

Japan's Comments on the WTO/TBT Notification of EU (G/TBT/N/EU/609)

“Draft Commission Regulation laying down ecodesign requirements for electronic displays pursuant to Directive 2009/125/EC of the European Parliament and of the Council, amending Commission Regulation (EC) No 1275/2008 and repealing Commission Regulation (EC) 642/2009”

Japan appreciates the EU's policy to improve the energy and resource efficiency of energy-related products. Japan has been closely watching the impact of this regulation on our industries, and we would like to submit the following comments.

1. Limit values applicable to an electric display

- ANNEX II Ecodesign requirements, A. ENERGY EFFICIENCY REQUIREMENTS, Point 1. ENERGY EFFICIENCY INDEX LIMITS
- Minimum Energy Performance Standard (“MEPS”) of on-mode power consumption and energy labelling indication (classification) proposed by the EU is difficult to apply to display products with advanced technologies (for example, televisions and television monitors with 8K image technology for high resolution) which are expected to be rapidly widespread in the global market.
- The Japan 4EE industrial associations (CIAJ, JBMIA, JEITA and JEMA) has already proposed introduction of appropriate correction factor for particular types of displays in the Energy Efficiency Index (EEI) formula, in order to eliminate low-efficiency products and to achieve the EU's ambitious goal of higher energy efficiency. The Government of Japan supports the proposal from the Japan 4EE industrial associations.

2. Application of low power mode to “signage display” and “interactive white board”

- Article 1. Subject matter and scope, and others
- “Signage display” is designed to operate continuously for long periods of time as opposed to televisions and television monitors and is never in a standby condition. Accordingly, the introduction of the standby power consumption requirement for signage displays would not contribute to energy saving.
- “Interactive white board” is operated connection with PC, and has additional functions such as television conference system, network hub, and wireless LAN access point. These functions need to be completely active and the requirements of automatic power down function will undermine the advantages of interactive white boards.
- The Japan 4EE industrial associations has concerned that some displays which cannot effectively realize energy saving are also included in the scope of the

regulation without enough consideration for practical usages and functions. They have already expressed a proposal to exempt the displays from the scope.

- The Government of Japan supports the proposal from the Japan 4EE industrial associations.

3. Repair and re-use and end-of-life information

- ANNEX II Ecodesign requirements, E. INFORMATION AVAILABILITY REQUIREMENTS Point 1 “Repair and re-use information and documentation” and Point 3 “End of life information and documentation”

Annex II. E.1 “Repair and re-use information and documentation” :

- The draft regulation requires manufacturers (or importers) to disclose specific information for repair and maintenance such as disassembly diagram in order to allow repairers who have been registered as professional by the EU member states to get the information. This requirement might cause a matter of intellectual property rights. Japan has concerns that it would be an excessive requirement.

Annex II. E.3 “end-of-life information and documentation” :

- Regarding “end-of-life information”, existing legal requirements should be preferred and disconformity or duplication should be avoided. For facilitating End-of Life treatment, recyclers are already allowed to get information of materials and components which is necessary for recycling under a dedicated platform in line with the existing Directive 2012/19/EU (WEEE Directive) Article 15.
- The Restriction of Hazardous Substances (RoHS) and the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) also cover the Substances of Very High Concern (SVHC). Furthermore, there are material declaration schemes for disclosing information of contained materials among global supply chains based on the IEC international standard.
- Considering the existing regulations or schemes, when the information is necessary for recycling risks on the contained materials in products, information required to be disclosed under ecodesign requirements should be limited to materials regulated by REACH and RoHS. The ECHA database should provide information on SVHC according to Directive (2018/851) Article 9 (Waste Framework Directive), (1) (i).
- These contained chemical substances are controlled through global supply chains, and many of them are commonly used for components of various products. Therefore, regulating each product by individual Energy-related Product (ErP) implementing rules will cause confusion on the operation of existing control schemes.
- Furthermore, it is necessary to establish cost-effective and feasible recycling

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technologies and to clarify scientific rationale in order to make it essential to disclose information of critical raw materials.

On the above-mentioned issues, the Japan 4EE industrial associations has already requested to remove or reconsider the above-described requirements. The Government of Japan supports the proposal from the Japan 4EE industrial associations.

We thank the EU for the opportunity to submit comments. We would also appreciate it if you would consider the comments from the Japan 4EE industrial associations (CIAJ, JBMIA, JEITA and JEMA) as well.

Attached proposals from Japan

1. Proposal of realistic limit values applicable to an electric display

- ANNEX II Ecodesign requirements, A. ENERGY EFFICIENCY REQUIREMENTS, Point 1. ENERGY EFFICIENCY INDEX LIMITS

The energy requirements proposed for the ecodesign regulation should be lowered to a more realistic level. For this to be achieved without compromising the overall ambition of the regulations, we recommend the introduction of a correction factor for particular types of displays in the EEI formula, similar to the one proposed in the Labelling draft for signage displays:

And the following proposal should be considered:

- Ease the limits for all display types, and allow higher energy consumption for particular features (please see suggested table below on correction factors for EEI formula).
- Eliminate the limits proposed for Tier 3, as even with ease of limits and allowances, these consumption caps will remain unachievable.
- Significantly ease requirement for displays with 8K resolutions and above.

$$EEI = \frac{(P_{measured} + 1)}{((3 \times [90 \times \tanh(0,02 + 0,004 \times (A - 11)) + 4] + 3) + \text{Corr_rum}) \times \text{Corr_resolution}}$$

Display Type	Correction factor (<i>corr_rum</i>)
Wide-screen monitors	15
Curved monitors	15
Gaming monitors	15
Self-emissive displays	30
Touch displays	5

Resolution	Correction factor (<i>corr_resolution</i>)
FHD / up to 1920x1080	1
UHD / up to 3840x2160	2
8K / up to 7680x4320	4