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**Position of ECOS, EEB, CAN-Europe,  
INFORSE-Europe, Greenpeace and WWF**

**on the EC Working Document  
on possible ecodesign requirements for simple set top boxes**

*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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**Position of ECOS, EEB, CAN-Europe,  
INFORSE-Europe, Greenpeace and WWF**

**on the EC Working Document  
on possible ecodesign requirements for simple set top boxes**

ECOS, EEB, CAN-Europe, INFORSE-Europe, Greenpeace and WWF (hereafter “Environmental NGOs”) **welcome and support the introduction of mandatory minimum performance on set top boxes.** As simple set top boxes will only be needed until 2015 but will be sold to millions of units very quickly, we encourage the European Institutions to speed the process so that Ecodesign Implementing Measures are implemented as fast as possible (i.e. before the end of 2008).

The European Commission must ensure that the sets of ecodesign requirement for simple STB and complex STB **are consistent and no loophole is created.** With the fast development of more sophisticated products on the market, it is very important that market surveillance is being made simple and that the requirements cover all kinds of boxes accurately. **STB functions that are integrated in TV sets should also be submitted to similar requirements.**

The working document only considers the electricity consumption in the use phase. **Environmental NGOs regret that all other environmental aspects have been neglected.** The preparatory study mentioned several other simple options which could improve the environmental performance of the product, such as on the use of some materials to reduce energy consumption in the production phase, the use of foamed boards to reduce the impact of the remote control, alternatives to alkaline batteries, etc.

#### **1. Insufficient concern for end-of-life**

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In particular Environmental NGOs emphasise the need to **consider much more seriously the end of life of the 170 million simple set top boxes** that will be made useless from 2015 and will end up being discarded. We already know that small electronic devices usually end up in the normal trash bin instead of being properly collected. There is a high risk that this will be the case for set top boxes, whatever the indications on the packaging or manual (which are long forgotten when the product is disposed of). We suggest **a very clear indication on the product itself (in the national language) that the set top box must not be thrown away but brought to an electronics shop or a recycling collection point.**

It seems set top boxes exist in very different sizes, shapes and materials (whereas they are only needed for a basic function). This will be detrimental to efficient recycling. The Implementing Measure could set **a mandatory requirement on recyclability:** the casing should be made of an easily recyclable material (for which recycling technologies exist in the EU and enable an easy dismantling of the components).

Proper and efficient collection and recycling chains have to be made available before 2015.

A communication campaign will be needed to inform consumers about what they should do with their redundant set top box. For instance whenever a consumer buys a new digital TV set, **it should be mandatory that a brochure be distributed explaining what to do with the old TV set and the set top box, clearly explaining where to take the appliances for recycling.**

If the new TV set is delivered by the retailer, the set top box should **be taken back** together with the old TV set to ensure proper collection.

## 2. Design of electronic components

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Simple set top boxes are made of electronic components, the processing of which has high environmental impacts. In particular the use of F-gases adds to global warming. The Ecodesign policy should **promote the use of components processed with reduced use of fluorinated gases, reduced energy and water use**. This might be considered in another EuP Lot if “electronic components” are selected in the next Ecodesign Working Plan.

## 3. Remote control

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Regarding the remote control, Environmental NGOs encourage the EC to propose horizontal measures to **improve the recyclability and energy performance of this device for all EuPs concerned**. More and more sophisticated luminous remote controls with LCD screens are provided, with questionable extra benefit for the user and inevitable increased environmental impact.

## 4. A mandatory hard-off switch

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Even if not all consumers might use it, a **mandatory hard off-switch on a clearly visible and easily accessible part of the STB (for example the front or the top)** is considered a necessary requirement by Environmental NGOs: it should be made very easy for people willing to save energy to do so (instead of having to get down on their knees to unplug the device).

## 5. Comments on the requirements on electricity consumption

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➤ In *point 1.a)*, Environmental NGOs do not see why the first tier for the standby and off-mode requirement after one year is not set at 0.5 Watt (rather than 1 W). According to the preparatory study, technologies to achieve less than 0.3 W are already available. **The standby requirement should therefore be 0.5 W after 1 year and 0.3 W after 3 years.**

➤ The Working document does not introduce any dynamic progress for the consumption in on-mode. **The requirement after 3 years for SD should be stricter** (for instance: 4 W) to stimulate innovation.

➤ In *point 2.*, Environmental NGOs are concerned that HD equipment could consume more energy than equivalent SD. If it is the case than HD cannot be considered as a sustainable technological development. Therefore we suggest putting more pressure on manufacturers so they prove HD can go in the sense of energy conservation. **The requirement on HD STB after 3 years should be set at 5 W for the on-mode.** If needed this deadline could be extended by 1 more year.

➤ In *point 3.*, it should be made clearer that **STB with additional functions still need to comply with the standby and off-mode limits** set in points 1 and 2. In particular the standby requirement should cover the timer for the recorder.

➤ In *point 3.a)* the allowances are not consistent with the preparatory study. According to it, the allowances in on-mode for STB with PVR should be 12 W for SD and 14 W for HD (*rather than 14 W for both as proposed in the working document*). For the same reasons as above, **Environmental NGOs call for a 12 W common target for both HD and SD.**

**Same remark in point 3.b)** for STB with just a 2<sup>nd</sup> tuner: the requirement should be 6 W for SD and 8 W for HD according to the preparatory study. **Environmental NGOs suggest 6 W for both.**

**Same remark in point 3.c)** for STB with PVR and 2<sup>nd</sup> tuner: the requirement should be 13 W for SD and 15 for HD according to the preparatory study. **Environmental NGOs suggest 13 W for both.**

➤ In point 4. (Automatic power down), Environmental NGOs wonder what “*or similar function*” might mean. We also believe a 4-hour delay is too long because it could mean the device is on 12 hours a day if it is used in the morning, at lunch and in the evening. **We suggest to reword the paragraph this way:**

*“6 months after this implementing measure has come into force all simple STB shall be equipped in factory settings and in all possible on-modes with an automatic power down system having the following characteristics: the simple STB shall be automatically switched from any on-mode into standby mode (providing only a reactivation function, or a reactivation function and a mere indication of enabled reactivation function, including timer for recording programs) after less than 2 hours in the on-mode following the last user interaction and/or the end of a recording program.”*

➤ Point 5 is missing.

## **6. Revision and market surveillance**

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➤ In point 6., given the STB market trends, Environmental NGOs would like to see **4 years** as the deadline for the revision of the IM. Probably this revision would mostly concern complex set top boxes.

➤ In Annex II on market surveillance, Environmental NGOs wonder why a 10% tolerance on measurement is proposed, whereas it was not the case in EuP Lot 6 (standby requirements). We expect the EC to provide clarification on the rationale behind this figure and are not in favour of enabling a 10% extra electricity consumption.

END.