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20-April-2026

Kind Attn: Eurasian Economic Commission

Comments on the draft Amendment No. 1 to TR EAEU 048/2019 (ТР ЕАЭС 048/2019)

We appreciate the opportunity to provide our comments on the draft amendment to TR EAEU 048/2019 (ТР ЕАЭС 048/2019). Having carefully reviewed the proposed changes, we would like to submit the following observations for your consideration.

<For Annex #5 (standby mode)>

Comment 1
Draft TR text
II. Основные понятия «режим выключения» - состояние оборудования, при котором оно подключено к источнику питания, не находится в рабочем режиме или режиме ожидания и может выполнять лишь функции обеспечения выполнения требований к электромагнитной совместимости и (или) индикации режима выключения; режим «Выключено» – режим, в котором оборудование подключено к источнику питания, и для достижения наименьшего энергопотребления переводится в состояние покоя автоматически, посредством переключателей или элементов управления, доступных пользователю;
Comment
Both definitions describe a condition in which the equipment is connected to the power supply, is not in active or standby mode, and aims to achieve minimal energy consumption. However, the definitions differ only in limited aspects, such as whether the transition occurs automatically or via user-accessible controls, and whether residual functions (e.g. EMC-related functions or indication) are explicitly mentioned. As currently drafted, the substantive overlap between the two definitions creates ambiguity as to whether two distinct regulatory concepts are intended or whether this is an unintended duplication. This ambiguity may affect the interpretation of energy consumption limits, testing procedures, and conformity assessment requirements throughout Annex 5. Without clarification, manufacturers, test laboratories, and market surveillance authorities may apply inconsistent interpretations, increasing compliance risks and administrative burden. International standards and regulatory frameworks, including IEC 62301 and EU ecodesign regulations, typically rely on a single, clearly defined "off mode," with distinctions based on permitted residual functions rather than parallel terminology. Aligning with this approach would enhance regulatory clarity and international consistency. We therefore respectfully request clarification of the regulatory intent behind these two definitions. If both are intended to coexist, their respective scope and application should be clearly distinguished. If not, we recommend consolidating them into a single, clear definition of "off mode" in the final text.

Comment 2
Draft TR text
II. Основные понятия

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«сетевой режим» – любые режимы работы прибора, в которых прибор, потребляющий энергию, подключен к сетевому источнику питания и активируется, как минимум, одна сетевая функция (например, повторное включение посредством сетевой команды или сообщение о целостности сети), но в которых основная функция не является активной;
Comment
The current definition describes a condition in which the equipment is connected to a network power source, at least one network function is activated, and the main function is not active. This description corresponds substantively to what is internationally recognized as "network standby mode" rather than a general "network mode." The term "network mode" could reasonably be interpreted as encompassing any operational state in which network connectivity is active, including fully active operating states, which would significantly broaden the scope beyond the apparent regulatory intent. This ambiguity may lead to inconsistent interpretation and application across EAEU member states, affecting the determination of applicable energy consumption limits, testing requirements, and conformity assessment obligations. To ensure clarity and consistent enforcement, we respectfully recommend that this definition be explicitly designated as "network standby mode" (сетевой режим ожидания) and that this terminology be applied consistently throughout the regulation. We further recommend aligning the definition with the internationally recognized formulation established in EU Commission Regulation (EC) No 1275/2008, which defines networked standby as: *"a condition in which the equipment is able to resume a function by way of a remotely initiated trigger from a network connection."* This definition is concise, technology-neutral, and applicable across diverse network types and communication protocols. By contrast, the current draft references specific examples of network functions, which may not capture all forms of network connectivity in modern products and risks becoming outdated as network architectures evolve. A technology-neutral definition would ensure long-term regulatory relevance and applicability to a wide range of product categories. Aligning with the EU definition would also facilitate international trade, enable the use of existing compliance data, and reduce unnecessary adaptation costs for manufacturers operating across multiple markets. We therefore respectfully recommend that the term "сетевой режим" be replaced with "сетевой режим ожидания," and that the definition be revised to align with EU Regulation (EC) No 1275/2008. These clarifications would enhance legal certainty, support consistent enforcement across the EAEU, and strengthen the regulation's alignment with established international practice. We respectfully request that these revisions be reflected in the final text.

Comment 3
Draft TR text
I. Область применения 1. Настоящие требования распространяются на выпускаемое в обращение на таможенной территории Евразийского экономического союза (далее – Союз) следующее оборудование, предназначенное для использования в быту или в офисе (в том числе вне помещений) не имеющими специальной подготовки пользователями, работающее непосредственно от электрической сети с номинальным напряжением до 250 В (включительно) (далее - оборудование): н) активные акустические системы с питанием от сети переменного тока;
Comment
HS codes 8528.71 and 8528.72 are assigned to television receivers and related audiovisual display equipment. These codes are therefore relevant to products regulated under Annex 4 (Electronic Displays / Televisions) and do not

correspond to audio-only equipment. However, according to the Decision of the EEC Board No. 23, HS codes 8528.71 and 8528.72 are assigned to [n) active acoustic systems powered by an AC network;]

<Decision of the EEC Board No. 23>

Наименование продукции	Код ТН ВЭД ЕАЭС	Документ об оценке соответствия	Примечание
1	2	3	4
н) активные акустические системы с питанием от сети переменного тока;	8528 71 8528 72		

https://docs.eaeunion.org/documents/399/6419/

Active acoustic systems powered by an AC network are fundamentally different from televisions in terms of their intended function, technical characteristics, and regulatory treatment. They do not provide image display or television reception functions and should not be associated with HS codes that are specifically designated for television equipment.

Including active acoustic systems in Annex 5 without clearly identifying the appropriate HS codes creates a risk of misclassification at customs and inconsistent application of technical regulation requirements. HS code classification plays a critical role in determining the applicability of EAEU technical regulations, and unclear or incorrect code references may lead to enforcement practices that do not accurately reflect the nature of the products concerned.

To ensure legal certainty and consistent enforcement, we respectfully request that the HS codes applicable to active acoustic systems powered from AC mains be reviewed and clearly identified in line with the Harmonized System nomenclature and Decision of the EEC Board No. 23. Any implication that HS codes 8528.71 or 8528.72 apply to such equipment should be corrected or clarified.

Clarifying the correct HS code classification would prevent customs misclassification, enhance consistency between technical regulation and customs enforcement, and provide greater predictability for manufacturers and importers. We respectfully request that this issue be addressed in the final text of Annex 5.

Comment 4

Draft TR text

I. Область применения

1. Настоящие требования распространяются на выпускаемое в обращение на таможенной территории Евразийского экономического союза (далее – Союз) следующее оборудование, предназначенное для использования в быту или в офисе (в том числе вне помещений) не имеющими специальной подготовки пользователями, **работающее непосредственно от электрической сети с номинальным напряжением до 250 В** (включительно) (далее - оборудование):

Comment

We understand that the regulatory intent is to address energy efficiency for end-use equipment that is directly connected to the mains and used by non-professional users. However, as currently drafted, the scope may be interpreted to include equipment that does not operate directly from the mains as intended, but instead requires a low-voltage external power supply (EPS), such as an external AC/DC adapter. This creates ambiguity as to whether the regulation applies to the end-use product, the external power supply, or both.

Such ambiguity may lead to inconsistent interpretation and enforcement across EAEU member states, increasing legal uncertainty for manufacturers, test laboratories, and market surveillance authorities. Clear scope definitions are particularly important because they determine which products are subject to energy consumption limits, testing requirements, and documentation obligations.

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Many globally marketed products—especially in the ICT, consumer electronics, and small household appliance sectors—are designed so that the end-use equipment operates exclusively at low voltage, while energy efficiency requirements for standby and off modes are addressed separately at the level of the external power supply. If these products are unintentionally brought into scope, manufacturers may face duplicative or overlapping compliance obligations, the need to redesign globally standardized products for the EAEU market, and increased testing and certification costs without corresponding energy efficiency benefits.

We note that EU Commission Regulation (EC) No 1275/2008, while not formally included in the List of international and regional documents, represents a well-established and internationally recognized regulatory framework for standby and off-mode energy consumption. A key feature of the EU approach is the explicit exclusion of equipment that requires a low-voltage external power supply to operate as intended. This ensures regulatory coherence with other horizontal ecodesign measures, particularly those applicable to external power supplies.

Aligning Annex 5 and the scope of application with this internationally accepted principle would reduce technical barriers to trade, facilitate the use of existing compliance data and test results, and enhance predictability for manufacturers operating across multiple markets.

We therefore respectfully recommend clarifying that the requirements do not apply to equipment that requires a low-voltage external power supply to operate as intended, and that the regulation applies only to equipment designed to operate directly from the mains electricity supply. This clarification could be introduced either as an explicit exclusion in the scope of application or through a definition-level distinction.

Such clarification would prevent unintended expansion of regulatory coverage, support consistent enforcement, and contribute to the effective and proportionate achievement of the regulation's energy efficiency objectives.

Comment 5

Draft TR text

I. Область применения

1. Настоящие требования распространяются на выпускаемое в обращение на таможенной территории Евразийского экономического союза (далее – Союз) следующее оборудование, предназначенное для использования в быту или в офисе (в том числе вне помещений) не имеющими специальной подготовки пользователями, работающее непосредственно от электрической сети с номинальным напряжением до 250 В (включительно) (далее - оборудование):

м) мониторы;

Comment

Under the current draft, monitors are explicitly listed as products subject to Annex 5, while Annex 4 establishes a comprehensive regulatory framework for electronic displays, including monitors. Annex 4 contains detailed definitions, performance requirements, test methods, and documentation obligations specifically tailored to electronic displays. As a result, there is a significant risk that the same monitor product could be subject to requirements under both Annex 4 and Annex 5.

Such potential double applicability creates legal and practical uncertainty regarding which requirements prevail, which test methodologies should be applied, and which conformity assessment and labeling obligations are required. From the perspective of manufacturers, test laboratories, and market surveillance authorities, this ambiguity increases compliance costs, leads to duplicative testing, and raises the risk of inconsistent enforcement decisions across EAEU member states.

Monitors are globally traded products that are typically designed and certified under a single, clearly defined regulatory framework. International regulatory practice, including EU ecodesign and energy labeling regulations, assigns monitors exclusively to electronic display regulations rather than to general equipment frameworks. This approach

ensures regulatory clarity, facilitates market access, and avoids conflicting or overlapping requirements.
Annex 4 of the draft technical regulation reflects this international best practice by establishing a horizontal, product-specific framework for electronic displays, including monitors. By contrast, Annex 5 applies broadly to a wide range of household and office equipment and is not tailored to the specific technical characteristics of displays. Including monitors simultaneously under Annex 5 risks undermining the coherence of the regulatory structure and blurring the intended boundary between product-specific and general requirements.
To ensure clarity, consistency, and effective implementation, we respectfully recommend that the definitions of "monitor" and "display" be clearly aligned across Annex 4 and Annex 5, and that it be explicitly stated that a single product shall not be subject to energy efficiency requirements under more than one Annex. As a practical and proportionate solution, monitors should be regulated exclusively under Annex 4 and excluded from Annex 5.
Clarifying this relationship would prevent double regulation, reduce unnecessary compliance burdens, enhance legal certainty for all stakeholders, and strengthen alignment with internationally established regulatory practice. We therefore respectfully request that the final text clearly delineate the applicability of Annex 4 and Annex 5 with respect to monitors.

Comment 6

Draft TR text

III. Требования к энергетической эффективности оборудования в режиме ожидания, выключения и сетевом режиме ожидания и особенности определения показателей энергетической эффективности
3. Оборудование должно иметь устройства (устройство) управления режимом электропитания, кроме сетевого, хотя бы одного из следующих видов:
а) автоматическое управляющее устройство, в кратчайшее время переводящее оборудование, подключенное к сети, но не выполняющее главные рабочие функции и не связанное с другим оборудованием, в режим ожидания или режим выключения, если данная функция не препятствует применению по назначению;
б) механическое управляющее устройство, расположенное на передней панели подключенного к сети и установленного в рабочее положение оборудования или в другом визуально наблюдаемом и легкодоступном месте на этом оборудовании, в ручном режиме переключающее оборудование в режим ожидания или режим выключения;
в) для мультимедийных акустических систем со встроенным электронным дисплеем с площадью экрана не менее 100 и не более 500 кв.см функцию управления питанием, которая в течение 4 часов после последнего взаимодействия с пользователем должна переключать мультимедийную акустическую систему из режима включено в режим ожидания или сетевой режим ожидания или другой режим, который не превышает установленные требования к энергопотреблению для режима ожидания или сетевого режима ожидания.

Comment

Regarding subparagraphs (a) and (b), we note an important internal inconsistency. Subparagraph (a) already includes a valuable safeguard, requiring automatic transition to lower-power modes only when "this function does not prevent the intended use of the equipment." This qualification is essential, as certain categories of equipment—such as security and surveillance devices, video cameras, and other event-driven or mission-critical products—must remain in on-mode at all times to fulfill their primary function.

However, subparagraph (b) does not include a comparable qualification. For the categories of equipment described above, even a manually accessible power management control may conflict with the intended use if it inadvertently facilitates inappropriate mode transitions. To ensure internal consistency and prevent unintended compliance conflicts, we respectfully recommend that subparagraph (b) be revised to include the same qualification as subparagraph (a),

explicitly stating that the requirement applies only where it does not prevent or contradict the intended use of the equipment.
Regarding the range of acceptable low-power modes, we note a further inconsistency between subparagraphs (a) and (b) on the one hand, and subparagraph (c) on the other. Subparagraph (c) already recognizes that products may transition into "another mode that does not exceed the applicable power consumption requirements for standby or network standby mode," reflecting the practical reality that modern equipment often incorporates low-power states that do not fit neatly into formal mode definitions.
Subparagraphs (a) and (b), however, restrict transitions exclusively to standby mode or off mode. This asymmetry may force manufacturers to redesign power management systems solely to comply with formal mode definitions, incurring additional costs without delivering additional energy savings. To ensure consistency and technical neutrality, we recommend that subparagraphs (a) and (b) be aligned with subparagraph (c) by explicitly permitting transition to:
"standby mode, off mode, or another mode that does not exceed the established power consumption requirements for standby mode or network standby mode."
Addressing both points would enhance internal consistency, support practical product design, reduce unnecessary compliance burdens, and maintain the effectiveness of the regulation's energy efficiency objectives. We respectfully request that these clarifications be reflected in the final text.

Comment 7

Draft TR text

III. Требования к энергетической эффективности оборудования в режиме ожидания, выключения и сетевом режиме ожидания и особенности определения показателей энергетической эффективности
7. Оборудование должно иметь функцию управления режимом электропитания, в кратчайшее время автоматически переводящую оборудование, подключенное к сети, но не выполняющее основных функций и не связанное с другим оборудованием, в сетевой режим ожидания.

Comment

We fully support the objective of improving energy efficiency and reducing unnecessary power consumption. However, the requirement as currently drafted may conflict with the intended use of certain categories of equipment that are designed to remain continuously operational or immediately available.
Certain products—such as video cameras, security and surveillance devices, and other event-driven or safety-related equipment—must remain in on-mode at all times in order to fulfill their primary function. These devices need to be ready to respond instantly to external triggers, initiate recording or monitoring without delay, or ensure continuous system availability. For such equipment, an automatic transition into network standby mode could impair core functionality and compromise the product's intended purpose.
We note that the regulation already recognizes this principle in Section III, paragraph 3(a), which requires automatic transition to lower-power modes only when this does not prevent the intended use of the equipment. This safeguard appropriately balances energy efficiency objectives with functional requirements. However, paragraph 7 does not include a similar qualification, despite imposing a comparable automatic transition requirement. This creates an internal inconsistency within the regulation and may lead to conflicting compliance obligations.
From a practical implementation perspective, applying paragraph 7 without consideration of intended use could force manufacturers to redesign products in ways that reduce usability, reliability, or safety, or to withdraw certain products from the market altogether. Such outcomes would be disproportionate to the potential energy savings and inconsistent with a risk-based and proportionate regulatory approach.
To address this issue while maintaining the regulation's energy efficiency goals, we respectfully recommend adding a

condition to paragraph 7 clarifying that the automatic transition to network standby mode is required only where it does not prevent or contradict the intended use of the equipment. This would align paragraph 7 with paragraph 3(a) and ensure coherent application across the regulation.
Introducing this clarification would enhance internal consistency, support practical and safe product design, and ensure that energy efficiency requirements are implemented in a proportionate and effective manner. We therefore respectfully request that paragraph 7 be revised accordingly in the final text.

Comment 8

Draft TR text

III. Требования к энергетической эффективности оборудования в режиме ожидания, выключения и сетевом режиме ожидания и особенности определения показателей энергетической эффективности
13. Прилагаемые к оборудованию эксплуатационные документы, предусмотренные пунктом 13 настоящего технического регламента, должны содержать сведения об его характеристиках и параметрах в режиме ожидания и режиме выключения:

Comment

We note that most of the information listed under paragraph 13 is highly technical in nature, including measured power consumption values, testing conditions, transition times between operating modes, and detailed descriptions of measurement methods. While this information is essential for regulatory compliance, conformity assessment, and market surveillance, it provides limited practical value to end users.
Instruction manuals are primarily intended to support the safe and correct use of products and to explain key operational features in a clear and accessible manner. Including extensive test-related technical data in user documentation may reduce readability and usability, without delivering meaningful benefits to users or improving energy efficiency outcomes.
By contrast, such detailed technical information is more appropriately included in test reports and technical documentation, which are designed for expert review by conformity assessment bodies and regulatory authorities. Requiring the same level of technical detail in instruction manuals risks unnecessary duplication and increased documentation and translation costs for manufacturers.
We further note that Section 15 of the draft regulation already establishes a clear and proportionate framework for providing user-relevant information through publicly accessible websites. This includes key power consumption values for relevant modes and guidance on activation and deactivation of network functions. From a user information perspective, it is sufficient for the instruction manual to contain the same level of information as required under Section 15, or to refer users to that information source for additional details.
Maintaining a clear distinction between user-oriented information (instruction manuals) and compliance-oriented information (test reports and technical files) would improve regulatory efficiency and proportionality. It would also help ensure that users receive clear, relevant information, while authorities retain full access to the detailed data necessary for verification and enforcement.
We therefore respectfully recommend clarifying that the detailed technical parameters and test-related information listed in paragraph 13 should be included in test reports and technical documentation, while instruction manuals should be limited to user-relevant information consistent with Section 15.
Such clarification would enhance the clarity and usability of instruction manuals, reduce unnecessary administrative burdens, and maintain the effectiveness and transparency of the regulatory framework. We respectfully request that paragraph 13 be revised or clarified accordingly in the final text.

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<For Annex #10 (External power supplies)>

Comment 9
Draft TR text
I. Область применения 1. Настоящие требования распространяются на выпускаемые в обращение на таможенной территории Евразийского экономического союза (далее - Союз) внешние источники питания, за исключением: з) внешних источников питания, выпускаемых в обращение на таможенной территории Союза в течение 2 лет с момента вступления в силу настоящего технического регламента в виде запасных частей для оборудования, выпущенного в обращение на территории Союза до вступления настоящего технического регламента в силу, при условии, что в эксплуатационных документах на внешний источник питания идентифицировано оборудование, для работы с которым предназначены указанные источники питания;
Comment
We support the objective of ensuring that spare-part EPSs are clearly linked to the equipment they are intended to serve. However, limiting this identification exclusively to the instruction manual creates significant practical and implementation challenges. External power supplies are typically designed to globally harmonized specifications and distributed across multiple markets. For spare parts, distribution volumes are often limited, and modifying or rebundling instruction manuals solely to meet a market-specific requirement would impose disproportionate costs and logistical burdens on manufacturers and importers. This challenge is particularly acute for EPSs that were placed on the market before the entry into force of the regulation, for which instruction manuals cannot realistically be recreated, reprinted, or redistributed. As a result, spare-part EPSs that do not already include the required identification in their manuals could be effectively excluded from the market, even though they are functionally identical and fully suitable replacements. This would undermine the intended purpose of paragraph 1(z), which is to facilitate continued availability of spare parts for equipment placed on the market before the regulation entered into force. The regulatory objective of identifying the equipment for which an EPS is intended can be achieved through alternative and functionally equivalent means. In practice, after-sales and service contexts commonly rely on: markings or labels on the EPS itself, information on the packaging of the spare part, accompanying service documentation, or publicly accessible manufacturer or importer websites. These channels are effective, accessible, and well understood by service personnel and end users. Allowing flexibility in where the required identification is provided would support proportional regulation, reduce unnecessary administrative and printing costs, and minimize environmental impact associated with low-volume service parts. It would also help avoid unnecessary market restrictions and support longer product lifetimes, contributing to sustainability objectives. We therefore respectfully recommend clarifying that the identification of the equipment for which an EPS is intended should not be limited to the instruction manual, and may be provided through alternative means such as product labeling, packaging information, service documentation, or online resources. Such clarification would ensure that the exemption for spare-part EPSs functions as intended, maintains transparency regarding intended use, and supports efficient and sustainable after-sales service. We respectfully request that Annex 10 be clarified accordingly in the final text.

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Comment 10
Draft TR text
III. Требования к энергетической эффективности внешних источников питания и особенности определения показателей энергетической эффективности 7. Эксплуатационные документы, прилагаемые к внешним источникам питания, предусмотренные пунктом 13 настоящего технического регламента, должны содержать сведения об их характеристиках и параметрах согласно таблице 3.
Comment
We fully support the objective of ensuring that users have access to essential information regarding the technical characteristics and energy efficiency performance of EPSs. However, this objective can be achieved as long as the information is accessible, regardless of whether it is printed in the instruction manual or provided through other reliable means. The information listed in Table 3 is largely technical and is primarily relevant to professional users, service personnel, and regulatory authorities. Including all such information in printed instruction manuals offers limited additional value to end users, while significantly increasing documentation volume, translation effort, and printing costs. This is particularly challenging for EPSs that are marketed internationally using globally standardized documentation. Allowing the required information to be provided via a publicly accessible website, with the instruction manual including a URL or QR code, would fully satisfy the purpose of the requirement. This approach enables users to easily access the information, ensures that data can be kept up to date, and avoids unnecessary duplication of printed materials. It also reflects modern information provision practices and is consistent with approaches already recognized in other parts of the draft regulation and in international regulatory frameworks. From a proportionality perspective, mandatory inclusion of extensive technical data in printed manuals may impose unnecessary administrative burdens on manufacturers and importers, particularly for low-volume products, replacement units, and service parts. In contrast, digital disclosure reduces logistical complexity and supports efficient compliance without weakening transparency. There are also clear environmental benefits to allowing website-based disclosure. Reducing printed documentation lowers paper consumption, minimizes waste, and supports sustainability objectives without compromising user access to information. We therefore respectfully recommend clarifying that the information specified in Table 3 may be provided through a publicly accessible website, and that the instruction manual may fulfill its obligation by including a clear reference to that information, such as a URL or QR code. Such clarification would maintain full transparency for users, improve regulatory efficiency and proportionality, reduce environmental impact, and align the regulation with international best practices. We respectfully request that Annex 10, Section III, paragraph 7 be clarified accordingly in the final text.

<For Annex #11 (Display)>

Comment 11
Draft TR text
● Formula of EEI «3. Пределы индекса энергоэффективности для режима включено. Индекс энергетической эффективности (EEI) электронного дисплея рассчитывается по

следующей формуле:

$$EEI = \frac{(P_{measured} + 1)}{(3 \times [90h(0{,}02 + 0{,}004 \times (A - 11)) + 4] + 3) + \boxed{3}}$$

где:

A представляет собой площадь экрана в дм2;

Pmeasured - измеренная мощность в ваттах в режиме включено в нормальной конфигурации, определенная как указано в таблице 1;

corr - поправочный коэффициент, установленный в таблице 2.»

- Electronic displays with automatic brightness control (ABC)

4.1. Электронные дисплеи с автоматической регулировкой яркости (ABC)

Электронные дисплеи имеют право на 10-процентное снижение мощности в режиме включено P, если они отвечают всем следующим требованиям:

а) ABC включается в обычной конфигурации электронного дисплея и сохраняется в любой другой стандартной конфигурации динамического диапазона, доступной конечному пользователю;

б) измеренное значение P в нормальной конфигурации измеряется с отключенным ABC или, если ABC не может быть отключено, при условии окружающего освещения 100 люкс, измеренном на датчике ABC;

в) значение P, измеренное при отключенной ABC, если это применимо, должно быть равно или больше мощности режима включено, измеренной при включенной ABC-системе при условии окружающего освещения в 100 лк, измеренной на датчике ABC;

г) при включенной системе ABC измеренное значение мощности в режиме включено должно уменьшаться на 20 % и более при снижении состояния окружающего освещения, измеренного на датчике ABC, со 100 люкс до 12 люкс; и

- Power demand limits other than on-mode

5. Электронные дисплеи в режиме выключено, режиме ожидания и сетевом режиме ожидания не должны превышать пределы потребляемой мощности, указанные в таблице 4, с учетом допусков для дополнительных функций согласно таблице 4.

Предельные значения потребляемой мощности в режиме выключено, режиме ожидания и сетевом режиме ожидания

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	Режим выключено	Режим ожидания	Сетевой режим ожидания
Предельные значения	0,30	0,50	2,00
Допуски для дополнительных функций, если они присутствуют и включены			
Отображение состояния	0,0	0,20	0,20
Деактивация с помощью обнаружения присутствия в помещении	0,0	0,50	0,50
Сенсорный функционал, если его можно использовать для активации	0,0	1,00	1,00
Функция HiNA	0,0	0,0	4,00
Общая максимальная потребляемая мощность со всеми дополнительными функциями, если они присутствуют и включены	0,30	2,20	7,70
Реактивация с помощью голосового управления	0,0	2,0	5,0

Comment

This Annex seems to be adopted the good and leading practice by harmonizing with EU regulation. The policy is very effective and suitable, so we would like to support it.
However, it is found that there are some differences with EU regulation. These differences will occur the unnecessity burden and confusion. Therefore, these differences should be modified based on EU regulation. The below points should be modified;

For reference; Latest version of Lot5 regulation text

- **Formula of EEI**

In this Annex 4, the EEI formula is as follow. But, it is the old version, so it should be revised as the below Lot5 one.
<In this Annex 4>

$$EEI = \frac{(P_{measured} + 1)}{\left(3 \times \left[90h\left(0{,}02 + 0{,}004 \times (A - 11)\right) + 4\right] + 3\right) + 3}$$

<EU Lot5>

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$$EEI = \frac{(P_{measured} + 1)}{\left(3 \times \left[90 \times tanh\left(0,02 + 0,004 \times (A - 11)\right) + 4\right] + 3\right) + corr}$$

- **Electronic displays with automatic brightness control (ABC);**

In this Annex 4, the below described in EU Lot5 cannot be found. It should be added for harmonizing with EU Lot5.

(e) the ABC control of the display screen luminance meets all of the following characteristics when the ambient light conditio measured at the ABC sensor changes:

- the measured screen luminance at 60 lux is between 65 % and 95 % of the screen luminance measured at 100 lux;
- the measured screen luminance at 35 lux is between 50 % and 80 % of the screen luminance measured at 100 lux; and
- the measured screen luminance at 12 lux is between 35 % and 70 % of the screen luminance measured at 100 lux.

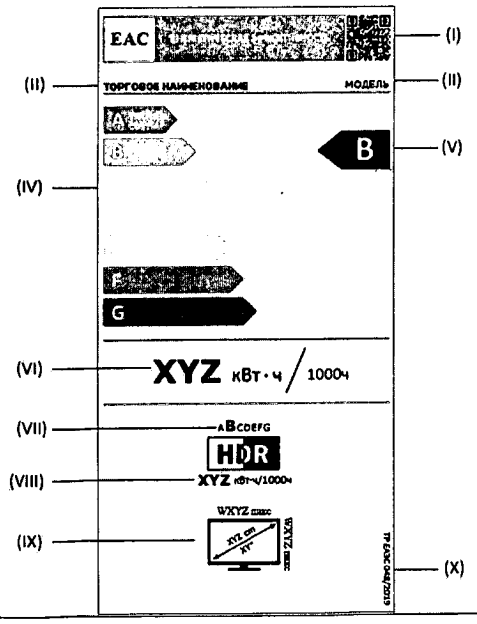
- **Power demand limits other than on-mode;**

This annex 4 seems to not have the test method and the test criteria, so it cannot be tested. Considering that there is no requirement on "Reactivation via voice control" in EU Lot5, so there is no the test method and test criteria, it should be removed from this annex 4 also.

Comment 12

Draft TR text

I. QR-код (указывается по выбору (усмотрению) заявителя, а именно изготовителя, уполномоченного изготовителем лица, импортера (продавца), при наличии информации о показателях энергетической эффективности продукции в глобальной компьютерной сети Интернет на их общедоступном вебсайте);



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Comment
It is reasonable that the indication of QR code is optional for the producer. If the contents of WEB page linked to QR code is optional also, it is more effective.

Comment 13
Draft TR text
I. Область применения 1. Настоящие требования распространяются на выпускаемые в обращение на таможенной территории Евразийского экономического союза (далее – Союз) внешние источники питания, за исключением:
Comment
We respectfully request that multifunction external power supplies (e.g., combined AC adapter and battery charger) be excluded from the scope. Such products necessarily integrate both AC-DC conversion and battery-charging control/protection circuits; to ensure safe charging (monitoring, isolation, fault detection), a non-zero standby load is scientifically unavoidable even when not actively charging. Applying single-function EPS no-load limits would therefore create an inequitable compliance disadvantage unrelated to design quality, and could discourage integration that reduces material use, packaging, and e-waste. A targeted exclusion (or separate tier) would improve fairness and enforceability while supporting policy goals for durable, multifunction products.

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Inquiries on the draft Amendment No. 1 to TR EAEU 048/2019 (ТР ЕАЭС 048/2019)

<For Annex #5>

Question 1
Draft TR text
III. Требования к энергетической эффективности оборудования в режиме ожидания, выключения и сетевом режиме ожидания и особенности определения показателей энергетической эффективности 7. В состоянии, обеспечивающем сетевой режим ожидания, функция управления режимом электропитания может переводить оборудование в один из следующих режимом: - режим ожидания; - режим «Выключено»; - другой режим, при котором потребляемая мощность не превышает установленных требований для режима «Выключено» и/или режима ожидания, когда оборудование подключено к источнику сетевого питания».
Question
Can we assume that the 3rd mode is same as "another condition which does not exceed the applicable power consumption requirements for standby and/or off mode" which is stated in "EU Regulation (EC) No 1275/2008" > "ANNEX II" > 3 > "(b) Power management for networked equipment". Although "when the equipment is connected to a mains power source" has been added from EU regulations, what is the intention behind this?

Thank you for taking the time to review our comments. We sincerely appreciate your attention to this matter and look forward to your favorable consideration. Should you require any further clarification, please do not hesitate to contact us.

Sincerely,

Balaji Kannan
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Sony Middle East and Africa FZE
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