



CECOF Strategy/Position Paper for the EuP Study

I. Cobham position

1.

Definition of "industrial furnaces and ovens" and thus the scope of the study is still open and Cobham likes to have advice from CECOF.

Cobham looks at two options for a classification:

- a) - furnaces within the scope of IPPC and ETS
 - smaller furnaces not covered by this legislation
 - laboratory furnaces and ovens

b) furnaces by process

2.

- Cobham might be prepared to take out furnaces covered by IPPS and ETS from further investigations and eventual regulations. However, it has to be proved that IPPC and ETS take energy efficiency sufficiently into account when describing BAT. For the moment the BREF documents of IPPC don't.
- For smaller/medium sized furnaces that are not covered by IPPC or ETS - in this category the vast majority of furnaces produced by CECOF members are included (do we mean CECOF furnaces would be included=are part of IPPC or excluded from the EuP, many major industrial furnaces are covered by IPPC)– Cobham looks for "virtual cases" of typical furnaces with representative or typical components (insulation, heat source, control equipment, fans etc.) sold on the market and compare this with BAT equipment. By varying the eco-efficiency of these components (e.g. burners) and by choosing a realistic number of burners and other components the overall eco-design impact shall be calculated. Cobham refers to the approach of CECIMO for machine tools (slide 10-11 of the CECIMO presentation).
- A full BOM (bills of material) approach is foreseen for small and laboratory furnaces.
- For all these tasks Cobham needs/likes to have data from stakeholders (particularly CECOF).



II. CECOF position

1.

No clear preference or proposal for a classification/definition of furnaces and ovens is given to Cobham so far.

2.

EuP is inappropriate to cover complex plants or systems like industrial furnaces as the vast majority of furnaces are custom built and vary according to application which again results in a large variety of processes, input material and temperature resulting again in a large variety of components used (see CECOF presentation at stakeholder meeting). All industry comments at the stakeholder meeting and beyond so far support CECOF's position.

The components itself (e.g. burners) may be considered "products" but have always to be looked at in the context of their application in the furnace. Thus a base-case approach that investigates "representative" furnace designs and extrapolates the results for the industry is completely inappropriate.

- Standard laboratory furnaces and "out of the shelf" ovens may be considered as "products". With respect to their energy consumption their overall eco-design impact is however small.
- Due to the complexity of the market neither CECOF (nor anybody else) is in the position to provide comprehensive, complete and at the same time differentiated market data either with respect to production, consumption or any other criteria Cobham is looking for.
- Due to the fairly long lifetime of most industrial furnaces and to their large energy consumption, the BOM (Bill of Material) impact on the energy consumption is not relevant.



III. Strategic options for CECOF

1. As the operation of industrial furnaces are highly energy intensive, the European Commission will not admit that the EuP approach does not quite fit to the industry due to the above mentioned reasons. CECOF should bear in mind that the Commission definitely wants to come up with a set of regulations for industrial furnaces and ovens sector.
2. Cobham is determined to follow the EuP study scheme as long as the Commission does not change the mandate for Cobham.
3. CECOF should nevertheless investigate if and to which extent the European Commission might change the mandate in the sense that the vast majority of industrial furnaces are not "products" (but are more 'assemblies of products' or complete processes) that are suitable for a common regulation.
4. CECOF should continue to cooperate with Cobham as far as feasible and should not endanger its role as a reliable stakeholder. Its main lobby focus, however, should be the European Commission.
5. CECOF should prove that the components approach of CECIMO is not suitable due to fundamental differences between machine tools and industrial furnaces.
6. CECOF needs to offer Cobham a definition at least for those furnaces/ovens CECOF members are covering.
7. CECOF probably has to take up the intended approach of Cobham/Bio to select "representative" furnace designs, calculate various options with different components and ways of running the furnace and come up with figures for potential energy savings. This is regardless of the fact that findings from these scenarios will be extremely hard to extrapolate.
8. CECOF should seek alliances with other machinery industry branches via VDMA Euro Office (Dr Claudia Schöler) that are or will be affected by the EuP directive in order to make clear that the EuP instrument is not applicable for complex machines, plants or systems. In this context CECOF and others should possibly lobby vis-à-vis the EC to extend IPPC to explicitly include energy efficiency criteria.
9. CECOF should offer company visits in customer plants to the Commission (Mr Eifel, Ms Baillargeon) to give them an impression about the complexity of the furnace applications, processes, designs etc.



Open questions:

- Should CECOF concretely suggest the overall scope of the study or leave it up to Cobham?
- In which way should CECOF help to define "representative" furnaces taking into consideration that this analysis will be crucial and the basis for possible regulations. An active involvement in this task would possibly mean a heavy workload on some CECOF member companies that produce equipment being identified as "representative".

Dr Gutmann Habig
August 9, 2010