



**Position on Commission proposal to revise the
Ecodesign measures on standby and networked standby**

January 2018

Extending the scope

We support the proposed extension of the scope to new products, such as adjustable furniture, building controls, and low voltage products. However, we want to highlight some important aspects regarding the scope:

- Professional equipment

The revision clause of Regulation 801/2013 stipulated that this review would address the scope, and “*inter alia, professional equipment*”. However, the working document does not refer to professional products whatsoever, and simply postpones the topic to the next revision.

Yet, the preparatory study for this review did address some professional equipment and analysed the pros and cons of including them in the scope. It concluded that determining standby definitions and requirements in vertical implementing measures would be more practical. As there is no sign that such vertical regulations will be adopted soon, standby losses for these products will continue to be completely ignored.

Therefore, we call for the **immediate inclusion of professional product categories in the current scope, such as professional washers & dryers, professional cooking equipment, motor speed drives, tertiary hot drink machines, and vehicle battery chargers.**

- Office products

The preparatory study also noted that some products used in the workplace are not mentioned in the scope of the current Regulation on standby, and evade requirements. Individually, they may not appear to represent huge saving potentials, but the impact of this horizontal regulation lies in its cumulative effect. We consider that the horizontal regulation should prevent any product from falling through the cracks for no justifiable reason. We recommend refining the list by **adding the following office products: audio and video conference systems, electronic door locks & card readers, paper shredders, electronic staplers, 3D printers.**

- Signage displays

We see an opportunity to include signage displays in the scope of this regulation. Their energy consumption is currently not regulated at all, and the revision of the electronic displays measure is unlikely to solve the issue either. The preparatory study (p. 86) states that there are no issues for compliance of signage displays for all standby requirements, an analysis we support. Data from Energy Star certified devices shows that the thresholds are already largely attained. In Energy Star,

the sleep mode is the sum of standby, networked standby and off-mode consumption. 77 out of the 96 signage displays with full connectivity consume less than 1 W for all modes put together.

- Domestic dishwashers & washing machines

We are in favour of maintaining dishwashers and washing machines in the scope of the current regulation.

- Connected products

We regret that the current scope of the proposal only covers products that are already on the mass market and does not consider emerging technologies. This should be a priority for the next revision and integrated in the review clause.

Stricter requirements for off-mode/standby

The working document proposes to reduce the level of requirement for off-mode to 0.3 W and leave the requirement for standby untouched at 0.5 W.

This proposal is too modest and contradicts the preparatory study, which states: *‘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. This provides technical justification of proposing 0.2 W as the new limit for standby/off mode consumption.’* Besides, *‘the net cost savings for most products are positive’*.

Not following these conclusions would waste energy saving potentials at hand. We invite the Commission to **consider correcting the requirements to 0.2 W for both standby and off modes, in line with the preparatory study analysis**. As discussed during the Consultation Forum meeting, the impact on resources should also be looked at during the Impact Assessment.

Reinforcing the networked standby requirements

We regret that the focus of the revision has not been more on reducing the network standby requirements, which are significantly higher than standby and off-modes, and becoming increasingly prevalent. It is crucial that appropriate requirements are defined to prevent possible **rebound effects** resulting from the influx of new connected devices.

For Germany, the number of networked products per person is expected to increase from 5,6 in 2015 to 9,5 in 2021¹. Worldwide, the number of networked household appliances (smart lighting, home automation, smart appliances) is expected to be six times higher in 2025 compared to 2015². Televisions, for instance, represent a product category where the vast majority of models are already connected. Out of the 39 Ultra High Definition (UHD) televisions on Tipten.eu in January 2018, 36 models have Wifi. With ‘smart’ products on the rise, the risk is that networked standby or HiNA standby requirements replace the current 1W/0.5W (off- and standby-mode) standby requirement and become the ‘new normal’.

¹ Cisco. (2017). VNI Forecast Highlights Tool, https://www.cisco.com/c/m/en_us/solutions/service-provider/vni-forecast-highlights.html#

² Friedli, M., Kaufmann, L., Paganini, F. & Kyburz, R. (2016). *Energy Efficiency of the Internet of Things - Technology and Energy Assessment Report*, <http://edna.iea-4e.org>

The preparatory study shows that for all data points that were collected (288 data points over 9 product categories), 55% of the data points are below 2W for networked standby. Only washing machines and electric ovens have networked standby consumption that is at Tier 2 (3W). All other products have already reached Tier 3 (2W) or are even lower (in some cases less than 0.5W).

The study concludes that Tier 3 requirements should absolutely not be removed but does not envisage making the requirements stronger. Lower thresholds in the long term (e.g. 1 Watt in 2021, 0.5 Watt in 2024) could encourage the diffusion of communication standards that are far more efficient.

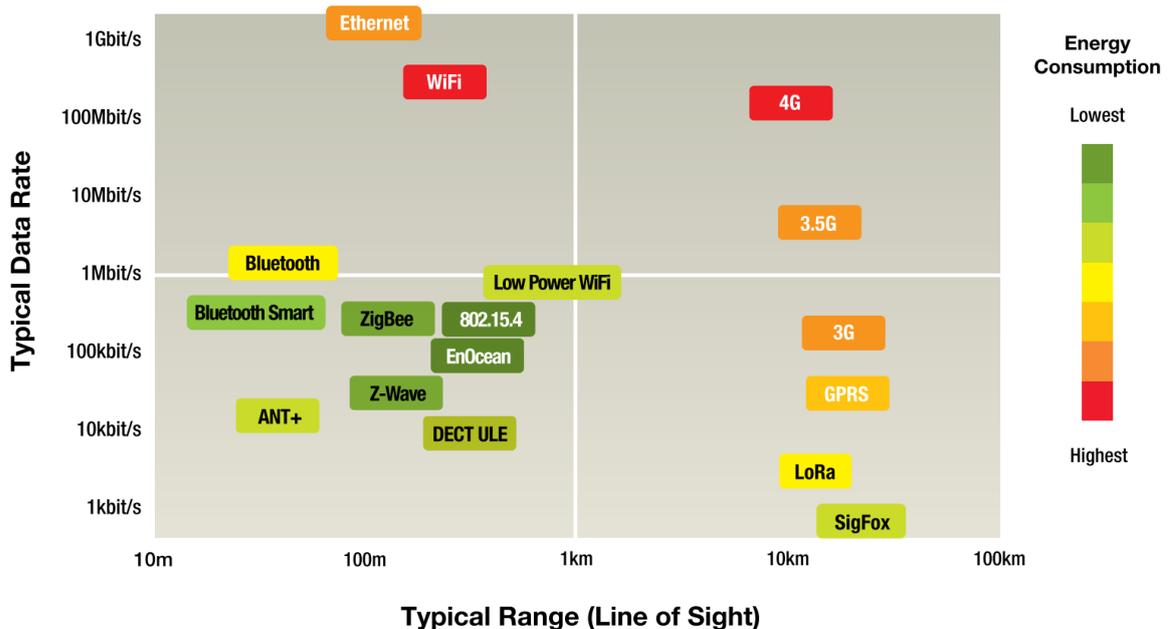


Figure 1: Energy consumption, range and data rate of different communication standards (IEA, 2016³)

Therefore, we consider that the Commission’s proposal not to reduce the ambition of Tier 3 for non-HiNA equipment and to even allow for a few exemption is weak. Exemptions and delays granted to product groups go against the principles of fair treatment and creating a level playing field. We have no evidence that the proposed exemptions for set top boxes and game consoles are technically justified, and we recommend that they are very carefully considered and time-framed.

Wireless deactivation

We do not support the proposed addition of the mention '*unless inappropriate for the intended use*' to the provision on wireless connection deactivation. It substantially weakens the requirement, and opens the door to multiple derogations that go against the principle that users should always remain free to deactivate wireless functions on their products if they wish to. **It should not be up to the manufacturer but to the user to decide if the wireless connection is useful and should remain always on.**

We also consider that **by default, the network function should be deactivated**, since more and more household products include a network functionality, while only a minority of consumers have an

³ IEA. (2016). *IEA-Policy Brief*. Paris: IEA Electronic Device and Network Annex (EDNA).

interest in them. Finally, we believe that the **main function of the product should be ensured when the wireless connection is deactivated, in order to** prevent early obsolescence that might be caused by security problems, unavailability of firmware updates or a breakdown of the network service.

Need for clearer definitions

To ensure enforceability of the requirements, the ambiguities in the definitions should be addressed, including:

- Main function: Lack of definition of what main function is and how the manufacturers should declare it results in ambiguity.
- Reactivation function: The definition for “reactivation function” creates misinterpretations when the activation of the main function from standby occurs for the first time (“activation” rather than “reactivation” may therefore be more appropriate).

Moreover, the ADCO group reported on an issue with CSTB being shipped with compliant networked standby functions, but suppliers/installers giving consumers the choice of different low-power modes, some of them not complying with the Regulation. This could point towards a more general problem, which we invite the Commission to look at seriously as part of the Impact Assessment. We do believe that **in any mode/condition where the product is not providing its main function, the mode/condition shall comply with regulation 1275/2008**, i.e. it should meet the power requirements for networked standby, standby, or off-mode, and if not, the power management requirement shall apply.

Issues with information requirements

We have identified two loopholes in the information requirements:

- The information requirement 7 of Annex II on product information refers only to networked equipment, meaning there is little online and freely accessible standby consumption data for non-networked equipment.
- The requirements for technical documentation for networked equipment are not applicable if no information is provided, where it is assumed therefore that the product is not networked equipment: *“If no information is provided, the equipment is considered not to be networked equipment unless it provides the functionalities of a router, network switch, wireless network access point (not being a terminal), hub, modem, VoIP telephone, video phone.”* (Annex II, 9 b)

We also think that consumers should be informed about how to activate and deactivate the network connection and the type of available functions if the networked function is activated/deactivated.

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