Brussels, 22 January 2010

Position of ECOS, EEB, Friends of the Earth Europe, WWF-EPO and INFORSE-Europe

on the updated version of the Working Documents on Ecodesign Requirements for Computers and Displays

(version of 2 December 2009)

In the context of Directive 2005/32/EC establishing a framework for the setting of ecodesign requirements for energy using products.

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Introduction

We welcome the updated Working Documents from the European Commission on Ecodesign requirements for computers and displays.

These new versions include improvements based on comments made by several stakeholders during the Consultation Forum meeting in October 2009. We provide a list of these improvements below and insist on the need to maintain them in the final regulations.

We regret that some other propositions that we had made before have not been substantially considered. We reiterate them with additional comments at the end of this paper.

For further background on our position, please refer to our previous position paper on computers and displays circulated before the Ecodesign Consultation Forum of October 2009[1]*.*

Improvements strongly supported by our organisations

- **Inclusion of servers** (in line with the Energy Star approach), although only through requirements on the internal power supply unit. We expect further requirements in the next revision of the measure (based on a preparatory study on servers).

- **Extension of the scope for displays beyond 30 inches.**

- Approach directly based on **Energy Star 5.0** (and not 4.0), which will facilitate the implementation.

- **Improved timing for the entry into force of most requirements**, ensuring a more credible level of ambition and a reasonable and stimulating challenge for the industry.

- Adequate set of specific rules to ensure that **power management features** on computers are set as default and trigger maximum energy savings in sleep and off modes.

- **Earlier revision date** for the measure on computers, to guarantee a dynamic upgrading.

- **Mandatory information on mercury**, as a first (still shy) step to consider non-energy aspects in the ecodesign of electronic products.[2]

[1] http://env-ngo.eup-network.de/fileadmin/user_upload/ENGOs_Intern/Position_Papers/Environmental_NGOs_EuP_PC-monitors_Oct09.pdf

[2] We take this as an opportunity to remind that the European Commission is currently finalizing requirements for cold cathode fluorescent lamps (CCFL), in terms of mercury content (*see last draft EC decision from 27/07/2009*). LED backlights remain the greenest available alternative and should be further promoted.

Additions requested by our organisations

➢ As the proposed implementing measures are still very much focused on the energy consumption in the use stage, which is far from being a holistic approach to Ecodesign, we request **the following sentence (or a similar) to be added to the recitals**:

"*For pragmatic reasons, the following implementing measures are mostly focusing on the electricity consumption in the use stage. Therefore, they shall not be considered as a holistic approach to the Ecodesign of computers and displays (which is supposed to include broader and significant aspects such as the embedded energy in the production, the resource efficiency, the recyclability and repairability, the end of life dismantling, etc.) The fact that the current measures do not include requirements on these other aspects does not mean that these are not significant or that they might not be covered in a future revision.*"

➢ In the perspective of increasing consumer awareness on energy aspects when they purchase their equipment, the proposed very limited information requirement (just a publication on an open website) is clearly insufficient and should be complemented by **a mandatory indication of the energy consumption of computers and displays at the point of sale** (shops and e-shops), on the **user manual and packaging** and on screen in the **hardware property box** displayed in the operating system.
The **A-G energy labelling** of monitors remains a promising approach, which should be considered in light of the comments made by the Netherlands.

➢ We question the **additional 6 month delay** granted for the entry into force of power management requirements (not substantiated by an evidence that an earlier date is impossible).

➢ As the proposed requirements are rather short term, there should be a clear indication somewhere in the measures that **the overall objective is to reinforce these requirements over time in a dynamic process** based on regular assessment of market evolution and consideration of benchmarks.

END