



CECED Contribution on the working document on standby and off-mode

GS 07-109

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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 decided to put in writing preliminary comments on the available Working Document on possible eco-design requirements for standby and off-mode electric power consumption of electrical and electronic household and office equipment.

General Remarks

- The proposed measure is a cross product provision that overlaps with established activity of Standardization Bodies at European and international level, by including divergent specific technical content in the legislation. We are concerned about EUP implementing measures which depart from the spirit of the New Approach, based on conformity assessment procedure, CE mark and Harmonized Standards, which is supported by CECED.
- The proposal made for standby distances itself from the New Approach and contradicts the expectation that EUP implementing measures should deliver a coherent product policy and allow improving product ecodesign by balancing different characteristics. CECED believes that such an approach can be accepted only if it is clearly stated that vertical measures prevail over horizontal ones, because only vertical measures can deliver a coherent ecodesign, balancing all relevant environmental aspects.
- CECED believes it is not possible to propose a single limit for *Passive Standby* without jeopardizing the flexibility of design and without the risk of being unfair toward appliances offering a variety of user oriented functions.
- A single all-inclusive energy efficiency rating, setting the basis for the calculation of the energy label classes, would enable the customer to make a purchasing decision depending on the yearly energy consumption of the appliance. Please see the proposal of New Energy Efficiency Index (CECED doc. ID: GS-07/69)
- Household appliance industry - unlike faster moving sectors- to have proper return on investments requires a lifetime for product platforms of 6-7 years. This needs to be considered not to penalize European household appliance companies through early implementation dates).

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 Definitions

- CECED supports the exclusion of “sensor-based safety functions” from Standby mode, as these are priority functions and should not be addressed by eco-design requirements. In order to clarify the scope definition and avoid confusion with proper safety requirements, we would suggest using the word “protection functions” instead of “safety functions”.
- As far as voltage, the scope should be clearly limited to equipment powered from the public ac mains supply, having a nominal input voltage not exceeding 230V single phase, 400V three phase, in line with the nominal public supply voltage across Europe.
- We are very concerned by the proposal to have the limit for the standby features providing reactivating function equal to the limit for off-mode. Consumption in off-mode is the minimum consumption that cannot be avoided when the appliance is performing no function. Such consumption persists also when the appliance starts performing a function, such as the reactivating feature. Therefore, it appears to us quite illogic to grant to an appliance certain consumption in off-mode and exactly the same value when in addition to the consumption in off mode, the appliance start performing also a function, which will require some additional energy to be performed.
- CECED is concerned by including Delay Timer in the standby definition, and consequently having a limit for this very important function. The Delay Timer can be successfully used to shift the electrical load from a higher to a lower electricity demand peak (or electricity tariff zone) resulting in a much better use of the available energy. In order to promote the use of such feature, in Australia it was decided to leave the energy consumption during the delay start mode out of the Energy Efficiency Index for washing machines, so not to discourage manufacturers from equipping appliances with that feature. As a result, CECED proposes to remove “timer” from the definition of “reactivation function” and to add it to the exclusion list.
- The transient power consumption entering or leaving Standby mode should be either:
 - listed in the exclusion list,
 - or the Standby definition in the working document should be modified to include the sentence “which may persist for an indefinite time”.
- As far as the IEC 62301, we agree that is the reference for measuring power consumption; however, it has to be clearly stated also that definitions included in the proposed working document will prevail on the definition included in the measuring standard, to avoid misunderstanding when checking performances.

Remarks on Eco-design requirements

- Proposed implementation timeline is hardly in line with product development cycles. To cope with the level of investment required to redesign entire lines of products, CECED asks for a thorough impact assessment on the consequences for the European Industry competitiveness of the proposed short implementation timeline.
- In the proposed working document, there is the obligation to declare in the technical documentation file all energy consumption modalities and related energy consumption value. To make it applicable, it should be clearly specified what to include and how to measure it.
- As far as the power management requirement, CECED supports it, but it should be better specified on a product by product basis, to avoid the risk of confusion between active modalities and the transition to lower power consumption.

Verification Procedure

- The proposed verification procedure differs significantly from the verification procedure already in place for checking Energy Label parameters. CECED is in favor of a critical review of the current scheme, but the proposed one is not acceptable. The key point to bear in mind while addressing the verification procedure is that manufacturers should be given responsibility for factors they control. By no means they should be given responsibility for factors under testing laboratories control. Manufacturer’s role is to properly control manufacturing

process and its deviations. Responsibility of Testing Laboratories 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.
- The current proposal basically identifies in 10% the production tolerances and in 0% the testing tolerances. We believe that the proposal is unbalanced since it does not recognize the real dispersion existing among Laboratories (and proved in occasion of ring tests carried out also recently in European Labs).
- CECED proposal is:
 - To internalize in the standby consumption declaration the variation caused by manufacturing process.
 - To assess the dispersion among Testing Laboratories, and use a parameter deriving from that dispersion, as the tolerance (different from zero) to be employed for checking the compliance.
 - Being the dispersion among Testing Laboratories the only relevant tolerance to take into consideration, such dispersion should provide the tolerance value for both the first unit tested and for the following three (should the first fail to pass the test).

Relationship between Product specific ("vertical") Implementing Measures

A critical aspect is the relationship between Product specific Implementing Measures and Horizontal ones. In order to have a clear and precise reference framework, CECED asks that:

- Product specific Implementing Measures prevail over Horizontal ones. If a product is not covered by a specific Implementing Measure addressing off mode or standby, then – and only then – the Horizontal Measure on Standby will apply. It is important that vertical measures prevail over horizontal ones, because vertical measures can take care of the specificity of product categories not addressed horizontally. Vertical requirements linked to products specifics can allow not only exceptions, but also stricter limits, if justified, or alternative approaches to improve energy efficiency that can be put in place only departing from the horizontal limits.
- As far as vertical measures that will address standby, but that are not yet adopted when the horizontal measure is published, we believe that a transition period could be established for those product where a study has been launched by the EU Commission. It is important that manufacturers can plan in advance and with sufficient certainty their investments and that no change of policy occurs because of the adoption of a vertical measures, when investments have already been planned in a different direction.

Remarks on the focus of this Implementing Measure

- In the proposed working document, the product definition refers to Annex I B of WEEE directive. This list is indicative and not prescriptive and leaves room to misinterpretation. To avoid this, it should be more precisely specified which products are under the scope of the Implementing Measure and which are not.
- The study carried out by Fraunhofer/IZM was limited to some pilot products, while the proposed working document extends the scope of application to a wider range of products, which were not analysed. We believe that applicability of proposed limits to a family of products should be demonstrated before imposing them.
- According to CECED, it would be much better to foster innovation and flexibility of design, while keeping a tight control on the yearly energy consumption, which is what matters most. CECED proposal of a New Energy Efficiency Index to be included into the review of the Energy Label will provide both, keeping unnecessary power consumption at the bare minimum and giving a clear indication of the overall energy efficiency of the appliance. Finally, including all type of consumptions in the New Energy Efficiency Index, would push manufacturers to optimise all energy uses, up to those functions that are correctly exempted from horizontal limits. For instance, manufacturers will have an incentive to reduce, when possible and compatible with protection needs, also the energy use for performing protection functions or used in Delay Timer mode.