



# EU ECOLABEL CRITERIA FOR SANITARY TAPWARE

## BEUC AND EEB POSITION

Contact: Łukasz Woźniacki- <u>environment@beuc.eu</u> - <u>Lukasz.wozniacki@eeb.org</u>

Ref.: X/2012/024 - 13/04/2012

#### 1. Introduction

In this position paper BEUC and EEB comment on the draft Ecolabel criteria for sanitary tapware prepared by the Joint Research Centre after the second Ad Hoc Working Group. Although we welcome the proposed criteria, we see a need to further improve certain criteria. In this position paper, we outline our proposals on how to raise the ambition level for the future Ecolabel criteria.

#### 2. Exclude double-lever products

BEUC and EEB support the exclusion of double-lever products. With single-lever products the desired water temperature is achieved faster and less water is used.

We call on the European Commission and Member States to:

Exclude double-lever products from the scope.

#### 3. Support for the maximum available water flow

BEUC and EEB welcome the proposed levels for flow rates for all sub-types. In particular we support the proposal for verification. It is important that the measurement is done not only at 3 bard but at different water pressures: 1,5 / 3,0 / 4,5 bar.

We call on the Member States to:

Support the criteria proposed by the JRC.

### 4. Product quality and lifetime extension

BEUC and EEB support the proposed requirement for spare parts to be available at least seven years from the end of production. It will help in extending the lifetime of the products. Nevertheless, the paragraph on verification needs further clarification. In our view, the verification for "general requirements" and "exposed surface condition and quality of Ni-Cr coating" need clarification. It is not clear whether a complete verification of the whole standard has to be done. It is also unclear what "additional tests" means.

We call on the European Commission and Member States to:

Support the criterion on product quality and lifetime extension.

**END**