



European Commission
Directorate General For Energy
F.a.o. Mr. Paolo Tosoratti

Per email: Paolo.TOSORATTI@ec.europa.eu

Date: 29 August 2017

Subject: Art 18 of the eco-design of energy related products (2009/125/EC) on possible energy labelling requirements for electronic displays.

Dear Mr. Tosoratti,

With reference to the Consultation Forum, which was held on 6 July 2017, EERA would like to take the opportunity to accept your invitation to provide additional comments and recommendations before 1 September 2017. In addition to our earlier position of 13 January 2015, which document is attached in Annex 1, we would like to give the following comments:

1. Scope

During the Consultation Forum we were informed that the horizontal approach for all different product groups has been transposed to a vertical approach for drafting regulation. This means that for every product group there will be consultations and new regulation will be drafted.

EERA comment: How will be guaranteed in this vertical approach that the requirements needed for proper treatment (recycling) as given in art 8 of the WEEE Directive (2012/19/eu) and the annex VII of this Directive, will be transposed into the eco-design regulation for each product group? This remark is relevant because when collecting WEEE, different product categories are mixed and collected as (normally 5-6) collection groups. For proper treatment, the eco-design requirements of the different products in one collection group (for instance IT and telecommunications equipment, consumer equipment in Germany) must be the same, otherwise legislative requirements for proper treatment cannot be fulfilled.

2. Disassembling

Present text proposal: Reversible process for repair and for re use. Proposed text: (Annex III, resource efficiency requirements, art. 1). Manufactures shall ensure that joining, fastening or sealing techniques, do not prevent to remove readily * the components listed in point 1 Annex VII.

**Wording from Battery Directive, art 11 to indicate quickly, safely, without spillage*

The sequence of dismantling operations, tools or technologies needed to access the targeted components shall be documented as from Annex IV.3 incl. for each necessary operation.

During the Consultation Forum proposals to allow for exemptions were given. For instance exemptions should be made where non removable joining and sealing techniques are required to assure safety, quality, or functionality.

EERA comment: EERA would like to emphasize that disassembling requirements should not only apply to repair and re-use. The removal of materials en components as required by the WEEE Directive Annex VII must be taken into account. Removal of these components and materials must be in line with the definition of removal in this Directive i.e. 'removal' means manual, mechanical, chemical or metallurgic

handling with the result that hazardous substances, mixtures and components are contained in an identifiable stream or are an identifiable part of a stream within the treatment process. A substance, mixture or component is identifiable if it can be monitored to verify environmentally safe treatment.

The eco-design requirements must include the functional requirements that make ‘removal’ of the Annex 7 materials and components possible. So fixing these materials and components in such a way that they cannot be contained in an identifiable stream or identifiable part of a stream shall not be allowed.

3. Plastics

Once more EERA would like to draw the EC’s attention for the subject of plastics that are being applied in EEE products. As follow up to our earlier comments in the Ecodesign dialogue (see Annex 1) EERA has published a position paper on plastics for the EU Plastics Strategy. This document is given in Annex 2. We would like to ask the EC to streamline subjects into a consistent strategy and policies for EEE.

Other recommendations with respect to the Ecodesign are:

- Reduce the total number of plastic types, but several types are fine. Use recyclable plastics that do not lose too much on IZOD¹. Some 60 % of the plastics used for electronics are ABS, HIPS and PP. There are many „exotic“ plastics in too low quantities to be recovered
- Avoid using:
 - unusual plastics that may not easily separate from common plastics;
 - cross-linked thermosets;
 - glass filled polymers or structural foamed plastics;
 - laminates and incompatible adhesives;
 - paints or metal coatings.
- For fasteners, use a comparable plastic type or a magnetic metal. Magnetic material can be easily separated with magnet.
- Use “compatible” paints if absolutely necessary to use paints.

Last but not least we would like to repeat some of our earlier points.

EERA comments and recommendations:

- **EEE must be compliant to RoHs, so signs/labels marks on the product that makes visible that the product is RoHs compliant;**
- **The producers must make sure that the plastic marking is correct. A study done by an EERA member over the last few weeks showed that a substantial amount of markings (in a small sample of 20 units, 4 samples showed a wrong marking of the plastics used i.e. 20 % !) is not correct;**
- **Stop using flame retardants in plastics in displays. It is now based on the candle flame test and this is not realistic. Displays do not include internal heat sources. The candle argument is an invalid argument, while if the candle argument would be valid, all furniture and textiles would need to contain flame retardants, which they don't. Adding flame retardants to flat panel displays largely reduces the recyclability of these plastics. The benefit to utilize plastics from Flat Panel Displays into PCR plastics outweighs from an environmental and safety point of view by far the fallacy of using flame retardants.**
- **Stimulate the use of PCR plastics by economic measures (for example VAT exemption for the use of recycled WEEE plastics) in new products.**

4. Mercury and Cadmium labels:

EERA is not in favour of the introduction of more labels on the products. Reasons being the difficult removal of such labels from casings. Mercury is presently not used in new displays (as it was in LCD displays). The proposed label in the Document for Consultation EL Display/ECF 6/7/2017 (Chapter 5 Label on page 13) is adequate if the QR code applied refers to online information where substances like Cadmium and Mercury (and other hazardous substances) are declared. Such information should be aligned with the requirements of article 15 (information to recyclers) of the WEEE Directive (2012/19/EU).

¹ The ASTM International standard for Izod Impact testing of plastics is ASTM D256.

Annex 1: Memo on Ecodesign Displays 13th of January 2015



EERA_Comments on
_Ecodesign_V0.11.pdf

Annex 2: EERA's comments and proposals for the EU Plastics Strategy 2017



WEEE Plastics
Recycling Strategy pr

Back ground EERA

EERA counts 37 recycling companies (> 90 locations in the EU) that reuse and treat > 2.2 million tonnes of WEEE annually. Our members are located in Austria, Belgium, Bulgaria, Czech Republic, Denmark, Italy, Finland, France, Germany, Greece, Ireland, Poland, Portugal, Romania, The Netherlands, Norway, Slovakia, Spain, Sweden, Switzerland and the United Kingdom.

For more information please visit our website www.eera-recyclers.com