

Public consultation on ecodesign requirements for standby, networked standby and off mode electric power consumption

Fields marked with * are mandatory.

Questionnaire supporting the review of the Commission Regulation on ecodesign requirements for standby, networked standby and off mode electric power consumption of electrical and electronic household and office equipment

Introduction

The Ecodesign Directive 2009/125/EC establishes a framework for setting ecodesign requirements for energy-related products. It is a key instrument of EU policy for improving the energy efficiency and other aspects regarding the environmental performance of the products placed on the internal market. Article 16 of the Ecodesign Directive lists products which were initially identified by the Council and the European Parliament as priorities for the Commission for implementation, including consumer electronics, office equipment and domestic appliances. The reduced energy consumption in standby, off mode and networked standby of electrical and electronic household and office equipment addresses therefore groups of priority products.

The Commission Regulation (EC) No 1275/2008 (hereby referred as the Regulation) set ecodesign requirements for standby and off mode electric power consumption of electrical and electronic household and office equipment. Subsequently, Commission Regulation (EU) No 801/2013 amended Regulation (EC) No 1275/2008 and added ecodesign requirements for networked standby. The Regulation requires that a review is carried out in light of technological progress. Furthermore, the current [Ecodesign Working Plan covering the period 2016-2019](#) includes this review as a specific work item.

Explanations

The terms 'off mode', 'standby' and 'networked standby' are defined in the Regulation. They broadly refer to appliances and equipment that are respectively: connected to the power mains but not offering any services (i.e. being shut off), or are on standby and actively waiting for a command (e.g. via a remote control or an internal timer), or are on networked standby and actively waiting for a command via a network (e.g. an activation signal sent through Wi-Fi or Bluetooth). As such, all the appliances and equipment connected to power mains consume electricity even when they do not provide any immediate service. As this consumption should be kept to an absolute minimum, the Regulation sets requirements regarding maximal energy consumption in these modes.

The regulation covers a wide range of products sold on the internal market, varying from household washing and cooking appliances to consumer electronics (such as audio and video equipment) and ICT products. The precise scope is defined in the Regulation and is estimated that some 2.5 billion products currently in use in the EU are covered.

An initial study completed in 2007 estimated that: (i) the total energy consumption in standby and off

modes for all products in scope was 47 TWh in 2005 and (ii) the consumption would have increased to 49 TWh in 2020 without an Ecodesign regulation being adopted. A subsequent review study completed in 2017 estimates that: (i) the energy consumption in standby, networked standby and off mode of all products in current scope will be approximately 14 TWh in 2020 and (ii) the consumption will increase to approximately 27 TWh in 2030 (due to rapid technological development leading to more products in scope having networked standby functionality, and the increased number of products sold on the European market). Thus, the legislation in force since 2008 has already brought important energy savings. However, these could be further enhanced.

Actions

The European Commission is currently reviewing the Regulation with a view to maintaining its provisions in line with technological development. The process started in July 2015 and has already involved technical experts from the EU Member States, European Standardisation Organisations, European associations of product manufacturers, and European non-governmental organisations representing consumers and environmental networks.

About this open public consultation

In the policy context described in the previous section, this open public consultation aims to offer to all relevant stakeholders, in particular the citizens, SMEs and other interest groups, the opportunity to contribute to the review process and to provide relevant and robust information in a structured way. Feedback obtained from stakeholders will complement the findings and information collected to date.

This consultation will ultimately inform the evaluation and impact assessment prepared by the Commission, in support of a revised Regulation on standby, networked standby and off mode electric power consumption. Any proposal for a revised Regulation would need to be discussed and agreed with the Member States and approved by the European Parliament and the Council according to the applicable procedures.

To avoid the risk of double counting (i.e. considering twice the same contributions sent by a stakeholder on different occasions) we kindly ask the organisations that have already contributed (by sending feedback/position papers in the context of the Ecodesign Consultation Forum meetings) to not respond to this open public consultation.

The consultation consists of a questionnaire, divided into three main parts:

- Part 1: information about the respondent;
- Part 2: general questions, no technical expertise needed for answering;
- Part 3: specific questions, some technical knowledge is required.

Thank you for your feedback.

Related links:

- 1) [Commission Regulation \(EC\) No 1275/2008](#) with regard to ecodesign requirements for standby and off mode electric power consumption of electrical and electronic household and office equipment
- 2) [Commission Regulation \(EU\) No 801/2013](#) amending Regulation (EC) No 1275/2008 with regard to ecodesign requirements for standby, off mode electric power consumption of electrical and electronic household and office equipment, and amending Regulation (EC) No 642/2009 with regard to ecodesign requirements for televisions
- 3) [Ecodesign Framework Directive \(2009/125/EC\)](#) - [List of ecodesign measures](#)

PART 1: General Information about the respondent

*1) Please provide your name and surname (Note that submissions that are sent anonymously will not be taken into consideration):

*2) Please provide your email address in case we need to follow up with you about your reply:

3) Please provide your telephone number in case we need to follow up with you about your reply:

*4) Please select your country of residence:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden

- United Kingdom
- Non EU

* Please specify:

* 5) You are replying as/on behalf of:

- A citizen/consumer
- A public authority
- A market surveillance authority
- A standardisation organisation
- A non-governmental organisation representing societal interests (for example, environmental or consumer interests)
- A company or a business organisation
- Other:

* Please briefly describe the organisation and main field of activity:

Policy development and market surveillance

* Please provide the name of your company/organisation:

Danish Energy Agency

* What size is your company?

- micro (self-employed)
- micro (1-9 employees)
- small (10-49 employees)
- medium-sized (50-249 employees)
- large (250 employees or more)

* Which of the following activities are performed by your company?

at least 1 choice(s)

- Manufacturing of home appliance (white goods)
- Manufacturing of cooking products
- Manufacturer of personal care products
- Manufacturer of consumer electronics
- Manufacturer of ICT equipment
- Manufacturer of sports and leisure equipment
- Sales/distribution
- Repairer
- Recycler
- Consultancy/Research
- Other

* Please specify:

Policy development and market surveillance

* In which country is your company most active?

at least 1 choice(s)

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

* Please specify:

* Is your organisation registered with the EU Transparency Register? If not, you may do so here. Registration is not compulsory to complete this questionnaire.

- Yes (please provide your registration number):
- No
- Not applicable

* Please provide your EU Transparency Register number:

* 6) Do you consent to the Commission publishing your replies? *Note that, whatever the option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N° 1049/2001.*

Note: respondents who select the option "only anonymously" should not include personal data in documents submitted in the context of the consultation.

- Yes** (*I consent to the publication of all information in my contribution in whole or in part, including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.*)
- Only anonymously** (*I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that I remain anonymous. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.*)

PART 2: General questions

7) How would you qualify your knowledge regarding the standby, networked standby and off mode electric consumption of electrical and electronic household and office equipment?

- I have very limited knowledge
- I know the general aspects allowing me to act as an informed buyer/user
- I am familiar with the specific technical details

8) Are you aware of the provisions of Commission Regulation (EC) No 1275/2008 (and its subsequent amendments) setting ecodesign requirements for standby, networked standby and off mode electric consumption?

- I have very limited knowledge
- I know the main parts that are relevant to me/my work
- I have detailed knowledge of the Regulation

9) Do you see the Regulation (EC) No 1275/2008 as an effective instrument in delivering energy savings?

- Yes, very effective
- Effective to a certain extent
- Has a very limited effect
- I don't know or no opinion

Please provide a brief reasoning for your answer above:

500 character(s) maximum

The regulation has reduced the standby consumption to a low level among a broad group of electric equipment and appliances and have implemented efficient power management.

10) What main impact do you think the Regulation has for you/your company?

- Lowers my energy bill
- Helps better products to be placed on the market
- Has no immediate effect
- I don't know or have no opinion
- Other

Please specify:

500 character(s) maximum

The regulation has increased innovation and helped in creating a level playing field in respect to energy efficiency.

11) Do you agree that the ecodesign requirements on standby, networked standby and off mode should be updated in light of technological developments?

- Yes, this would bring additional benefits
- No, the current requirements suffice
- The Regulation is burdensome and should be replaced with something else/removed
- I don't know or have no opinion

PART 3: Specific questions

12) Do you think that the consumption in off mode could be lowered below the current threshold value of 0.5W for all products in scope of the Regulation?

- Yes, the current technology would allow that in a cost-effective manner
- No, the wide range of equipment covered and variety of technologies used would not allow that in a cost-effective manner
- I don't know or no opinion

13) Do you think that the consumption in standby mode could be lowered below the current threshold value of 0.5 W for all products in scope of the Regulation?

- Yes, the current technology would allow that in a cost-effective manner
- No, the wide range of equipment covered and variety of technologies used would not allow that in a cost-effective manner
- I don't know or no opinion

14) Do you think that the consumption in networked standby mode for edge equipment (e.g. smart washing machines, Wi-Fi speakers, wireless printers, game consoles, etc.) could be lowered to 2W, as the Regulation foresees starting with 2019, or should remain at the current level of 3W?

- Yes, the current technology would allow that in a cost-effective manner
- No, the current technology would make such a change too expensive
- I don't know or have no opinion

15) Do you think that more products should be included in the scope of the Regulation?

- Yes, that would ensure additional energy savings
- No, the product range currently covered is enough
- I don't know or have no opinion

Please list some additional products that could be considered for inclusion:

200 character(s) maximum

We propose that local building controls for all buildings (household, public building, private and industrial) and all adjustable furniture should be included in the scope and that definitions are made as precise as possible for this equipment.

16) Further comments. Are there further comments you would like to make on anything that is not covered above?

2000 character(s) maximum

In our market surveillance, the DEA has seen examples of low power modes called "normal or standard standby", that do not comply with the power limits for standby in the regulation. Another example is a product which has a compliant mode called deep standby and a non-compliant mode called normal standby. It is difficult for the consumers and market surveillance authorities to understand the various terminologies used for standby and whether the standby mode is in accordance with the definitions in the regulation. On this background, we propose, that the revised regulation shall state that non-compliant low power modes may not be called standby or networked standby.