



***Raising standards for consumers***



**The Consumer Voice in Europe**

## CONSUMER ORGANISATIONS VIEWS ON ECODESIGN AND ENERGY LABELLING FOR ELECTRONIC DISPLAYS

Following the Consultation Forum meeting of 6 July 2017 as well as the release of the consumer survey summary on 30 August 2017

**Contact:** Aline Maigret – [sustainability@beuc.eu](mailto:sustainability@beuc.eu) – [anec@anec.eu](mailto:anec@anec.eu)

BEUC Ref: BEUC-X-2017-112 - 16/10/2017

ANEC-PT-2017-ErP-004

**ANEC, THE EUROPEAN ASSOCIATION FOR THE CO-ORDINATION OF CONSUMER REPRESENTATION IN  
STANDARDISATION**

Av. de Tervueren 32, box 27 – 1040 Brussels - +32 (0)2 743 24 70 - [www.anec.eu](http://www.anec.eu)

EC register for interest representatives: identification number 507800799-30

**BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND**

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • [www.twitter.com/beuc](http://www.twitter.com/beuc) • [www.beuc.eu](http://www.beuc.eu)

EC register for interest representatives: identification number 9505781573-45



Funded by the European Union

## Why it matters to consumers

Many consumers watch television for several hours per day, and it is common to find one or more TV sets and electronic displays in European households. As natural resources are depleting, those devices should use less energy while performing equally well. Also, consumers should be better informed about an electronic device's energy consumption before they purchase it. That is why the EU sets Ecodesign and Energy labelling requirements for electronic displays, including TVs.

An update of these measures is however urgently needed. With already 41 TV models under energy labelling class A++<sup>1</sup>, top performing products cannot stand out and consumer information is inaccurate. Furthermore, the size of TVs has rapidly increased over recent years, thereby inflating energy bills. The EU must also address other technology and market changes, such as the switch to smart TVs potentially leading to increased energy consumption and security issues.

---

<sup>1</sup> Possible Ecodesign and Energy Labelling requirements for electronic displays – explanatory notes (EC, 2017).

## Summary

Televisions have been covered by Ecodesign requirements since 2009<sup>2</sup> and by Energy Labelling requirements since 2010<sup>3</sup>. Discussions to review these measures started in 2012 and are still ongoing. On 6 July 2017, Ecodesign Consultation Forum stakeholders discussed possible Ecodesign and energy labelling requirements for electronic displays. In this paper ANEC and BEUC jointly present their opinions following this Consultation Forum and the release of the EU consumer survey on 30 August 2017.

Firstly, ANEC and BEUC welcome that the **consumer survey** for electronic display has now<sup>4</sup> been made available. It provides a strong basis for discussion, and hopefully - after refinement - a common way forward for all product groups.

We then comment on the **scope** and argue that integrated displays as well as digital photo frames (DPFs) must be included in the scope.

Furthermore, we detail our position on the proposed **energy label**, and provide recommendations on how to improve the design and methodology of the survey in the future. On the results of the survey themselves, we are reassured that many of them are in line with our previous comments as well as national consumer associations' experience with the energy label. For example, the survey clearly indicates that is essential for consumers that the annual consumption is displayed on the label - one of our main demands. We also agree with the need to rework the label in terms of proportion, and increase room for the energy efficiency classes.

We also recommend that **test method** is updated as it is far from reflecting real-life usage.

In addition, we develop our position on **Ecodesign** and ask the European Commission to rework the provision on software and firmware updates. That is key to ensure consumers are not faced with an unnecessary increase in energy consumption, a loss of functionality and security issues.

Finally, we recommend maintaining and expanding **resource efficiency** requirements, and ask for software updates to be made available mandatory for a certain period.

---

<sup>2</sup> [COMMISSION REGULATION \(EC\) No 642/2009](#)

<sup>3</sup> [COMMISSION DELEGATED REGULATION \(EU\) No 1062/2010](#)

<sup>4</sup> During the Consultation Forum meeting on 6 July 2017, the European Commission explained that a survey on consumer comprehensibility of the proposed label had been launched to test the design and content of the pictograms. However, the survey was published after the discussion with stakeholders at the Consultation Forum meeting.

## 1. GENERAL COMMENTS

### **Consumer survey should be developed and applied in a consistent way across all product groups**

The new Energy labelling framework requires the EU to test the label among consumers before it is displayed in shops. Therefore, the European Commission launched a survey to test the comprehensibility of the design and content of the pictograms for the proposed electronic display label.

ANEC and BEUC welcome that the consumer survey has now been published. In section 3, we make recommendations on how to improve the methodology and interpret the results. We strongly encourage the Commission to take them into account, not only for this specific product group, but also in the future when the Commission will conduct a consumer survey for other products.

### **No privilege should be given to bigger appliances**

In general, we believe that bigger appliances, consuming more energy, should not be (unintentionally) promoted. If these appliances are more energy-guzzling, the label must reflect it more transparently. It will then be up to the consumers to decide whether a bigger product's potentially increased comfort, e.g. larger TV screen, is worth the increase in energy bill. This is especially valid for TVs as larger screens are more and more present in households. For this reason, we appreciate the proposal under Ecodesign where the new equation should stop providing incentives to buy larger screens<sup>5</sup>.

### **No more delays, no 'packages' and an ambitious measure**

The European Commission recently announced its intention to release Ecodesign measures by 'packages', as opposed to releasing them in an individual regulation. We fear that bundling the measure on electronic displays together with the adoption of other Ecodesign and Energy labelling measures will only further postpone its adoption. Furthermore to adding up to the time already lost with this measure, this delay will also impact the level of ambition of the regulation.

## 2. SCOPE

### **Integrated displays and digital photo frames should not be exempted**

During the Consultation Forum on 6 July 2017, participants discussed how to deal with 'integrated displays', i.e. most often 'smart' products with display integrated into them. We believe integrated displays should be dealt with horizontally, i.e. under this regulation for electronic displays. To treat them as a separate product group will only add up work, provide room for loopholes and delay the process of each measure. In addition, there is no reason to treat standalone or integrated displays differently as at the end of their life, they are treated similarly.

Furthermore, we also advise to include digital photo frames in the scope.

---

<sup>5</sup> Curve as suggested by CLASP in October 2016

### 3. ENERGY LABEL

#### 3.1. CONSUMER SURVEY DESIGN AND METHODOLOGY

##### **Consumer survey results must be available on time**

Wherever possible, the results of the consumer survey should serve as a starting point for discussion, and therefore be available before the discussion in the Consultation Forum starts.

##### **Aim for geographical representativeness over time**

We welcome that the survey aims to be representative, with for instance 7 countries being covered in the sample group. For future surveys, we advise to alternate the geographic locations in order to accurately reflect the members of the entire EU population over time.

##### **Icons tested must reflect what consumers want to know**

It is positive that the survey is structured in such a way that the first part assesses what matters to consumers and the second part tests the comprehensibility of the draft label and their icons. However, in the second part, the elements tested are not necessarily those that consumers value the most. For example, the annual consumption is highlighted as most important by consumers but the test has not considered how understandable different variants are. Similarly, the comprehensibility of both icons for motion sensor and automatic brightness control was tested, although they seem to be less relevant for consumers.

We therefore recommend that the first and the second part of the survey are linked in such a way that relevant icons are tested.

Similarly, we wonder why the display size and resolution should feature automatically on the label, as consumers do not value much this information.

##### **Questions should be unambiguous**

For instance, it is unclear what 'annual power consumption' refers to. It is necessary to clarify whether it is about the absolute annual energy consumption (given in kWh/annum) or the power consumption (in Watt).

##### **A differentiated presentation of results per user group is needed**

Half of the survey respondents are "experienced buyers"<sup>6</sup> and the other half are "general consumers"<sup>7</sup>. As consumer organisations, we insist that the label must work for everyone, including less informed consumers. For this reason, it would be useful to access the data in a segregated way in the future to assess whether there is a difference between informed and less informed consumers.

##### **Surveys should also be undertaken offline**

As there are still many consumers who do not have internet access – being often the most vulnerable – surveys should also be undertaken through other means which do not require computer use and/or internet connection, such as questionnaires sent via post.

---

<sup>6</sup> Better informed, i.e. recently bought or were planning to buy a display and gathering information on the products available in the market at the time of data collection.

<sup>7</sup> a nationally representative sample in terms of age, gender, educational level, and region.

### 3.2. LABEL DESIGN

#### **The annual energy consumption must stand out**

In its draft presented to the Consultation Forum on 6 July 2017, the European Commission proposed to remove the annual energy consumption from the label. ANEC and BEUC disagreed, arguing that this information ensures consistency across product groups and provides a matrix for consumers to compare between similar products and make informed choices. It is also in line with the new framework regulation which imposes to display. Now that the survey clearly points out that consumers consider the annual power consumption as most important information, it obviously needs to be included.

The measured consumption must be based on real life data and consider stand-by consumption. In case the 4 hours assumption<sup>8</sup> is now judged as unrealistic, the Commission should put forward new data to replace this figure. Consumers should be able to know the number of hours used to calculate the energy class (e.g. through user manual, QR-codes or similar).

#### **More space for key information**

We agree with the two main conclusions of the survey which highlight the need to rework the label in terms of proportion, and increase room for the energy efficiency class.

#### **No room for unclear and low-interest pictograms**

New technologies can impact the energy performance of TVs and computer displays. To reflect this trend, the European Commission proposed pictograms for the new energy label:

- **A double A-G scale with High Dynamic Range<sup>9</sup>:**

This double scale aims to show the energy consumptions when the High Dynamic Range (HDR) function is enabled and disabled. We have doubts about both the comprehensibility of the double scale and the conclusiveness of the survey regarding this aspect.

Firstly, the survey highlights that 57% of respondents were able to derive the energy class when both scales were displayed. This score is insufficient, when the 2014 consumer survey undertook by VZBV Rheinland-Pfalz e.V.<sup>10</sup> shows that 91% of respondents understood uni-scale labels. Secondly, it is unclear whether respondents understood well crucial information such as the difference between the two scales, what HDR is, whether HDR is relevant in their situation, etc. Also, we wonder whether respondents received any kind of explanation before they assessed the label. The European Commission should provide more information to stakeholders and must investigate consumer understanding of one scale versus two scales.

---

<sup>8</sup> The current label provides for annual energy use based on 4-hours/day, 365days/year

<sup>9</sup> HDR is a technique used to reproduce image with a greater contrast ratio. HDR is relatively new but is becoming more common, for example on streaming services like Netflix. Such feature consumes considerably more energy.

<sup>10</sup> *Comprehensibility of the EU Energy label – Results of two focus groups and a representative consumer survey*, VZBV Rheinland-Pfalz e.V 2014 <https://www.verbraucherzentrale-rlp.de/media231718A.pdf>

Hence, we would advise against the double scale. However, we agree that the additional energy consumption incurred when the HDR function is enabled must be reflected to consumers before purchase. We thus urge the Commission to investigate the possibility to both an information requirement<sup>11</sup> and to display for instance an icon with the energy efficiency class of HDR (at the bottom, separate from the single scale).

- **Pictograms for motion sensor<sup>12</sup> and automatic brightness control (ABC)<sup>13</sup>:**  
Despite the high level of comprehensibility, the percentage of respondents who wish to have this information on the label is rather limited. For this reason, we advocate to exclude them from the label, also to avoid information overload.
- **A pictogram indicating the presence of standardised external power supply (EPS) and its inclusion in the product packaging<sup>14</sup>**  
We share the concern highlighted in the survey that the information related to EPS is too complex to be grasped in one icon. As this information may be of interest to consumers, written text would be easier to understand. If this cannot be done on the Energy Label, there could be an information requirement based on Ecodesign.

## 4. TEST METHOD

### Test method needs an update

As highlighted by the recent STEP study<sup>15</sup>, the television testing standard (EN 62087:2016) is outdated and does not reflect real-life usage. For example, the video clip test is not available in ultra-high definition (UHD) resolution or high dynamic range (HDR) – the former constituting the largest TV sales today and the latter becoming increasingly present with high impact on energy use. In addition, STEP highlights that the standard does not provide a method to measure the performance of automatic brightness control (ABC) – an energy saving feature that controls the brightness of the screen.

---

<sup>11</sup> To detail in which cases HDR is used at what cost consumers will use it – in the user manual and to appear on the screen at start-up.

<sup>12</sup> It can help identify the last movement of viewers. The television is turned from on-mode to standby after at the latest 4 hours from the last interaction.

<sup>13</sup> Displays can be dimmed when room ambient light levels are reduced, to achieve lower power consumption while improving viewer comfort.

<sup>14</sup> The reasoning behind this pictogram is that standardised power supplies would be shared with different electronic products in the same power range. The availability of a standardised EPS would unbundle it from the product and leave doors open for resource efficiency savings in the long term.

<sup>15</sup> [Closing the 'reality gap' – ensuring a fair energy label for consumers](#) – STEP project (2017).

## 5. ECODESIGN

### **Information requirements should also serve more vulnerable consumers**

In the current proposal, 'general information'<sup>16</sup> about the products can be provided in printed forms together with the products or online. As consumer organisations, we believe such provision leaves aside consumers who are less comfortable with new technologies, including the elderly. We propose that the general information should always be provided both in print and online.

### **Visible and accessible on/off switch button needed**

We regret that provisions for a visible and accessible on/off switch have been discarded. It should be reintroduced in the text as it can help users save energy when they are not using the device. We also call for a mandatory on/off switch for all televisions, including smart TVs. Although we acknowledge that most consumers might not use it on an everyday basis, it still makes sense for planned periods of inactivity, e.g. holidays, secondary residence, etc. It is not only for energy consumption reasons but also to a certain extent for security reasons, e.g. reduced risk of short circuit.

### **Enhanced reactivation functions should not be subject to power allowance<sup>17</sup>**

We do not support the allowances foreseen for displays with enhanced reactivation functions such as voice recognition and presence sensor. As those functionalities consume energy, they come at a cost for consumers and therefore no allowances should be granted.

### **Provision on software and firmware updates to be improved**

We welcome the Commission's willingness to deal with software updates. Unfortunately, the provision overlooks the main issues<sup>18</sup>.

First of all, we note that it is very unlikely that people will refuse software updates although they are informed of the energy increase. However, in the case consumer actually refuses the update, it must be ensured that the TV consumption still complies with the consumption stated on the label when the TV set was bought in the shop, and that there is no loss of functionality.

In the context of market surveillance, we call for:

- 1) Tests on updates within the 4-year period to assess their impact on the energy consumption;
  - 2) Market checks on how much the consumption has increased as of the 5<sup>th</sup> year.
- This way, one could gather data for future updates of the measures and assess if this proposed approach – which is new – is feasible.

---

<sup>16</sup> Annex IV (information requirements), information is divided into three parts: general information, technical information and repair and end of life documentation and information.

<sup>17</sup> Enhanced reactivation function means a reactivation function other than those traditionally supported by electronic displays (such as a remote-control unit and internal timer) and using sensor systems for voice recognition, room presence and/or gesture detection.

<sup>18</sup> According to the current text, "each single software or firmware update that may result in detriment of any of the parameters of in the label, shall only be explicitly authorised by the customer when the electronic display is in on-mode, even if the download and installation can be scheduled at a later moment or while in standby. The customer shall be informed of the objective of the update, of which parameters in the label would be negatively affected and in which circumstance or functionality the change would occur, if applicable. For a period of at least 4 years, the customer shall be given the option to refuse the specific update without relevant loss of functionality. No notification is mandatory if the update has no negative relevance to energy use."



Secondly, when users accept to install the software updates, we do not see any technical reason why updates would go hand in hand with an increase in energy consumption. According to ICRT<sup>19</sup> tests, differences in energy use between similar TV models tested with different software versions are mostly not present or marginal. Furthermore, consumers should be enabled to go back to the original software version in case they are not satisfied with new features.

It is necessary to take into account that connected TVs are becoming more present in households. It is therefore necessary that test standards properly cover them. As highlighted by the new STEP report<sup>20</sup>, there is a risk that TVs are compliant in shops and that energy use increases once consumers update them at home. The energy consumption increased by 31% to 37% for three out of the seven television models they tested. This issue must be addressed.

## 6. RESOURCE EFFICIENCY

### Resource efficiency requirements must be maintained and expanded

The proposed resource efficiency requirements are crucial to make Ecodesign contribute in creating a more circular economy, as the Commission has committed in 2015. These requirements include design for dismantling, re-using, recycling and recovery, marking of plastic parts as well as mercury and cadmium logos. They aim to tap the resource saving potential of electronic displays, as highlighted in the Ecodesign work plan 2016-2019.

We welcome the proposed resource efficiency requirements as well as the reference to the Commission Communication "Closing the loop - An EU action plan for the Circular Economy". However, we note that the action plan also allows for more ambition, such as setting durability requirements and availability of software updates.

### Consumers needs software updates

According to a survey from Verbraucherzentrale Bundesverband<sup>21</sup>, 30% of consumers replaced their electronic devices because of software issues. Indeed, it is often impossible for consumers to update their appliance's software simply because updates do not exist. Eventually, their TVs are no longer upgradeable and become incompatible with other devices. Hence, consumers will use their device for a short period and won't see any reason to refurbish the outdated product for the second-hand market.

We call on the Commission to impose that software updates are available for a minimum period that reflects the normal life time of a TV where it is cost-effective for consumers. Consumers should also be provided with comprehensive information about how long they can expect the product to be supported.

END

---

<sup>19</sup> International Consumer Research and Testing Ltd.

<sup>20</sup> [Closing the 'reality gap' – ensuring a fair energy label for consumers](#) – STEP project (2017).

<sup>21</sup> [http://www.vzbv.de/sites/default/files/downloads/2017/06/01/umfrage\\_-\\_haltbarkeit\\_und\\_reparierbarkeit\\_von\\_produkten\\_o\\_gewaeehrleistung.pdf](http://www.vzbv.de/sites/default/files/downloads/2017/06/01/umfrage_-_haltbarkeit_und_reparierbarkeit_von_produkten_o_gewaeehrleistung.pdf)