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The Consumer Voice in Europe

CONSUMER ORGANISATIONS COMMENTS ON ECODESIGN FOR STANDBY, NETWORKED STANDBY AND OFF MODE ELECTRIC POWER CONSUMPTION

European Commission's draft legislative proposal of November 2017

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Why it matters to consumers

Thanks to EU rules, appliances from computers to washing machines and TVs must switch into low power mode after a certain idle period. The European Union is even bringing down the maximum consumption of low power modes in many consumer products. To match with fast-evolving technological progress, the EU Ecodesign requirements need an update. This will ensure consumers save more on energy.

Summary

The European Commission put forward a draft measure on 'standby and off-mode electric power consumption' aiming to revise the existing Ecodesign requirements under the Commission Regulation (EC) 1275/2008.

We welcome the intention of the European Commission to include Low Voltage External Power Sources in the scope. However, we believe that household-like professional products should be covered too. In our view, this measure should continue to include products such as washing machines and dishwashers.

Furthermore, we regret that the current scope of the proposal covers products that are already on the mass market only. It is necessary to also consider emerging technologies such as connected appliances. Furthermore, material efficiency should also be assessed in the future.

In terms of the overall ambition of the proposal, the requirements put forward for both off-mode and standby power consumption are in our view weak. The proposed values are currently already achieved by many appliances. We call for more ambitious requirements.

Finally, we insist that this measure must be released as part of the next package at the end of 2018.

1. SCOPE

1.1. LV-EPS to be taken on board

We welcome that Low Voltage External Power Sources are now included in the scope. Although it might not have a big impact per type of appliance, it will have all together a significant effect as tablets, mobile phones, health care equipment and building control systems will be included.

➔ **LV-EPS need to be part of the scope.**

1.2. Household-like professional products to be covered

Due to a number of technical reasons[1], the European Commission decided to limit the scope to household products, i.e. excluding professional products. However, it is unclear whether professional appliances that are similar to household appliances (that could be bought by consumers) would be covered. While a product might be initially designed for professional use, there are many cases of migration where the product ends up being used by households too. As the distinction between professional and domestic products is unclear, we ask against the exclusion of professional products.

➔ **Household-like professional products and ICT products for professional use should not be excluded from the scope.**

2. ECODESIGN REQUIREMENTS

2.1. Power consumption of off mode must be reduced

The European Commission proposes to deal with the maximum power consumption of **off-mode** in two stages:

- Stage 1: max 0,50 W power consumption from the date of entry into force of the new regulation. It means that this first stage would not foresee any improvement as this value equals to today's level under the currently applying regulation.
- Stage 2: max 0.3 W power consumption two years after the regulation has come into force. This means an improvement of 0.2 W compared to the currently applying regulation.

We are disappointed with this proposal as - in the vast majority of home appliances and according to our members performing test - it is nowadays already possible to achieve low values such as 0.3W power consumption in off mode. For example, many manufacturers of TVs, washing machines and other appliances already achieve such results.

[1] Larger size, more frequent use, shorter wake-up time for standby, etc.

Topten reported in 2013 values for the best performers among not networked devices in off-modes of 0.1W, 0.05W, 0.1W for monitors, washing machines and printers (inkjet/laser) respectively. It is fair to assume that, 5 years later, the best-performers are no longer BAT (best available technologies) and can be considered state of the art (or business as usual). Hence, a reduction in off mode can in our view safely be limited under 0.3W without restricting the market too much.

- ➔ **The European Commission must propose a more ambitious value for off mode power consumption, such as a maximum power consumption of 0.2 W, especially if the requirement would only apply in a second stage.**
- ➔ **Exemptions for certain products could be envisaged only if evidence is put forward that such value is not appropriate.**

2.2. Standby power consumption must be reduced

For power consumption in standby modes, the European Commission proposes the following requirements to apply from the entry into force of the regulation[2]:

- Max **0,50 W** for equipment providing only a reactivation function, or providing only a reactivation function and a mere indication of enabled reactivation function;
- Max **1,0 W** for equipment providing only information or status display, or providing only a combination of reactivation function and information or status display.

Our Portuguese member, DECO, tested in 2013 the standby power consumption of appliances in 10 real households. In many cases, the average stand-by consumption as measured in 2013 was – for many cases - already aligned with the proposed future requirement. Please find more information in Annex 1.

Although recent measurements are rare, other literature also seems to confirm our claim that the value proposed is not ambitious. For TV, the median is below 0,2W[3] and for computer displays, 99% of computer displays listed in the Energy Star V7 Database 2017 are <0,5W and 58% are <0,3W[4]. Regarding adjustable furniture, 41% are <0,5W and the best performer in passive standby = 0,1W[5]. For coffee machines, BAT was 0.15W in 2013[6]. For DVD players, BAT was 0.2W in 2013[7].

- ➔ **Power consumption in standby mode must be reduced.**
- ➔ **Especially the 1.0 W limit is not acceptable as such values were already achieved in 2013. We propose a value of 0.8 W for equipment providing only information or status display, or providing only a combination of re-activation function and information or status display.**

[2] One stage approach.
[3] Fraunhofer USA 2017 "LCD Television Power Draw Trends".
[4] Öko institut compilation of data based on Energy Star V7 database Displays (2017).
[5] Danish Energy Agency (2012).
[6] topten.eu.
[7] Idem.

2.3. Users should be able to deactivate wireless network connection

We welcome that the European Commission introduces a mandatory possibility of deactivating wireless network connection. However, providing users with this possibility will not be sufficient in its own to save power. Considered that an average consumer would leave devices in their default setting, consumers would need to be informed about the benefits of such possibility and this requirement should also be complemented with hard requirements regulating the standby and off mode power consumption of appliances.

➔ **The mandatory possibility of deactivating wireless connection should be complemented with hard requirements (see other recommendations).**

2.4. Washing machines and dishwashers: Low power modes requirements must be covered

The European Commission proposes to remove household washing machines and household dishwashers from the scope of this horizontal regulation on standby and to deal with the power consumption of the low power modes on the product specific Ecodesign regulations of washing machines and dishwashers instead. However, such approach means that other requirements of the standby regulation would not apply to household washing machines and household dishwashers, such as general information requirements, or specific requirements like the mandatory possibility of deactivating wireless network connection(s). Moreover, as in the future more and more washing machines and dishwashers that are not connected to the home network today but might be in the future so that 'smart' washing machines and dishwashers can participate in demand-side management schemes, this change is not appropriate.

➔ **As a general approach, we favour a horizontal approach, i.e. to deal with standby and lower power modes of machines within the standby regulation.**
➔ **Dealing with low power modes at vertical level should not mean reducing the level of ambition of the requirements.**
➔ **In case household washing machines would be kept in the horizontal regulation, household washer-dryers should be added to the scope.**

Furthermore, in case of a mandatory power management function and when the modes are not defined as 'standby' (as they are not 'indefinite'), we fear that loopholes may arise, especially when the duration for starting the power management function is not defined.

➔ **Please specify the following sentence under Annex II 1d "(…) the power management function shall switch equipment after the shortest possible period of time appropriate for the intended use of the equipment". We recommend adding a maximum duration of 30 minutes for all appliances.**

3. GENERAL COMMENTS

3.1. No delay for this regulation on standby

As the European Commission recently announced its intention to release Ecodesign measures by 'packages'[8], we insist that this measure on standby must be part of the next package at the end of 2018. Otherwise, the adoption of the measure will be delayed, and its ambition reduced.

➔ **The standby, networked standby and off-modes measure must be released as part of the Ecodesign package at the end of 2018.**

3.2. Connected products: a more forward-looking legislation needed

We regret that the current scope of the proposal covers products that are already on the mass market only. It is necessary to also consider emerging technologies such as connected appliances. As those products are increasingly becoming part of our daily life, the European Commission should send a clear signal to manufacturers and encourage them into designing connected appliances with low standby power values.

In this context towards more connected appliances, one can observe an increasing use of equipment such as HDD boxes, wireless emitters, routers, etc. However, according to the same test performed by DECO in 2013, this type of equipment had the highest values when it came to standby consumption[9].

On the same line, we advise that the definition of local building controls include non-rotating devices which will become increasingly relevant in smart buildings.

➔ **The revision clause must include 'internet of things/connected devices' as priorities for future analysis.**
➔ **Including non-rotating devices in definition 43 - 'local building controls'.**

3.3. Material efficiency must be addressed in the future

As additional standby power savings need to be achieved, more sophisticated hardware that contains critical raw materials may appear. Hence, we encourage the European Commission to analyse any future regulatory options with a life cycle perspective that would focus not only on the energy consumption, but also on materials/resource efficiency savings.

➔ **Include material efficiency in the revision clause to assess this aspect during the next preparatory study.**

[8] as opposed to releasing them in an individual regulation as soon as they are finalised.
[9] See last table in Annex 1.

Annex 1. Average stand-by consumption as obtained in the measurements performed by DECO in 10 real households in 2013

	•	Average W
IT	External HDD	0.19
	Monitor	0.60
	Printer All-In-One	0.50
	Desktop PC	4.87
	Laptop PC	0.73
	UPS	4.20

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		Average W
LIVING ROOM	Air Conditioner	4.82
	Stereo System	2.30
	Game Console	0.97
	DVD Player	1.66
	Media Player	0.44
	VCR Player	4.41
	Surround System	0.43
	TV	0.22

		Average W
TRIPLE-PLAY	Box HDD	15.43
	Box without HDD	10.17
	Wireless emitter	3.34
	ONT	7.84
	Router	7.61
	Telephone	1.86