

11th January 2018

**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 has strongly supported IEC TC23 WG9 to create an international standard with the title

“Methodology for determining the energy efficiency class of accessories “

This international standard allows to classify control devices in relation to their energy usage and will help the integrators to design the most efficient system based on its application.

These deliverables will be handed over to the project team dealing with BACS / HBES ErP study.