



## **ECOS comments (on behalf of European environmental NGOs) on the draft task reports 7&8 of the preparatory study for UPS (Lot 27)**

February 2014

We welcome the work undertaken so far by the study team and would like to put forward our comments on Task 7 and 8 respectively.

### **Task 7 Report**

We regret that the option of long life batteries is not taken into account for BC 1 (the BC with the highest sales numbers) despite this having been requested during the third stakeholder meeting. Even though industry stakeholders say that BC 1 products are replaced anyway with the IT equipment every three years, such replacement cycles can vary, as three years is only the (claimed) average. According to the on-going preparatory study on servers, even the *economic* lifetime of servers is between three and five years (cf. ENTR Lot 9 study, 1<sup>st</sup> support document, p. 75). Moreover, it points in the wrong direction of the status quo, not encouraging potential users to think about acquiring a longer life product together with their longer life UPS. Also, it is not appropriate to exclude an improvement option for certain base cases already at the stage of the preparatory study, which aims at mapping out and giving an overview of the various improvement potentials. **We therefore call for the inclusion of long life batteries for BC1 in this Task.**

Even though greater life cycle cost savings and environmental impact reductions can be achieved through the energy related design options, we believe that the reduction in life cycle costs as a result of moving to longer life batteries coupled with lower hazardous waste and VOC emissions, are significant reasons for this improvement option to be tackled in Task 8. **We therefore call upon the study team to explore in the Task 8, policy options of incorporating longer life batteries in a potential future regulation.** Further details are given below (Task 8 section).

Regarding other improvement options that had been discussed during the stakeholder meeting, but that are not considered in the final report, we recommend that these are expanded on beyond the footnote on p. 11, which will be easily overlooked (“For other design options discussed with stakeholders, for example the automatic battery self-test or internal resistance of battery cells, there are no detailed data available to calculate the improvement potential properly. Nevertheless stakeholder confirmed the improvement potential in general.”). **More data data may become available in the future, so we suggest to include some more short background on these options on p. 3,** which can be further investigated in the future (e.g. in a review study).

## Task 8 Report

We welcome the suggested policy mix of measures including MEPS and an Energy Label that might be able to cut losses through UPS significantly by 2025. The introduction of Tier 1 in 2017 and subsequent timing of 2 years seems realistic and will lead to higher savings. There are still a number of issues for which we would like to put forward our comments:

- **Concerning, longer life batteries, policy options should be investigated under this task**, as aforementioned. These could take the form of an information requirement (section 2.2.3 of the report), whereby information is conveyed to end users concerning benefits from the use of longer life batteries via technical documentation, booklet of instructions and free access websites of manufacturers.
- With regard to other design options discussed at the stakeholders meeting “for example the automatic battery self-test or internal resistance of battery cells” and on the basis that improvement potential was confirmed, the groundwork should be laid out in a future regulation that would lead to generation of data and potential consideration at a later stage. **Reference to these improvement options should therefore be made in an information requirement or in a potential review clause**, so they are tackled at the review of a potential future regulation.
- We support the declaration of annual energy consumption on the Energy Label, as it is important to convey this information to the final user.
- We disagree with the following statement on p. 13 on GPP: “The Green Public Procurement covers just public works contracts, public supply contracts and public service contracts and therefore is a policy without major impact outside the public sector.” Firstly, the public sector and its purchasing impact on the market regarding more energy efficient products is not to be underestimated ; secondly, GPP does not only strictly concern the public sector, but sometimes large companies align their purchase practices with GPP criteria. **The option of setting GPP criteria should therefore not be ruled out**, especially in a preparatory study that aims at mapping out possible policy options.
- Also on p. 13: “European Ecolabel – UPS are already covered by the EPA Energy Star Product Labelling. The specifications of such label are recognised by the different manufacturers and therefore it is not recommended to implement another label with different specifications. However, the adoption in Europe of the existing Energy Star label, has already happened for office equipment, and so is a possible solution for UPS.” While indeed the adoption of the Energy Star in this field is a positive development in the EU, **an Ecolabel could cover additional environmental aspects (e.g. related to resource efficiency, end of life, hazardous chemicals) and should therefore not be ruled out**.
- It seems unclear where the improvement option of extended battery life was considered in the scenarios. Obviously not in the Ecodesign measure, which seems to cover only MEPS – even though table 12 seems to suggest this. This improvement option should be clarified.

END.