

Thursday, 22 April 2010

Mr Philip Lowe  
Director General  
Directorate General Energy  
European Commission  
Rue de la Loi 200  
B – 1049 Brussels

Dear Mr Lowe,

On behalf of the European Digital Technology Industry, I am writing to express our concerns with respect to the ongoing development of Energy Efficiency Requirements for Television equipment. Our concerns relate in particular to the currently tabled classifications as compared to the proposal presented in February 2010, and the procedure to elaborate the proposal followed by your services (Unit C3 – Energy Efficiency of products & Intelligent Energy - Europe).

Television manufacturers have responded quickly and already invested so as to comply with the targets elaborated jointly between industry and your services in March 2009. Those investments resulted in a marked improvement in energy efficiency of televisions, as compared to previous product offerings.

Unfortunately the improvements made in the past year have been, erroneously interpreted by some Member States and the Commission services as achievements which are repeatable on an ongoing basis. This may have led to the Commission proposals of February 2010 and a further development at the Consultation Forum meeting in March 2010. Independent experts share our view that the latter is extremely challenging. Indeed the A+++ target is impossible to achieve with existing and foreseeable technical developments in next generation products. We **strongly recommend to re-instate your ambitious proposal of February 2010** which has, in principle, the support of our members.

Television manufacturers have reached the peak of achievable energy efficiency products. The measures introduced in March 2010 if adopted, would considerably limit the integration of new functions and features in TV-sets. Specifically, strident power restrictions are incompatible with integration of product features demanded by consumers, including set top box, digital video disk reader, and hard drive components. These product features are important to senior citizens who rely heavily on their televisions for connectivity to society and as an alternative to computer based internet access for public services and health monitoring.

The financial burden to incorporate these energy limitations and the short time frame during which the targets are being changed are particularly onerous for European small and medium enterprises active in the television equipment manufacturing sector.

In view of the above we call on the Commission to abide to Art. 10.3 b of the current recast on the Labeling Framework Directive, and undertake a **proper impact assessment of the proposed measures**. The impact assessment should consider the environment, consumers (taking into consideration various user segments) and manufacturers, including SMEs, as well as implications for innovation and market access.

With regard to classifications development process, it appears that the Commission has been particularly receptive to the concerns expressed by too few Member States and is ignoring important market based industrial realities and technology limitations. Indeed in the weeks which have elapsed between the February and March proposals, it would appear that the views expressed by manufacturers have been completely disregarded. We have also noted that the recent reorganization of your services may have added to the unpredictability of proposal development.

We thank you to give these observations their due attention. We are available at your disposal for any further questions in relation to this subject and hope that our suggestions are put into effect.

Yours sincerely,



Bridget Cosgrave  
Director General

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**DIGITALEUROPE** is the pre-eminent advocacy group of the European digital economy acting on behalf of the information technology, consumer electronics and telecommunications sectors. We are dedicated to improving the business environment, and to promoting industry's contribution to economic growth and social progress in the European Union.

**DIGITALEUROPE** ensures industry participation in the development and implementation of EU policies. **DIGITALEUROPE's** members include 60 leading corporations and 40 national trade associations from all the Member States of EU; altogether 10,000 companies with 2 million employees and €1,000 billion in revenues. You can learn more about our activities via <http://www.digitaleurope.org>

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