



Position on the draft Ecodesign requirements for electronic displays

- Version notified to the WTO in December 2016 -

March 2017

We welcome the opportunity to provide feedback on the proposal of the European Commission to revise Ecodesign Regulation 42/2009, as notified to the WTO on 21st December 2016. Given the long delays this revision has already suffered, we urge the EC to prioritise the revision of both the Ecodesign and Energy Label measures and move forward as swiftly as possible, as soon as the Energy Labelling Directive revision is completed. We have put forward our views on the proposed requirements below.

Scope

We welcome the inclusion of all electronic displays in the scope, especially computer displays. However, we believe that all display categories should be subject to energy efficiency requirements.

The decision to exempt signage displays from energy efficiency requirements was taken despite the commitment made in the Ecodesign Working Plan 2016-2019 that this product group would be *"taken up in the ongoing work on the revision of the existing implementing ecodesign measures for televisions"*. Market research¹ has shown that these displays currently mushrooming in the public space (notably ad screens), tend to consume on average 40% more energy than comparable consumer TVs, and are often operated 24/7. Hence the need to swiftly tap the efficiency potentials at hand. Not grasping the opportunity to regulate them now means postponing their regulation for many years, which would be difficult to accept for environmental NGOs. One of the reasons put forward for exempting signage displays from energy efficiency requirements is the absence of test methods. However, we would like to point out that the ENERGY STAR test procedure for displays has been applied to both computer monitors and signage displays for several years. The only difference between testing a computer monitor and a signage display is that computer monitors are calibrated when tested, whereas signage displays are tested as shipped. The test procedure relies on a host computer playing a video clip. We urge the Commission to consider using the same method at European level. Should the Commission stick to its current decision, we urge the Commission to make the Regulation's wording stronger².

¹ GfK, European Digital Signage Markets. Presented at EEDAL 2015.

² The Recital should state that signage displays will be covered by energy requirements at the next revision, and that the Commission shall launch all necessary technical analysis and standardisation work well in advance to make it possible to set such requirements by 2022 at the latest.

Alternatively, Article 10 should be made stronger, with a formulation such as 'The evaluation shall develop precise technical recommendations to ensure energy efficiency and energy management requirements can be set on signage displays no later than 2022'.

Energy Efficiency Requirements

Ambition

We support the levels of ambition of the energy requirements proposed, which are in line with the CLASP market analysis carried out in November 2016. We welcome the shift from a linear efficiency approach to a curved screen area–power equation. This is a big improvement that will solve the currently misleading incentive towards larger screens, and is a change we have been repeatedly calling for. We also welcome the unique EEI equation for all displays without differentiation between screen sizes or resolution and the more stringent MEPS levels for non-UHD displays.

Standby and networked standby

We believe that the networked standby requirements should be tightened. This is of significant importance given the market uptake of smart products:

- Networked standby could be reduced from 2W in Tier 1 to 1W in Tier 2;
- Networked standby with HiNa functionality should be set at 4W in Tier 2 and 2W in Tier 3;
- Quick power down to standby should be required for all networked standby devices.

We also think that the 0.5W allowances for non-energy saving functionalities³ should be removed.

We welcome the introduction of a 0.3W power requirement on devices with an activated quick start function, especially as a recent study by the NRDC⁴ shows that some TV models with an activated quick start function can consume up to 30-40W in standby mode.

Automatic Brightness Control allowance

To make sure that the ABC function in fact triggers energy savings, the allowance foreseen in the draft should be linked to a gradual power reduction requirement. The current requirements foresee a minimum 20% power reduction at ambient light illumination of 12lux. However, 12lux corresponds to a very dark room. Tests have shown that many displays with an activated ABC function remain at a high-power consumption level until the 12lux level is reached. A gradual power reduction requirement between 300 and 12lux should therefore be linked to the ABC allowance and the measurement standard should be amended accordingly.

Resource efficiency requirements

Safeguard the resource efficiency requirements

In the Working Plan 2016-2019, Europe has taken a strong commitment to establish product-specific requirements in order to make products more durable, repairable, upgradeable, and designed for disassembly, reuse or recycling. In this context, we strongly welcome the resource efficiency requirements put forward by the Commission on displays, which should be maintained, considering

³ That is to say allowances for displays with voice recognition and presence sensor, and for displays providing an information display or a combination of a reactivation function and information or status display including or not a quick start function.

⁴ NRDC, Horowitz N., What do we know about the energy use of Ultra High Definition (UHD) and “Smart TVs”, August 2015.

the recommendations below.

Product durability

To facilitate improved product durability, a requirement should be included for compliance with certain levels of standard MIL-STD810G (or IEC 60068/60529) relating to shocks and other damages. Examples are available in the JRC technical report for the Ecolabel of computers (2015).

Design for dismantling, reuse, recycling and recovery & marking of plastic parts

We especially welcome:

- the intention to ensure the easy access of key components for dismantling, re-use, recycling and recovery (Annex III. 1.);
- the improved marking for hazardous substances through the display of mercury-inside and cadmium-inside logos;
- the required documentation on flame retardants which could inform a decision of phasing them out under RoHS at a later stage.

Regarding plastics recycling, we welcome the proposal for a mandatory marking of plastics and its additives according to the relevant ISO standards. Moreover, a requirement should be included that all plastic parts >100g should be made of single polymer or directly recyclable polymer blend (to limit the variety of materials used), as specified in the voluntary agreement for imaging equipment⁵.

Repair and end of life documentation and information

The availability of information to support repair and disassembly of products is key in ensuring that the efforts taken by designers to consider these aspects result in concrete changes in the treatment of products after failure or at end of life. The current text is very restrictive in the formulations around information provision, allowing the possibility for all three types of information to only be provided in “a common database of manufacturers, their authorised representatives or importers”. Further, for the repair information, registration with the manufacturer is required, which will present a significant barrier to achieving the goals of the circular economy, preventing for example third party repairers, and those involved in repair cafes from being able to access this information. We request that the statements on information availability (for general, technical and repair and end of life documentation) be changed to the following as a minimum:

From 1 July 2018, the following information shall be kept available for at least 15 years from the day the last model of a product family was placed on the market and free of charge:

*1. General information: available as printed documentation with the product **and** in free access websites **and (optionally) in a common database of manufacturers, their authorised representatives or importers.***

*2. Technical information: available in free access websites **and (optionally) in a common database of manufacturers, their authorised representatives or importers.***

⁵ The additional requirement could be worded as follows:

“In addition to the requirements of 2.1, plastic parts heavier than 100 g, 2.2. Shall consist of one single polymer or a polymer blend, shall avoid the use of coatings and shall be designed in a way that the plastic content can be used for the production of high-quality durable products by applying available recycling techniques.”

Further, the information relevant for recyclers should be made publicly available or through established information platforms for handling Waste from Electric and Electronic Equipment (WEEE). If the audience for repair and end of life information was to be restricted, this should be clearly supported by evidence and the information should still be made available to third parties on request. The regulation should express clearly if there are any conditions (e.g. in terms of qualification) attached to the access to repair information. Therefore, the information requirement for information could be reformulated as:

3. Repair and end of life documentation and information: available to third parties upon request via websites and (optionally) in a common database of manufacturers, their authorised representatives or importers.

Specification of a registration process should be avoided as it presents the option to deny certain audiences access to information on the basis of (for example) commercial concerns.

It has been found that information on the availability of spare parts can often provide a reasonable proxy for product lifetime. Therefore, information on spare part availability can be very relevant to consumers. Further, provision of information on spare parts availability can be very useful to third parties dealing with the maintenance, repair, reuse and upgrading of products and could contribute to improved reparability of products. An information requirement on the availability of spare parts (in years) should be included within the general information provided to the consumer and made available online.

We welcome the inclusion of a diagram of the product showing the location of the components listed for removal and plastic parts containing flame retardants, but recommend that the diagram also includes the information required under Annex IV section 3.d. (i.e. also illustrate the components containing toxic, ecotoxic or rare and precious substances: cadmium, lead, arsenic, mercury or their compounds and indium). The inclusion of information on total weight of these substances as requested in Annex IV section 3.d. is considered appropriate, and in line with the potential impact these substances can have on the choice of a safe waste treatment and/ or recycling process.

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