



Brussels, 18 October 2010

**Main comments from ECOS (on behalf of European environmental NGOs)  
on the final draft of the Ecodesign preparatory study  
for Sound & Image equipment (ErP Lot ENTR 03)**

*The final draft of the Ecodesign preparatory study covering multimedia equipment (DVD players/recorders, projectors and game consoles) provides some new interesting ideas in terms of policy options but which are too briefly mentioned and insufficiently developed. Also, several other aspects have unfortunately not been improved, despite our previous comments in June 2010.*

- The two sections of the final chapter ('policy options and scenarios') addressing video players and projectors **are expressed in an insufficiently rigorous and clear language**, leading to ambiguous expressions. The English needs to be proof-checked and clarified, using more precise descriptive terms.
- **Several proposed requirements are not enough substantiated.** It is not always clear why a specific limit value is proposed and how it compares to the least life-cycle cost level (aim of the Ecodesign policy).
- If the study suggests ecodesign rules on the energy use, the other environmental aspects (toxicity, recyclability, resource efficiency, etc.) **are very poorly addressed in the policy options and scenarios. This is a major disappointment for us and a reason for not supporting the study conclusions.** The argument used by the study team that it would "*seem unsuitable to suggest these types of requirements for some products in isolation*" is not an acceptable reason not to work on the subject. One example that the study team should have elaborated on is how recyclability of multimedia products can be improved through requirements on dismantability (especially of scarce metals, not just plastic parts). A few components (such as motherboard, circuitry...) represent a large share of the total impacts in manufacturing phase, and include metals whose primary extraction is very impacting. Dismantability can be made enforceable and verifiable.
- Too rudimentary paragraphs are included on the **energy labelling** of video players and projectors. They are far insufficiently developed to be a guidance for policy making. **This is a pity since they could be interesting concepts.** We expect from the study team to beef-up and substantiate more these key aspects.
- When compared to current base case products, **the proposed power caps for video players & recorders appear insufficiently stringent.** We suggest 8 W for DVD players and 15 W for high definition playback of Blu-ray players for the 1<sup>st</sup> tier (2012). **A much more elaborated 2<sup>nd</sup> tier (2014) should also be proposed for all product categories and modes, to ensure dynamism.**
- So-called 'Fast start' modes in media players and recorders should be disabled by default and consumers informed about their much higher electricity consumption compared to usual standby.
- By not suggesting minimum requirements on the gaming mode of game consoles, **the study fails to use a fundamental leverage to ensure that energy efficiency is a priority in the design of the new generations.** A long-term cap on gaming products would not be the end of the world (as it can eventually be re-discussed if there is very strong evidence that it is indispensable). At least, it would send a clear message to the industry about what is expected from them, and give motivation to front runners.
- We again express our concern that media playback on game consoles can consume four times more energy than a stand-alone player. **The study has not proposed a satisfactory way of fixing this problem.**
- The study should develop **more refined wording for the Auto-power down requirements (APD)**, to ensure they cover all possible modes and avoid annoyances to users. This is particularly true for game consoles, where the study team should consider the current detailed drafts elaborated by manufacturers and NGOs. Refinement of the APD for video players is also required.
- We have many doubts on the legal possibilities to **exempt so-called 'high-end products'** (quality expensive models) if they have similar functions than mass market products. A sales limitation or exemption sticker would pose some serious issues. Another option of setting specific and limited additional allowances for pre-determined high-end performances could be explored instead.