



Position Paper

Concerning the working document on possible ecodesign requirements for standby and off-mode electric power consumption of electrical and electronic household and office equipment, presented and discussed during the meeting of the Consultation Forum (established under Directive 2005/32/EC) on October 19, 2007, the HIGH END SOCIETY has the following comments.

About the HIGH END SOCIETY

The HIGH END SOCIETY (Interest Society for High Quality Consumer Electronics), founded in 1982, is a European association of manufacturers and distributors who are involved in the high end market. Presently 47 mostly small-scale companies are members of the association. Although the product portfolio covers non-EuPs like connection cables and plugs, the majority of companies (also) place EuPs on the market. They serve a very small but outstanding niche within the market of entertainment electronics. Products are characterized by

- highest quality
- very long durability
- keeping alive and developing technologies (e.g. analogue sound processing) withdrawn from mainstream-producer

Expected consequences of the suggested ecodesign-requirements for standby and off-mode

The HIGH END SOCIETY supports the activities of the EU-Commission to foster environmentally well performing products. We also support the methodology of taking the entire life-cycle of a product into account.

Consumer electronics clearly fall under the scope of the discussed working document. Thus the products of the majority of members of the HES would be affected by an implementing measure as outlined in the working document.

Due to the very high need for quality and due to specific technologies used (e.g. tube technology) it will be for technical reasons impossible for many – if not most – of the EuPs put on the market by our members to be produced in conformity with the requirements.

As a consequence

- diversity of products (in regard technologies and quality) would be considerably reduced
- small-scale companies with a limited number of products / technologies in their portfolio (common in this sector) would loose their fundament of market

Although there is no Life-Cycle-Analysis on consumer electronics comparing ecological performance of mass-market mainstream products with the long-lived ones produced by the HES-members, we are convinced that loosing this segment of consumer electronics would be a painful impoverishment of the sector.

We kindly ask you to keep our concerns in mind when further developing an implementing measure on standby and off-mode.

Kind regards,

HIGH END SOCIETY e.V.,

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Chairman of the Board

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