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INFORSE-EUROPE
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**Position of ECOS, the EEB, CAN-Europe,
INFORSE-Europe, Greenpeace and WWF**

**on the EC Working Document on possible ecodesign requirements
for standby and off-mode electric power consumption
of electrical and electronic household and office equipment**

In the context of Directive 2005/32/EC establishing a framework for the setting of ecodesign requirements for energy using products.

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Position of ECOS, the EEB, CAN-Europe, INFORSE-Europe, Greenpeace and WWF

on the EC Working Document on possible ecodesign requirements for standby and off-mode electric power consumption of electrical and electronic household and office equipment

ECOS, the EEB, CAN-Europe, INFORSE-Europe, Greenpeace and WWF (hereafter “the environmental NGOs”) **strongly welcome and support the introduction of horizontal mandatory power consumption thresholds** for standby and off-modes. It is of key importance to address these modes by stringent mandatory ecodesign requirements.

However, the environmental NGOs would like to draw the European Commission's attention to **some weaknesses in the rest of the working document** (including on the exclusion of some modes, on a far too restrictive coverage, on a lack of ambition on the power management requirements and on a total lack of requirements on user information).

The environmental NGOs strongly advise the EC to address these weaknesses which could jeopardise the impact of the Implementing Measure (IM).

1. Support to power consumption thresholds on EuP standby and off-modes

The environmental NGOs consider the requirements expressed in Watt (i.e. 1 Watt then 0.5 Watt) and the implementation timeline proposed in the EC Working document to be reasonable and a right way to start tackling standby losses.

Any increase of these thresholds or delay in the timeline would undermine the implementing measure credibility and would not be supported by the environmental NGOs.

2. Scope of the working document too narrow

The document suggests to exclude some standby modes from ecodesign requirements (for different reasons). **The environmental NGOs believe this is not an accurate option.**

Excluding some modes and according exemptions would create loopholes and would multiply controversial situations in the implementation. Moreover, pre-heating and networked standby are growing and high-consuming modes and leaving them aside would create large gaps in the ecodesign consistency.

The environmental NGOs would like to see networked standby, pre-heating modes and safety functions appropriately addressed in the document.

- Considering the strong trend to network all equipment (smart home, home office, office equipment, etc.), **networked standby should be governed by the same requirements as non-network standby**. It is increasingly feasible to integrate chips which recognize wake up signals from networks and are able to start the equipment on demand. There are many examples of BAT values which prove the feasibility in different fields and with one and three years timelines the industry should be able to adapt its equipment.

If networked standby raises an issue regarding consumption measurement, **the EC should come up with a clear solution to overcome it** (for instance a mandate for new measurement standards...) and not only make a vague reference to a “*possible future revision*”, which does not sound convincing enough to environmental NGOs.

- Products with enhanced standby due to pre-heating functions should be covered as they may have 10 to 100 times higher standby consumption than usual equipment. Such products can easily be addressed with **stringent and user-friendly requirements for power management** switching them to conventional standby after a short period of time, and thus falling under the horizontal requirements. The environmental NGOs expect this issue to be addressed at least in other specific IM. In particular coffee-espreso machines cause huge standby losses (about 170 kWh per year according to the EEDAL'06/London 2006 paper ID130 by Jürg Nipkow and Eric Bush) whereas the BAT value is at 70 kWh/year!
- Even if safety is a “*priority*” (as stated in the working document and shared by the environmental NGOs), **this should not be an argument to exclude any ecodesign requirement on safety functions**. They shall at least be addressed in the other product-specific IM and include for instance a “hard-switch” enabling the user to turn the equipment totally off if he desires.

Generally speaking, every other product-specific IM should specify which function of the EuP falls under which of the defined modes in order to avoid any lack of clarity. The environmental NGOs strongly expect these other IM to **introduce minimum requirements on the modes not addressed here**, especially for very specific and complex equipment such as PCs, imaging equipment and set-top boxes.

As far as possible exemptions are concerned, the document should explain much more in detail **on which precise basis such exemptions or less stringent requirements would be tolerated**, and what will be the process to decide upon them under the ecodesign stakeholders consultation.

3. Broadening the definition of the “equipment” covered

As this IM is a horizontal one, it should cover ALL the energy-using products concerned by the ecodesign directive. However, the working document introduces some limitations: only “end-user” products are considered. **The environmental NGOs do not agree with this option and believe all EuPs involving a standby or off-mode should be covered**, even industrial and B-to-B appliances (such as IT servers, professional electronics and external power supplies, etc.)

Therefore the environmental NGOs suggest introducing provisions on the other equipments which are not considered at the moment in the Working document.

4. Clarification and more ambition needed on the 2nd requirement for “power management”

The current text relating to requirements for power management does not appear clear enough and sufficiently detailed. It also lacks some complementary content.

The environmental NGOs propose to replace the first sentence under title “2.” By:

*“Equipment shall, without prejudice to the **intended and appropriate main function of the equipment**, offer a power management function that switches automatically after the shortest possible period of time into an off-mode or standby mode when the equipment is not providing its main function. **This management function should be available in the standard operating mode (factory settings) and clear information should be provided to the user explaining how to parameter this management function to the lowest consuming mode.**”*

The environmental NGOs indeed believe that the wording “*without prejudice to good engineering*” opens the door to too many possible inaccurate exemptions. They also consider that the wording “*into a condition with reduced energy consumption*” is not clear enough as it has not been defined in the Working document.

Moreover, the environmental NGOs suggest to **include a clear indication that unjustified “always-on” products will be excluded from the EU markets:**

“Always-on equipment without any switch or standby functions should not be tolerated on the European market if they are not constantly delivering their main function.”

This is particularly relevant for computer devices and set-top boxes which tend to fall more and more into this category.

Finally the environmental NGOs would strongly appreciate to see **a supplementary requirement enabling to switch any equipment to a 0 W mode** if the user wishes so:

“All equipment should include a function enabling the user to turn the equipment to 0 Watt consumption (off the grid) if he wishes so.”

5. Lack of requirement on labelling and user information

According to the ecodesign directive text, consumer information is an important issue. Therefore the environmental NGOs **regret that no requirements on user information have been introduced.**

They suggest to include a requirement on mandatory information to the user (in a standardised way) **making sure the user knows that the standby and off-modes of the equipment still consume energy and have environmental impacts** even if not delivering its main function. It is of particular relevance for equipment with networked, pre-heating and/or sensor-based safety modes.

They also require the introduction of a **mandatory labelling of standby and off-mode consumption.** This labelling could be part of the revision of the EU energy labelling scheme. In the meantime, clear and correct information on standby and off-mode consumption should be provided to the user. Such requirements have already been introduced in Australia, Japan, Korea.

As an illustration the environmental NGOs suggest to introduce two energy classes for (passive) standby: “<0.5W” and “<0.2W” (as most equipment has BAT between 0.2 and 0.5). Such classes could be used in a labelling scheme in the beginning and then **become the new mandatory requirements when the IM is revised** (for instance in a 5 years time).

As a final comment the environmental NGOs would like to stress the importance of **verification procedures and market surveillance** and indicate that they do not support the definition of standby in IEC 62301. Standby according to IEC 62301 should express the power consumption of the lowest state into which the product enters automatically according to the factory settings and after typical use.