

## **Europacable comments on the Revision of the 2012 – 2014 Working Plan under the EcoDesign Directive (2009/125/EC)**

Brussels, 18 September 2012

**Europacable believes that the inclusion of ‘power cables’ in the recently adopted priority list of the 2012-2014 Working Plan under the EcoDesign Directive is based on incomplete and incorrect information. While we strongly support Europe’s ambition to reduce carbon emissions and increase energy efficiency, we take the view that low voltage power cables installed in buildings only offer a marginal contribution to achieving the overall objectives.**

**Europacable therefore calls for a revision of the data provided for the Study for the Amended EcoDesign Working Plan by involving key stakeholders and collecting additional environmental and economic impact information for a balanced decision.**

Europacable welcomes the work currently under way regarding a revision of the working plan of the EcoDesign Directive (EDD) as we believe that the reduction of environmental impacts of energy related products are critical for a sustainable economy. Three product categories of the European Wire and Cable Industry can contribute to achieving these objectives:

1. Medium, High and Extra high voltage power transmission cables deployed in electricity distribution and transmission grids;
2. Low voltage power cables installed in buildings, either residential or non-residential;
3. Data- and telecommunication cables for infrastructure as well as building applications.

Europacable takes the view the largest energy efficiency improvements and carbon dioxide reductions for copper and aluminum cable systems are mainly depending on:

- intelligent management of central and de-central electricity generation,
- increasing the share of renewable energy sources in the energy mix, and
- installing energy saving equipment and management devices in buildings.

This said, in our view low voltage power cables installed in the buildings only offer marginal contribution to achieving the overall European objectives.

After reviewing the reports, which motivated the inclusion of power cables in the working program of the EDD for 2012 - 2014, Europacable concludes that EDD goals will not be achieved by focusing on conductor size. Essential information about a major part of power cable applications is missing for a complete evaluation of a “significant environmental impact and savings potential”. Furthermore, the scope and assumptions in the report are inconsistent and not robust:

- The technical hypotheses used for the calculations of carbon savings and intensity rates are not accurate;
- The impact of cable size modification on the entire electrical installation has not been taken into account;
- Country differences in installation specifications and energy mix have significant impact on results and are not included.

Europacable therefore calls for a revision of the data provided for the Study for the Amended EcoDesign Working Plan by involving key stakeholders and collecting additional environmental and economic impact information for a balanced decision.

**Europacable is committed to supporting the upcoming consultation process to ensure the optimal effectiveness of the envisaged Directive.**

**For further information, please contact:**

**Annette Schermer**

Chair Europacable ECOE

Email: [a.schermer@europacable.com](mailto:a.schermer@europacable.com)

**Charlotte Ingold**

Member of Europacable ECOE

Email: [c.ingold@europacable.com](mailto:c.ingold@europacable.com)