

December 9th, 2015

## **Official EWA comments to Draft standardization request for welding equipment**

The Impact Assessment Study for Sustainable Product for Measures for Product Group: machine tools and related done by Bio (March 17<sup>th</sup> 2015) already states the exclusion of some types of welding equipment (e.g. hobby type welding equipment, submerged arc welding equipment, resistance welding). For the excluded type of equipment no limits were implemented in the study.

During the Consultation Forum held on May 6<sup>th</sup> 2014 member state representatives discussed deeply why there is a focus on welding equipment, if its solely represents less than 10% of the total energy consumption of all products within the scope of ENTR Lot 5.

Beside this discussion the welding industry did show readiness to contribute to energy saving topic and was in ongoing contact with EC to finalize a practicable solution. This always was based on the exclusion of some types of welding equipment, which was written and acknowledged several times in our communication to EC.

We cannot see any sense in including these welding equipment in the draft mandate:

- Submerged Arc equipment (arc > 600A);
- Welding equipment in the scope of EN 60974-6 (low duty cycle equipment designed primarily for domestic levels of use on an annual basis);
- Resistance welding equipment;
- Stud welding equipment.

which is excluded in the Impact Assessment Study and the draft legislation as well.

Therefore we once more want to state that the following modifications to the draft mandate needs to be done for acceptance by EWA:

- 2.2, 5. – delete last sentence  
“However, the requested harmonized standards should cover also those equipment types referred to in point 6 below, which are provisionally excluded from the scope of relevant Commission Regulation concerning eco-design requirements on welding equipment;”
- Paragraph 2.2., 6. - Delete sub-clause altogether