



Revision of EU Ecolabel Criteria for awarding the EU Ecolabel for electronic displays (previously Televisions)

TABLE OF COMMENTS
Post –EUEB February 2020
May, 2020

Criteria/subject	Comments received on TR5.0 (February 2020)	JRC response
<p>General Comments</p>	<p><i>The proposed validity period of 8 years is too long for this type of product. The dynamic approach suggested in criterion 1 is not enough. There will not be any possibility to adjust the energy requirements from 2023 to 2028, which according to previous lessons learnt is too long.</i></p> <p><i>We propose a validity period of 6 years.</i></p> <p><i>We also suggest to build in an evaluation of requirement 1 (Energy) in 2025. This will give the Commission the possibility to adjust the energy requirement according to the new market situation. It shall be defined that only the energy requirements are to be adjusted. If the evaluation conclude that the energy requirements are still relevant the criteria will automatically be prolonged until 2028.</i></p> <p><i>This proposal will enable us to have relevant requirements with a minimum of resources spent for both CB 's, license holders and also the Commission.</i></p> <hr/> <p><i>8 years until the 31 December 2028 is way to long. We propose 5 years until the 2025. Our arguments:</i></p> <ul style="list-style-type: none"> - <i>Better react to the recent technical developments and provide a trustworthy labeling scheme. Even if for practical reasons there is delay occurring which leads to longer validity times than 5 years in the past, we believe that through an extend of the validity time, it is even more likely that the next update occurs later than 8 years.</i> - <i>2022 the regulation for energy labelling of electronic displays (2019/2013) will be reviewed</i> 	<p>Comment partially accepted</p> <p>A dynamic approach has been followed linking the criteria to EPREL database. Therefore the validity period has been kept as 8 years.</p>
<p>1.1: Energy savings (i) Energy efficiency performance</p>	<p><i>According to the feedback from the French consumer association Stop to planned obsolescence (Halte à l'obsolescence programmée), TV and computers screens are mainly UHD screens and represent now most of the screens sold on the market. It is therefore necessary to scale the criterion for UHD to ensure the criteria remain stringent in the future. The JRC needs to ensure that the defined thresholds apply to UHD screens and are still relevant for the coming years.</i></p>	<p>Comment accepted</p> <p>Dynamic approach applies also to UHD models.</p>

We appreciate that our proposal to ensure that the Ecolabel stays at the top of the energy efficiency classes placed on the market has been acknowledged and that the criterion has been modified by introducing more demanding energy efficiency classes as of 2023, when the eco-design requirements for electronic displays will be tightened.

However, we still recommend rethinking the approach to avoid the risk that the proposed energy efficient classes are outdated due to faster technological developments in energy efficiency than anticipated. In that case electronic displays labelled with less energy efficiency classes than the top class could be eligible with the EU Ecolabel.

This could damage the reputation of the scheme similarly to the passed situation when Televisions with the Energy Class B could obtain the Ecolabel. Additionally, the Ecolabel should respond to the Energy Efficiency Directive requirement for public procurers to purchase only the products that comply with the criterion of belonging to the highest energy efficiency class (art. 6).

We would highly recommend introducing a more dynamic wording indicating that only the electronic displays complying with the top energy efficiency class (possibly two top classes for UHD) can be awarded the label. We think that the Ecolabel could make use of the EPREL database, as the framework for electronic displays should be in place as of March 2021.

Comment accepted

Link to EPREL database has been included after March 2021 when it will be available publicly.

	<ul style="list-style-type: none"> • <i>We are afraid, that the current energy requirements are still not ambitious enough, especially if the validity is prolonged until 2028. A further step (e.g. for 2025) including more ambitious thresholds could be suitable. Another approach could be a dynamic approach as proposed by the EEB, indicating that the energy efficiency classes are revised so that only the electronic displays complying with the top two populated classes can be awarded the label.</i> • <i>In addition, it should be ensured that software updates do not lead to a significant higher energy demand.</i> • <i>We disagree on the increase of the level from 100 W to 125 W for digital signage displays and for UHD resolutions. We question the environmental excellence of extremely big displays and emphasize the development target that an ambitious threshold could create.</i> 	<p>Comment partially accepted</p> <ul style="list-style-type: none"> • Dynamic approach followed: Link to EPREL database has been included after March 2021 when it will be available publicly. • The proposed change with regards software's updates seems to be interesting. However, no sufficient data or evidence has been collected at this stage to set a criterion on this topic. In addition, such requirement is not included in other schemes. It is suggested that this aspect is considered during next revision. • Data provided by a Competent Body showed that a small portion of big TVs could achieve 100W. Industry proposed 160 W for UHD models. A compromise value of 125W has been therefore proposed. At least 6 out of 47 big TVs above 70-inches are able to reach this value.
<p>2.1. Excluded or limited substances</p>	<p><i>2.1 c. We propose to exclude all phthalates, even if not classified. Especially DIDP and DINP shall be excluded to be used in all plastics. Even if they are not classified, they are not permitted according to the Toys directive.</i></p> <hr/> <p><i>We welcome the restriction proposed by the EU Ecolabel on phthalates but would like to reiterate our recommendation to exclude also DIDP and DINP.</i></p> <p><i>Although the JRC argues that these phthalates are not classified, we think that they should also be excluded considering a precautionary when alternatives are available to avoid exposure to chemicals that might be found in home dust. This would also contribute to better harmonise the EU Ecolabel with the Nordic Swan.</i></p> <p><i>The rationale provided by the Nordic Swan:</i></p>	<p>Comment accepted</p> <p>Following a precautionary principle, DIDP and DINP have been restricted in line with Nordic Swan.</p>

	<p>Phthalates are secreted from plastic products throughout their lifetime. This diffuse dissemination means that phthalates are found almost everywhere in the environment.</p> <p>DINP, DIDP and DNOP are banned in toys and childcare items that can be put in the mouth.</p>	
	<p>The proposal not to use DINP and DIDP in external power cables is based on a merely discriminatory approach and is not justified by scientific evidence nor the European regulation. In fact, the high molecular phthalates DINP and DIDP have been thoroughly evaluated under REACH (ECHA, 2013<https://echa.europa.eu/documents/10162/31b4067e-de40-4044-93e8-9c9ff1960715>) with the conclusion that they can be safely used in all current consumer applications. Moreover, in March 2018<https://echa.europa.eu/documents/10162/56980740-fcb6-6755-d7bb-bfe797c36ee7>, ECHA RAC confirmed that no classification for DINP for either effects on sexual function and fertility, or for developmental toxicity is warranted. In conclusion, there is no scientifically sound or regulatory reason why DINP and DIDP should not be used in televisions and monitors under the Ecolabel criteria : they are not meeting the hazard criteria and are therefore not classified and not SVHC !. The Ecolabel criteria for televisions and monitors, as any other Ecolabel, should follow the expert assessments and conclusions by ECHA.</p>	<p>Comment rejected</p> <p>Following a precautionary principle, DIDP and DINP have been restricted in line with Nordic Swan.</p>
<p>3. Reparability and commercial guarantee</p>	<p>Today, most of the TV screens and especially the “smart” ones include in fact a screen and computer. The French consumer association Stop to planned obsolescence advised that the computer software should be regularly updated to correct bugs, address security alerts and improve the performance of the equipment. In addition to the availability of spare parts, we think the operating system and drivers should be available on the manufacturer’s website for as long as the spare part are available (8 years), and that this should be included in the criterion.</p> <p>Missing requirement: Software updates</p> <p>The chief cause of the failure of television sets is attributable to software-induced faults.¹ There is a much greater diversity in TV operating system families than there is in computer or smartphone operating systems.² New devices are sometimes put onto the market equipped with software code that has not been fully tested, which can produce software errors. In addition, the appearance of new formats and functionalities in the market can cause TV’s to rapidly become functionally obsolete if the software can’t be updated to accommodate for this evolution.³ The longevity of TV’s is therefore highly dependent on the availability of software support and updates. Common types of TV operating systems (such as Android TV or Firefox OS) are hardware-independent and should be considered as middleware or software rather than firmware.</p>	<p>Comment rejected</p> <p>Ecodesign covers only the last version of the firmware and the security updates to the firmware, and not middleware or software. A guarantee of the display manufacturer that he will provide software updates for the duration of 8 years is practically impossible, because most apps installed on a TV are 3rd party and the display manufacturer has no control over them. The only “software” that can be guaranteed by the manufacturer is the operating system, but for other software apps it is simply impossible, because the developer of a 3rd party app could at some point simply go out of business, or end all commercial relations with a display manufacturer, or even bloc access to that app from the manufacturer’s devices.</p>

¹ Siddharth Prakash e.a., *Einfluss der Nutzungsdauer von Produkten auf ihre Umweltwirkung- Schaffung einer Informationsgrundlage und Entwicklung von Strategien gegen "Obsoleszenz"* (Umweltbundesamt, 2016), p. 46.

² See https://en.wikipedia.org/wiki/List_of_smart_TV_platforms_and_middleware_software#Smart_TV_platforms_utilized_by_vendors

³ Prakash 2016, p. 46, 53.

<p><i>The Ecodesign Regulation for Electronic Displays (Regulation (EU) 2019/2021) only lays down requirements for firmware updates (without however defining firmware), whereas for software, only information on the duration of availability is required. Thus, there is an opportunity for the EU Ecolabel to move beyond the Ecodesign requirements by defining more comprehensive support for operating systems and/or applications, i.e. firmware, middleware and software supplied with the product.</i></p> <p>We therefore propose the following requirement: full firmware, middleware and software support (including operating system updates) and security updates shall be available for 8 years following the end of the model production⁴.</p> <p>We propose that a similar criterion would also be added to the service level requirements listed under TS6 in the GPP criteria.</p>	<p>It is suggested that softwares updates are further explored during next revision as there will not be consultation to industry at this stage.</p>
<p>Missing criterion</p> <p><i>Software updates</i></p> <p><i>To ensure the longevity of displays the availability of software support and updates is crucial. This is also true for firmware, middleware and operating system updates. We propose that equally to the ecodesign requirements, but even more comprehensive:</i></p> <p>The latest available version of the firmware, middleware and software update shall be made available for a minimum period of eight years after the placing on the market of the last unit of a certain product model. The manufacture ensures the security of the software, firmware, middleware for a minimum period of eight years.</p>	
<p>Criterion 3 (a) (i) - Tools for repair</p> <p><i>The requirement for parts to be replaceable with 'commercially available tools' is severely lacking in ambition. Such tools may be very expensive or complicated to acquire. Although not proprietary, they may be specific to a given brand or model, including production-like jigs and fixtures for very specific disassembly operations, resulting in the need for an independent TV repairer to acquire a large number of different and potentially costly tools depending on the brands and models to be repaired. The tools listed as examples (screwdrivers, spatula, pliers, tweezers) are all</i></p>	<p>Comment rejected</p> <p>EN45554:2020 standard is horizontal and general and does not cover the specificities of different products. It is not possible to limit the reparability of a TV to the list of basic tools included in the standard which are not representative</p>

⁴ The last version of the French 'indice de réparabilité' for TV's had a criterion on availability of 'corrective updates'. However, it is necessary to check the outcome of discussions in the last meetings.

The French LongTime label requires "Le constructeur veille au maintien des performances d'origine de son produit lors des mises à jour de l'O.S. sans limite de temps ».

Austrian standard ONR192102 has 'Easy access to software and current updates (if updatable) for all repairers (not only for the contracted workshops)' as a major (10 point) criterion.

	<p><i>'basic tools' according to EN45554:2020, Annex A §A.4.4. Indeed, this category already covers a very broad range of tools sufficient to disassemble the vast majority of TV sets⁵, unless they are glued together (cf. infra). Even soldered joints are covered by this tool selection.</i></p> <p>We therefore suggest replacing 'commercially available tools' with 'basic tools' as defined in EN45554:2020, Annex A §A.4.4.6</p> <p><i>(a)(i) We suggest to replace 'commercially available tools (i.e. all tools except proprietary tools, e.g. screwdriver, spatula, pliers, or tweezers)' with 'basic tools' as defined in EN45554:2020, Annex A §A.4.4. From our perspective it would be suitable to adapt the wording of 3(a) according to the proposal of the EEB:</i> Proposed wording for Criterion 3 (a) (i-iii): The following parts of electronic displays shall be accessible and exchangeable by the use of basic tools (as defined in EN45554:2020, Annex A §A.4.4) and without the use of any chemicals:</p> <ul style="list-style-type: none"> - screen assembly and LCD backlight, - stands - power and control circuit boards - back cover, and - any electronic assemblies attached to the casing. 	<p>of TVs. According to the JRC reparability team, there are basic tools with are relevant for TVs and are not considered in this general standard.</p> <p>According to licenholders the list of basic tools in EN45554:2020 is very restricted, and, with few exceptions, not fully relevant for TVs. Furthermore, the screen assembly and LED backlight cannot be disassembled using these tools: to remove the screen you need to use suction cup lifters, which are commonly available tools, cheap and easily available online, but these are not included in the list of basic tools in the EN standard.</p> <p>It is suggested that for next revision further investigation and exchange with industry is carried out in order to define the basic tools relevant for TVs in order to include the relevant in this criterion.</p>
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⁵ All of the 12 TV sets (of 11 different brands) for which disassembly information is available on https://ric.wecycle.eu/c/TV_set, can be disassembled with class A tools. The same goes for dozens of TV repair guides on www.iFixit.com.

⁶ There is little point in referring to 'Product group specific tools' as defined in EN45554:2020, Annex A §A.4.4 since the standard refers to a product-specific assessment method, which currently does not exist yet. This option would therefore require defining a specific list of tools as part of the ecolabel criteria, which doesn't seem preferable.

<p>Criterion 3 (a) (ii) – Adhesives</p> <p><i>Due to the variety in available adhesives, it is complicated to define an objective criterion on the use of certain types of adhesives. TR4 contained a criterion prohibiting any type of adhesive to fix the back panel. Based on stakeholder feedback, the wording was adapted in TR5 to 'adhesives which need to be removed with heat or chemicals'. However, this is not easily verifiable, nor is it a watertight criterion as it would allow for other methods or tools for disassembly which might be just as cumbersome. In general, in order to define criteria in a technology-neutral yet watertight manner, it is often safer to define the performance required rather than to prohibit certain types of solutions.</i></p> <p><i>Since heating appliances (other than a soldering iron) are not listed as basic tools in EN45554:2020, Annex A §A.4.4, a reference to 'basic tools' would be sufficient to prohibit adhesives requiring heat. Only chemicals would need to be separately ruled out.</i></p> <p>We therefore suggest replacing the prohibition of solutions involving heat with a mandatory feasibility with 'basic tools'. This can be achieved by adding the back cover to the list of accessible parts under 3 (a) (i) provided that the wording is changed to 'basic tools' as defined in EN45554:2020, Annex A §A.4.4.) (cf. supra) and that a prohibition of chemicals is added to 3 (a) (i).</p> <p><i>This would also much simplify the wording of the criteria. See proposed new wording for criterion 3 (a) below.</i></p>	<p>Comment rejected</p> <p>No reference to basic tools will be made in this revision as there are basic tools with are relevant for TVs and are not considered in this general standard. Therefore, the wording for adhesives and Electronic assemblies in casings will be kept unmodified at this stage.</p>
<p>Criterion 3 (a) (iii) – Electronic assemblies in casings</p> <p><i>TR4 contained a criterion prohibiting any electronic assemblies to be part of the casing. Based on stakeholder feedback, the wording was adapted in TR5 to 'electronic assemblies which cannot be removed with use of commercially available tools'. As mentioned above, such tools may be expensive or complicated to acquire whereas 'basic tools' already provide quite a comprehensive selection.</i></p> <p>We therefore suggest to replace 'commercially available tools' with 'basic tools'. This can be achieved by adding 'any electronic assemblies attached to the casing' to the list of accessible spare parts under 3 (a) (i) provided that the wording is changed to 'basic tools' as defined in EN45554:2020, Annex A §A.4.4.) (cf. supra).</p> <p><i>This would also much simplify the wording of the criteria. See proposed new wording for criterion 3 (a) below.</i></p>	
<p>Criterion 3 (a) (iv) – Number of tools</p> <p><i>TR4 contained a criterion limiting the number of different tools needed to 3. Based on stakeholder feedback, this criterion was dropped in TR5. We feel that this was a very valid criterion in order to ensure a speedy disassembly</i></p>	<p>Comment rejected</p> <p>The requirement inspired on the draft EU GPP for IE on restricting the number of tools to disassembly casing parts have been removed in the absence of solid references and</p>

	<p><i>process, and we regret its removal. However, we can accept the removal of this criterion provided that the criterion on the type of tools is sufficiently strict (cf. supra).</i></p> <p>Proposed wording for Criterion 3 (a) (i-iii):</p> <p><i>The following parts of electronic displays shall be accessible and exchangeable by the use of basic tools (as defined in EN45554:2020, Annex A §A.4.4) and without the use of any chemicals:</i></p> <ul style="list-style-type: none"> <i>- screen assembly and LCD backlight,</i> <i>- stands</i> <i>- power and control circuit boards</i> <i>- back cover, and</i> <i>- any electronic assemblies attached to the casing.</i> <p><i>(Optional): each of these parts should be accessible and removable with a maximum of three different tools.</i></p> <p><i>NB If this wording is adopted, criterion 3 (d) may be reworded as the availability of the back cover may not be as relevant as far as spare parts provision is concerned.</i></p>	<p>evidence. Also removed in the EU GPP for Imaging Equipment.</p>
	<p>Criterion 3 (c) Price of spare parts</p> <p><i>We applaud the criterion on mandatory declaration of spare parts cost. Indeed, the price of spare parts plays a decisive role in the decision to repair or replace. However, it is not very realistic to expect a consumer to look up the price of spare parts on the manufacturer's website prior to making a purchase decision. The role of the EU ecolabel consists precisely in making purchasing decisions easier by offering an easily recognisable sign of environmental performance instead of relying on a complex evaluation of several product characteristics. Therefore, the right level of ambition would be to integrate an evaluation of spare parts prices into the ecolabel criteria. Failing this, the price of spare parts should at least be made available at the point of sale.</i></p> <p><i>Defining thresholds for spare parts prices is entirely feasible, by examining parts prices as a proportion of the price of the new product.⁷ Of course profit margins and concrete sales prices may vary, but the MEERP offers a theoretical</i></p>	<p>Comment rejected:</p> <p>Price restriction of spare parts is not seen appropriate. Price can vary significantly over products, parts, regions and time⁹. Nevertheless, information about price of spare parts could still allow the monitoring and comparison between different products Therefore it in TR5.0 was included that recommended price of spare parts is provided.</p>

⁷ The 2016 working document on GPP contained a criterion on the declaration of spare parts price in order to award points for the most cost-competitive offers. However, the recent technical report with new draft criteria (Felice Alfieri e.a., Revision of the EU Green Public Procurement (GPP) Criteria for Computers and Monitors. TECHNICAL REPORT v1.0: Draft criteria proposals (European Union, 2019), p. 56) proposes to remove this award criterion, based on stakeholder feedback saying that 'it seems to be very difficult to include the cost of the spare parts in the financial model or criteria besides for example costs of accessories'. We do not consider this argument to be a valid reason for abandoning this criterion. It is unclear how it would be more difficult to include the cost of spare parts as compared to accessories, which are already referenced in some tenders (Alfieri 2019, p.63).

framework for the evaluation of "design option incremental costs" that deals with such price variations either through a 'list price minus common rebate' approach or a 'cost plus markup' approach.⁹ We feel that it would be quite feasible to apply such an approach to the price ratio of spare parts and new products. It should be noted that the price of spare parts is also one of the 5 criteria applied in the French 'indice de réparabilité' (also applicable to TV's), which has gone through an elaborate stakeholder consultation process.

We therefore propose to reintroduce a criterion on the price of spare parts in the EU ecolabel, which could be used to demonstrate compliance with a similar criterion which we propose to preserve in EU GPP criteria.

It should be noted that the current wording may be taken to imply that during the guarantee period, the spare parts price availability may be limited to authorised service providers. This would make no sense, since (1) during the guarantee period, failures may occur which are not covered by the guarantee (e.g. accidental damage to the display) and (2) the price of spare parts may be a factor to take into account when making a purchase decision, and therefore should be available before the purchase.

We therefore propose to reword as follows: "During the guarantee period referred to in (e), the information on where to go to obtain professional repairs and servicing may be limited to the applicant's Authorized Service Providers. The price of spare parts shall be publicly available as soon as the product is placed on the market."

(c) Due to the fact that only very few consumers look up the price of spare parts beforehand we would like to include a threshold on the price of the spare parts based on a ratio of the price of a new product.

⁹ http://publications.jrc.ec.europa.eu/repository/bitstream/JRC114337/jrc114337_report_repair_scoring_system_final_report_v3.2_pubsy_clean.pdf

⁸ René Kemna e.a, MEErP 2011: *Methodology for Ecodesign of Energy-related Products. Methodology Report Part 1: Methods* (Brussels/ Delft, 2011), p. 149.

	<p>3 (d) Availability of spare parts: <i>In addition to the current ecodesign requirements the following spare parts, if applicable, shall be available to end-users:</i></p> <ul style="list-style-type: none"> - batteries and accumulators - DVD/Blue-Ray module - HD/SSD module <p><i>In addition to the current ecodesign requirements the following spare parts, if applicable, shall be available to professional repairers:</i></p> <ul style="list-style-type: none"> - printed circuit boards - displays - speakers and microphones - network module - receiver module - audio system module - remote control module - switches - transformers and inverters including proprietary ones designed specifically for the product or product family 	<p>Comment partially accepted</p> <p>Spare parts covered by eco-design are also covered by the scope of this EU Ecolabel. According to this criterion, all spare parts in the scope shall be publicly available. No change is suggested to be included in the scope agreed during the revision process with all type of stakeholders since no consultation to industry will be carried out at this stage.</p>
<p>4.1. Material selection and information (End-of-life management)</p>	<p>Criterion 4.1. Material selection and information</p> <p><i>We welcome the introduction of this requirement. However, we think that further measures can facilitate the recycling of plastics and to better differentiate the Ecolabel from Ecodesign:</i></p> <ul style="list-style-type: none"> - <i>Reintroduce a limitation on the number of polymers and the use of coatings/metal inlays. Limit as well the number of colors. As described in the report, mono-material plastic housing parts without coatings, inserted metal windings, and metal shields attached are better to recycle than composite materials.</i> - <i>Require that the model is placed on the market with a standardised external power supply (= 'universal charger').</i> - <i>Make more demanding the definition of "recyclable": readily recycling without pre-treatment or depollution into a commercially available recycling process.</i> - <i>The 10% threshold for recycled content does not seem very ambitious as it applies to the total plastic used</i> 	<p>Comment rejected</p> <p>Number of polymers are limited in criterion 4.1(a)(i). Criterion is considered ambitious. Considering the decreasing success of this label it is suggested to not increase the level of complexity of this requirement at this stage. Additional measures with this regards are suggested to be discussed in future revisions.</p>

	<p><i>and not for each plastic.</i></p> <ul style="list-style-type: none"> - <i>Require information requirements on the bill of materials (as done by the Nordic Swan) and the location of critical raw materials.</i> 	
	<p><i>Criterion 4.1 Material selection and information to improve recyclability</i></p> <p><i>(c) Recycled content: We would like to emphasize that the content of recycled material could be much higher. According to an expert judgement 30% of PCR content can be easily fulfilled for an average product. In addition, a small hint, please clarify the cross reference on 6(b). It is not explicit.</i></p> <p><i>(e) Commercial guarantee: We would like to encourage a prolonged guarantee of 5 years.</i></p>	<p>Comment partially accepted</p> <p>Data consulted for other schemes like EPEAT did not reveal a significant number of products reaching much higher recycled content percentage than the one proposed. Current licenseholders reported that for them it would be very difficult to reach even the 10%. In addition there seems to be potential difficulties to increase the recycled content and comply with the banning on halogenated FRs of mandatory Ecodesign.</p> <p>No relevant changes are possible at this stage without further discussion with industry.</p>
	<p><i>4.1c. the footnote "significant impact" refers to 4.1a, but is now listed at the end of part 4.1c. We recommend moving this note to the end of part 4.1a to improve the readability.</i></p>	<p>Comments accepted</p>
<p>4.2. Design for dismantling and recycling</p>	<p><i>4.2 b: here only a reference to LED is made. We think a reference to both LED and LCD would be more appropriate.</i></p>	<p>Comment rejected</p> <p>The LED backlight is in the LCD panel, therefore it is necessary to first disassemble the panel, and then to open it in order to access the LED backlights. If the panel cannot be disassembled with common tools, then the LED backlight cannot be disassembled with common tools either. If it can, the requirement is already met if the LCD panel is one of the components on the list, and as such it's no longer necessary to look into the disassembly of the LED backlights. Furthermore, "LCD panel" and "screen assembly and LED backlight" refer to the exact same component, which is already covered by the reparability requirement, which addresses disassembly with commonly available tools. Therefore, re-listing it here does not add any value, especially if the intention of the requirement is to</p>

		incentivize the manufacturer to make one of the other 3 components easily accessible.
6.1 Information on the Label	Finally, as GHG emissions are mainly occurring during the product manufacturing, it could be interesting to have the GHG balance of the product on the label (ISO 14044/40 and environmental labelling standards (PEP EcoPassport) are now quite mature). This complements the energy consumption criterion.	Comment rejected No relevant changes are possible at this stage without further discussion with industry.
Labour conditions	<p>Living wage:</p> <p>[Delete]: <u>“shall always meet at least legal or industry minimum standards”</u></p> <p>The applicant shall ensure that wages [add] (excluding any taxes, bonuses, allowances, or overtime wages) paid for a normal work week [add] (not exceeding 48 hours) shall be sufficient to afford basic needs [add] (housing, energy, nutrition, clothing, health care, education, potable water, childcare, and transportation) of worker [add] and of a family of four people and to provide some discretionary income. Implementation should be audited with reference to SA8000 guidance on “Remuneration”.</p> <p>The original definition is ambiguous as it equates living wage with minimum (legal or industry) wage. Local or national minimum wages are almost always below the living wage level. Workers can only reach living wages levels by working extreme overtime, with working hours reaching 60 hours or beyond.</p> <p>Deleting the passage (“shall always meet at least legal or industry minimum standards and”) makes it clear that living wage is not the legal minimum wage.</p> <p>Including qualifications on what constitutes the wage, the working week and basic needs is important for companies to have a framework they can refer to. Defining the worker and their family as recipients of the living wage makes the definition of a living work practical.</p> <p>Having regard to the International Labour Organisation’s (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Global Compact (Pillar 2), the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multi-National Enterprises, the applicant shall obtain third party verification supported by site audits that the applicable principles included in the ILO fundamental conventions and the supplementary provisions below identified have been respected at the final assembly plant(s) [add] and high risk tier 2 and tier 3 component manufacturing plants for the product.</p>	<p>Comment accepted</p> <p>Comment rejected Changes leading to a considerable increase of ambition level are not possible at this stage without further discussion with industry.</p>

<p>Including the passage (“and high-risk tier 2 and tier 3 component manufacturing plants”) will help the Ecolabel to reach a higher standard while providing for a practicable approach by including the limitation on “high risk” plants.</p> <p>This seems necessary as the Ecolabel is focusing on lower tiers of the supply chain in relation to hazardous substance restrictions and classified substances. Here PCB, wiring, cables, housing, back panels and LED arrays are a central part of the document. The same supply chain depth should be applied for labour conditions and compliance with labour rights standards.</p> <p>The higher standard would also help public buyers in Europe who already look into the ICT supply chains towards tier 2 and tier 3 in their tender document.</p> <p>Even the highly conservative German social criteria for public procurement developed by BITKOM (industry association of the ICT Industry) and the federal procurement department (“Declaration of commitment to comply with labor and social standards in public ICT procurement” - Verpflichtungserklärung zur Einhaltung von Arbeits- und Sozialstandards in der öffentlichen ITK-Beschaffung) regulates compliance towards tier 2 and tier 3 factories in the supply chain.</p>	
<p>The audit process shall include consultation with external [add] <u>industry-independent</u> organisation stakeholders in local areas around sites, including trade unions, community organisations, NGOs and labour experts. [add] <u>Meaningful consultations shall take place with at least two stakeholders from two different subgroups.</u></p> <p>Including qualifications “industry-independent organisation” and on duration of consultation will make it easier for companies to operationalize and report on the provision.</p> <p>The elaboration on industry independence of stakeholders will make sure that genuine worker engagement is achieved.</p> <p>The meaningful consultations with stakeholders is based on the OECD concept of meaningful stakeholder engagement “Meaningful stakeholder engagement is characterised by two-way communication and depends on the good faith of the participants on both sides. It is also responsive and on-going and includes in many cases engaging with relevant stakeholders before decisions have been made.</p>	<p>Comment accepted</p>
<p>During the validity period of the EU Ecolabel, the applicant shall publish aggregated results and key findings from the audits [add] (including details on (a) how many and how serious violations of each labour rights and OHS standard; (b) strategy for remediation – where remediation includes</p>	<p>Comment accepted</p>

	<p><i>prevention per UNGP concept; (c) assessment of root causes of persistent violations stakeholder consultation – who was consulted, what issues were raised, how did this influence the corrective action plan), together with corrective action plan with detailed remedial process to address specific problems if identified in the audit [add] (linked to final assembly and component plants that are in the supply chain of the product), online in order accessible to the public to provide evidence of their performance to interested consumers.</i></p> <p><i>Including qualifications on stakeholder consultations, link to specific factories and public access of the data will enable a transparent communication with companies. It will also guarantee that consumers will have the required transparency.</i></p> <p><i>Understanding which stakeholders were consulted is necessary to make sure that these processes took place and were meaningful.</i></p> <p><i>Detailing the link between audit reports and the final assembly and component plants of the specific product is important to receive focused and not general audit reports.</i></p> <p><i>Determining that the data will be publicly accessible is important to guarantee consumers the open access to the data.</i></p>	
	<p><i>Valid certifications from third party schemes or inspection processes that audit compliance with the applicable principles of the listed fundamental ILO Conventions and the supplementary provisions on working hours, remuneration, health & safety (add) and consultation with external stakeholders, shall be accepted.</i></p> <p>Delete: <i>“together or in part”</i></p> <p><i>Deleting “together or in part” allows for a clear definition which certifications are to be admitted.</i></p> <p><i>Including “with external stakeholders” ensures that the admitted certification schemes will include all standards and processes described above.</i></p> <p><i>Ensuring meaningful worker engagement during audit processes is important to give workers a voice in defining the grievances existing in the factories they are working at. Additionally, such provisions are important to strengthen standards defined by guidance documents released by the OECD and UN.</i></p>	<p>Comment accepted</p>
<p>Minerals from Conflict-Affected and</p>	<p><i>“(i) conducting due diligence in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, [add] by reporting on all details defined by the Guidance;”</i></p> <p><i>Including the qualification “by reporting on all details defined by the Guidance” the compliance of to</i></p>	<p>Comment accepted</p>

High-Risk Areas	<p><i>the OECD Guidance is strengthened.</i></p> <p>A recent WEED report (Weed - AM ANDEREN ENDE DER LIEFERKETTE. WAS TUN IT-HERSTELLER FÜR EINEN VERANTWORTUNGSVOLLEN BEZUG VON ROHSTOFFEN?) shows a rather low standard of compliance with the OECD Guidance for ICT companies. Companies often tend to focus on step 2 and 4 of the guidance (2. Identify and assess risk in the supply chain; 4. Carry out independent third party audits), while they leave out step 1 (establish strong company management systems), step 3 (design and implement a strategy to respond to the identified risks) and 5 (report on supply chain due diligence – publicly).</p>	
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