



ecee's comments on the draft proposed voluntary agreement for Complex Set-Top Boxes (CSTB)

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In principle, ecee is very sceptical towards voluntary agreements as an alternative to mandatory eco-design requirements, but believes complex set-top boxes represent products well suited for an industry voluntary agreement to phase inefficient products. However, any agreement must signify a real commitment from the industry, in order to represent an alternative to an eco-design regulation.

Scope

The overall philosophy of the voluntary agreement for complex set-top boxes (CSTB) should be to have environmentally ambitious energy limits that allows for excellent functionality, but at the same time encourage extra functions to be deactivated by default.

It should be further clarified whether triple play boxes (TV, Broadband and Telephone in one box) are included.

Necessary conditions for a voluntary agreement on CSTB

Representativeness and market surveillance

Industry signatories must represent a significant share of the EU market to avoid free riders and maintain the credibility of a voluntary agreement instead of regulation. Partners must show they have a market coverage of some 80% of the market, not only in general but of the specific products covered by the voluntary agreement. Thus industry must define market coverage in more detail. In this respect, it is important not to double-count (e.g. a distributor of cable TV services must not be double counted with a supplier of products to the distributors). Rules for sanctions for partners who sign the agreement but do not honour its requirements must be stipulated.

Strength of Tier II requirements

Tier II values are draft values. If final Tier II values are weaker than those now discussed, it should be discussed in a new consultation forum and not delegated to the industry or the steering group.

Defining requirements

It is important that the power consumption is defined in a transparent way. The measured TEC value should show the break-down power consumption values that make up the total quota. This is important information for consumers who may have different

About the European Council for an Energy Efficient Economy (ecee)

ecee is a non-profit, membership-based European NGO. The goal of ecee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, ecee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of ecee's principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 participants from a wide range of backgrounds. ecee and its summer study offer governments, industry, research institutes and citizen organisations a unique resource of evidence-based knowledge and access to reliable information.



usage patterns than those on which the TEC value is based, and it is also important for monitoring and evaluation of the agreement.

Other remarks

Allowance for and activation of extra functions

The extra functions with allowances listed in the proposed document are not always used. Thus it is important that all CSTBs covered by the agreement are required to pass the TEC limit that only includes the basic functionality (e.g. HD and advanced processing) that is essential to watching TV, in addition to the TEC limit that includes any extra functions like DVR.

The proposal should include requirements to ensure that the user has the possibility to deactivate unused extra functions, e.g. recording functions that are always on. A further step would be to have all extra functions not essential to TV-viewing deactivated by default in the settings on delivery.

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