



CECED Contribution after Consultation Forum on Standby

GS 07-120

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Introduction

CECED represents the household appliance industry in Europe¹. Its member companies employ over 200,000 people, are mainly based in Europe, and have a turnover of about €40 billion. If upstream and downstream business is taken together, the sector employs over 500,000 people.

CECED wishes to thank the Commission for the constructive meeting of Consultation Forum on possible standby and off mode requirements, where a number of points were clarified. Following the request of the Commission to send comments no later than three weeks after the meeting, we decided to underline some key items discussed during the Consultation Forum.

Delay Timer

CECED reiterates its concern at the proposal to set the limit for the standby features providing reactivating function equal to the limit set for off-mode. Consumption in off-mode is the minimum unavoidable consumption when the appliance is performing no function. Such low consumption persists also when the appliance starts performing a function, such as the reactivating feature. In order to incorporate a reactivation feature it is necessary to power control electronics, which inevitably means a higher consumption than the pure off-mode. For many types of domestic appliance an example of a reactivation feature would be a Delay Timer.

Not including the Delay Timer function within the definition of reactivation functions would mean that the limit for this very important function would be set to equal the very low limit for off-mode consumption.

The Delay Timer function provides both consumer and environmental benefits by permitting the appliance's full electrical load to be shifted from a higher to a lower electricity demand peak (or electricity tariff zone) resulting in a much better use of the available energy. As a result, CECED believes that moving "timer" from the definition of "reactivation function" to the exclusion list represents a relevant and non-controversial choice to improve the quality of the document.

Transient Power Consumption

Several stakeholders voiced their concern because definitions included in the Working Document were different from definitions available in European and International Standards.

According to CECED in the document it should be clarified that transient power consumption modes, entering or leaving Standby, are beyond the scope of the horizontal measure.

As a result we suggest that:

- either transient power consumptions is included in the exclusion list,
- or the standby definition of the working document be modified to include the sentence "which may persist for an indefinite time", in alignment with what already stated in EN 62301.

That way, only persistent power consumption would be subject to these regulations.

¹ Direct Members are Arçelik, BSH Bosch und Siemens Hausgeräte GmbH, Candy Group, De'Longhi, Electrolux Holdings, Fagor, Gorenje, Liebherr, Indesit Company, Miele, MTS, Philips, Saeco, SEB and Whirlpool Europe. CECED's member associations cover the following countries: Austria, Belgium, Czech Republic, Denmark, Estonia, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom.

Remarks on Hardware Off Switch

Some stakeholders advocated the inclusion of a provision related to a mandatory 'hard off switch'.

CECED understand that a 'hard-off switch' is considered by some stakeholders as a guarantee for minimization of power consumption. Should this be the case, a mandatory 'hard-off switch' requirement would imply that any regulation limiting off-mode and/or standby would be unnecessary, unless there is a general fear that the 'hard-off switch' is rarely used. However, if the 'hard-off switch' it is rarely used, a mandatory 'hard-off switch' requirement would add significant cost to the product without any corresponding benefit. According to this reasoning, CECED believes that (considering also that the Commission has decided to set limits for off-mode and standby) the mandatory introduction of 'hard-off switch' would be the wrong political choice.

In addition, we also believe that only vertical Implementing Measures, which are developed with a better knowledge of product specificity, should have the option of having more detailed and product specific eco-design requirements.

Furthermore, the CECED vision is to have a single 'All Inclusive Energy Efficiency Index'. This would enable the consumer to have a complete picture of an appliance, considering all energy consumption modalities

A single Energy Efficiency Index would enable:

- the consumer to make a purchasing decision based on the yearly energy consumption of the appliance, without entering too much into technical details (CECED doc. ID: GS-07/69).
- the legislator should control all other energy consumption factors that lay out of the scope of the horizontal measure, thereby avoiding unnecessary waste.

Avoiding contradictory requirements

During the Consultation Forum the Commission questioned the idea to postpone the application of the horizontal limits for products that are under investigated by a vertical study when the horizontal measure is adopted.

To allow manufacturers to plan their investments with sufficient certainty, CECED invites the Commission to identify a way that allows for flexibility in the application of horizontal and vertical requirements. While we support the idea that vertical measures should prevail over horizontal ones, steps must be taken to avoid a situation where a horizontal measure requires planning investments in one direction while a vertical measure (coming immediately after in time) would suggest a different direction.

Verification Procedure

As stated clearly at the Consultation Forum, CECED is in favor of a critical review of the current Verification Procedure scheme, but the one proposed in the working document is not acceptable. The key point to bear in mind when addressing the verification procedure is that responsibility for variability is split between the Manufacturer and the Testing Laboratory. The manufacturer's role is to properly control the manufacturing process and its deviations. The Responsibility of the Testing Laboratory is to properly measure values, within an agreed level of accuracy. As manufacturers, we accept taking charge of the possible variations in the production process, by internalizing this variation. However, it cannot be possible to internalize the variation due to Laboratories, since this is not under manufacturer's control.

While the current proposal does not recognize the real dispersion existing among Laboratories CECED proposal is:

- 1) To internalize the variation caused by manufacturing process.
- 2) To assess the variability among Testing Laboratories, and use a parameter deriving from that variability, as the tolerance (different from zero) to be employed for checking the compliance.
- 3) Being the variability among Testing Laboratories the only relevant tolerance to take into consideration (once manufacturing variation is internalised), such variability should be taken as the tolerance value for both the first unit tested and for the following three (should the first fail to pass the test).

Standardisation

Finally, as stated in many occasions during the Consultation Forum, CECED recalls the importance of standardisation, also acknowledged by Commission in several circumstances. Consequently we would like to stress, once again, the preference, wherever possible, to Implementing Measures referring to harmonised standards.