

Joint Industry Paper on Draft Ecodesign Regulation on Electronic Displays

Brussels, 3 July 2017

AmCham EU, CECED, COCIR, DIGITALEUROPE, EGMF, EHI, EPEE, FEM and TIE wish to reiterate their strong reservations to the proposed Lot 5 draft Ecodesign regulation covering electronic displays and outline procedural as well as substantive concerns shared by many European industries.

- Art.15.4(b) of the Ecodesign Directive, requires that an implementing measure can only include products that have been subject to prior assessment of the “impact on the environment, consumers and manufacturers, including SMEs, in terms of competitiveness — including in relation to markets outside the Community — innovation, market access and costs and benefits”. This has not been the case for the majority of products now included in the scope of the Lot 5 regulation, e.g. industrial equipment, machinery, medical equipment, smart meters, boilers, printers, laptop computers, heaters, air conditioning equipment, automation and control equipment, and household appliances. Without appropriate consultation and assessment of how the requirements would impact the functionality of products, the European Commission shortcut the process set forth in the Ecodesign Directive and cannot provide substantiation to verify the assumption that products with an integrated display can be subject to the same requirements as televisions and stand-alone computer displays. Stakeholders were only consulted on energy and resource efficiency requirements for TVs and computer displays.
- Secondly, the industry is concerned that the nature of some requirements in the draft Lot 5 regulation is too prescriptive (e.g. restriction on gluing and welding), in that it imposes a specific design trait rather than setting performance requirements. This approach lacks consideration for future product concepts and production technologies, thereby unnecessarily restricting innovation in the IT industry and impeding manufacturers in their ability to design products with more functional capabilities, better connectivity and the rigidity to withstand everyday customer use. Prescriptive restrictions may therefore have an adverse effect on resource efficiency.
- Thirdly, the scope of the proposed Lot 5 regulation is too broad and should exclude products with an integrated display also when larger than one square decimeter. In addition to the reasons also when already specified in the first point, the extended scope of the Lot 5 regulation would lead to multiple regulations impacting the same products, which generates unnecessary complications for the industry and may lead to inconsistencies and confusion. For example, a product may be in scope of the resource efficiency requirements of the proposed Lot 5 regulation and their energy efficiency in scope of another Ecodesign implementing measure. This horizontal approach will dramatically increase the number of companies and types of products affected by the proposed regulation, and is contradictory to the principle of Better Regulation promoted by first Vice President Timmermans.



In summary, industry recommends that all integrated displays are taken out of the scope of the regulation but rather managed through vertical regulations, if necessary. Furthermore, all requirements should be based on an impact assessment to ensure the proposed Ecodesign measures are helpful to achieve the overall objective of the regulation (decrease energy and resource consumption), do not unnecessarily burden the industry and hamper future innovation.



ABOUT AmCham EU

AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totalled more than €2 trillion in 2016, directly supports more than 4.5 million jobs in Europe, and generates billions of euros annually in income, trade and research and development.

ABOUT CECEC

CECED represents the home appliance industry in Europe. The total annual turnover of the industry in Europe is €50bn. Total employment as a result of the presence of the sector is approximately 1 million jobs. The sector contributes €1.4bn to research and development activities in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De’Longhi, Dyson, AB Electrolux, Gorenje, Indesit Company, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. CECEC’s member Associations cover the following countries: Austria, Baltic countries, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom. www.cecec.eu

ABOUT COCIR

COCIR is the European Trade Association representing the medical imaging, radiotherapy, health ICT and electromedical industries. Founded in 1959, COCIR is a non-profit association headquartered in Brussels (Belgium) with a China Desk based in Beijing since 2007. COCIR is unique as it brings together the healthcare, IT and telecommunications industries.

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 61 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

ABOUT EGMF

The European Garden Machinery Industry Federation – EGMF – has been the voice of the entire garden machinery industry in Europe since 1977. With 30 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe. www.egmf.org

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ABOUT European Heating Industry (EHI)

EHI, the association of the European Heating Industry, represents 90% of the European market for heat and hot water generation, heating controls and heat emitters, 80% of biomass central heating, as well as more than 70% of the hydronic heat pump and solar thermal markets. Our Members are the market leaders in the production of energy efficient and renewable energy technologies to affordably heat buildings. In doing so, they employ directly more than 120.000 people in Europe and invest more than 700 million euros a year in research and innovation. For further information, please visit www.ehi.eu

ABOUT EPPE

The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies, national and international associations. EPEE member companies realize a turnover of over 30 billion Euros, employ more than 200,000 people in Europe and also create indirect employment through a vast network of small and medium-sized enterprises such as contractors who install, service and maintain equipment. EPEE member companies have manufacturing sites and research and development facilities across the EU, which innovate for the global market. As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. Please see our website (www.epeeglobal.org) for further information.

ABOUT FEM

Created in 1953, the European Materials Handling Federation represents, defends and promotes European manufacturers of materials handling, lifting and storage equipment. FEM speaks for 15 members representing some 1,000 companies (mostly SMEs) employing 160,000 people directly and with an annual turnover of more than €50 billion. www.fem-eur.com

ABOUT TIE

Toy Industries of Europe (TIE) is the voice of the reputable toy manufacturers in Europe. Members of TIE include corporate companies as well as national associations from Bulgaria, France, Germany, Italy, the Netherlands, Spain, Sweden, the UK and the Nordic region. TIE membership is open to both corporate companies with a presence in Europe and national associations from European Union Member States (including candidate countries).

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