



DIRECTORATE-GENERAL FOR ENERGY AND
TRANSPORT
DIRECTORATE D - New and Renewable Energy
Sources, Energy Efficiency & Innovation
**Energy efficiency of products & Intelligent Energy -
Europe**

DRAFT MINUTES OF THE MEETING OF THE ECO-DESIGN CONSULTATION FORUM HELD ON 22 February 2008

Place: Centre Borschette, Brussels
Chairman: André BRISAER (TREN/D3)
EC Participants: Martin EIFEL (ENTR/I4), Stephan KOLB, Jacek TRUSZCZYNSKI, Andras TOTH (TREN/D3)

1. Welcome and introduction

The **Chairman** welcomed the participants and introduces the agenda and the participants from the Commission.

2. Adoption of the agenda

The **UK** asked to for an update on the Working Plan. The **Chairman** indicated that the data and analysis provided by the external consultants for the Working Plan give a basis for selecting future product groups for the EuP process but is rather statistical and often difficult to translate into concrete policy options. The Commission will need to complement it with a more pragmatic and practical approach and would welcome any additional suggestions from Member States in that respect.

DK asked for a clarification on the timing of the EuP process, and in particular the indicative dates when the first implementing measures will be sent to the members of the Regulatory Committee. The **Chairman** indicated that the Consultation Forum will be followed by the refinement of the impact assessment and a Commission' internal inter-services consultation. The draft implementing measure will then be submitted for vote to the Regulatory Committee. The committee has not been created yet (adoption of internal rules of procedures) but the intention would be to have one committee covering both the Labelling (92/75/EEC) and the Ecodesign (2005/32/EC) Directives which should ensure the consistency of these two processes. The committee would operate under two different 'formations', which could have the same or distinct Member States' representatives. The intention is to have the first committee meeting before the summer break.

It is difficult to say at this point what will be the next product groups to be discussed by the Consultation Forum, but its members will be informed in line with the rules of procedure of the Forum.

3. Adoption of the minutes of the 2nd Consultation Forum meeting on 19 October 2007

The modified minutes of the 2nd Consultation Forum meeting as circulated to the Consultation Forum per E-Mail on 19 February were adopted.

4. Working document on possible ecodesign requirements for external power supplies (EPS)

The **Commission services** presented the main aspects of the working document and the rationale of the approach for discussion (see presentation circulated together with these draft minutes).

Scope

Products which are not in the scope and which have not been considered in the preparatory study, e.g. chargers for industrial applications and uninterruptable power supplies, could be explicitly excluded, or clarifying elements could be added to the scope definition itself (**ORGALIME**). "Chargers" for mobile applications as e.g. digital cameras and MP3 players should be covered, and a clarifying paragraph that e.g. chargers for mobile devices are covered would be welcome (**BEUC**). In order to ensure consistent regulation, all halogen lighting convertors (i.e. internal and external) should be regulated in the same implementing measure, preferentially in the implementing measure referring to general lighting (Lot 19) (**DE, AT**), and the scope for convertors should be extended to 500W (**DE**). It should be considered to extend the scope of lighting convertors to convertors for low voltage lighting other than halogen (**SE**).

The **Commission services** underlined that the scope comprises products accounting for 95% of the combined environmental impact of external power supplies and battery chargers as analysed in the preparatory study. Battery chargers are currently difficult to address because measurement methods have to be further developed which is time consuming, while providing little added impact. It will be considered to cover halogen lighting convertors in lighting specific ecodesign legislation. On request of **DK** it was clarified that cradles powered by an EPS e.g. for a DECT phone are not considered to be an external power supply.

Ecodesign requirements for EPS

Consistency with other schemes in the world is welcome because it simplifies EPS testing and qualification. The approach to make criteria of a voluntary programme as e.g. Energy Star or the Code of Conduct mandatory is acceptable for EPS being an accessory, but it should not be applied for complex products because useful products/functionalities may disappear from the market (**EICTA**). The staged approach (**BEUC, NL**) and the demanding set of thresholds, in particular the 2nd stage requirements, are welcomed (**BEUC**).

In some cases focussing on the active efficiency compared to the no-load losses may not be appropriate. For mobile phone EPS the 2nd stage requirements may imply material-related impacts which are not unjustified for active efficiency improvement of a few percent, and improvements should be focussed on no-load having a larger environmental impact (**ORGALIME**). The issue has been discussed in the framework of the EU Code of Conduct for EPS and it was decided to set different criteria for mobile phone EPS for a restricted time only. While voluntary programmes can be fine tuned to the market, mandatory ecodesign requirements have to be enforceable. This

becomes difficult for complex requirements foreseeing functional exemptions, which are not loophole proof, and one simple requirement as suggested in the working document is preferred (NL).

The **Commission services** underlined that the data available shows that the requirements for the 2nd stage are realistic, and acknowledged that the 2nd stage active requirements for EPS should be re-considered for those cases when EPS are typically used very little time in active mode. The consequences of the slightly modified draft for the new Energy Star specification shortly before the meeting of the Consultation Forum will be considered.

Ecodesign requirements of halogen lighting convertors

Distinct requirements for magnetic and electronic convertors should be established, because the suggested requirements imply that magnetic halogen lighting convertors cannot comply. If magnetic convertors are to be phased out a longer transition period than the suggested two year period is necessary for industry to adapt. For certain applications, e.g. convertors operated in humid ambient conditions, magnetic convertors should be allowed because electronic convertors are not suitable (CELMA). If an off-switch, being the preferable solution for the consumer and the environment, is on the primary side, no no-load requirement is needed (BEUC).

Convertors should be transferred to lighting specific implementing measure(s), e.g. under Lot 19, and built-in types of convertors, possibly being more common than convertors separate from the luminaire, should be covered. Future technologies imply that there will be convertors being connected to the lighting control network, requiring a standby energy consumption which should be considered consistent with the horizontal "standby" implementing measure, and should not be considered "no load". The power consumption levels should be 1W/0.5W for the first and second stage respectively (CELMA).

The **Commission services** underlined that it is not appropriate to differentiate between technologies providing the same function. CELMA is welcome to provide further input on applications where magnetic convertors could be indispensable. The no-load requirement is readily met by devices having an off-switch, but it is important e.g. for "wall pack" type convertors.

Measurement methods

If third-country measurement methods are incorporated explicitly into the ecodesign measure it should be clear who is responsible for common modifications, possibly required by European conditions. With fast track procedures it is feasible to develop a measurement standard in a timeframe of six months, and the corresponding mandates should be issued immediately, and the appropriate resources for European standardization organizations have to be made available (IT). Relevant information related to legislation and standards related to products should, in general, be easily accessible (SE).

The **Commission services** considered that the suggested measurement methods are suitable for European conditions. The **Chairman** invited the affected industry to flag potential difficulties which may arise due to EU specificities. The **Chairman** stressed that a standard to be referred to in an ecodesign implementing measure should be available at the point in time when the measure is tabled for vote in the Regulatory Committee. This approach has been requested by Member States as a reaction to the difficulties with labelling of air conditioning equipment. The **Chairman** confirmed that, in general, European standardization is the preferred option, but mandates should be

issued on the basis of clear policy options. The time needed for developing European standards for EPS and convertors would not allow to refer to European standards in the proposal for an ecodesign measure on EPS, because this measure is to be tabled to the Regulatory Committee soon. The relevant draft mandates will be presented to the Regulatory Committee. The implementing measure will make clear that when available, European standards will supersede the measurement methods explicitly contained in the ecodesign measure.

CENELEC welcomed that the preferred option is harmonized standards. **CENELEC** strives for quick standardization processes.

Standardization of interfaces

A decisive option to reduce material related/life cycle environmental impacts is to use a single EPS for several appliances, which would be facilitated by standardization of interfaces, and consumers could buy them separately from the primary load device. Universal chargers sold with different plugs already exist on the market. Technical difficulties should be no excuse to do nothing (**ECOS**). Mandatory ecodesign requirements are not meant to cover only energy efficiency. Facilitating the compatibility of interfaces is a key issue, and a mandatory ecodesign requirement would be necessary. A voluntary approach is not sufficient because the business model for EPS provides no incentives for manufacturers, and there is no confidence that the usual standardization process yields the necessary solutions. For each voltage type a unique interface specification should be contained in the ecodesign implementing measure (**EEB**). It is more convenient for the consumer to have only one instead of several EPS, which currently is not possible due to different interfaces. Production/transport related savings due to reduced number of EPS can be more important than energy efficiency improvements, e.g. for mobile phone and digital camera EPS. USB interfaces for mobile phones in China shows that solutions are available. The consumer should be able to make an own choice, and the consumer can choose the most efficient one (**BEUC**).

The idea to have a universal EPS is in principle a good one. But the issues relevant for standardization are not only related to standardization of the connector. EPS, charging circuitry and the battery are specified, designed, tested and certified/verified together. The energy efficiency of a universal charger cannot be the same as a charger specific for the primary load, and the environmental balance has to be considered. Safety considerations are important. In particular, EPS are tested for compatibility and safety with the primary load. There is no method available to test a universal charger with all the primary load products that it could potentially be used with. These are not excuses, but the reality (**EICTA**).

A mandate to the standardization organizations is supported (**DE, BEUC**). **BEUC** offered support to the Commission staff for issuing a mandate and underlined that the industry should be involved.

There are many technical difficulties related not only to the interface, but also to voltage/current. For standardization of interfaces mechanical or electronic coding are possible. This should be discussed by the standardization organizations. The standard should be made compulsory. If the standard is not delivered by the standardization organizations as foreseen by the mandate, the Commission should define the relevant specifications itself. In order to actually reduce the number of EPS it has to be made sure either by a voluntary or mandatory initiative that the consumer has the choice to buy an EPS or not, and primary load products and EPS are sold separately (**DE**).

Standardization of interfaces has potential cost benefits also for industry, and an initiative to investigate standardization is supported (**FR**).

The **Chairman** suggested that standardization of interfaces should not delay the process for developing the implementing measure on EPS. Possible solutions have to be realistic. A generic requirement could be considered for the regulation, linked to a mandate to the standardization organizations. Concrete input for the mandate is welcome.

Consumer information

There is still room for communication to consumers on off-mode losses, e.g. "please unplug this device to avoid energy waste", or on waste disposal, e.g. "do not put EPS into the waste bin, but bring to recycling" (**BEUC**, supported by **FR** and **EEB**).

On request of **FR** the **Chairman** confirmed that the Ecodesign Framework Directive, Annex I Part2 provides the legal framework for consumer information requirements.

4. Working document on possible ecodesign requirements for simple set top boxes (Simple STBs)

The **Commission services** presented the main aspects of the working document and the rationale of the approach for discussion (see presentation circulated together with these draft minutes). That was followed by a short overview of the written comments.

Definitions/scope

The definition should indicate that devices converting radio signals are also covered by the implementing measure (**DE**).

The definition of standby will be aligned with the one laid down in the implementing measure on standby; the decision as to include or not the reactivation function (timer for recorder) in the power allowance for standby is still being considered (**Commission services**). According to **NL** this function should be included in the power allowance for standby.

Simple STBs integrated into TV sets are not part of subject matter (**Commission services**).

The definition should cover all Simple STBs irrespective of the interfaces used (SCARD, HDMI etc...) (**MVV**, authors of the preparatory study on Simple STBs).

Timing of implementation and staged requirements

There is a need to set first tier requirements as soon as possible, as of 2010 (**FR, ENV NGOs**).

The proposed timing for requirements applying to Simple STBs decoding high definition (HD) signals and for Simple STBs with recording functions is based on the expected entry into the market of such devices (**MVV, Commission services**). Furthermore, requirements for standby are aligned with those laid down in the working document on possible ecodesign requirements for standby and off-mode.

The fact that power consumption thresholds proposed in the working document are already fulfilled by products on the market indicates that the timing for power consumption requirements can be ambitious as the necessary technology is available at low cost (**ANEC**).

Limit values

There is a need to clearly formulate requirements for limit values, preferably in a table, with basic power consumption limit for SD (standard definition) and additional allowances for HD, second tuner and hard disk (**DE, FR**).

Power allowance for hard disk should be 3 to 5 W, and not 7 W (**FR**).

Even if 0 W in off-mode is not technically feasible at this stage, we should be aiming at achieving it at some point (**DE**). 0 W in off-mode is unrealistic as the function of electromagnetic compatibility always consumes a certain amount of energy (**EICTA**).

Simple STBs are low-price devices, therefore the cost-effectiveness and simplicity of any ecodesign requirements has to be considered in order to avoid delay of the process; the implementing measure should focus on a limited number of requirements with the biggest potential (**UK**).

Automatic power down

The implementing measure should explicitly indicate that the automatic power down function is not optional (**DE**).

Technical solutions to reduce the 4 hours period before the device goes automatically into standby should be sought (**ANEC**). Such solutions do exist but are not cost-effective (**Commission services, MVV**). **EICTA** to provide information of the availability and cost-effectiveness of remote controls that switch off/on simultaneously both the TV set and the Simple STB.

The automatic power down function should be active already when the box is delivered to the consumer (**SE**).

Hard-off switch

An ecodesign requirement to include a hard-off switch in Simple STBs would be cost-effective (**ANEC**). This technical solution would bring a significant increase of the prices of Simple STBs (**ORGALIME**), and its effect on consumer behavior has so far been very limited. Another argument against prescribing this particular solution is the tendency to miniaturize Simple STBs (**Commission services**).

Environmental aspects other than energy use

As many Simple STBs will be disposed soon after purchase, the measure should include provisions on recyclability and end-of-life (**ENV NGOs**). Some of these aspects are already covered under the waste legislation, particularly the WEEE Directive but improved recyclability through better design is always considered under the EuP process. The preparatory study did not provide evidence on the availability on the market of materials which would improve the recyclability of Simple STBs beyond the provisions laid out in existing Community legislation (**Commission services**).

There should be a coherence between the different policy instruments- requirements on information on waste should be set under WEEE, and on design under EuP (**EICTA, ORGALIME**).

Information to the consumer

Energy labelling is not the most appropriate policy option in this case due to the miniaturization of Simple STBs and the need to act fast (**Commission services**).

Consumers should be provided information above all on how to dispose these devices (**ANEC, ENV NGOs**). If the current provisions in that respect are ineffective they should be reviewed, but as part of the WEEE process, and not EuP (**ORGALIME**).

Revision

There was a broad support for fixing the review date of the measure at 'no later than 5 years after its entry into force'. It was indicated that the ongoing preparatory study on Complex STBs will feed information also into this process. Revision may not be needed if simple STB would disappear from the market with the function being integrated in the TV set.

Consistency with Complex STBs

There is a need to ensure consistency between the two measures (**NL, DE**).

List of written statements from members of the forum
(as filed in CIRCA)

Comments received before the meeting

-    20080215_CELMA comments on the Commission's working document on external power supplies_FINAL.pdf
-    ANEC-PT-2008-EuP-001final.pdf
-    ANEC-PT-2008-EuP-002final.pdf
-    Danish comments EPS and settop box.doc
-    EbP_RL_2008_02_15_1557_n__eDE_DM_Ew_EK_KF_Stellungnahme_BAM_UBA_Ef.doc
-    eceee comments - EPS eco-design - 17 Feb08.pdf
-    EuP EPS Environmental NGOs 15-02-08.pdf
-    EuP STB Environmental NGOs 15-02-08.pdf
-    FW EuP Consultation Forum 22 Feb 08 - comments from AeA Europe.htm
-    NL comments to EPS IM proposal - 080214.pdf
-    NL comments to STB IM proposal - 080214.pdf
-    Nokia comments on the LOT 7 IM for EPS.htm
-    Set_Top_Boxes_Statement_Germany.pdf
-    STB eceee comments15Feb08.pdf

Comments received following the meeting

-    080414 EICTA EuP Lot 7 Comments.pdf
-    Belgian comments power supplies .doc
-    Comments Settop Boxes Austria_EV.pdf
-    External_Power_Supplies_Statement_Germany.pdf
-    Position EuP lot 7 20.doc
-    SE - Pos conc lot 7 and 20.msg
-    UK Comments EPSU and STB final 6 March.doc
-    UK Comments on Proposals for EuP Implementing Measures for External Power Supplies and Simple Set Top Boxes.msg