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### JBCE comments concerning EuP lot 6 study

JBCE would like to communicate a number of comments and concerns regarding the EuP Preparatory Studies Lot 6 “Stand-by and Off-mode Losses”.

Firstly, we are surprised to see that the horizontal lot 6 study is producing very different results from those that are emerging from vertical/product category specific lot studies, such as the ones on PCs and computer monitors, TVs, imaging equipment, and battery chargers and external power supplies.

Secondly, we would like to express our concern that not enough attention has been paid to the subject of varieties of functions during the stand-by period. The energy use of different products during their stand-by periods is different, because different functions are in use. Each product has its unique functions during its stand-by period. It is therefore inadequate - and this will create misunderstandings - if the stand-by impact of different products is compared in general.

Thirdly, JBCE would like raise and emphasise the point that ‘eco-design’ with the objective of reducing total energy consumption is a highly complicated process. Reducing total energy consumption requires, for example, dealing with trade-offs of energy uses between different processes (i.e. active/ready/sleep modes).

Fourthly, we also concerned to see that stand-by data from catalogues and manuals have been used. Catalogue and manual data do not necessarily represent useful data for the lot 6 study, because, for example, sometimes only representative data are given. We strongly request that only relevant and detailed data are used in the study. Indeed, we believe that the use of data provided directly by manufacturers is indispensable.

Finally, JBCE does understand that there is also the difficulty of limited time. We therefore propose to alter only the way of reporting the concept of standby, i.e. focusing on what stand-by energy consumption is composed of plus ideas of reducing consumption. We do not consider it necessary to mention/report on exact figures in relation to, for example, BAT as it is irrelevant to show the exact figures in the study report without studying the data provided by manufacturers.