

T&D Europe¹ position paper on 111/266/DTR:2012-07 IEC 62725: Analysis of quantification methodologies for greenhouse gas emissions for electrical and electronic products and systems

T&D Europe asks to vote against 111/266/DTR:2012-07

Rationale: Cross connection to existing and future EC Directives

- The scope of DTR 62725 refers to Electrical Equipment “EE” in general, thus embracing High Voltage and Medium Voltage equipment above 1000V. The DTR also uses the abbreviation EE. This could be perceived as a link to the EU Directive WEEE EC 2002/96 (WEEE: Waste Electrical and Electronic Equipment Directive).
- The scope of WEEE EC 2002/96 is less than 1000V, thus excluding HV and MV equipment. However, a clear discrimination of HV and MV equipment from the scope of WEEE EC 2002/96 is not explained in the DTR. The term “EE” used as a general term in the DTR and similarly in the WEEE Directive may confuse.
- The DTR could create a precedent by virtually transferring non suitable requirements that are defined in the WEEE Directive to HV and MV equipment.

Further concerns:

T&D Europe asks to exclude the word <switchgear> from the scope of this Technical Report to avoid any confusion.

Rationale: Functional Unit

- The word <switchgear> might suggest a Functional Unit to be realistic for a wider scope of switching apparatus that can be achieved by referring to one standard only.
- It is possible to define a functional unit for a circuit breaker or switch according to IEC 62271-100, -102 or -103, because the functional requirements are clear and laid down in the respective standards.
- This is not the case for switchgear such as e.g. a Gas Insulated Ring Main Unit (GIS RMU). A GIS RMU is a product with a set of performance requirements put together

¹ T&D Europe (www.tdeurope.eu) is the European Association of the Electricity Transmission & Distribution Equipment and Services Industry, which members are the European National Associations representing the interests of the electricity transmission and distribution equipments manufacturing and derived solutions. The companies represented by T&D Europe account for a production worth over € 25 billion EUR, and employ over 200,000 people in Europe.

from different functional units and therefore complex. Not all properties can be covered by functional units.

- By selecting a functional unit as the best fit common denominator, favourable properties of the functionalities of the entire assembly are not included (read: not rewarded in a comparison for best environmental performance).
- Switchgear are specific in nature and do not correspond to the scope of this Technical Report which is applicable to any type of Electrical and Electronic products.

Conclusion

T&D Europe asks the representatives of the National Mirror Committees of IEC TC 111 to vote against the above mentioned DTR.