cecapi

European Committee of Electrical Installation Equipment Manufacturers

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POSITION PAPER

CECAPI comments on Ecodesign Consultation Documents "20171005_ACT_ED_review_standby" and "20171005_ANNEX_ED_review_standby"

CECAPI supports the EU's energy conservation efforts, but has some doubts of the extension of the scope to Local building controls used in products.

CECAPI believes that the extension of the scope can be in contradiction to the conclusions that will be reached from the ErP study regarding Building Automation and Control Systems BACS/HBES.

Therefore, to not jeopardize the work in the ongoing study no requirements shall be made to local building controls in products in this recast.

All requirements on Building controls, independent if they are integrated in Buildings products or separate in the electrical installations, shall be centralized under one regulation.

Also under the one lighting regulation no requirements have been set to the lighting controls as these will be handled separately

Due to the fact that we want to increase the energy efficiency of the building control system, taking into account all operating modes of the individual controls, CECAPI proposes to use a functional Stand By regulation approach. This approach is already known for Broadband equipment described in the JRC Technical Reports "EU Code of Conduct on Energy Consumption of Broadband Equipment" and described in IEC 63172 "Methodology for determining the energy efficiency class of accessories "

Both documents describe a method where the energy consumption is linked to the functions of a device. This method allows to limit the energy consumption of all devices which are in scope independent if the devices are simple or complex devices. A strict e.g. 500mW limit is a hurdle for complex but more energy efficient devices and is in many cases in contradiction to the CO2 reduction target.

An ADSL Home Gateway as an example from the JRC "EU Code of Conduct on Energy Consumption of Broadband Equipment Version 6" document *

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Function	idle-state		on-state	
	2017	2018	2017	2018
Central functions + ADSL WAN interface	2,2	2,0	2,8	2,4
4 Fast Ethernet LAN ports	4 × 0,2 = 0, 8	4 × 0,2 = 0,8	4 × 0,3 = 1,2	4 × 0,3 = 1,2
single radio IEEE 802.11b/g Wi-Fi interface (23 dBm EIRP)	0,7	0,7	1,3	1,2
USB 2.0 ports	2 × 0,1 = 0,2	2 × 0,1 = 0,2	2 × 0,1 = 0,2	2 × 0,1 = 0,2
Total equipment	**3,9W**	**3,7W**	**5,5W**	**5,0W**

In addition to the functional view described in “EU Code of Conduct on Energy Consumption of Broadband Equipment”, the IEC63172 document “Methodology for determining the energy efficiency class of accessories “describes a method which may allow to classify devices in relation to their energy usage and will help the integrators to design the most efficient system based on its application.

* “EU Code of Conduct on Energy Consumption of Broadband Equipment Version 6” European Commissions Joint Research Centre, D.1, Page 49
https://publications.europa.eu/en/publication-detail/-/publication/700037d4-150d-11e7-808e-01aa75ed71a1