

Joint industry statement on the draft ecodesign and energy labelling regulations for electronic displays (Lot 5)

13 December 2018

Companies in the information and communications technology (ICT) sector are leaders in energy efficiency and supportive of the Ecodesign and Energy Labelling frameworks, aiming to ensure that their products are designed, produced, used, and recycled in a sustainable and safe manner whilst providing increased benefits to customers and society at large. By closely collaborating with policymakers and other stakeholders, we remain committed to contributing with our technical expertise to the ongoing Lot 5 discussions, provided that transparency becomes the guiding principle in the development of technical requirements.

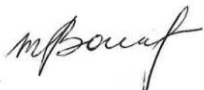
The revision process for the Lot 5 regulations has been ongoing since 2012 and in some cases it lacked transparency, thorough analysis and proper impact assessment. In addition, the data provided by industry was not given due consideration in the setting of the on-mode power consumption requirements, and there is no line of sight in the technology roadmap to achieve the future energy efficiency gains proposed by the Commission. Notably, innovation and market demand are already driving impressive energy efficiency achievements and benefiting consumers in the absence of new regulatory measures.

We understand the Commission's political ambition to integrate strict energy and resource efficiency aspects in ecodesign but we are concerned about some of the requirements put forward that either (1) are unmanageable (unrealistic energy efficiency limits), (2) lack proper impact assessment (e.g. inclusion of signage displays into the scope), or (3) provide no added value (extensive repair and end-of-life information requirements). In short, the current texts of the draft regulations limit market access, deviate from internationally recognized best practices and compromise intellectual property.

The signatories of this statement remain committed to work together with the European Commission, Member States and other relevant stakeholders. At this particular stage in the process, we count on the Member States, which will meet on 19 and 20 December, to make the necessary improvements to the Commission's proposal to ensure that under the ecodesign requirements for electronic displays, EU consumers have access to the benefits of the most recent breakthroughs in picture quality improvement.

Sincerely,


Milda Basiulyte
Senior Policy Manager
DIGITALEUROPE



David S. K. Park
Center Head, Technology and
Standards Center
KEA



Erica Logan
Senior Director, Environment &
Sustainability
ITI



Douglas Johnson
Vice President, Technology Policy
CTA



Shuhjiroh Hamaguchi
Chair of Ecodesign WG, Japanese electric and electronic
industrial associations JP4EE: CIAJ, JBMIA, JEITA and JEMA



About the signatories

CIAJ (Communications and Information Network Association of Japan)

The Communications and Information Network Association of Japan was established in 1948 as a voluntary industry association composed mainly of telecom terminal manufacturers and network infrastructure vendors. In October 2009, CIAJ embarked on a new page in its history by becoming a general incorporated association.

The core Regular Members are manufacturers of telecom equipment, including network devices and mobile handsets, while other industry players, such as telecom operators and solution vendors participate as Forum Members. As part of upholding CIAJ's basic principle of creating new business opportunities and contributing to the robust growth of the industry, we will strengthen our efforts to promote policies and raising awareness of industry positions, attain tangible achievements from committee activities, and enhance our efforts to disseminate information to a wide audience.

<http://www.ciaj.or.jp/en/>

Consumer Technology Association™ (CTA)

CTA is the trade association representing the consumer technology industry in North America. CTA's membership includes more than 2,200 companies, 80 percent of which are small businesses and startups, with others among the world's best-known manufacturer and retail brands. CTA's membership spans the breadth of the industry and includes component suppliers, device manufacturers, software companies, retailers, distributors, installers and service providers. All of these players contribute to industry-wide efforts to improve energy efficiency. For many years, with efforts focused on policy, research, industry standards and consumer education, CTA has advanced energy efficiency in consumer electronics as part of the industry's broader commitment to environmental sustainability.

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 in total over 35,000 ICT Companies in Europe represented by 63 Corporate Members and 39 National Trade Associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

JBMA (Japan Business Machine and Information System Industries Association)

Japan Business Machine and Information System Industries Association (JBMA) is the industry organization which aims to contribute the development of the Japanese economy and the improvement of the office environment through the comprehensive development of the Japanese business machine and information system industries and rationalization thereof.

<http://www.jbma.or.jp/english/index.php>

JEITA (Japan Electronics & Information Technology Industries Association)

The objective of the Japan Electronics and Information Technology Industries Association (JEITA) is to promote the healthy manufacturing, international trade and consumption of electronics products and components in order to contribute to the overall development of the electronics and information technology (IT) industries, and thereby further Japan's economic development and cultural prosperity.

<http://www.jeita.or.jp/english/>

JEMA (The Japan Electrical Manufacturers' Association)

The Japan Electrical Manufacturers' Association (JEMA) consists of major Japanese companies in the electrical industry including: power & industrial systems, home appliances and related industries. JEMA will contribute to sustainable global development through improvement and enhancement of social and living infrastructures by strengthening international competitiveness of Japanese electrical machinery equipment industry.

<http://www.jema-net.or.jp/English/>

Information Technology Industry Council, ITI

ITI is the global voice of the tech sector. We advocate for public policies that advance innovation, open markets, and enable the transformational economic, societal, and commercial opportunities that our companies are creating. Our members represent the entire spectrum of technology: from internet companies, to hardware and networking equipment manufacturers, to software developers. ITI's diverse membership and expert staff provide a broad perspective and intelligent insight in confronting the implications and opportunities of policy activities around the world. Visit <http://www.itic.org/> to learn more. Follow us on Twitter for the latest ITI news [@ITI TechTweets](#).

KEA (Korea Electronics Association)

KEA is a representative organization of Korea's electronics industry and dedicating to advancing IT & electronics industry. We were established in 1976, and have more than 800 members including global electronics companies such as Samsung Electronics, LG Electronics, etc. We are striving to promote industry development and to build infrastructure of Electronics & IT industry by reflecting the companies' needs and interests.

<http://www.gokea.org>