Final comments from ECOS on the Ecodesign Lot 26 (Networked standby) preparatory study

Date: 13/05/2011

ECOS welcomes the draft chapter 8 of the lot 26 study and generally agrees with its conclusions.

We want to stress the importance of the following points and suggestions:

- a horizontal approach is much preferable, based on the regulation 1275/2008 structure.
- Tier 1 in 2013 seems a good proposal.

Maybe it could be possible to be more stringent in the distinction between products falling under non-networked and networked requirements. At bottom of page 10 you say "*It is recommended that products offering networked standby modes are excluded from the requirement of EC 1275/2008 to power down into a standby or off mode. Instead it will be allowed to remain in a defined networked standby mode so long as it achieves the power consumption levels detailed below...*"
We see a risk here that manufacturers could add a basic network connectivity to many products (without necessarily great added value on the functionality) and thus be allowed higher standby allowances, even if the user does not actually connects the device to any network. When the device is not connected, we think it should comply with 1275/2008 (and not be excluded from its scope).

Here's a suggested alternative wording:
"It is recommended that products offering networked standby modes are subject to two sets of requirements. When the network connectivity is not the primary function of the product and is inactive or disabled, it should comply with EC 1275/2008. When the network connection is enabled and active, it may remain in a defined networked standby mode so long as it achieves the power consumption levels detailed below. In practice, this means that products for which the network connectivity is not the primary function will be tested and checked under two regimes (with the network functions enabled and disabled)..."

- If the networked standby Ecodesign measure can be processed swiftly (e.g. through a revision of 1275/2008) and adopted in the beginning of 2012, then we consider Tier 2 could start in 2015.

- A tentative Tier 3 for 2018 could be set requesting networked standby modes to be aligned to simple standby modes (i.e. less than 1 W), at least for MeNA and LoNA. If this is not included in a Tier 3, it could be presented at a visionary objective in the recitals or revision clauses of the regulation.

- In 8.1.2.5 (page 13), we suggest adding the following to bullet point n°3:
"Users should have the possibility to:
1- force at any time the product to enter into networked standby immediately (via a remote control, switch…)
2- activate a power down sequence to standby and off mode conforming to EC 1275/2008 - When the product goes into a 1275/2008 mode (or is unplugged), it should not lose important configurations or functionalities.
3- in case the network connectivity is not the primary function, deactivate network functions (including wireless emissions), in which case the product shall conform to EC 1275/2008.
For products offering a setup menu, this menu shall be prompted automatically when the product is switched on for the first time and offer clearly possibilities 2 and 3."

- In 8.1.2.5 (page 13), an additional point should be added:
"Unless impossible for practical reasons (size, location...) a product in a networked standby mode shall inform the user that it is not in off mode. This can be done through a display, colour code, etc.
Here a generic Ecodesign requirement could be set and the practical implementation delegated to standardisation bodies."