Exploring the potential for standby requirements on professional / commercial products

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As described in our Comments on the preparatory study for the review of the Ecodesign regulation 1275/2008 on standby consumption of November 2015, we firmly believe that the ongoing review study should assess the feasibility of including professional products in the existing standby regulation. To illustrate the presumed saving potential, we have started gathering data from public literature, presented in the below table:

Product group	EU annual sales (million units)	Typical idle or standby power(W)	Relevant improvement options	Data source
Speed drives for industrial motors	8	?	Lack of data, but '*it is possible that some products have significantly lower standby power than others*'; power limits could be applied	Ecodesign Preparatory Study Lot30
Enterprise servers	2.7	150 *(idle)*	'*the utilisation of servers in traditional data centres is still rather low and often influenced by meta-stable day-and-night cycles. This situation would allow for a more consequent power management including low power idle*', such as inactive power state at 90% of idle power (with up to 10 seconds recovery time), or at 30% of idle power (with up to 20 minutes recovery time).	Ecodesign Preparatory Study Lot ENTR 9
Commercial signage displays	0.41	30 to 950 *(idle)*	Programmable auto-power down function could be made mandatory by default to encourage users to power down during night/Sundays…	Study to establish the Ecodesign Working Plan 2015-2017
Professional under-counter dishwashers	0.14	250 *(idle)*	Auto-power down could reduce energy use in inactive state	Ecodesign Preparatory Study Lot24
Professional hood-type dishwashers	0.07	350 *(idle)*	Best available idle reduces power by 45%; Auto-power down could reduce energy use in inactive state	Ecodesign Preparatory Study Lot24
Professional laundry washers	0.08	3 *(standby)*	Standby power limits could be set	Ecodesign Preparatory Study Lot24
Commercial steamer ovens	0.05	1500 *(idle)*	Auto-power down could reduce energy use in inactive state	Ecodesign Preparatory Study Lot22

Commercial store / rack ovens	0.02	7500 *(idle)*	Auto-power down could reduce energy use in inactive state	Ecodesign Preparatory Study Lot22
Tertiary coffee machines	?	100 *(idle)*	Auto-power down could reduce energy use in inactive state	Topten paper on energy label for coffee machines
Battery chargers for electric vehicles	?	34	Standby / no-load power limits could be set; 90% savings achievable	California Energy Commission - Analysis of Battery Chargers
Battery chargers for electric trucks	?	50	Standby / no-load power limits could be set; 80% savings achievable	California Energy Commission - Analysis of Battery Chargers

We selected some professional product groups for which data could be found (namely signage displays, professional under-counter and hood-type dishwashers, commercial steamer and rack ovens, professional coffee machines, and enterprise servers). We assumed that instead of constantly remaining in a high energy consuming, idle state, the selected products would enter a lower power mode 4 hours per day, consuming 50% less energy. According to our calculations, the electricity savings in the EU would **be around 4 TWh/year**. This number would grow when considering all the other existing professional and commercial product categories.

Based on the above, we call on the study team to consider an expansion of the scope of the current Regulation to the following list of professional products:

- Professional washing machines and driers;
- Professional under-counter dishwashers;
- Commercial steamers;
- Professional coffee machines;
- Signage displays;
- Professional sound and image systems;
- Professional sport equipment;
- Variable speed drives for motors;
- Professional battery chargers.

We believe that the standby consumption of the above listed products should be limited and the following provision to the power management requirement added (Annex II 2.d):

> *'For professional products intended for use in the professional and tertiary environment, the power management function, or similar function, shall also allow the user to set when the product powers down and reactivates according to the day of the week and/or hour of the day*.'

Contact:
ECOS – European Environmental Citizens' Organisation for Standardisation
Chloé Fayole - chloe.fayole@ecostandard.org