

European Commission
DG Energy and Transport
Unit D3
B-1049 Brussels
BELGIUM

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TOM, BS/ecodesign-nat 07
ZVR 914305190

Via email

Comments from Austria regarding the working document on possible ecodesign requirements for standby and off-mode losses in the framework of the Consultation Forum process

Dear Mr. Brisear! Dear Mr. Kolb!

Austria generally welcomes the proposal for possible eco-design requirements for standby and off-mode losses. We agree on the proposed scope and the requirements. Considering the premises of such a horizontal measure we support the generic approach chosen in this proposal. In the following we ask for further clarification for some aspects and would like to propose possible adaptations.

General comments

Scope

Austria appreciates the principal aim to deploy a broad scope to tap the full potential of efficiency improvements for stand by and off-mode losses.

For this reasons we encourage to apply a definition which

- comprises the full range of products in household and office use in principle,
- avoids the risk of an ambiguous understanding of the terms “household and office equipment”,
- is capable of covering upcoming developments and innovative product types in the context of utilisation mentioned above (especially regarding new versions of product types and products with merged primary functionalities)

Therefore we propose to adopt the product categories 1, 2, 3, 4 and 7 listed in Annex IB of WEEE Directive directly and suggest to avoid definitions based on “household and office equipment”. Additionally the scope shall apply for products which are powered by the mains (single phase 240 V, three phase 400 V, regardless whether hard wired or plugged). We would like to highlight that the proposed scope based on WEEE would not cover e.g. gas-fired or wood boilers, (table) lamps with halogen bulbs including a transformer.

Relationship to product specific Implementing Measures (IM)

We ask for a more clear procedure in this context: Our position is that for products falling under the scope of the horizontal IM as well as under the scope of a product specific IM, the horizontal IM would prevail, unless the product specific IM sets requirements for standby and off mode losses explicitly.

Levels

The levels seem to be both sufficient ambitious and realistic.

Specific comments

OW off

Austria supports the concept to use hard off switches if appropriate. A requirement on hard off mode should follow the indicative character of the proposed requirement for power management in the working document.

In order to facilitate soft measures in the field of standby and off-mode losses products should cope with hard off in a way which is acceptable from the user's perspective:

- This implies a defined (72 hours, 1 week, etc.) or even better an unlimited period of memory retention of stored user settings. In concrete this is attained by a flash memory instead of volatile memory, provided there is no negative effect on Life Cycle Costs. Primarily this applies inter alia to products like video or hard disc recorders, mini hifi sets, white goods with advanced functionalities like several dishwashers and washing machines.
- Second it should be considered to aim at an appropriate restart time period including code upload or boot up effects, ensuring that user will actually use any hard off. This topic is relevant especially for consumer electronics, as set top boxes, TV sets, etc.

- In any case hard off switches should be positioned to be easily reached by the user.

Networked standby

We are accepting the constraints for the time being in this context. Nevertheless we may state our concerns about the proposal to exclude networked standby in general, which likely contributes to standby losses to a great extent. This proposal may support an unintended drift to networked functionalities to elude the requirements set.

Austria proposes to set clear requirements for the second tier (3 years after the IM gets into force), to enable industry to anticipate and take appropriate efforts on product design even at this stage. As an alternative we suggest to stipulate the inclusion of networked standby for the revision phase at least.

Market Surveillance

We believe that market surveillance will be a crucial success factor in the framework of a high effective implementing measure. Since production and logistics are mainly focused on the entire European market it may turn out suboptimal basing efforts for market surveillance on member state level only. Most likely this would result in activities targeting the end of the distribution channel only. Therefore we would encourage any consideration of cooperative concepts or approaches in the field of market surveillance beyond the member state level.

We highly appreciate comprehensive efforts on the design of sophisticated surveillance mechanisms. In this regard we feel confident that a twofold approach may serve best, thus measures are partly based on member state level as well as jointly on EU level.

We believe that the proposed tolerances would be sufficient high, even considering any possible deviation between different laboratories in Europe. Since the requirements for evaluating power levels presumably are not this high.

Yours sincerely

Dr. Bernd Schäppi

on behalf of the Federal Ministry of Economics and Labour of the Republic of Austria