Stakeholders meeting
for the follow-up
of the MEErP Preparatory Study
on Taps and Showers

25 October 2018,
Comisión Europea - Representación en España, Paseo de la Castellana, 46
28046 - Madrid, SPAIN

Draft minutes

Contents

Agenda

Schedule	Topic
11:00 – 11:15	Registration and welcome (EC)
11:15 – 11:30	Introduction of participants, context and state of play (EC)
11:30 – 13:00	Background information on taps and showers (incl. labels and standards) – presentation and discussion (EC)
13:00 – 14:00	Lunch break
14:00 - 14:15	Policy options (incl. saving potentials) – presentation only (EC)
14:15 – 14:45	Best of all initiative – presentation only (EBF)
14:45 – 15:30	Open discussion on policy options
15:30 – 15:45	Coffee break
15:45 – 17:30	Open discussion on policy options (cont.)
17:30 – 18:00 (max)	Wrap-up and conclusion of the meeting (EC)

Participants List

Last Name	First Name	Organisation
BAILERA	BeléN	LGAI TECHNOLOGICAL CENTER, S.A. (APPLUS)
BATON	Marie	CLASP
BRUNE	Rene	Gebr. Echtermann GmbH & Co. KG
CONTI	Luca	CEIR
CORDELLA	Mauro	European Commission - JRC
DA SILVA LEMOS	Paulo	European Commission – DG ENV
DONATELLO	Shane	European Commission - JRC
FAYOLE	Chloé	ECOS
FEHRHOLZ	Holger	CEIR
FOX	Michael	IKEA of Sweden
HANGA	Alexandru	VALSIR SPA
HEIJNK	Dominik	HKI - Industrial Association for House, Heating and Kitchen Technology
HEINZELMANN	Werner	Hansgrohe SE
HENRIKSSON	Kjell-åKe	JM AB
HENRY	Pierre	European Commission – DG ENV
KLÜH	Michael	Hansgrohe SE
MAGGIONI	Alessandro	Federazione ANIMA/ AVR
MENEZES	SíLvia	Deco Proteste, on behalf of BEUC - Bureau Européen des Unions de Consommateurs
NEWTON	Filipa	ADENE - Agência para a Energia | Portuguese Energy Agency
NORDING	Stefan	Swedish Energy Agency
ORGILL	Yvonne	European Water Label
PARDAL	Antonio	AGRIVAL
REGUEIRA-LOPEZ	Adrian	BEAMA
RODRIGUES	Carla	ANQIP
SERRA	Maite	AGRIVAL
SIDERIUS	Hans-Paul	Netherlands Enterprise Agency
SILVA AFONSO	Armando	ANQIP
TAYLOR-HAMLIN	Christian	Neoperl
TEMBRINK	Hartmut	EUnited Valves
VALENTE	Aldo	VERNET
VAN DEURSEN	Rob	Kiwa Nederland B.V.
VELAZQUEZ	Carlos	Roca
WACHAU	Andre	Federal Institute for Materials Research and Testing (BAM)
WOLF	Oliver	European Commission - JRC

Minutes

Introduction

The European Commission (EC) thanked the stakeholders for coming to Madrid for this meeting and emphasized that the aim of this meeting is not to reach some final and binding decision about the next steps for the Taps and Showers (TS) project but instead to provide an update about the work carried out by the EC and provide the opportunity for stakeholders to provide their feedback and discuss relevant technical issues (in the morning) and relevant policy issues (in the afternoon).

JRC presentation and update about research in the taps and showers project.

The JRC provided a brief summary of the "*taps and showers journey*", which began back in 2010 with background research into possible EU Ecolabel and Green Public Procurement criteria, which was followed in 2013-2014 by a preparatory study to explore the feasibility of implementing additional policy tools. As a consequence, the potential development of an energy label for water-related products has been included in the Ecodesign Working Plan 2016-2019. In the meantime, the "Best of All" initiative run by the European Bathroom Forum (EBF) managed to cluster an important portion of the market.

A public consultation was open in 2017 by the EC to get update information on TS. The consultation showed a clear preference of industry stakeholders for harmonizing the label based on a voluntary approach. Market and stock data was also presented, as well as main labelling approaches available for TS and related technical characteristics. It was in particular pointed out that nominal flow rates is the main functional parameter that can be measured through European standard methods. Other technical aspects can be addressed, either through available standards or other methods. Existing standards could be updated to take these aspects into account. However, it was considered that there are no satisfactory methods for the satisfactory assessment of the overall functionality of products (including rinsing efficiency, comfort, economy features). This issue is considered critical due to the specificities of the product group, due to the direct interactions with the human body. This was explained making an analogy to the testing situation for washing machines.

Stakeholder discussion relating to technical aspects

All stakeholders understood the potential benefits of a single label but it was unclear about how to best capture rinsing efficiency and other functional aspects in the label.

Some stakeholders consider important to go beyond the water flow rate, other testing experts reported that the main function of TS is to deliver water and that some key functional aspects are already covered in existing standards.

The main concern was related to the loss of functionality as the water flow is reduced, leading to the consideration of "*how low can you go*" with water flow before tap or shower rinsing performance becomes unacceptable. To add to the uncertainty of defining rinsing performance *per se*, it was generally understood that rinsing is also a rather subjective experience and so even if a quantitative metric is agreed, where to define the acceptable limit could significantly vary from person to person.

The discussion moved towards the possible rating of rinsing efficiency and other functional aspects on the label, although this was generally dismissed as something of a "*holy grail"* and something that has affected the TS project since the beginning.

Even if a "*holy grail*" solution is not available for the rating of TS, minimum "*pass-fail"* requirements could be explored. It was mentioned that there are schemes (in New Zealand, Mexico and Sweden) where attempts to the assessment of rinsing efficiency have been made and that currently these different approaches were being compared by EBF with a view to deciding on what could be the "*best of all"* approach to take. Much has apparently already been agreed from a technical perspective although there were still some terminology issues to iron out. Some general assumptions can be made for factors such as spray distribution and rinsing efficiency or flow rate and rinsing efficiency but a relationship in the laboratory is one thing and the actual relationship in the diverse installation environments is another thing entirely. There is always some variability but as flow rates go down, the potential variability increases. To help bridging the performance gap between the lab and real buildings, one aspect being promoted by the EBF was "*pressure independence*" of taps and showers, meaning that they should deliver the claimed flow rate at standard, higher and lower pressures.

It was also suggested not to opt for policy action if testing methods are not satisfactory. Industry representatives consider that these aspects can be integrated in existing EN standards without the need for a formal mandate. A formal mandate would require more time, 3-4 years (until standard completion) or even more. It was underlined that lot of time has passed since the beginning of the "journey" and that solutions are needed now for the benefit of everybody.

In terms of resource efficiency aspects, it was emphasized that taps are widely recycled due to the high scrap value of the brass materials they are generally made from (approximately 3 EUR per tap). From an LCA perspective, the use phase of a tap or shower is much far more important than the impacts due to manufacture of the materials they are made of. Benefits of saving water from taps and showers go beyond the use of the product and involve system aspects as heating, distribution systems and wastewater treatment plants. With plastic parts, caution was urged about any requirements for recycled contents due to the different national requirements for drinking water contact materials that are in place in different Member States. With respect to durability, it was stated that most taps and showers reach the end of their life due to decisions to renovate bathrooms, so the existing product standards are considered to sufficiently cover this aspect.

EBF presentation about work towards an harmonized European label.

Representatives of the EBF presented their work towards a harmonized European label to cover TS (and covering 13 bathroom product categories in total). It was clarified that this is not only an industry initiative, being public entities also involved (see for example the case of ANQIP for Portugal).

Of the five schemes available in Europe for labelling TS, four have sat together to capture the best parts of each scheme. The result is a label with five colored bands for water efficiency, a barometer for energy efficiency below and, at the bottom, a series of technical icons related to the use and functionality of the product. Each of these aspects of the label were briefly presented. A timeline for next steps was presented and it was intended to launch the label at the ISH in 2019. A website and online database to promote labelled products currently covers 143 brands and 11 000 products. It has been reported that the label is covering 60% of market

in terms of units, with the possibility to increase soon to 80% as Italy manufacturers will join the initiative. Industry is awaiting to know which is the next move of the EC.

Stakeholder discussion about market-related aspects

In relation to the market data about the penetration of labelled products, it was pointed out that the numbers relate to registered products rather than sales volume and that while the number of registered products allows to identification of certain trends, it would be much more valuable to know about sales of labelled products. Unfortunately, it was not possible to gather better data about this. Manufacturers are reluctant to provide their confidential data until they are sure about the EC´s intentions with TS.

The proliferation of different schemes confuses customers and is an additional burden for producers who wish to market their products in regions where different labelling schemes are in place. Part of the reason for their differences is related to energy being prioritized more in areas where energy may be more expensive and water being prioritized more in areas where freshwater is less abundant.

The final objective of any labelling scheme, which was repeatedly emphasized during the discussion, is that the label should help inform customers better about their purchasing decisions, especially if they want to reduce their water and energy consumption. Industry is moving ahead with developing water efficient TS but a European-wide label is missing to help industry to promote them.

The EBF database for labelled products would be an important benefit. On parallel, the EC is expected to launch a database for energy labelled products in 2019. Sales of TS over the internet or in DIY stores are increasing and these types of sales, where there is little or no expert advice available at the point of sale, is precisely the type of business that would benefit most from a harmonized label. It was mentioned that around 25-40% of sales are via the internet.

The issue was raised that the current EBF label under development could be potentially legally challenged for mimicking the energy label format. However, the EC responded saying that they had some internal discussion but not a full legal assessment of the question. However, considering that the label under development clearly refers to ‘water’, not ‘energy’ and includes only five bars with no letter, contrary to the EU Energy label, it seems unlikely that the Commission would consider it as mimicking the Energy label.

Commission presentation about policy options

The Commission presented the four main ways to proceed with the taps and showers project which were as follows:

- Business As Usual (BAU): no intervention from the EC at all, no harmonized EBF label and multiple schemes remaining on the EU market.
- Business As Usual (BAU+): no intervention from the EC but with majority of industry agreeing on a single harmonized label for the EU market.
- Voluntary Agreement (VA): the EC and a market-significant part of industry (above 80% of the market in terms of product units) reach an agreement about minimum requirements for TS, including information on the performance of the product through a single harmonized label for the EU market.

- Mandatory Energy Label (EL): the EC develops a mandatory energy label for TS according to the existing Regulation; the label must be applied to all products on the EU market.

Specific aspects related to each option were presented. Of particular importance:

- The prerequisite for ≥ 80% of the market to be onboard when dealing with the VA. Currently 60% are estimated to be behind the EBF initiative.
- A mandatory label developed in the context of Regulation (EU) 2017/1369 must have a primary focus on energy aspects, while TS are used to deliver water, and be based on a robust testing of functionality for different technologies.

Details of the different options have been provided in the Follow-Up report shared with stakeholders before the meeting. Main results of an assessment of the savings achievable depending on the penetration of a harmonised label in the EU market were also presented. It was highlighted that water and energy savings from TS are occurring already in the BAU scenario as a consequence of:

- Improved efficiency of heating systems;
- Market transformation.

Some additional saving could be achieved in the future by reducing the flow of water, which could be associated with a further boost of the market transformation (e.g. through VA/EL). However, the replacement of the installed stock of TS will require time due to the relatively long lifetime of these types of products.

Stakeholder discussion about policy aspects

Some stakeholders pointed out that they were expecting the EC to make a commitment to one particular policy option at the meeting. However, it was explained that the next step would be in any case discussed in a Consultation Forum.

There was some confusion amongst the stakeholders about what a "*voluntary agreement*" means in practice. Both EL and VA require the approval of the EC. EL requirements could be adopted in 2020 at the earliest, for application in 2021 at the earliest, and they would have to be respected by all producers. A VA would have a similar timing but it could be applicable immediately. A VA for TS would be carried out within the framework of the Ecodesign Directive, which requires 80% of the market to be onboard and 90% of products of signing manufacturers to comply. The VA approach would still require an Impact Assessment and Inter Service Consultation with other DGs of the Commission, the consultation of the WTO and decision process for a Commission decision recognizing the VA. In total, these procedures could add around one year to the process.

A big element of uncertainty is how rinsing efficiency and other functional aspects should be dealt with. A mandatory EL must be based on a robust functional testing. This would necessarily require a mandate for new standard methods which would add several years to the process and could make a VA approach more desirable.

Moreover, according to the EL Regulation, there is the obligation to develop a label in a way that the 1st top class is empty. The incentive for manufacturers to provide products populating the top class could lead to products with a too low flow of water and related health and safety risks.

An alternative and quick solution would be to let the EBF proceed with their label and reach a consensus with their members about the rinsing efficiency and any other technical details and to revisit the situation to check if more than 80% of the market is onboard.

Most of industry representatives were supporting the activity of EBF and a potential VA. Split views were registered by representatives from some Member States and NGOs: for some of them the label has to be developed in the EL framework, for others it is just important that a harmonized label is available timely. It was generally agreed that both water and energy must be reported in the label.

A stakeholder moreover proposed to cut-off worst products from the market. However, it was explained that the development of ED measures were considered not appealing for TS, as explained in the preparatory study and reflected in the Ecodesign working plan 2016-2019.

Conclusions

The EC concluded the meeting thanking the participants for the open and fruitful discussion and reminding all stakeholders to provide a written feedback. All the input received will be processed and contribute to take a decision on the next steps for TS, which will be communicated to everybody in due time.