Position paper

Review of EU Ecodesign Requirements for standby and networked standby

Brussels, 27 January 2022

Introduction – More Ambition, Less Loopholes!

EU Ecodesign Regulations for off, standby, and networked standby modes have represented major achievements in mitigating energy waste when first introduced. However, we regret that the review of the instrument has failed to keep up with market developments, and that the proposed update to the requirements **comes half a decade later than planned**. While the technology evolution that has taken place since the regulation was first introduced offers indisputable potential for setting much stricter requirements, the proposed regulatory text fails to capture latest market developments and **runs the risk of having no effect on the market whatsoever**. Moreover, the text **contains a number of potential loopholes** which we call to be tackled prior to adoption.

Disappointing scope review

The proposed review of the regulatory requirements misses a large share of existing products without sufficient justification, with both professional and some relevant office products continuing to be excluded from the scope. We therefore reiterate our calls to **include additional types of equipment in the scope**, including:

- professional washing equipment,
- professional cooking equipment,
- tertiary hot drink machines,
- vehicle battery chargers,
- audio and video conference systems,
- electronic door locks & card readers,
- paper shredders,
- electronic staplers,
- office & 3D printers.

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More ambition required

Completed back in 2017, the preparatory study undertaken to inform the review[1] found that "*very low standby/off mode technology is available for many product types and it is believed that similar technology can be applied to most product categories in Annex I.*" It then concluded that "*this provides technical justification of proposing 0.2 W as the new limit for standby/off mode consumption.*" The conclusion drawn by the independent consultants back in 2017 has only been confirmed by the technological progress that has taken place in the years since then.

Given the delay that has been witnessed in seeing the new requirements tabled, we **strongly regret for the proposed review to have ignored the findings of the preparatory study**. The proposed values of keeping the standby and off mode power limits at 0.5 W (and higher still for products with status display) are not only obsolete now as they would have virtually no impact on the market, but also contradictory to the least life cycle cost principle.

In light of the above, we **call for revised requirements to be set at the following levels**:

Mode	Benchmark (as reported in Regulation)	Prep. Study proposal	EC proposal	ECOS proposal
Off	0 – 0.2 W	0.3 W	0.5 W	**0.2 W**
Standby	0.1 W	0.3 W	0.5 – 0.8 W	**0.2 W**
Networked standby HiNA	3 W	-	8 W	**5 W**
Networked standby non-HiNA	< 1 W	-	2 W	**1 W**

Table 1 - *proposal for revised power limits*

Loopholes in need of closing

In order to deliver its full potential of tackling energy waste a minimise the risk of a large part of savings being jeopardised, the regulation should minimise the extent to which changes to standby settings and power management features are allowed. The current text of the regulation contains a number of mentions of "*unless inappropriate for the intended use*" all along the regulatory text which constitutes a very strong safeguard. We believe that these are largely sufficient and that all other flexibility options proposed in the text should be removed. Notably:

- The regulation should **more clearly stipulate that all low-power modes that are not providing the main function shall meet the power requirements for standby or networked standby**. Past examples have been reported of products (such as game consoles and complex set-top boxes) with different modes that their manufacturers sometimes ambiguously called "standby" but which did not meet regulatory power limits[2]. We

1 Viegand Maagøe, VHK, 2017, Review study on Standby Regulation – Final Report
2 See FAQ on the Ecodesign Directive, question (32) on page 65

strongly believe that this is not acceptable and that such possibilities of circumventing existing requirements should not be allowed.

- **The possibility for users to deactivate wireless connections if they wish so** should be unconditional, i.e. the mention "*unless inappropriate for the intended use*" needs to be removed in this case; it should not be up to manufacturers to decide if constantly keeping their products connected is considered appropriate or not.

- Also, this possibility to deactivate wireless connections should be **available on all networked products** and not only on those that have an alternative wired network connection. As an illustration, a user of, e.g., a networked electric toothbrush should have the possibility to switch off the wireless connection whenever desired.

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