Raising standards for consumers

POSITION PAPER

ANEC POSITION PAPER ON ECODESIGN REQUIREMENTS FOR COMPUTERS

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CONTENTS

INTRODUCTION

This paper aims at depicting the state of play regarding ecodesign legislation and standards for computers and ANEC preliminary recommendations on the next steps from a consumer perspective.

1 | THE CONTEXT

Ecodesign requirements for computers introduced in 2013

Personal computers are essential to the functionality and productivity of European consumers and have become an indispensable appliance in daily life. Computers have been subject to dedicated ecodesign rules since 2013 to ensure that they are energy efficient[1]. However, the revision of the legislative framework, planned for 2017, has not been completed yet. As a result, manufacturers can continue producing short-lived devices, regulated by outdated rules that do not reflect technological progress, and leave a massive energy saving potential untouched. This situation is detrimental to the consumer, and to the planet. Additional consumer focussed issues such as durability, software longevity, repairability, water ingress protection and hazardous materials are either not addressed at all, or only minimally addressed, in the current Ecodesign Regulation on computers. The revised Regulation will likely address these other impact areas in significantly more detail.

In its Ecodesign and Energy Labelling Working Plan 2022-2024[2], next to the extension ecodesign and energy labelling to new product groups, the Commission intends to catch up on the delays it has accumulated in recent years in developing new product-specific regulations and updating the existing ones, including the Commission Regulation (EU) No 617/2013 on computers.

What caused such delays in the regulation and where are we now?

The Preparatory study on the Review of Ecodesign Regulation 617/2013 (Lot 3) showed that there were significant gaps in the current Ecodesign regulation on computers and significantly more savings were achievable through development of a revised regulation. The same preparatory study also showed that one of the largest missed savings comes from not tackling energy efficiency when computers are undertaking work. The reason for that shortcoming is that there were no acceptable test procedures that address energy efficiency during work.

To bridge the gap, the Commission has taken steps to work with CLASP, the Collaborative Labelling and Appliance Standards Programme, to develop such a test

[1] https://www.coolproducts.eu/wp-content/uploads/2021/09/EEB_ECOS-Delays-in-ecodesign-report.pdf

[2] https://ecostandard.org/news_events/ecodesign-and-energy-labelling-working-plan-2022-2024-new-products-a-boost-to-ecodesign-efforts-and-the-foundation-for-an-eu-repair-index/

procedure. It has taken a considerable amount of time to start and then develop the test procedure.

CLASP and the high-tech company GTD GmbH have been working together since 2020 to develop an open-source software for testing the active energy-efficiency and performance of personal computers (i.e., products covered under Lot 3). See On-Mode computer testing tool.

It has taken a considerable amount of time to start and then craft the test procedure, which is still in development today. Discussions are still taking place over which "worklets" (i.e. software simulating work activities on the computer such as web-browsing, watching a video, etc.) should be included in the final standard. Work is also continuing on testing products and identifying suitable metrics for use in the new Ecodesign Regulation on Computers. Eventually, the metrics within the new Ecodesign and Energy Labelling Regulations should take account of efficiency when performing tasks within these worklets (or a sub-set of the worklets). Manufacturers will be encouraged to reduce power demand when the computers are performing tasks within these worklets. The idea is that the Energy Label will be designed to identify the most efficient types of computers for a number of overall usage types (e.g. home/office, game playing etc).

2 | THE WORK AHEAD

Work is about to start on the development of the new Computer Ecodesign Regulation which will include reference to the new test procedure being supported by the Commission and CLASP. In parallel, in its 2023 Annual Union Work Programme[3], the European Commission announced its ambition to revise the existing and develop new standards for computers active state energy use through reliable, accurate and reproducible measurement methods which take into account the recognised state of the art.

Next to improving the active power and performance of computers, the revised Regulation will likely address other consumer relevant requirements linked to material efficiency in significantly more detail. The Commission will probably encourage the use of criteria similar to those found in the recently adopted Ecodesign Regulation on smartphones, mobile phones, cordless phones and slate tablets. These include software updates availability, minimum number of cycles for batteries, availability of spare parts, maximum delivery time, access to repair manuals, dismantling for recovery and recycling, easy disassembly requirements, etc. It is expected that the standards used to support the requirements in the Ecodesign Regulation on mobile phones and tablets will also be used in the revised Ecodesign Regulation on Computers.

It is also expected that the revised Ecodesign Regulation on Computers will include the hazardous material content requirements, or similar, included in the Commission Regulation (EU) 2019/2021 of 1 October 2019 laying down Ecodesign requirements for electronic displays.

[3] The 2023 annual Union work programme for European standardisation,

3 | ANEC RECOMMENDATIONS

In this context, ANEC plan on promoting the following points:

- The requirements in the new Ecodesign Regulation on computers should be sufficiently robust to be able to make a difference in the energy use of consumers' products. This includes ensuring that integrated display energy of notebook computers is measured within the new standard and that suitable requirements, similar to those found in the Ecodesign Regulation for Electronic Displays, for this high energy using component are included. It should also ensure that the least efficient products are removed from the market.
- Care also needs to be taken to ensure that the new Ecodesign Requirements are based on the measurement of a sufficient number of new products on the market and over as many different types of computers available as possible.
- The new standard for computers and servers should exhibit sufficient robustness over time so that consumers are always provided an accurate idea of how much energy their new products will use when under normal use and whilst in low power modes.
- Consumers will often have decided to purchase either a "notebook" or a "desktop". As such, the new standard should allow consumers to be able to choose amongst "notebooks" and amongst "desktops" based on their energy efficiency, as well as wider environmental impacts.

Beyond the scope of the computer regulation and subsequent standardisation deliverables, ANEC recommends that the European Commission broadens its assessments beyond individual product types and assesses the potential energy savings available through optimisation of services.

ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and the use of standards, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 34 countries.

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