

## **Comments on Draft Guidelines accompanying Commission Regulation (EC) No. 1275/2008 on standby and off-mode of 17 December 2008**

Danish Energy Agency – September 7

### **General remarks**

Denmark welcomes the Commission's initiative to elaborate a guideline accompanying the ecodesign regulation on standby and off-mode consumption.

Denmark shares however, the concerns made by the Netherlands mentioned in the document of Hans Paul Siderius dated September 2, 2009.

Denmark agrees with the Commission on the need for a guideline. At the same time, such guidelines must be worked out carefully so they cannot be used to justify the exemption of many products. We consider it very important that the vast majority of products within the scope of the regulation meet its requirements regarding a standby mode with a power consumption not exceeding the target values and power management.

The guideline is generally good and clear, especially where examples are mentioned.

The target group for the guideline seems primarily to be the manufacturers or persons with a certain level of technical knowledge. However, if the language was made a little less technical, the guideline could also be useful for member states representatives and various stakeholders with less technical insight (for instance some foot notes could help).

### **Detailed comments and questions**

#### **Page 3**

Scope of consumer equipment:

- We recommend that it is explained whether the consumer equipment catch-all clause includes set-top boxes or not.

#### **Page 6**

Examples of functions other than standby are given and it is mentioned that operating modes in which products provide this function are not standby.

We agree on that but would like to stress that according to the regulation products which provide the mentioned functions still need to have a standby mode.

One of the examples mentioned in the list is “Volatile memory preservation functions enabling instant reactivation without booting (e.g. ACPI S3 for PCs)”. What about ‘save to disk hibernation’, i.e. ACPI S4, for a computer without WOL? We think that it should be mentioned whether this mode is covered or not.

**Page 7:**

The role of battery maintenance:

- Will a notebook computer in off mode then not be covered? Or will it be covered without a battery?
- Does this only cover portable products? Some stationary products do also have a battery for avoiding memory losses, e.g. a desktop computer.
- Do portable appliances such as portable vacuum cleaners need to be in maintenance mode when not in use or when being charged? We think it should be possible to have power management on such systems, ensuring that the products are in the standby mode most of the time, and only needs to be in maintenance mode when the battery needs recharging.

**Page 15**

Question regarding the preheating of cups:

- We agree that preheating is not the same as standby. However, the machine should still have a standby and/or off-mode to comply with the requirements in the regulation.

Question regarding espresso coffee machines:

- We agree that the cooling function is not included in the definition of the standby mode. However, the machines should still have a standby and/or off-mode, or at least a hard off switch.

**Page 19:**

Annex II doesn't mention 'S4' either (see comment to page 6 above).

The example regardign PC and monitor:

- Should a monitor connected to a separate desktop (typical setup) not comply with the standby regulation when in standby, only in off mode? If the monitor automatically went in to a standby mode, would it be covered then?