



# EEB and BEUC comments on Revision of EU Ecolabel criteria for Television & Computer Displays

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Ref.: X/2013/095 - 29/11/2013

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# Summary

The European Commission is revising the EU Ecolabel for Televisions. In September 2013, the Joint Research Center presented the study carried out to support this process and criteria proposals. These documents were discussed at the 1<sup>st</sup> AHWG meeting organised in Seville on 11 October 2013<sup>1</sup>. This position paper provides EEB and BEUC comments to the draft proposal.

BEUC and EEB support in general following the approach for the revised Ecodesing Regulation, but highlight the urgent need for up-to-date market data so that the requirements set reflect the technological progress of TVs in the market.

BEUC and EEB stress the importance to make available to the JRC relevant information on the hazardous substances included in televisions, so that meaningful and workable requirements can be established. In this regard, we welcome the creation of the subgroup on hazardous chemicals to further investigate this criterion.

BEUC and EEB strongly support the inclusion of criteria addressing the life time extension and end of life of these products, tackling a more efficient use of resources. In the comments, we make additional proposals such as giving access to the necessary repair information, diagnostic tools and spare parts to third party reuse or repair organisations; further limiting the variety of polymer types, functional additives, surface coating/metal inlays, to facilitate recycling; and increasing the minimum recycled content.

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<sup>1</sup> <http://susproc.jrc.ec.europa.eu/televisions/stakeholders.html>

No.	Comment from	Contact person	Reference: - document - section/task - page	Subject of the comment	Comment
1	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	Criterion 1.1 Energy savings	<p>EEB/BEUC support a progressive approach (setting higher efficiency criteria for larger devices combined with a maximum cap for the energy use) in order to set clearly market incentives connected with the overall environmental targets.</p> <p>Regarding the definition of the energy consumption criteria, we support in general to follow the approach for the revised Ecodesign Regulation in order to ensure a clear level playing field for the different types of devices under the different regulatory instruments.</p> <p>In this respect, it should be stressed the urgent need for up-to-date market data allowing to align currently available data on TV sets (and efficiency of monitors) with the possible new proposal defining the energy efficiency.</p> <p>Opening clauses for emerging technics (like OLED backlights) are not considered as appropriate, due to the mostly unclear timelines for acceleration of the efficiency of these technologies</p> <p>We support that standby limits should be lower than mandatory 0.5 W. Regarding (Passive Standby/Off-mode) EEB/BEUC consider a visible on/off switch still as an important element.</p> <p>EEB and BEUC recommend a criterion not allowing any "fast start" mode, as this feature can consume much more than the usual standby.</p>

2	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	Criterion 1.2 Power management	We support the JRC proposals for power management
3	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	Cluster 2 Hazardous substances	<p>From the perspective of the EEB and BEUC, it is very unfortunate that up to now so little information regarding the inventory of hazardous substances included in televisions have been provided to JRC/consultant team.</p> <p>Availability of these information is the basis for a systematic assessment approach as discussed by the chemicals HTF and key for any rational debate about substitution possibilities and barriers and respective needs for derogations.</p> <p>The presence of candidate list SVHC and article 57 substances should be known and named by the market actors in the supply chain in any case.</p> <p>For the further substances with hazard statements prioritised by the EU Ecolabel (see HTF Paper), the respective functionalities in the different materials may be used as a “bridge” to help companies to identify possible contents in the articles.</p> <p>Based on a more meaningful picture of the hazardous substances inventory – EEB and BEUC are open for further discussions on a subgroup level on how to implement the HTF principals in a balanced way for this product group. We are furthermore willing to share and discuss information on substitution with less hazardous substances.</p> <p>EEB and BEUC would also like to highlight the need to avoid use of substances that will cause health and environmental impacts during the end of life of these products. This is of particular importance in third countries where substandard treatment technologies are in place and considerable amounts of electronic products end up, as described by the European Environmental Agency in the report: <i>Movements of waste across the EU's internal and external borders</i>, <a href="http://www.eea.europa.eu/publications/movements-of-waste-EU-2012">http://www.eea.europa.eu/publications/movements-of-waste-EU-2012</a></p> <p>According to this report, “a large volume of used electrical products are shipped out of the EU to West Africa and Asia, much of them falsely classified as ‘used goods’ although in reality they are non-functional. The report estimates this trade to be at least 250 000 tonnes every year, possibly much more. These goods may subsequently be processed in dangerous and inefficient conditions, harming the health of local people and damaging the environment”.</p>

4	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	Cluster 3 Life time extension  3.1 – Commercial guarantee	<p>Beside an extended commercial guarantee, more criteria should be included addressing “performance quality “of the devices during their lifetime.</p> <p>This shall include max failure rates from respective life-time tests as well as avoiding a potential loss of brightness.</p> <p>These quality criteria are especially important for devices used very intensively like those addressed by GPP and other commercial clients.</p>
5	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	3.2 Reparability	<p>For end- users the availability of professional repair options to fix day to day problems with the devices by reasonable costs is an important fact for a substantial prolongation of the use time.</p> <p>To stimulate such costly services, in addition to the requirements proposed in the current criteria document, we strongly support a requirement to guarantee easy access to the necessary repair information, diagnostic tools and spare parts to third party reuse or repair shops or organisations.</p>
6	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	Cluster 4 4.1 Material selection and information	<p>Consideration of the environmental effects from the (pre-) production stage and possible barriers for high level recycling is crucial for any requirements for material selection, in line with the aim of the roadmap for a resource efficient Europe. Meaningful criteria are needed to address these issues. In this respect, EEB and BEUC welcome the proposals included in the current criteria draft, but see the need to strengthen the criteria for the following elements:</p> <p><u>(a) Variety of plastics:</u> Like in the proposal for computers the variety of polymer types in the housing of TVs/monitors should be clearly limited. Beyond such a reduction of polymer types as well a limitation of functional additives is a key prerequisite for any closed loop recycling attempt.</p> <p><u>b) Surface coating/metal inlays</u> This criteria should simply be phrased as “Neither desktops nor notebooks cases/housings shall have surface coatings (or even electroplated layers) or metal inlays.”</p> <p>The opening clauses “incompatible with recycling” and “technical requirements” should be skipped. The first one is not meaningful with respect to the variety of current recycling processes and the second is too imprecise.</p> <p><u>c) Content of recyclates</u></p>

					<p>From an environmental perspective a much higher recycled content than the current 10% should be stimulated.</p> <p>This is feasible under the current market conditions as the results from independent assessment schemes like the TCO Certified Edge Label shows. This label is asking for &gt; 65% post-consumer-recyclate. In 2012 more than 20 screens were labeled by TCO.</p> <p>An other example: "In 2009, Lenovo worked with a Lenovo recycled plastic supplier to develop and qualify a new HB-ABS recycled material with 65% PCC plus 20% PIC for use in producing decorative monitor parts." (Source: A Lenovo Environmental Success Story "Using Recycled Content Plastics"  <a href="http://www.lenovo.com/social_responsibility/us/en/GreenPaper_Recycled_Content.pdf">http://www.lenovo.com/social_responsibility/us/en/GreenPaper_Recycled_Content.pdf</a>)</p> <p>EEB and BEUC welcome any proposal allowing real front running companies to communicate in a meaningful way real recycling solutions ( e.g. recycled contend &gt; 80%).</p> <p><u>d) material information</u>  <i>additional:</i> The inclusion of critical raw materials in the components of the products shall be identified with type an amount of such materials in respective documentations (recycling pass) in order to support more target recalling activities in future.</p>
7	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	4.2. Design for disassembly and recycling	<p>EEB and BEUC support the criteria proposed for (easy) disassembly, because separate treatment of the respective components allows a much higher efficiency of the following material recycling steps.</p> <p>But the proposed requirement (d) "<i>Electrical modules shall be easily removed from the case.</i>" needs to be phrased more clearly. As example, in Screens LED from the backlighting system include a relevant share of critical raw materials. In this respect, the treatment of LEDs in a separate waste/recycling stream should be addressed. Whether an easy manual dismantling is the appropriate requirement to support such separated treatment needs further assessments.</p> <p>For TV screens and Monitors, it might be appropriate to consider ongoing developments for their targeted treatment (focussing on a quantitative recovering of the included critical raw materials). This would contribute to the formulation of more precise requirements on design for recycling supporting such treatments in further revisions of the Ecolabel.</p>

8	EEB and BEUC	Blanca Morales& Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	4.3. Packaging	In order to ensure consistency with other EU policies the requirements set out should remain unchanged
9	EEB and BEUC	Blanca Morales& Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	Cluster 5 CR criterion 5.1 Social labour conditions during manufacture	We support the inclusion of this criterion.
10	EEB and BEUC	Blanca Morales& Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	criterion 5.2 Emissions of fluorinated GHG	We support the inclusion of this criterion.
11	EEB and BEUC	Blanca Morales& Dirk Jepsen	Technical Report Task 4 Improvement potential (Draft) Working Document	criterion 5.3 Use of 'conflict-free minerals' during production	We support the inclusion of this criterion.