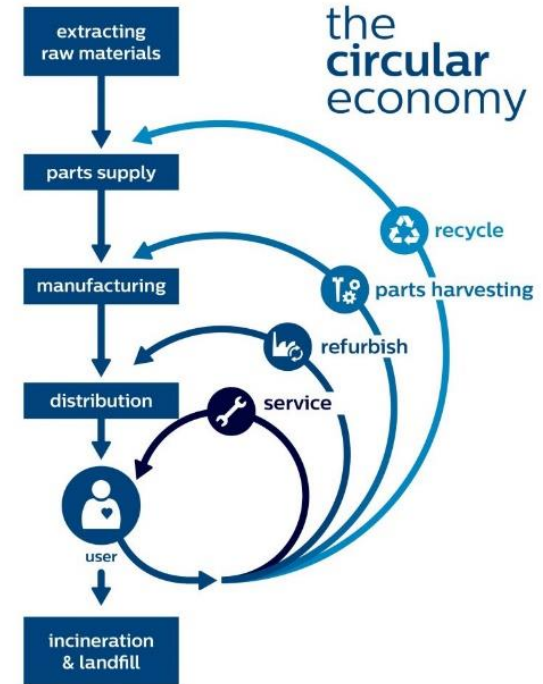
**Jesper Jerlang, chairman of CEMEP Task Force
on Circular Economy**

Industry characteristics

- Electric motors, VSDs and UPSs are industrial products sold for the professional market (B2B)
- Key market drivers:
 - Energy efficiency
 - Electric motors convert >50% of electrical energy consumed in Europe
 - Applying VSDs to motors running at part load saves 20-50% of energy
 - Reliability – minimizing downtime for driven applications
 - Safety and security

Material efficiency in CEMEP industries

-  Long lifetime by design
-  Well established maintenance and repair services
-  Increased use of recycled materials
-  High recyclability of materials used
-  Shifting away from plastic based packaging
-  Increasing digitalisation enabling optimization



CEMEP welcomes the draft EU Regulation on Sustainable Products

CEMEP especially welcome

- ✓ **Harmonization:** A regulation = uniform implementation in all member states
- ✓ **Differentiated approach:** Product group oriented approach is maintained
- ✓ **Strengthening the market:** More incentives for circular solutions and better availability to information
- ✓ **Increased transparency:** Digital product passports open for better flow of data throughout the value chain
- ✓ **Decentralized and market-driven DPP:** Allows for differentiated access ("need to know" basis)
- ✓ **Improved market surveillance:** Introducing minimum efforts

CEMEP concerns

- Need for an involving process
- Avoidance of double regulation
- Responsibilities for the Digital Product Passport
- Harmonized European standards
- Third part certification adding costs
- Need for balancing conflicting requirements and tradeoffs

Need for an involving process

- Involvement of all stakeholders has been a key to the success of the Ecodesign Directive
- New process for delegated acts must allow for an iterative and involving process
- Recommendations:
 - Add more clarity to the process for delegated acts and when and how stakeholders will be involved
 - Define the role of the Ecodesign Forum better (scope/role, membership, frequency of meetings)

Avoidance of double regulation

- Important to avoid double regulation
- Especially for the regulation of substances of concern, the draft ESPR opens for potential double regulation
- Recommendations:
 - RoHS and REACH to continue as the main instruments for regulating hazardous substances
 - We call for the process to identify such substances to be defined more clearly

Responsibilities for the Digital Product Passport

- Responsibilities for the Digital Product Passport needs to be clearer as products flow through the value chain
- Recommendations:
 - Clarify who should be responsible for maintaining data for the product when in use, and how
 - Clarify the relationship between the ESPR and the Data Act
 - We suggest a staged approach to DDP deployment, starting with the most obvious data

Harmonized European standards

- Keeping approach based on harmonized European standards
- Recommendations:

- Build as far as possible on international standards
- Maintain a strong European standardization system
- Avoid issuing own specifications

Third part certification

- Third part certification adding costs and complexity
- Self-declaration has worked well on product safety area
- Recommendations:

- Maintain self-declaration as main principle and only impose third party verification where needed

Need for balancing conflicting requirements and tradeoffs

- Need for balancing conflicting requirements and tradeoffs

- e.g., energy efficiency vs material efficiency
- or lifetime vs recyclability
- not impairing safety

Key takeaways

1

CEMEP welcomes the
ESPR and the DPP

Will strengthen the European
market for sustainable products
and solutions and add
transparency

2

CEMEP has some
concerns on the
practical
implementation

Involvement
Avoiding double regulation
Responsibilities for the DPP
Use of harmonized ENs
Third party certification
Need for balancing tradeoffs

3

CEMEP would like to
contribute to the further
process of finalizing
and deploying the
ESPR and the DPP

Thanks for the attention!

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