Comments / Queries on Proposed Regulation repealing Commission Regulation (EC) No 640/2009 with regard to ecodesign requirements for electric motors

1. Inclusion of 8 pole motors

It is not clear if the COM intends to include 8 pole motors. Although 8 pole motors are mentioned in the scope, there is no reference to 8 pole motors in the Annex I timetable. The volume of 8 Pole motors is really low and regulating efficiency class for 8 Pole motors will require a design change and investment in new machinery, the economic cost of which far outweighs the environmental benefits. This will make European manufacturers less competitive against manufacturers from outside Europe.

If the regulation intends to cover 8 pole motors, a clarification is needed as to when 8 pole motors will be affected. The text of Annex I, 1 (b) (ii) needs to be amended to: the energy efficiency of three-phase motors with a rated output of equal or above 0,75 kW and equal or below 1000 kW and having 2, 4, 6 or 8 poles ….

1. Increased Safety motors

The draft mentions increased safety motors in Annex I and defines increased safety motors as ‘increased safety motor’ means a motor intended for use in explosive atmospheres and qualified ‘**Ex-e**’ as defined in standard IEC EN 60079-7. All motors in IEC EN 60079-7 are now termed ‘increased safety’ but there are now two types: **Ex eb** (old **Ex e**) for Zone 1 and **Ex ec** (the new definition for non-sparking motors). The draft regulations need to be amended to be clear on which specific type of increased safety motors are to be regulated. There have been a number of changes to the EN 60079 series since the initial studies and impact assessments and careful thought is needed to ensure the regulations are in line with the current standards otherwise the regulation will lead to ambiguity and loopholes.

1. TEAO motors

The draft regulation states in Article 4.2 (k) that TEAO motors are exempt, whereas 4.2 (d) (iii) effectively includes smoke extraction motors rated for 400°C and below (it states that motors designed exclusively to operate above 400°C are exempt, and in almost all cases these are supplied for general use). The text could be interpreted that a TEFC smoke extraction motor is in scope but a TEAO version of the same motor would be out of scope.

General comments

1. Industry has concerns regarding the policing of the efficiency standards as the scope now includes motors down to 0.12kW. There is very little evidence that the current regulation 640/2009 with a much smaller scope is being effectively policed. How will market surveillance cope with this increased scope of motors, especially small motors with ratings below 0.75kW?

1. What about EN 50598 series of standards? EN 50598 series of standards cover Ecodesign for power drive systems and their driven applications. No mention is made to these standards in the draft regulation.