



Comments on the preparatory study for the review of the Ecodesign Regulation 1275/2008 on standby consumption

November 2015

It should be noted that these comments only refer to the slides presented during the first stakeholder meeting on 21st October, as no draft report has been shared with stakeholders at this stage. This does not correspond to the usual practice of the Ecodesign process.

▪ Extension to professional equipment

Looking into the standby and networked standby consumption of professional equipment is mentioned in Article 7 of the amended 1275/2008 Regulation as one of the purposes of this review.

However, the approach proposed to date by the study team to address this question cannot be considered valid. The study team only provided a list of general differences between household and professional product characteristics, to conclude that the scope should not be expanded. No analysis is provided on whether or why these differences would have any technical impact on the feasibility to improve and reduce the standby/off-mode consumption for professional products.

Recital 16 of Ecodesign Directive 2009/125/EC clearly states that '*As a general principle and where appropriate, the energy consumption of energy-related products in standby or off-mode should be reduced to the minimum necessary for their proper functioning.*', without any discrimination between product types (domestic, office, professional, etc.)

We therefore urge the study team to apply a proper and fact-based methodology, i.e:

- collect data on typical standby/off-mode consumption for main professional equipment (e.g. those with the highest sales volumes to start with),
- look at the level of the best performers on the market,
- discuss if there are strong technical or economic reasons to why it would not be possible to progressively apply the best levels to other models. If not, then they should definitely be added to the scope.

As an example and to suggest that there is a strong potential, the preparatory study on Lot 24 (professional wash products) concluded on a factor 2.8 between the consumption in standby/left-on mode of the best and worst professional dishwashers available, and a 45% improvement potential from the market average to BAT¹.

⇒ **We urge the study team to apply a fact-based methodology to assess the feasibility of tackling the possible inclusion of professional products in the standby regulation**

¹ https://circabc.europa.eu/sd/a/5eedd0be-bc43-4506-81b2-2a825eb79e01/Lot24_Dish_T4_ENER%20clean_final.pdf

- **Extension to other products**

There is no clear, evident reason to why electric furniture or office electric equipment (electric beds, shredders, 3D printers, etc.) should not be in the scope of the regulation. The same applies for robot cleaners and small LV electronics. If some clarification points need to be added to the Regulation in this sense, we would support them.

- **Applying standby requirements in a consistent way**

Regulation 1275/2008 specifies that reactivation by a timer is to be considered as standby, but the guidelines accompanying the Regulation provide a contradictory interpretation, by explaining that 'delayed start' modes are not to be considered as standby. Yet, delayed start is precisely an activation by a timer! This needs to be corrected, and 'delayed start' modes covered by the regular standby requirements.

The implementation of the requirement on power management also puts into question the existence of the so-called 'left-on modes' on some appliances. If an appliance has completed its cycle, why would there be a need for a 'left-on mode' with a higher energy consumption, before it transitions to normal standby/off-mode? If a 'left-on mode' has no justified relevance for the intended use of the appliance, it should not exist - the Regulation states that the auto-power down should take place '*after the shortest possible period of time appropriate for the intended use of the equipment*'.

- **Ambition levels**

Investigation of new tiers for all categories

The principle of a regulation review and associated study is to look at potential new steps to be set after current requirements are met. **This applies to all of them.**

In this context, the review should not only look at the appropriateness of tier 3 for non-HiNA, **but also to potential new tiers for HiNA products.** We wonder why this has not been mentioned until now. Should this part be excluded from the study, strong technical justification for overlooking this should be provided.

Levels for networked standby

Regarding the level of requirements, we firmly believe that **tier 3 for non-HiNA should not be relaxed.** Manufacturers still have more than three years to prepare. Available BAT technologies suggest that if any modification is to be done, it should rather be to lower the level to 1.5 or 1 W.

Levels for passive standby / off-mode

There is also clear potential for lowering the levels of passive standby / off-mode to below 0.5 W.

In this context, the quick calculation provided by the study team is insufficient: the impact of going from 0.5 to 0.2 W is only applied to a fraction of the market. The resulting 2 TWh/year saving potential put forward is not representative. From our own, similar, calculations, we conclude that in reality the potential when all products are considered would be **in the range of 7 TWh/year²**, which is

² Calculation based on [the impact assessment study](#) of Regulation 1275/2008, which expects the current Regulation (with a limit at 0.5 W) to lower passive standby & off-mode use to 15 TWh/y by 2020 (for a stock of about 6 billion products). It means for one unit, an average power of 0.3 W. A similar assumption of an average 0.15 W after ten years if the regulatory limit is down to 0.2 W leads to a stock consumption of 7.5 TWh, which is about 7 TWh additional savings.

commensurate to the saving potential of several other Ecodesign regulations adopted so far. This is therefore not negligible, and equivalent to the residential electricity consumption of Ireland.

Moreover, when looking at the impact at the level of one household, the study team has only presented the result for one unit (i.e. 24 kWh / € 5). In reality, households are equipped with dozens of energy-using products. Applying the figure to e.g. 30 products in the house leads to 700 kWh and €150 saving for one household (comparable to what a TV consumes today), a more striking and representative figure.

We invite the study team to refer to the very low passive standby and off mode levels currently reached by BAT, as identified by Topten in their November 2015 Policy Recommendations³.

- **Always on products**

When discussing networked standby back in 2011, remarks were made by some stakeholders about the existence of network protocols that would not allow products to go on standby or would be incompatible with network standby. Thus, the only way was to always leave the products on.

It would be useful to revisit this issue. We invite the study team to check whether it is still a substantial problem. If it is the case, then we reiterate our past views that a solution should be found to tackle it, such as forcing network providers to, by a certain date, implement standby-friendly network protocols.

- **From networked to passive standby**

It is our understanding that a product that goes into a networked standby mode despite not needing to be in this state for the intended use, shall promptly switch to normal standby. An example of this is a 'smart' washing machine that has completed the washing cycle after a network-triggered signal.

Networked standby (with higher energy consumption levels) should only be used when a signal from the network is effectively expected for the intended use of the product. This should be clarified in the Regulation if need be.

- **Deactivation of wireless signals**

We do not agree with the suggestion from Digital Europe to add the wording '*unless the wireless deactivation of the port is inappropriate for the intended use*' in Annex II point 3 (a) of the Regulation.

We are concerned that '*for the intended use*' would not be sufficiently clear in this context (i.e. manufacturers could easily consider that network connectivity is an intended use).

We consider that as a matter of principle, **users should always be free to deactivate wireless functions on their products if they wish so** (be it for energy or health reasons), even if it reduces a part of the product functionalities. This should be up to the user to decide.

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³ See [Topten Policy Recommendations – November 2015](#)