



**Document:** Minutes of Meeting of consultation forum under the art 18 of the ecodesign of energy related products (2009/125/EC) on possible energy labelling requirements for electronic displays.

**Date:** July 6, 2017

**Place:** Brussels

**Attendees:** Member states, DE(10x) , Ceced (2x), Anec /beuc, EGMF (no show), EHI (no show), Ifixit, Fairphone, Euric (3x), Fead: (2x), Topten, Orgalime, Lighting Europe, ECOS (3x), EEB (2x), EERA etc..

**Introduction: Robert Nuij, EC DG Energy Policy officer**

- Time line: 1,5 year (end of next year delivering of the regulation)
- Labelling is not exactly same deadline as ecodesign regulation.

Update on working group database- steering group: first meeting last Tuesday (July 4) with stakeholders. The objective is establishing a Database, ready January 2019 . Monthly meetings from now.

Minutes of last meeting Wednesday 10 december 2014 (?) are adopted.

**Presentation of the proposals for possible energy labeling requirements for electronic displays. – Mr. Paolo Tosoratti**

- Scope: electronic displays designed primarily as televisions and computers.
- Bottom threshold is 100 cm<sup>2</sup>
- Out of scope: any other product (no professional, no medical, no picture frames, no displays integrated anywhere (**Question: is this acceptable for EERA?**). DE: would suggest a more general exemption.
- Discussion is going on with examples of what is in or out scope.

EERA did not comment on the energy requirements part of the regulation.

**Presentation Ecodesign requirements review, Mr. Paolo Tosoratti.**

**Timing:**

Tier 1: January 2020

Tier 2: 1 January 2022

Tier 3: 2024

Overview of the comments will be presented and changes will be considered. Subsequently a new text will be drafted.



**Key issues: based on first consultation: (December 2014)**

**Scope:**

There is proposed to narrow the scope to tv's and computer displays. Displays integrated are proposed now to be outside the scope. But vertical approach for drafting regulation will set the same regulation for these (new) product groups. The proposed horizontal approach, which means that a lot of articles will be implemented automatically into the regulation drafted for other product groups. This approach was not accepted by the industry (DE), so the idea is now that the regulation will be repeated vertical. There are some objections against changing the approach. Countries like Germany & NE are in favor of horizontal regulation.

**EERA comment:** the assurance that for each product group the regulation will be transposed vertical is too uncertain at this moment. How will be guaranteed in this vertical approach that the requirements needed for proper treatment (recycling) and related to annex VII WEEE Directive, will be transposed into the regulation for each product group?

**Disassembling: 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.

DE is asking for the following exemption:

~~Exemptions apply where non removable joining and sealing techniques are required to assure safety, quality, or functionality~~

**EERA comment:** DE is asking for exemptions and EERA is doubtful: is it measurable and/or for what objective?

**Question to EERA members:**

- Do we have special requirements for glueing and welding? Hazardous materials should not be firmly fixed with glue or welding/soldering/fusing/attaching?

**Plastics marking:**

A transitional method reference for marking standards for plastics with FR is listed in the WEEE Directive (current only BFR) :

EERA comment and discussed in consultation:

- more details requested for a separation system before shredding. (see further: overview EERA comments during consultation)
- If flame retardants are present, they shall be marked according the available standards and the using of the following notation. x-fr-y.

**Questions to EERA members:**

- What are achievable, measurable thresholds? 1.000 ppm?
- What do the recyclers need regarding marking of plastics?



### Information requirements:

The logo issues are discussed, see Annex III

- Mercury: Hg and Cadmium: Cd.

### Question to EERA members:

Which labelling is important for recyclers?

### EERA comments during the consultation (06-07-2017)

- EERA is insisting on a clear reference to the requirements of Annex VII. The link between Ecodesign requirements and the requirements in the Annex VII of the WEEE Directive (2012/19/EU) are requested by recyclers. Selective proper treatment, by removal of described materials and components is mandatory.
- EERA is in favor of the prohibition of 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.
- For the dismantling of components and substances it is important to refer to the Annex VII of the WEEE Directive. Uniform requirements are important, link to art 15 WEEE Directive regarding information for recyclers, and e.g. the removal of batteries must be possible manual, without many different special tools. The request is to require “non-proprietary” tools.

### EERA comments not mentioned during consultation (but stated in EERA position paper 13-01-2015)

- EERA would like to recommend the use of 10% of used plastics in the EEE (electronic equipment, with an gradually increase) .
- EERA recommends to include criteria for the recyclability of glass parts in screens. Recycling of screens is difficult because of increasing of the number of coatings, laminates and other substances. The glass makes up a large amount of the weight. The recycling targets will not be met in case the glass cannot be recycled.
- Pay attention to manual disassembly: that is still requested. EERA would recommend “non-proprietary tools”.

### Other topics during consultation:

- Standardised **EPS: external power supply**. : if EPS is not provided with the display the product shall be with 15%. The idea is the he consumer buys this separately from the devices.
- **Proposed new energy labels** (based on two scales, industry is in favor of this, consumer organisations not): Survey in 7 different countries to test if the labels are clear for customers. This study is ongoing. Some adjustments can still be made. QR code is part of the label. Consumers will have easy access to information on the product, with choices in different language. Proposed new labels are shown on the screen.

### How to proceed by EERA in the coming months:



EERA already sent out a position paper to the EC, Directorate General for energy, Mr. Paolo Tosoratti, on the 13th of January 2015. EERA will provide the EC Directorate General for energy, mr. Paolo Tosoratti with an update. The deadline for comments is: **September 1, 2017.**

The EERA position paper can be found here:

[http://www.eera-recyclers.com/sites/default/files/EERA\\_Comments%20on%20Ecodesign\\_V0.1%5B1%5D.pdf](http://www.eera-recyclers.com/sites/default/files/EERA_Comments%20on%20Ecodesign_V0.1%5B1%5D.pdf)

**EERA secretariat is asking EERA members approval for the statements made in this working document to reply on the questions in this document. Please before: 20 August 2017.**