NRDC, ECOS, EEB inputs to Steering committee of Game Consoles SRI

July 2017

In response to the 7 June 2017 overview on the Game Consoles Self-Regulatory Initiative (SRI) and the discussion hold on 21 June, here is a summary of the issues/concerns NRDC, ECOS and EEB would like to raise for the Steering Committee discussion to take place on 13 July 2017.

1- Standby Power Levels and Targets

The presentation was completely silent on standby power use. While Microsoft's Xbox consoles may technically comply with the EU horizontal standby power requirements, the Xbox has an Instant On option that draws in excess of 10W whenever the console is not in use (e.g. after the user hits the power button or the device auto powers down (APD)). For users who select the Instant On feature, standby power can represent around 1/3 or more of the devices total annual energy use.

Our requests:

a) Provide a description of the current implementation of the horizontal standby power requirements and how options such as the Instant On option comply;
b) Update the current language to better inform users of the energy impacts of options such as the Instant On and encourage them to keep using the energy saving mode instead;
c) Report the default standby power levels and the capabilities and standby power levels when certain features like Instant On are selected by the user (either during initial setup or a later time);
d) Include targets to reduce power levels of standby capabilities such as Instant On within this renewed SRI.

We do not think that it is sufficient to simply stat that the EU's standby power limits are met and not to report on the standby aspects, nor to integrate more clearly the corresponding limit values in this SRI.

2- Gaming Power Use

We appreciate the rigorous testing that was done by industry on multiple games. We disagree with some of the conclusions that were drawn (as shown on slide 23 in the presentation we had). The average measured power for testing done playing a particular game were remarkably reproducible (See slides 21

and 22). The average power use from five tests of the same game were within a few percent. This was the case for each of the four games that were tested.

Based on this data, we request the SRI to include clear requirements to report the power use during game play. A protocol can be set up to determine which games to test (such as the top selling HD and UHD versions of a shooter game, an adventure game and a sports game for each platform).

3- Power Levels for Latest Devices

The presentation we were given did NOT include the power levels of the existing PS4 Pro, Sony's console capable of playing UHD movies and games. This data is essential to assess the level of ambition of the proposed Tier 4 levels. In addition, Microsoft has announced the launch in November of its new console, the Xbox One X which is capable of UHD gaming. While some final tweaks in the software may occur, the final design is probably already locked down and testing on preproduction levels should be done and provided as an estimate of likely power levels of the final product.

We invite the game consoles industry to provide more data ahead of the coming Consultation Forum planned for the end of 2017.

4- Tier 4 Limits

Per the above we recommend collection and review of data on the latest consoles be provided before setting the Tier 4 levels for 2019 and beyond, or at least providing explicit possible refining of those in 2018. Absent any additional data, we fear the proposed levels are way too generous as Microsoft's Xbox One S, which is capable of playing UHD media, only uses 25W in Navigation mode and 38W for media play. These values are much lower than the proposed UHD navigation and UHD media play levels of 50 and 60W, respectively.

Of even greater concern are the 70W navigation and 110W levels being proposed for UHD gaming capable consoles. These levels are a lot higher than current consoles. For example, the proposed media play level is more than double the level used by the PS4, and roughly triple the levels of the Xbox One S. Similar backsliding is occurring for navigation mode. We fail to see how the proposed levels will deliver any real energy savings.

Again, we would appreciate to first see the data from PS4 Pro and the new Xbox One X and then discuss what the Tier 4 levels should be. While we are not fundamentally opposed to setting higher modal limits for features that require additional power allowances, the levels proposed seem quite excessive.

5- Peripherals

We would like to see the SRI cover the standby power use of first-party peripherals sold for each platform, such as Microsoft's Kinect, PlayStation VR, etc. These devices should be shipped to automatically power down when not in use, just like the console they are connected to. As such, we would like to see commitments added to the SRI that address these points (i.e. commit to include APD in peripherals and for them to be shipped with APD enabled, and to report the active and standby power for each peripheral).

6- Resources use aspects

We appreciate the declared intent to align with material efficiency aspects as discussed today for other electronic product lots covered by Ecodesign, such as displays, computers and servers. As those discussions are not finalized yet, and may not reach their final formulations before the renewal of this SRI, we invite the Game Consoles industry to reflect what is today proposed with regards:

- The reversible disassembly of key components (such as internal power supply units, mass storage systems, memories, network interface board and wireless LAN board) and providing of related information to end users and professional repair operators in a convenient accessible format (e.g Open Manual Format). Mandatory spare parts availability shall also be considered, enabling repair during the life time of the game console. We understand some repair features could touch on confidential information and that an escalating perspective could be adopted, providing this escalating approach does not deprive end users and independent repair services from most frequent maintenance and repair to be performed;
- The information to recyclers for dismantling, recycling and/or recovery at end-of-life, including exploded diagram of the consoles, location and extraction of parts containing hazardous materials and instructions to safely remove and handle them;
- Marking of plastics, including about flame retardants contents if any;
- Possible disassembly of plastic parts beyond 100 grams and requirements that they should be made of single recyclable polymer or recyclable blend of polymers without further need for depollution or (chemical) treatment before recycling;
- Information on Critical raw material amount and location;
- Personal data deletion possibility through embedded software or offered on a website.