

Comments on the inclusion of status displays in the proposed ecodesign requirements for televisions and electronic displays¹

Summary:

The priority of the proposed regulation is to establish requirements for products with the main function of displaying visual information. The proposal rightly make exemptions for some product groups which may contain displays but whose main function is something else than visual information, and which are already covered by other related regulations.

In line with this, CECED and DigitalEurope would suggest adding status displays incorporated into other products to the list of exemptions.

CECED and DigitalEurope are of opinion that some requirements included in the proposal will create over complex double regulation for certain products (e.g. domestic appliances and printers) with integrated status displays. Over the past few years, the European Commission has proposed more and more stringent regulations, establishing double or cascade requirements on a single product category.

Regulating components, in addition to the complete product, impedes the ability of industry players to innovate. In addition, it has been proved that in several cases multiple requirements do not lead to any significant saving². As a result, extra costs are introduced with no return on investment made. Moreover, market surveillance authorities are not able to cope with increasing and more complex rules.

According to article 1, point 2 status displays are exempted from the Ecodesign requirements (Points from 1 to 5 of Annex II) but are subject to the resource efficiency and end of life requirements proposed in Annex II.6 and Annex III. This will lead to double regulation, because most products integrating status displays are already covered by product specific ecodesign measures and WEEE.

Furthermore, we would like to highlight that the draft regulation does not apply to digital signage

¹ Commission working documents implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to ecodesign requirements for electronic displays and repealing Regulation 642/2009 with regard to ecodesign requirements for televisions and supplementing Directive 2010/30/EC of the European Parliament and of the Council with regard to energy labelling of electronic displays and repealing delegated Regulation 1062/2010 with regard to energy labelling of televisions.

²This was proved by an assessment that CECED carried out in the frame of the revision of Regulation 640/2009 on electric motors, establishing requirements also on motors integrated in household appliances.

displays, projectors, smart boards and displays in game consoles because they belong to product groups that are subject to other regulatory work. As the same applies to most products with status displays (including domestic appliances and printers), which are covered by ecodesign measures, they should be added to the exclusion list.

Recital 7 of the proposal states “Furthermore the study concluded that the Regulation should apply to the other display product groups available on the market where the primary function is to display visual information and that are neither televisions nor computer displays, e.g. digital photo frames.” Clearly this does not apply to domestic appliances and printers as their primary function is to do other things and displaying information is ancillary to the primary function. To an extent this is covered in the definition of an “Electronic display” (Article 2(1)); nevertheless, this definition is rather convoluted. The Recital and the content of the Regulation should manifestly match.

We propose the following amendments to the text of the draft regulation:

Article 1 should be re-worded in order to be consistent with Recital 7 to “This Regulation establishes ecodesign requirements for the placing on the market of ~~electronic displays, including but not limited to~~ equipment where the primary function is to display visual information, such as.....”

We also propose a new sentence be added to **Article 1 (3)**

“(NEW) any status display integrated into household appliances (e.g. refrigerators, ovens, etc.)”

Household appliances could be defined as all the products covered by Annex I.1 of the Standby Ecodesign Regulation 1275/2008, plus heating and ventilation equipment.

The definition proposed in **Article 2(1)** is very long and convoluted. It would be clearer to break-apart the various concepts as different indented sections, e.g.:

‘*Electronic display*’ means an electrical or electronic product:

- With a display screen and associated electronics, that is primarily intended for use in a household and/or in an office;
- that has, as its primary function, the display of ~~displays~~ visual information and;
- that ~~is~~, as delivered to the end-user for its intended use, is to be connected to an AC mains power source, or a standardised DC power source (e.g. USB) ~~for its intended use~~, either directly or via an external power supply.

With regard to the resource efficiency (or more precisely material efficiency) requirements, CECEC and DigitalEurope call for a holistic set of definitions and measures (including measurement procedures) that are applicable horizontally for energy related products under ecodesign. Introducing piecemeal and potentially inconsistent requirements on a product-by-product basis bears the risk of missing the goals of the legislator while creating unnecessary burdens for the industry.

In addition, before setting any requirements, the legislator should also close the loop ensuring that recycling practices and facilities will be able to benefit from any mandatory requirements.

Conclusion

We call for an exemption of status displays integrated into other products which main function is not to display visual information from the regulation, in order to avoid onerous and redundant requirements that will not lead to the objectives expected by the European Commission.

About CECED

CECED is a Brussels-based association representing household appliance manufacturers in Europe. Its members, European producers and non-EU companies that have operations in the EU, cover around 90% of the European market of household appliances. The products manufactured range from large (refrigerators, washing machines), small (vacuum cleaners, coffee machines) to heating ventilation and air conditioning appliances (heaters, heat pumps). With a turnover of 35 billion euros and half a million employees, this is a major sector for the EU economy. CECED's website provides further information on news and activities: <http://www.ceced.eu>

Direct Members are Arçelik, Ariston Thermo Group, BSH Bosch und Siemens Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, AB Electrolux, Gorenje, Indesit Company, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. CECED's member Associations cover the following countries: Austria, Baltics, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom.

About DigitalEurope

DigitalEurope represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DigitalEurope wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DigitalEurope ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 58 corporate members and 36 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>