

COMMENTS from ZAO "Hewlett-Packard AO", to the March 18th Draft Customs Union Technical Regulation:  
**"ABOUT REQUIREMENTS FOR ENERGY EFFICIENCY OF ELECTRICAL ENERGY-CONSUMING DEVICES"**

<http://www.eurasiancommission.org/ru/act/texnreg/deptexreg/tr/Pages/%d0%a2%d0%a0-%d0%a2%d0%a1-%d0%a2%d0%ad%d0%ad%d0%a4-%d0%bd%d0%b0-%d0%9f%d0%9e.aspx>

2014-05-19

Thank you for giving us the opportunity to comment on the draft, we hope it's possible to give input in English. In below table are comments and suggested input for some of the sections.

We welcome the introduction of this regulation and we're positive to the aim that this regulation will be built upon similar regulations adopted in other regions or countries.

One of our key comments is the importance of being able to use test reports from international labs (self-declaration) for Declaration of Conformity. Another main comment is that the means on showing Compliance should be optional between Declaration of Compliance or via Certification for product types in appendix 5, 10 and 17. It's also key to allow business ample time for transition to adopt

If there are comments that are unclear, please don't hesitate to contact me and we can clarify and motivate our suggestions.

Kind regards,

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No.	Document	Article	Comments and Suggestion for new wording	Motivation
1	TECHNICAL REGULATIONS of the Customs Union "About requirements for energy efficiency of electrical energy-consuming devices" (TR TS 0___/201___)	General comment	<p>We suggest to clarify the compliance date, in relation to the definition of "placing on the CU market".</p> <p>This could be done by harmonizing with other international regulations.</p> <p>The word "first" could be added to the text; "issuance of electrical energy-consuming device <i>the first time</i> to the market (issuance for circulation)" in the text in article II, section 3</p>	<p>There exists several definitions of "placing on the market" in the draft TR. For example: article III, section 4 "available for market circulation", in Section 5 "issuance into the market", in section 6 "be made available on the market."</p>

			"issuance of electrical energy-consuming device to the market (issuance for circulation)".	To avoid confusion we suggest that one definition is used. This will also make controls easier.
2				Even though requirements are aimed at being equal to the limits in existing regulations features such as information in printer operating documents and similar takes time to implement in an efficient way.
3			Chapter V. section 12. Operating documents	
4	LIST electric energy-consuming devices, subject to the technical rules of the Customs Union "on energy efficiency requirements for electric energy consuming devices (TP TC/20), and form of validation		Device type 16. computers	The device type 16 (computers) are tested for compliance with the requirements set forth in the Lot 3 in the EU Directive 617 /2013 which are identical to the requirements of Appendix 17 in the draft CU TR, same as for Office equipment in Appendix 5. For this type of devices Declaration of compliance can be used, and the practice to use test reports from external laboratories should be applicable also to computers.
5	List of Standards used to show Conformity (Предложения по перечню стандартов, содержащих правила и методы исследований (испытаний) и измерений, в том числе правила отбора образцов, необходимые для применения и исполнения требований технического		Can you please clarify what standards are to be used for showing compliance for products included in Appendix 5, 10 and 17?  We propose to clarify the standards to be used for each product type by adding the respective Appendix number to the table of standards.	As written it's not clear for instance which standards are to be used for products included under Appendix 17 on computers.

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6	Appendix 5, 10 and 17	Chapter IV, "Operational documents"	<p>It's not clear whether the "operating documents" are those delivered to the customer for them to understand how to operate the product as intended or if it's the test reports from internal/external test of compliance that needs to be complied.</p> <p>We propose to exchange the word "operational documents" for "test reports".</p> <p>We propose to clarify the both "residential areas" and "office premises".</p> <p>One suggestion is to use this text: " ....only applies to products that are designed to be used in a "domestic environment" according to the EU EMC Directive whether they are used in a residential area or at office premises. "</p>	<p>The level of detail needed for a user (consumer) is the confirmation that the products meets the legal requirements. Data such as energy consumption in idle mode as requested in Section 7.1 , chapter IV in Appendix 10 is of limited use for a consumer.</p> <p>Equipment designed for use by the end consumer in residential areas and office premises is mentioned. Then there is a definition of the "residential areas" in line with the one used for EMC Class B, but same definition is missing for "office premises".</p>	
7	APPENDIX 5, Domestic and office equipment ( Stand-by)	1.Scope			
8			<p>We propose to clarify that requirements for computers are included in Appendix 17, by deleting the words "Personal computers (including system units)" that are currently mentioned in the draft.</p>		
9		2. Definitions	<p>Only internal reactivation (Lot 6) is included and not the network reactivation (Lot 26 in the EU Directives). We propose to align with the EU Directive(s) and to clarify by adding for instance " .....unless inappropriate for intended use".</p> <p>This provision for exempting some equipment does not appear in the draft CU TR, so we propose to add it.</p>	<p>If the "unless inappropriate for intended use" is not added this would mean that all products would have to be equipped with Auto-off functions. Motivation: some products needs to have a network standby mode. If they go to auto-off mode they're not possible to reactivated due to the low energy level of 0.5 W level. For example an office printer shared between 20 users, goes to off mode. Next user will try to print, but the printer will not be reactivated unless the person goes to reactive the printer by pushing a button</p>	

				on it. This is not intended use for s shared printer.
10		Chapter III, Table 1 and 2, and section 3. Hard-off switch requireme nt of 0.3 W	<p>We propose to clarify that if a product meets the soft-off requirements there is no need to test the hard-off (mechanical switch) requirement at 0.3 W.</p> <p>The current text: ... Equipment should have devices (a device) for controlling power supply mode that are one or both of the following types:...</p> <p>Could be changed to: Equipment should have devices (a device) for controlling power supply mode that are <i>should have at least</i> one or both of the following types:...</p>	This seems to be a requirement added on top of the requirements in international regulations, and we propose alignment with international regulations.
11		Table 1, reactivatio n function	The requirements for reactivation function of 0.1W from January 7 <sup>th</sup> 2014 is unclear. We propose to delete this.	
12	APPENDIX 10, External Power Supplies	Chapter 1, section 1. Scope	<p>We propose to include the intended exemptions.</p> <p>Proposal: This Regulation shall not apply to external power supplies placed on the market no later than 30 June 2015 (for instance) as a service part or spare part for an identical external power supply which was placed on the market not later than one year after this Regulation has come into force, under the condition that the service part or spare part, or its packaging, clearly indicates the primary load product(s) for which the spare part or service part is intended to be used with.</p> <p>We would like to point to a possible minor error in writing, using Appendix 4 instead of 5 here: intended for use with household and office electrical equipment covered by Annex 4 to the technical regulations of the Customs Union "About requirements for energy efficiency of electrical energy-consuming devices" (TR TS 0___/201___).</p> <p>Please correct as needed.</p>	In the corresponding EU Directive there is exemption for replacement EPS under certain limits, and we believe it will facilitate implantation if CU and EU regulations are aligned.
13		Chapter II, section 2. Definitions		

14			We also propose to harmonize the definition of "efficiency factor of external power supply" and "average efficiency factor of external power supply" with international standards, such as the EU Directive 278/2009.	
15		Chapter II, requirements for energy efficiency	Please clarify by when the requirements in section 3 and 4 needs to be met.	No implementation or adoption date makes the planning of the implementation less efficient.
16		Chapter IV, sections 5-6	We propose to refer to international standards rather than to give explicit details in the text : (Current text = ) 5. Power equal to or above 0.50 W should be measured with uncertainty below or equal to 2% with a fiduciary level of 95%. 6. Power below 0.50 W should be measured with uncertainty below or equal to 2% with a fiduciary level of 95%. The standard to refer to is EN 50563:2011.	EN 50563:2011 is almost same as the test methods of external power supplies in the U.S. Federal law "Energy Conservation Program for Consumer Products (2010)", it is currently de-facto international standard of test methods for external power supplies.
17	Appendix 17, Computers	Chapter V, section 5	We propose that Declaration of Conformity could be used also this product group, to align with international regulations.	This is in harmonization with international regulations such as EU Directive and also used for Domestic and Office equipment in Appendix 5. Tests of the same features are already made on the products due to release in other markets, so extra testing only adds extra administration and costs on manufacturers and importers.
18		3.2.1.	Please confirm that the deadline to comply desktop computers is actually July 1 <sup>st</sup> 2017, and not July 1 <sup>st</sup> 2015 as is stated in the draft TR.	The second deadline to meet for notebooks (in 3.1.4) is in harmonization with the period between 1 <sup>st</sup> and 2 <sup>nd</sup> set of requirements in the EU Directive, two years. Therefore we think that this might be a minor error in the draft text for desktops.
19		3.2	We propose to clarify that the limit < 10 W is for a mode where the display is turned off. Could be expressed as "idle mode is with display off".	

20		3.6.2 reduce speed	<p>Please clarify if it's the network speed that is of concern, and not the "processing speed" in the text: "A computer featuring WOL should lower the processing speed to 1 Gbit/s when switched to sleeping mode or turned off on the Ethernet."</p> <p>We propose to align with definition used in the EU Directive. Section 3.6.2. "Desktop computer, integrated desktop computer and a laptop, effective July, 01, 2015: Computer with WOL should reduce the processing speed up to 1 Gigabit per second (Gbps) when switching to sleep mode or if being powered off via LAN Ethernet." should be changed to: 3.6.2. Desktop computer, integrated desktop computer and a laptop, effective July, 01, 2015: Computer with WOL should reduce the network speed of any active 1 Gigabit per second (Gbps) network interface when switching to sleep mode or if being powered off via LAN Ethernet.</p>		
21		3.6.2 display sleep mode	<p>We propose a clarification on what part of the product the sleep-mode refers to.</p> <p>The text is now "If the computer has a display, it should switch to sleeping mode after 10 minutes of user idleness." It needs to be clarified that 10 min refers to the display being in sleep mode, not the computer.</p>	Requirement is currently unclear. In the EU Directive it's the (operating) mode of the display that is meant.	