

DG ENTR Lot 8: Ecodesign for Power Cables in Indoor Electrical Installations

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Ref.	Section	Page	Topic	Comment	Proposed change	VITO reply
1	All tasks	All	General	Data, such as cables length installed in buildings or sales or stocks of power cables will have a great impact on the final conclusion; The reliability of such data needs to be checked and validated among stakeholders before conclusion on losses in cables and energy efficiency potential can be done.		Stakeholders are always welcome to provide additional data.
2	All tasks	All	General	The different reports only focus on copper cables. It has to be highlighted that aluminum cables may also used in building applications	Potentially include the aluminum cables in the calculation performed	A base case based upon aluminum cables is added to the study.
3	Task 2 and task 5	Task 2 : 26 and Task 5 page 11 and 14	Copper resource	It is mentioned that "copper is becoming a scarce resource" . Indeed, copper is highlighted by Europe as an important material considering resource efficiency. Such aspect should be pointed out and taken into account into the environmental study	Include Resource depletion indicator in the environmental evaluation, specifically when evaluating use of higher cross-sections.	Critical raw materials were recently studied by the European Commission Services and Copper was excluded:: http://ec.europa.eu/enterprise/policies/raw-materials/critical/index_en.htm It is not the objective of this study to review this position.
4	Task 3	40	Table 3-15	Average life time of buildings cables seems higher, for residential, than average life time of buildings in Europe.	Re-consider the calculation done for average life time, or get more information from buildings manufacturers on such information	Text has been changed.
5	Task 5	11	BoM	The calculations are done using a simplified approach for cables composition. In LCA studies, some additives or raw materials used in small quantities may induce the most important impact on some indicators	Improve the accuracy of LCA study or highlight that this evaluation is a simplified approach and that some key impacts related to process or raw materials may have been forgotten.	Text in task 5 has been adapted to indicate that the simplified MEERp approach is taken. In the second stakeholder meeting stakeholders were invited to provide more accurate LCA analysis, if they could not agree with the MEERpEcoReport tool use.

Stakeholder comments form



6	Task 5	24	Cost for consumer	Any increase in cable cross-section will induce an increase in other electrical accessories costs and building cost due to larger cable management	Consider the increase on building cost related to increase in copper cross-section	This is mentioned in Task 3 and will be discussed qualitatively in Task 7.
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