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**Position of  
ECOS, EEB, CAN-E, INFORSE-Europe, Greenpeace, WWF and ZMWG  
on the EC Working Document on implementing measures  
for ecodesign requirements for televisions**

*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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Contacts:

ECOS – European Environmental Citizens' Organisation for Standardisation  
Edouard Toulouse, Ecodesign Officer  
Tel: + 32 2 289 10 96 / E-mail: [edouard.toulouse@ecostandard.org](mailto:edouard.toulouse@ecostandard.org)

INFORSE – International Network for Sustainable Energy - Europe  
Gunnar B. Olesen  
Tel: + 45 86 22 70 00 / E-mail: [ove@inforse.org](mailto:ove@inforse.org)

EEB – European Environmental Bureau  
Nathalie Cliquot, Policy Officer on Waste and Products  
Tel: + 32 2 289 10 97 / E-mail: [nathalie.cliquot@eeb.org](mailto:nathalie.cliquot@eeb.org)  
Elena Lymberidi-Settimo, Project Coordinator of ZMWG "Zero Mercury Working Group"  
Tel: + 32 2 28913 01 / E-mail: [elena.lymberidi@eeb.org](mailto:elena.lymberidi@eeb.org)

CAN – Climate Action Network Europe  
Katherine Watts, Policy Officer  
Tel: + 32 2 229 52 22 / E-mail: [katherine@climnet.org](mailto:katherine@climnet.org)

Greenpeace European Unit  
Joris Den Blanken, EU Climate & Energy Policy Director  
Tel: + 32 2 274 19 19 / E-mail: [joris.den.blanken@greenpeace.org](mailto:joris.den.blanken@greenpeace.org)

WWF-Europe  
Mariangiola Fabbri, Energy Efficiency Officer  
Tel: + 32 2 740 09 34 / E-mail: [mfabbri@wwfepo.org](mailto:mfabbri@wwfepo.org)

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The content was elaborated with contribution from Hans Jager from SNM  
Tel: + 31 30 2348274 / E-mail : [h.jager@natuurenmilieu.nl](mailto:h.jager@natuurenmilieu.nl)

**Position of  
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on the EC Working Document on implementing measures  
for ecodesign requirements for televisions**

*ECOS, EEB, CAN-Europe, INFORSE-Europe, Greenpeace, WWF and ZMWG (hereafter "Environmental NGOs") welcome and fully support a regulation to tackle the growing environmental impact of the European stock of TV sets.*

*Environmental NGOs are deeply concerned by market and technology trends for this product group: increasing stock, increasing turn-over, larger screens, poor performance of plasmas, lack of proper recycling of flat screens, new energy consuming features.*

***Therefore, a very aggressive ecodesign implementing measure (targeting all environmental aspects) is required, as well as additional policies. Environmental NGOs call European governments to implement them rapidly.***

## **1. More ambitious requirements on energy**

The proposed minimum requirements on energy efficiency are not ambitious enough. They are not targeting the least life-cycle cost for consumers, and would fail to improve LCD screens (the largest market share). As the preparatory study<sup>1</sup> indicates, such requirements could be "easily" met, meaning they would not go much further than a business as usual trend. These requirements would clearly fail to decrease the overall energy consumption of the stock of TVs, therefore being also inaccurate as regards the EU 2020 target on energy savings.

Environmental NGOs encourage the European Commission to discuss with Californian stakeholders about the ecodesign regulation to be implemented in this US State<sup>2</sup>. According to our information, their requirements on energy would be more stringent (in particular for larger screens, and with a -30% reduction for the 2<sup>nd</sup> stage from 2013). This shows more ambition is achievable.

Environmental NGOs call for:

- **Setting differentiated requirements for LCDs and plasmas.** The argument that only a technology-independent approach is feasible under EuP is not accurate. The recent vote on tertiary lighting has proven that technology-specific requirements may sometimes be the most relevant approach to ensure effective measures. In the case of TV, using a single formula accommodating plasmas means quasi-no effect on LCD screens. This would be an inadequate policy if it does not promote ecodesign improvement for this technology.  
The best approach would be to use the same methodology of the Working Document twice, for the LCD market and for the plasma market and set differentiated minimum requirements.
- **Setting tougher requirements for extra-large screens.** The trend to go for larger and larger screens needs to be stopped one way or the other if we are serious about ecodesign. We do not consider extra-size to be part of the functionality of the product. Therefore we suggest for instance a 20% malus factor in the formula for screens larger than 42 inches.

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<sup>1</sup> EuP Preparatory Study for Lot 5 compiled by Fraunhofer IZM

<sup>2</sup> See e.g. Pacific Gas and Electric Company (PG & E) document and presentation downloadable on: [http://www.energy.ca.gov/appliances/2008rulemaking/documents/2008-07-16\\_workshop/proposals/](http://www.energy.ca.gov/appliances/2008rulemaking/documents/2008-07-16_workshop/proposals/) and [http://www.energy.ca.gov/appliances/2008rulemaking/documents/2008-07-16\\_workshop/presentations/](http://www.energy.ca.gov/appliances/2008rulemaking/documents/2008-07-16_workshop/presentations/)

- **Supporting, as proposed, similar requirements for SD and full-HD** (after a short transitional period). This is a prerequisite for full-HD to be considered as a sustainable technological development. Otherwise, Environmental NGOs would flag out the inconsistency of high definition as regards environmental protection goals.
- **Considering a more ambitious second stage**, at least 30% below the initial level, if it is meant to have an impact on business as usual trends.
- **Introducing specific minimum values for standby and off-mode.** the Working Document must go further than the regulation voted in July 2008, in accordance with the preparatory study conclusions.  
We suggest a standby/off-mode requirement of 0.5 W for the 1<sup>st</sup> stage, and 0.3 W for the 2<sup>nd</sup>.
- **Introducing a mandatory “0 W mode”.** In this vertical implementing measure, we consider such requirement would be fully appropriate. TV sets are the kind of equipment users are or could be inclined to switch off when not in use. Therefore the hard-off switch (or similar function) would be a simple way to increase energy savings cost-effectively.
- **Modifying the way to calculate “P basic”.** This value should be based on features included, for instance reduced by 5 W for TV sets without a second tuner.

## 2. Non-energy aspects

The Document fails to address non-energy issues, such as chemicals and recycling. These aspects might be technically implemented by other EU processes, however a decent ecodesign proposal must grasp these issues. It needs to propose and discuss limit values and recommendations. Otherwise, it would contradict the aim of the EuP Framework Directive.

Environmental NGOs call for:

- A recommendation for a **limit on mercury per backlight lamps** of 2 mg.
- A recommendation for an **absolute limit on mercury per set**, in order to stimulate other lighting technologies for largest screens. This limit could be inspired by discussions already held for the revision of eco-label, in particular the table provided by EICTA for maximum quantity of mercury per TV<sup>3</sup>. In order to leave sufficient time for alternative technologies, these limits could be set in the second stage.
- **Phasing-out brominated and chlorinated flame retardants** in line with recommendations from the preparatory study. There is no reason not to tackle this issue seriously.
- Discussing a **limit value on the use of precious metals**. Neither the preparatory study nor the Working Document cover this aspect, which can have important indirect environmental impacts. Therefore some additional expertise would be required.
- Introducing a **minimum value for recycled plastic content**, for instance 50% of the casing.
- Introducing a **generic requirement about easy dismantling and recycling**, favouring better end-of-life treatment. As an example, fixtures within TV sets should allow for disassembly and plastic parts should be of one polymer or of compatible polymers for recycling.

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<sup>3</sup> i.e. 75 mg for smallest screens, 99 mg for 40-45 inch screens, 108 mg for 46-51 inch screens, 144 mg for 52-56 inch screens, 162 mg for 57-65 inch screens.

### 3. Energy Labelling scheme

We fully support the introduction of mandatory energy labelling for TVs as a complementary tool. In order to be successful, this tool needs to be based on simplicity and clarity: a unique scale for all sets, a simple A-G layout, a dynamic upgrading strategy.

Environmental NGOs call for:

- **Keeping a simple layout based on letters**, without introducing confusing numbers.
- **Supporting the dynamic upgrading system** proposed, but **improving it to avoid the problem with E, F and G classes**: in the labelling scheme outlined, these classes would be very quickly empty, due to mandatory minimum requirements. This would not be a fair signal to consumers to keep an A-G scale with only A to D products on the shelves. In order to really move the market, the existing least performing products have to be flagged out with the bottom letters of the scale. One solution would be to move the scale a couple of classes higher.
- Ensuring that the label **does not reward larger screens compared to smaller ones**. One option could be to use a formula based on diameter, rather than screen area.
- **Reducing the tolerance for testing** from 10% to 5%, in order to minimise everlasting discussions about incorrect classification.

### 4. Measurement method

The Working Document heavily leans on measuring method IEC 62087 Ed II and the 2007 data of EICTA. Although the new measuring method is an improvement for measuring LCD and plasma sets, this method does not allow easy comparison of results and checking will be made difficult. In particular because the “home” or “standard” mode is not defined unequivocally in the Working Document.

Environmental NGOs call for:

- **Improving definitions and reducing testing tolerances**, in particular for large screens.

### 5. Other policy options

Environmental NGOs are concerned that even very aggressive EuP measures would probably fail to decrease the overall energy consumption for this product group, as the preparatory study outlines it.

Therefore, we call European institutions and national governments to live up to the challenge by implementing relevant additional policies.

These policies are not related to the EuP process, however we believed it was appropriate to mention them in this paper as a starting point:

- Energy efficiency targets per producers could be envisaged, comparable to what has been suggested for car fleets.
- Fiscal measures discouraging the uptake of very large screens, like a tax on extra-size or a “bonus-malus” system. 75% of the tax could be based on energy consumption and 25% on the screen size. Eco-labelled TVs could be exempted.