



possible ecodesign requirements for external power supplies: eceee's comments on the working document

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eceee welcomes the proposed ecodesign requirements for external power supplies. In particular we believe the most important issue is ensuring a swift as possible transition to the stricter (stage2) proposals.

Staged requirements and performance levels

In the working document, the proposed performance levels are aligned with the following international systems:

- Stage 1 requirements are harmonised with current US minimum standards.
- Stage 2 requirements are harmonised with the EU 2008 Code of Conduct for power supplies and the current US Energy Star requirements.

In the proposal, 6 months are given for compliance with stage 1 requirements and another 18 months for stage 2 (i.e. 2 years after the regulation takes effect). It would probably make most sense for manufacturers to design the products for compliance with stage 2 requirements at once, to avoid expensive testing and redesign. However, they cannot do so, unless they are ready within 6 months and thus automatically comply with stage 1 requirements.

eceee's proposal

- We propose that the stage 1 requirements are skipped and that the stage 2 requirements become the first mandatory performance level. In return, we would accept a slightly longer time for implementation, let's say 12-15 months after the regulation comes into force. Such an approach might create less confusion and reduce strain on testing facilities and Member States checking for compliance. We do not believe that much energy would be wasted with this approach since many manufacturers have products that already comply with the stricter requirements.

About the European Council for an Energy Efficient Economy (eceee)

eceee is a non-profit, membership-based European NGO. The goal of eceee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, eceee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of eceee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 participants from a wide range of backgrounds. eceee and its summer study offer governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.

eceee promotes the understanding and application of energy efficiency in the energy research, policy and commercial organisations. It offers membership for both individuals and organisations.

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The Form of regulation

The proposal does not mention the legal form of the implementing measure.

eceee's proposal

- We suggest the Commission to give the implementing measure the form of a directly applicable regulation or decision, as has been already done by the Commission in other proposals for implementing measures.

Availability of background documents for stakeholders

We support the approach not to let the absence of European Standards delay the process, as long as there are clear definitions of testing methods etc. available elsewhere.

However it is sometimes difficult for stakeholders to find these documents. For instance, in the working document, a reference is made to a testing procedure described by a US consultant and to documents from Standards Australia. In order to make the implementation quicker and to support both companies and national agencies, this information should be made easily available.

eceee's proposal.

- We propose that the Commission sets up an ecodesign web portal with key information, legal documents and other background documents for each product group. This portal should be made public, and can be used by authorities in Member States when they provide information about Implementing Measures as well as manufacturers and other stakeholders.

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