



24 October 2007

Dear,

We, Japan Business Council in Europe (JBCE) ¹, are the organisation representing Japanese companies with significant operations in Europe. Our members are among leading multinational corporations in the world.

Attached please find our views for the Working document on possible ecodesign requirements for standby and off-mode electric power consumption of electrical and electronic household and office equipment.

We highly appreciate if our comments are taken into consideration in the discussion, and would like to express our willingness to contribute to the future legislative process for this matter, if necessary.

Sincerely yours,

Lars Bruckner
Chairman, Environment Committee
Japan Business Council in Europe
(JBCE)

¹ For details, including a list of its member companies, please refer to the following website:
<http://www.jbce.org>

24 October 2007

Subject: Regarding the 'Ecodesign of Energy Using Products' (EuP) Directive 2005/32/EC: Comments on 'the working document on possible ecodesign requirements for standby and off-mode electric power consumption of electrical and electronic household and office equipment' (Lot 6)

1) Scope of Lot 6

Under 'Definitions' the Commission working document refers to Annex IB of the WEEE Directive 2002/96/EC. JBCE fears that such a reference does not provide enough clarity. We would like draw the attention to the case of the ROHS Directive 2002/95/EC: a reference to the WEEE Directive has caused significant confusion as to whether or not the scopes of these two Directives are the same. Consequently, there have been suggestions to remove the reference and indeed clearly separate the two scopes under the 2008 review of the two Directives.

2) Timeline of entry into force

Generally, energy using products have very different redesign-cycles. An Implementing Measure on stand-by and off-mode losses must take this into account in terms of setting a deadline for entry into force.

3) Definitions

There is a strong need for a clear definition of 'household' and 'office' equipment. A reference to Annex IB of the WEEE Directive is not satisfactory, as there have been many different interpretations on what constitutes household equipment and how one should differentiate this from non-household equipment.

The definition of stand-by is not harmonized across industry. For example, stand-by in the field of Consumer Electronics means something different than it does in the field of Information Technology. The definitions applied in the Commission working document are in conflict with agreed international standards (e.g. IEC 62087 for Consumer Electronics) and international voluntary programs (e.g. Energy Star for Information Technology products). An Implementing Measure on stand-by and off-mode losses must take this into account. JBCE therefore strongly suggests that particularly the relevant definitions of the Energy Star, which have been adopted in the EU in relation to office equipment, are included.

4) Eco-design requirements

JBCE considers the power management requirement too vague ("...the shortest possible

period of time appropriate for the intended use ...”) and suggests that this should be made clearer. Additionally, we are uncertain as to how a) compliance with this requirement can be demonstrated and b) this can be verified through the market surveillance process. Moreover, no enforcement date has been proposed in relation to this requirement.

5) Use of harmonised standards

Regarding conformity assessment, the Commission working document makes reference to standard IEC 62301. Several issues therefore need to be emphasised.

First, the scope of the standard has to be in line with the scope of an Implementing Measure on stand-by and off-mode losses. If the scope of this standard were to be smaller than the scope of the Implementing Measure certain products could not show compliance. JBCE proposes to investigate the possibility to apply this standard to all products in the scope of the eventual Implementing Measure.

Second, the purpose of the standard is to measure the stand-by and off-mode losses. However, it is not clear if leakage current is also taken into account. Certain standards (e.g. EN 60335-1) set maximum leakage current levels. JBCE suggest that an Implementing Measure on stand-by and off-mode losses takes account of leakage currents. It must be avoided that these existing standards and the future Implementing Measure are in conflict with each another.

Third, the EMC Directive requires that products contain electrical components (e.g. filters) prevent electromagnetic radiation emissions. Such filters may have impact on the energy use. JBCE requests that this is taken into account when setting limits and deciding on a measurement method described in the proposed harmonised standard.

6) Conformity assessment

JBCE proposes to make clear reference to Directive 93/465/EEC on modules for conformity assessment and rules for CE marking and describe a predefined module. This is also a requirement in Article 8 of the EUP Framework Directive 2005/32/EC. We are of the opinion that an Implementing Measure on stand-by and off-mode losses should prescribe module A as the conformity assessment procedure to be applied by manufacturers.

7) Tier 2 requirements

JBCE would like to highlight that the development periods of products vary widely depending on product category. We therefore propose to apply neither one fixed 3-year period nor one fixed limit value for all products.

8) Final, general remarks

In the context of limits the Commission working paper refers to Watt. JBCE suggests to clarify that this means Watt of electric power mains.

Finally, JBCE fully supports the EICTA position paper on the working document. Our comments should be understood as complementary to EICTA's position.