

## Comments to second MEErP draft Interim Reports

4 August 2022

EPEE welcomes the opportunity to comment on the second draft Interim Reports on revising the Methodology for Ecodesign of Energy-related Products (MEErP). The JRC organised a stakeholder meeting on 23 June 2022, and various aspects were clarified for stakeholders in terms of content and timelines.

Nevertheless, concerns remain, and EPEE would like to highlight these matters in this paper.

TOPIC	PAGE	COMMENT
Task 1: Impact categories	General	EPEE supports the use of the impact categories from the Product Environmental Footprint methodology in the Ecoreport Tool. This methodology ensures alignment with existing datasets and better facilitates future updates and follow-up.
Task 1: Impact categories	7	More explanation is needed on the assessment inclusion of the impact category for human toxicity. EPEE would like to ask to further elaborate this element.
Task 2: Estimation of expected lifetime	29-30	<p>The calculation of the total lifetime is now based on a scoring approach where the original lifetime is added with the additional lifetime due to repairs/upgrades. In our view, it seems that the longest lifetime can only be achieved if the product meets the 'level 1' criteria.</p> <p>However, caution should be taken regarding the design features introduced for assessment. Consequently, for products that require professional repair (e.g., related to compliance with the F-Gas Regulation), the overall lifetime of such products would be shorter than if no professional repair is required. Such unfair situations should be avoided, and the criteria should be developed taking into account the characteristics of each specific product group. EPEE therefore fully supports the statement made at the first stakeholder meeting that the specifications should be elaborated in detail by the consultants of the preparatory study.</p>
Task 2: Estimation of expected lifetime	30	<p>It is unclear how the various characteristics listed on pages 29-30 are assessed and how they are related to the additional lifetime. For example, the link between the dismantling depth and the additional lifetime is not clear.</p> <p>We cannot see any connection between the repair effort and a resulting shortened life span.</p>

		In general, easy repair does not mean longer lifetime. It will depend on the product group whether that has an impact on the choice to repair.
Task 2: Estimation of expected lifetime	31-32	<p>Task 2 assumes that each critical component is repaired or upgraded only once. EPEE challenges this assumption as many factors will influence the decision to repair or replace a product.</p> <p>It is also unclear whether the assumption of only one repair/upgrade applies to the entire product or to each critical component. It is apparent from the graph and subsequent explanation that after one repair (no matter how small) it is assumed that the lifetime of the product will not be extended any further. Overall, a much higher granularity is required.</p>
Task 2: Estimation of expected lifetime - recyclability	33-34	The features currently defined in the report to assess the recyclability of the product should be carefully weighed checked against the possible trade-offs. A reduction in the number of different materials used within one assembly, could have a negative impact on the quality of the product and could lead to a shorter lifetime.
Task 2: Estimation of expected lifetime – recyclability	44	In the example provided for washing machines on page 44, the assumption is taken that labour costs would reduce by 40 % if a 'higher level' washing machine is chosen. From our point of view, a more expensive washing machine will also require more expensive parts and therefore more expensive repair. Further clarification on this would be appreciated.
Task 5: Systematic updates	53	EPEE supports that the Primary Energy Factor (PEF) is periodically updated according to the latest publication of the EED. However, we would also stress that in the study phase the evolution of the PEF should be considered when assessing future scenarios (Task 7). It should be considered that the PEF will reduce over time.

## ABOUT EPEE

EPEE represents the Refrigeration, Air-Conditioning and Heat Pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of over 50 member companies as well as national and international associations from three continents (Europe, North America, Asia). With manufacturing sites and research and development facilities across the EU, which innovate for the global market, EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment. Please see our website (<https://www.epeeglobal.org/>) for further information.