

Comments from Republic of Korea with respect to Electronic Display Ecodesign Regulation of EU (G/TBT/N/EU/609)

The Republic of Korea appreciates the opportunity to comment on the eco-design regulation¹, which was notified to WTO as G/TBT/N/EU/609 on October 9th, 2018, as well as the recently published draft revision² (hereinafter referred to as the revision). The revision was published in February, 2019, but has not been notified to WTO/TBT members.

First of all, the Korean government respects the efforts of the European Parliament and the Council to provide information to the consumers. Furthermore, Korean companies are committed to comply with the regulation of EU.

In this regard, the Republic of Korea would like to express our concern and submit some comments as below.

Duplicative Regulation¹

‘End of life information and documentation’ (E3, Annex II) requirement is redundant, because other EU regulations such as WEEE and RoHS is already governing the components such as flame retardants and heavy metals. Therefore, Korea would like EU to delete this requirement, due to its duplicative nature.

Extension of APD¹

According to C4, Annex II, APD (Automatic power down) time is set at 60 seconds. If you consider actual behaviour of consumers using a television, 60 seconds is a very short time. Therefore, Korea would like EU to change it to a more realistic time (for example, the U.S. Energy Star sets the time at 15 minute).

¹ 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 (and its accompanying annexes

² COMMISSION REGULATION (EU) .../...of XXX 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

Grace period for Micro LED products¹

Applying the eco-design regulation to a product with latest technology, may hinder commercialisation of products such as Micro LED. Therefore, Korea would like EU to exclude the Micro LED products from Tier 1 (to be enforced in 2021; A1, Annex II).

Correction factor^{2,3}

According to the energy labelling regulation³ (notified as EU/610), a correction factor is set at zero for a TV and monitor. Korea would like EU to provide the rationale for the correction factor.

Korea would also like to know if EU is planning to revise the regulation, to set a correction factor for a product above UHD-4K.

WTO/TBT notification²

Korea would appreciate if EU would notify the recently published draft², and receive & reflect the opinions of WTO/TBT members.

Korea would be grateful if our concerns could be considered positively and if we could receive a reply. Do not hesitate to contact us if you have any questions or concerns.

³ Draft Commission Delegated Regulation (EU) supplementing Regulation (EU) 2017/1369 of the European Parliament and of the Council as regards energy labelling of electronic displays and repealing Commission Delegated Regulation (EU) No 1062/2010 (and its accompanying annexes)