EEB and BEUC comments on Revision of EU Ecolabel and GPP criteria for Personal & Notebook Computers

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Summary

The European Commission is revising the EU Ecolabel and GPP criteria for Personal & Notebook Computers. 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 1st AHWG meeting organised in Seville on 10 October 2013[1]. This position paper provides EEB and BEUC comments to the draft proposal.

BEUC and EEB support in general ensuring consistency between the criteria set by EU Ecolabel and Energy Star. However, the requirements need to address the best products on the market at the point in time when the revised Ecolabel enters into force. Also it is fundamental that the criteria cope with the fast developments in the product segment. In this respect, the Ecolabel shall include an ambitious start point and a dynamic approach.

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 functional additives, surface coating/metal inlays, to facilitate recycling; and increasing the minimum recycled content.

[1] http://susproc.jrc.ec.europa.eu/computers/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 5 Criteria Proposal (draft) working document September 2013 Page 12 ff	Criterion 1.1 Energy savings	The energy efficiency requirement needs to address the best products on the market i) at that point in time when the revised Ecolabel enters into force (probably in summer 2015 at the very earliest) and ii) need to cope with the fast developments in the product segment. In this respect, the Ecolabel shall include an ambitious start point (for i) and a dynamic element (for ii). Whether the Energy Star v 6.0 can serve as such an ambitious start point (for i) needs to be reassessed during the further discussion process, based on up-to-date market data. Following this assessment, introducing benchmark thresholds (Variant 3) should still be considered to ensure that the starting point remain ambitious enough. We understand that a dynamic link to “the most recently published Energy Star version” is not feasible from a legal perspective. Therefore, a short revision cycle, (within 2 years maximum (tbd)) after the revised criteria enter into force, based on a market research seems most appropriate to ensure the dynamic development of the Ecolabel requirements: e.g. if the market share of ES v 6.0 products exceeds 30%, the requirements are automatically strengthened e.g. by 15% …).

					It may be checked whether the market database currently to be developed for the EU Commission under the service contract EACI/IEE/2013/002 may serve as a reference for such a market research. We would like to draw the attention to the fact that the allowances for discrete graphic adders can sometimes be huge and represent as much as the core consumption of the computer. We would in the first place recommend to not give any allowance for discrete GPU. If this is not supported, other options can be suggested to deal with the graphic adder problem: - 1) Leave the allowances for graphic adders as recommended by JRC in the draft criteria proposal, but set a maximum to the total amount of allowances (to make sure a giant highly consuming gaming PC with several graphic cards cannot get the Ecolabel). This maximum could be set at 90 W for desktops and 33 W for notebooks (these levels correspond to the allowance for one single G6 adder in Ecodesign tier 2016). This would be a similar approach to the power cap for the TV Ecolabel. - 2) Allow discrete graphic adders only if they are switchable or highly scalable (this means they are nearly consuming zero when the computer does not need them, for instance in the idle mode that is used for measuring the energy consumption).

2	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 15	Criterion 1.2 Power management	We support the JRC proposal with screen off mode after 10 min. For info: The Ecodesign regulation already says that computers from July 2014 shall be placed on the market with setting for display sleep after 10 minutes. So it is simply a matter of consistency to adjust Ecolabel requirement to the 10 min.
3	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 15	Criterion 1.3 Internal power supply	We support the JRC proposal to align the minimum requirements for internal power supplies to those of the 80plus-label class gold, as research suggests that there are a range of certified power supplies available in the market. We support as well the proposal discussed during Ad Hoc Working Group meeting to include guidance not to charge tablets using a notebook USB port or USB port from desktop computers
4	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 16 ff	Cluster 2 Hazardous substances	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 computers have been provided to JRC/consultant team. 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. 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.

					For the further substances with hazard statements prioritised by the EU Ecolabel (see HTF Paper), the respective functionalities in the different materials may used as a “bridge” to help companies to identify possible contents in the articles. 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. EEB and BEUC would also like to highlight the need to avoid use of substances that will case health and environmental impacts during the end of life of these products. This is of particular importance in third countries where substandard treatments technologies are in place and considerable amounts of electronic products end up, as described by the European Environmental Agency in the report: *Movements of waste across the EU's internal and external borders*, http://www.eea.europa.eu/publications/movements-of-waste-EU-2012 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 tones 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”.
5	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 25	Cluster 3 – Life time extension 3.1 Upgradeability & Capability enhancement	Requirements regarding the Upgradeability & Capability enhancement are very important e.g. for the professional use of IT device (=> GPP) Namely the exchangeability and upgradability of internal memory and batteries should be included in the criteria-set.

6	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 26	3.2 Lifetime of batteries	Durability of the batteries is one of the most important quality aspects for notebooks and other portable devices, seen from an environmental perspective. Therefore, the inclusion of meaningful criteria regarding the “long-life” battery quality is a key issue for the revision of the criteria. Based on this consideration, any effort possible should be made to come up with a robust and, at least, indicative testing method for battery lifetime. An additional issue of similar importance is the need for technical solutions to avoid deterioration of the battery while the device is connected to the grid for long periods (e.g. while using a notebook with a clocking station).
7	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 28	3.3 HDD reliability	As for batteries, also for the HDD the durability/reliability is very important from an environmental perspective (certainly as well from a user perspective). In this respect, we strongly support the attempt to include meaningful quality criteria for HDDs.
8	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 29	3.4 Repairability	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. 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.

9	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 32	Cluster 4 - EoL Management 4.1. Material selection and information	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: <u>(a) Variety of plastics:</u> Beyond a reduction of polymer types to be used, as well a limitation of functional additives is a key prerequisite for any closed loop recycling attempt. <u>b) Surface coating/metal inlays</u> Neither desktops nor notebooks cases/housings shall have surface coatings (or even electroplated layers) nor metal inlays. The opening clauses “incompatible with recycling” and “technically 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. <u>c) Content of recyclates</u> From an environmental perspective a much higher recycled content than the current 10% should be stimulated. EEB and BEUC welcome any proposal allowing real front running companies to communicate in a meaningful way real recycling solutions (e.g. recycled contend > 80%). <u>d) Material information</u> *additional*: The inclusion of critical raw materials in the components of the products shall be identified with type and amount of such materials in respective documentations (recycling pass) in order to support more target recalling activities in the future.
10	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 34	4.2. Design for disassembly and recycling	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.

					But the proposed requirement -*(d) "Electrical modules shall be easily removed from the case."* - needs to be phrased more clearly and possibly a more differentiated way regarding the various kind of products covered (desktops, notebooks, tablets). E.g. beside circuit boards, HDD contain relevant shares of critical raw materials and should be treated separately. For notebooks and (even more) for tablets, 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.
11	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 36	4.3. Packaging	In order to ensure consistency with other EU policies the requirements set out should remain unchanged
12	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 37	Cluster 5 criterion 5.1 Labour conditions	We support the inclusion of this criterion.
13	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 38	criterion 5.2 Emissions of fluorinated GHG	We support the inclusion of this criterion.
14	EEB and BEUC	Blanca Morales & Dirk Jepsen	Technical report Task 5 Criteria Proposal (draft) working document Page 39	criterion 5.2 Noise	We support the proposal.