



PP 11-10
Brussels 8th September 2011

CECED preliminary comments on Commission staff working documents for possible regulations on energy labelling and ecodesign for Networked Standby Losses

CECED calls for a sound and quick definition of networking standby ecodesign regulation in order to give manufacturers clear and timely requirements for new product development.

CECED welcomes the working document amending the Regulation (EC) 1275/2008 on Networked Standby Losses requirements; however we would like to highlight the following points for attention: the feasibility of the proposed limits and the verification tolerances references.

Feasibility of the limits

The limit of 2 W assumes for 2016 the availability for technology which is current not present in the consumer electronics market for the case of household appliances.

The market of networked household appliances is still in development and at the time when the Ecodesign Study was developed for Lot 26 there were no data available to on networking energy consumption for household. Therefore there is no proof that the limits established would not exceed the Least Life Cycle Cost for the introduction of the needed improvements on household appliances.

Hence, household appliances industry is currently not in the position to assess the validity of the limits suggested by the European Commission. These have been defined following an Ecodesign Study based substantially on the system architecture of Information technology equipment, which is different from that of household appliances.

Within the provisions of the regulation, it should be possible to review these limits in order to allow industry to adopt correct solutions for reaching feasible values based on the current technologies of motor operated products and heating appliances in the market.

Therefore CECED would like to propose that the following definition of motor operated appliances and heating appliances is included in the working document:

- *motor operated appliances - appliances incorporating motors, including also magnetically driven appliances*
- *heating appliances - appliances including heating elements and without any motor.*

Furthermore Article 7 of the Regulation 1275/2008 should be amended including the following wording in addition to the one already existing:

In the light of the technological developments, the validity of the second tier (1 January 2016) of the Ecodesign Requirements on Networked Standby should be revised for motor operated appliances and heating appliances.

Specification of verification tolerances

In chapter 6, “Verification Procedure” (page 6), there is a mention to a 5% tolerance. We believe this is a lapse since in other parts of this document and within 1275/2008 the tolerance is defined at 10%. A 5% certainty in the measurement cannot be reached with the same laboratory instrumentation needed to reach a 10%, which is the one used nowadays for compliance with the Regulation 1275/2008. If this is just an editorial issue, we would like to ask you to disregard this comment. On the contrary, please consider that the cost of the equipment needed to halve the tolerance may be one order of magnitude greater.

Furthermore, for clarity we suggest to always repeat the physical measure when stating a tolerance, as described below:

*The model shall be considered to comply with the provisions set out in Annex II, points 1(a) and 1(b), or points 2(a) and 2(b), as applicable, to this Regulation if the results for off -mode and standby-mode conditions, as applicable, do not exceed the limit values **[of power]** by more than 10 %.*