



INFORSE-EUROPE
International Network for Sustainable Energy - Europe



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**Position of ECOS, EEB, Friends of the Earth Europe,
WWF-EPO, INFORSE-Europe and CAN-Europe**
on the EC Working Documents
on Ecodesign Requirements for Computers and Displays

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

ECOS, EEB, Friends of the Earth Europe, WWF-EPO, INFORSE-Europe and CAN-Europe are concerned that computers and monitors are on average still far away from a sustainable production and use, and welcome **bold Ecodesign regulation to improve the situation**.

➤ The sales of personal computers are expected to nearly double in Europe by 2020, associated with a growth of some 20 TWh in electricity consumption¹. According to on-site measurements, the average power of desktops used in a typical situation has increased by 75% in the last 5 years, without a very clear correlation with average user needs².

As far as monitors are concerned, the switch from CRT to flat screens is clearly bringing up some electricity savings, however the trend is now in expanding the use of these screens in all of our daily activities (digital picture frames being an iconic example). The stock of monitors is expected to grow by more than 50% by 2020.

➤ The voluntary Energy Star program has been a good first step to increase awareness. However, **the limits set in Energy Star 5.0 are still two to threefold above currently available benchmark products**. Going tougher than Energy Star should be considered; in this respect, we strongly denounce any barrier that could have been set on this point³.

➤ **The environmental impacts outside the energy in the use-phase are completely neglected in the Working documents** issued by the European Commission; they reflect in this major weaknesses in the EuP Preparatory Study. These aspects should be better addressed:

- A study suggests that when considering a lifetime of 3 years for computers and taking into account the high electricity needs for producing semi-conductors, **the energy impact of the production phase may be greater than the energy in the use-phase**⁴. And this issue is not sufficiently handled by current market practises⁵.

- The use of **chemicals and non-recycled materials is to be addressed**⁶. Apart from heavy metals potentially covered by RoHS and toxic flame retardants, a research project concluded that the following non-energy Ecodesign parameters should definitely be considered for computers: **mass of gold plating and silver content, size of the printed wire board and mass of plastics**⁷.

- **The end of life of computers shipped to developing countries is still often shameful**. Even if a recyclability target is set under WEEE, more needs to be done on the path to sustainability.

- **Noise** is an aspect which could be covered under the Ecodesign policy⁸.

¹ Preparatory Study for the EuP Lot 3 on personal computers and monitors (2007)

² REMODECE study for the European Commission (2008)

³ There seems to be a 2006-2011 agreement between EU and US discouraging any tougher scheme than Energy Star.

⁴ See for example *Williams, ED. (2004). "Revisiting energy used to manufacture a desktop computer", Conference Record - 2004 IEEE International Symposium, p. 80-85*. This contradicts the EuP Preparatory Study which is based on a rather long lifetime assumption (6.5 years) and a simplified EcoReport LCA missing a part of the energy needed to produce semi-conductors.

⁵ See Greenpeace International's assessment: "The ICT Sector slow in demonstrating climate leadership" (<http://www.greenpeace.org/india/press/releases/ict-sector-slow-climate-leadership>)

⁶ See Greenpeace International report "Green Electronics... The search continues" (2008)

⁷ EPIC-ICT project funded by the European Commission (www.epic-ict.org)

⁸ Noise was considered an important criteria for the Eco-label on computers, see AEA report on EUEB (August 2009)

We therefore suggest the following.

Computers

1- As the Energy Star 5.0 specifications have been officially published, we do not see the point in referring to the old version to set requirements.

The proposed Tier I should already be based on Energy Star 5.0:

- Typical annual consumption to comply with the Energy Star 5.0 levels
- Off-mode limited to 1 W (or 1.7 W with WOL function)
- Requirement on the internal power supply
- Power management enabled

As Energy Star 5.0 is more demanding than 4.0, **some more time (e.g. 6 additional months) could be left** before this Tier I enters into application. This approach would be much simpler for manufacturers since they would not need to cope with two different sets of specifications.

2- A second tentative tier could be proposed for mid-2013, based on **25% tougher limits on the typical energy consumption**, an off-mode limit reduced to 0.5 W and a more elaborated requirement on mandatory auto-power down. This 2nd tier would be re-discussed before its entry into force to **eventually be replaced by Energy Star 6.0 specifications if these are available** and of comparable ambition.

3- Additional requirements should be included to:

- impose a **mandatory share of at least 10% of recycled plastics** in the product
- ban the use of **PVC and the most hazardous chemicals** (e.g. brominated flame retardants), to prevent health impact on the users and recyclers
- reduce the use of **metal content (gold, silver)**
- complement the WEEE target on computer recyclability by a **design requirement for easier upgradeability and dismantling** (eventually through a standardisation mandate).

4- As regards information requirements, the typical annual energy consumption (TEC) and max power consumption should also be **displayed at the point of sale (including on-line shops)**.

5- A new study will also be needed to develop an Ecodesign **requirement on the embodied energy** in the product, as this aspect is very significant. No international standard is available yet, so we encourage the Commission to develop a methodology to assess the embodied energy (e.g. in relation to the number of semi-conductors, chips, cards and their integration).

Monitors and displays

1- For computer monitors, we **question the proposal to exempt large screens above 30 inches**. These are known to have lower energy efficiency and consume electricity up to 400 W. It is urgent to improve their Ecodesign and set limits on their energy consumption.

2- We again recommend to base requirements **only on the new Energy Star 5.0 scheme**. We suggest to replace the on-mode requirement of Tier I by the one from Tier II, while leaving **more time (e.g. 6 additional months)** before it applies.

3- A second Tier in mid-2013 would **cut by 20% the limit on the on-mode** and by a half the limit on the sleep and off modes. This tier could be re-discussed beforehand, in line with potential Energy Star 6.0 specifications if these are available and ambitious enough.

4- We propose the **introduction of the Energy Labelling of monitors** (comparable to what has been developed for televisions), to enter into force as quickly as possible. The A class would be set at the level of current benchmark products, and the Energy Star 5.0 level would correspond to D.

5- Additional requirements should be included to:

- impose a **mandatory share of 10% of recycled plastics** in the product
- ban the use of **PVC and most hazardous chemicals** (e.g. brominated flame retardants)
- **reduce progressively the total mercury content** and the use of **metals such as gold**
- improve **recyclability and easy dismantling** (eventually through standardisation)

6- As regards **digital picture frames**, we strongly question if these energy-using gadgets do provide a significant added value for the energy they consume. We all know that the EU will not reach its sustainability targets if such kind of electronic devices continue to proliferate without restriction.

As we understand that the Ecodesign directive cannot just ban a product (even if it could be desirable), at least **digital photo frames should be strictly regulated by an energy efficiency requirement at the level of current benchmark models**. This would guarantee that this fast growing market gets subjected to a clear regulatory framework from the onset.

Users should also be strongly discouraged to leave them always on, by clear messaging on the packaging and user manual.

END