



J R C T E C H N I C A L R E P O R T S

# Development of European Ecolabel and Green Public Procurement Criteria for Personal & Notebook Computers

TECHNICAL REPORT  
**Criteria Proposals, Revision v2**  
(Draft) Working Document

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## 1. INTRODUCTION

This document is intended to provide the background information for the revision of the Ecolabel criteria for Personal and Notebook Computers and the development of Green Public Procurement (GPP) criteria for this product group (see separate report). The study has been carried out by the Joint Research Centre's Institute for Prospective Technological Studies (JRC-IPTS) with technical support from the Oeko-Institut. The work is being developed for the European Commission's Directorate General for the Environment.

The main purpose of this document is to evaluate the current criteria and discuss if the criteria are still relevant or should be revised, restructured or removed. This document is complemented and supported by the preliminary report, which consists of a series of task reports<sup>1</sup> addressing:

- Scope and definitions (Task 1 report),
- Market analysis (Task 2 report),
- Technical analysis (Task 3 report),
- Improvement potential (Task 4 report), and
- First criteria proposals (Task 5 report).

Furthermore, during the course of the revision process two general questionnaires on the scope and improvement potential as well as queries specific to certain criteria were sent out to selected stakeholders. The target groups were industry, Member States, NGOs and research institutions. The specific information, views and suggestions arising from questions about the scope, improvement potential and criteria revision were reflected mainly in the Task 1 and Task 4 reports and taken into consideration as far as possible in the proposals for the criteria revision.

The draft version of the technical report (Task 5) has built the basis for the first Ad-Hoc Working Group (AHWG) meeting taken place in October 2013. The current Task 6 report provides an update of the criteria development process based on new

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<sup>1</sup> The previous Task 1-5 reports and further information can be downloaded at <http://susproc.jrc.ec.europa.eu/computers/stakeholders.html>

information (stakeholders' discussion at the AHWG meeting, further stakeholder inputs following the meeting, further desk research).

For each of the criteria, boxes are provided with the current criteria (grey), the first proposal (yellow) and a second proposal (green) for revised criteria. After each box a discussion of the rationale for the proposed change (or not) to the criterion is made, based on the stakeholder feedback and further research. Proposals for *new* criteria have also been made together with the rationale behind each proposal.

This second version of the technical report will bring together the scientific arguments for the proposed new criteria document to provide input for another stakeholder discussion at the second AHWG meeting taking place in May 2014, before finally being voted upon by the EU Ecolabelling Board.

*The current scope of the EU Ecolabel criteria for Desktop and Notebook Computers*

Currently, two separate sets of Ecolabel criteria exist for personal computers (Commission Decision 2011/337/EU) and notebook computers (Commission Decision 2011/330/EU). They consist of fifteen and fourteen criteria for personal and notebook computers respectively which are listed in Table 1.

**Table 1: Current Ecolabel criteria for Personal and Notebook Computers according to Commission Decisions 2011/337/EU and 2011/330/EU**

<b>Current EU ecolabel criteria for "Personal Computers"</b>	<b>Current EU ecolabel criteria for "Notebook Computers"</b>
Criterion 1 – Energy savings	Criterion 1 – Energy savings
Criterion 2 – Power management	Criterion 2 – Power management
Criterion 3 – Internal power supplies	---
Criterion 4 – Mercury in fluorescent lamps	Criterion 3 – Mercury in fluorescent lamps
Criterion 5 – Hazardous substances and mixtures	Criterion 4 – Hazardous substances and mixtures
Criterion 6 – Substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006	Criterion 5 – Substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006
Criterion 7 – Plastic parts	Criterion 6 – Plastic parts
Criterion 8 – Noise	Criterion 7 – Noise
Criterion 9 – Recycled content	Criterion 8 – Recycled content
Criterion 10 – User instructions	Criterion 9 – User instructions
Criterion 11 – User reparability	Criterion 10 – User reparability
Criterion 12 – Design for disassembly	Criterion 11 – Design for disassembly

Current EU ecolabel criteria for “Personal Computers”	Current EU ecolabel criteria for “Notebook Computers”
Criterion 13 – Lifetime extension	Criterion 12 – Lifetime extension
Criterion 14 – Packaging	Criterion 13 – Packaging
Criterion 15 – Information appearing on Ecolabel	Criterion 14 – Information appearing on Ecolabel

The revised Ecolabel criteria document is proposed as covering both product groups; thus common criteria proposals for both personal computers and notebook computers have been developed, with differentiation made between technical product characteristics where necessary.

Furthermore, within the parallel revision processes for EU Ecolabel criteria for televisions and computers it has been discussed<sup>2</sup> to remove the product subcategory “computer display” from the current scope of the Ecolabel criteria for personal computers and move it to a revised scope of Ecolabel criteria for “Electronic Displays”, subsuming television sets, television monitors and external computer displays. Thus, the following sections highlight the revised criteria proposals but exclude specific requirements for computer displays, which are considered and presented within the Technical Report and Criteria Proposals for Televisions.

*The key environmental impacts associated with the product group*

Based on the LCA review presented in the Task 3 report the overall findings indicate that the production phase and the use phase are associated with the most significant environmental impacts during the life cycle of computer products.

Within the manufacturing phase of desktop PCs, specific environmental ‘hot spot’ components identified as being of significance are the motherboard and other Printed

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<sup>2</sup> As stated in the previous technical report Task 1 of the revision process for the development of EU Ecolabel criteria for televisions, there is a functionality overlap between computer displays and television sets placed on the EU market. Computer displays are being used to watch content normally only viewed on televisions and television sets are increasingly enabled for web browsing. Thus, it is becoming more and more difficult to distinguish between the two product categories. In the current review process of the EU Ecodesign and Energy Labelling Regulations for televisions, the discussion paper (presented and discussed with stakeholders at the Consultation Forum meeting of 8 October 2012) proposed to change the scope from solely “televisions” to “electronic displays”, including television sets, television monitors, and external computer displays.

Wiring Boards of the desktop unit, the screen (LCD panel), as well as the power supply, CD ROM and the hard disk drive (HDD).

Within the manufacturing phase of notebooks, the production processes of the motherboard and the display have the most significant environmental impact, followed by battery production. One of the reasons is that critical raw materials are concentrated in these components, whose extraction and processing is associated with major material requirements, the transformation of land and the consumption of energy, and cause severe environmental impacts: specifically silver, gold and palladium in the motherboard and other Printed Circuit Boards; indium and gallium in the display and background illumination, and cobalt in batteries.

The potential for the direct influence of ecolabel criteria on the production of single computer components is considered to be limited. However, by improving design (e.g. design for durability and disassembly) or indirectly by extending the lifetime or by reusing parts, the impacts of the manufacturing phase can be reduced as secondary resources from recycling or extended product lifetime avoid primary production stages. Thus, the allocation of benefits from re-use and recycling is an area specifically highlighted in Task 4 (improvement potential) and in the criteria proposals.

A number of issues are currently not addressed by the EU Ecolabel criteria although evidence exists for the potential environmental and / or social impacts (e.g. fluorinated greenhouse gases, conflict-metals). Proposals to include them in the revised criteria are provided in this technical report.

#### *The proposed framework for the revision*

The following table provides a proposal for a new schematic to cluster and allocate the existing as well as possible new criteria to certain thematic fields which reflect the identified hotspots for computers:

**Table 2: New proposed criteria cluster and allocation of sub-criteria for the revision of the Ecolabel criteria for personal and notebook computers**

<b>New proposed criteria cluster</b>	<b>Proposed allocation of sub-criteria</b>
<b>1 Energy consumption</b>	Criterion 1.1 – Energy savings
	Criterion 1.2 – Power management
	Criterion 1.3 – Internal power supplies
<b>2 Environmentally hazardous substances</b>	Research and evidence presented in a separate document
<b>3 Life time extension</b>	Criterion 3.1 – Expansion facilities
	Criterion 3.2 – Lifetime of batteries
	Criterion 3.3 – HDD reliability
	Criterion 3.4 – Notebook durability testing
	Criterion 3.5 – Upgradeability and repairability
	Criterion 3.6 – Data deletion enabling second-hand usage
<b>4 End-of-life management: Design and material selection</b>	Criterion 4.1 – Material selection and material information
	Criterion 4.2 – Design for disassembly and recycling
	Criterion 4.3 – Packaging
<b>5 Corporate production / supply chain management</b>	Criterion 5.1 – Labour conditions during manufacture
	Criterion 5.2 – Use of “conflict-free minerals” during production
<b>6 Further criteria</b>	Criterion 6.1 – Noise
	Criterion 6.2 – Ergonomics
	Criterion 6.3 – Emission of fluorinated GHG during LCD production
<b>7 Information</b>	Criterion 7.1 – User instructions
	Criterion 7.2 – Information appearing on the Ecolabel

The following sections and criteria proposals follow the revised schema and criteria clusters in Table 2. Note: The final numeration of the single criteria could change in the course of discussions with stakeholders and the final decisions on the criteria.

## 2. PRODUCT GROUP DEFINITION

<b>Present scope, Decisions 2011/337 and 2011/330</b>
<p>The product group 'personal computers' shall comprise: desktop computers, integrated desktop computers, thin clients, displays and keyboards (as a stand-alone item) as defined in Article 2. Notebook computers, small-scale servers, workstations, gaming consoles and digital picture frames shall not be considered personal computers for the purpose of this Decision.</p>
<p>1. The product group 'notebook computers' shall comprise devices which have the following characteristics:</p> <p>(a) They perform logical operations and process data and are designed specifically for portability and to be operated for extended periods of time either with or without a direct connection to an AC power source;</p> <p>(b) They utilise an integrated computer display and are capable of operation off an integrated battery or other portable power source. If a notebook computer is delivered with an external power supply this power supply is considered part of the notebook computer.</p> <p>2. For the purpose of this Decision, tablet personal computers, which may use touch-sensitive screens along with or instead of other input devices shall be considered notebook computers.</p> <p>3. Digital picture frames shall not be considered notebook computers for the purpose of this Decision.</p>

### Major proposed changes (first proposal)

<b>Proposed scope (first proposal)</b>
<p>The product group 'computers' shall comprise: desktop computers, integrated desktop computers, notebook computers and tablet computers, thin clients, workstations, and small-scale servers. Gaming consoles and digital picture frames shall not be considered computers for the purpose of this Decision.</p>

- The so far separate EU ecolabel criteria documents for personal computers and notebook computers to be subsumed under one criteria document 'computers'.
- External computer displays are proposed to be excluded from the revised scope of the EU ecolabel for computers and moved towards the revised scope of the Ecolabel criteria for "Electronic Displays", subsuming television sets, television monitors and external computer displays.
- Keyboards (as stand-alone item) are proposed to be excluded from the scope due to their minor relevance in comparison to the other product sub-categories.
- Workstations and small-scale servers are proposed to be included in the revised scope.

For more details cf. Task 1 report ("Scope and Definitions").

### Stakeholder feedback on product scope and definition

At the first AHWG meeting, Competent Bodies did not appear to see a problem with the separation of the computer and display criteria. In the case that the two are sold as a bundle then reference shall be made to the display criteria document.

The general view of the discussion at the AHWG meeting was that the scope should not be narrowed, but should be aligned with Energy Star. GPP is significant for computer *and* display products. The implications of dividing those subcategories into two different Ecolabel criteria sets for the GPP criteria set 'Office IT equipment' should be clarified.

Written feedback from one stakeholder following the AHWG meeting further explained that basic keyboards are not exceptional for the functioning of a specific computer and are often exchanged for more functionality keyboards (not so with a delivered external power supply). Criteria for a keyboard should be more extensive in ergonomic design and not only cover environmental criteria. Therefore a keyboard should have a separate criteria document and have the eco label on the marking label of the keyboard since it will likely in its product life become separated from the computer.

Another MS stakeholder gave feedback that the proposed harmonization of the scope with Energy Star is welcomed and the fact that stand-alone keyboards will be out of the scope would be an acceptable consequence.

### Second proposal for the product scope of the EU Ecolabel

It is recommended to maintain the first proposal for the revised scope.

#### **Proposed scope (second proposal)**

The product group 'computers' shall comprise: desktop computers, integrated desktop computers, notebook computers and tablet computers, thin clients, workstations, and small-scale servers. Gaming consoles and digital picture frames shall not be considered computers for the purpose of this Decision.

### 3. CURRENT ECOLABEL CRITERIA AND PROPOSED CHANGES

#### 3.1 Cluster 1 – Energy Consumption

##### 3.1.1 Criterion 1.1 – Energy savings

<b>Present criteria, Decisions 2011/337 and 2011/330</b>
<p>(a) <i>Energy savings for desktop computers, integrated desktop computers and thin clients</i></p> <p>The energy efficiency performance of desktop and integrated desktop computers shall exceed the appropriate category energy efficiency requirements set out in the Agreement as amended by Energy Star v5.0 by at least the following:</p> <ul style="list-style-type: none"><li>- category A: 40 %,</li><li>- category B: 25 %,</li><li>- category C: 25 %,</li><li>- category D: 30 %.</li></ul> <p>The energy efficiency performance of thin clients shall meet at least the energy efficiency requirements for thin clients set out by Energy Star v5.0.</p> <p>Capability adjustments allowed under the Agreement as amended by Energy Star v5.0 may be applied at the same level, except in the case of discrete graphics processing units (GPUs) where no additional allowance shall be given.</p> <p>(b) <i>Energy savings for computer displays</i></p> <p>The computer display's energy efficiency performance in active mode shall exceed the energy efficiency requirements set out in Energy Star v5.0 by at least 30%; computer display sleep mode power must not exceed 1 W; computer displays shall have an energy consumption in on-mode of <math>\leq 100</math> W measured when set to maximum brightness; computer monitor off mode power shall not exceed 0.5 W.</p> <p><u>Assessment and verification:</u> The applicant shall declare compliance of the product with these requirements to the competent body.</p>
<p><i>Energy savings for notebook computers</i></p> <p>The energy efficiency performance of notebook computers shall exceed the appropriate category energy efficiency requirements set out in the Agreement as amended by Energy Star v5.0 by at least: category A: 25%; category B: 25%; category C: 15%.</p> <p>Capability adjustments allowed under the Agreement as amended by Energy Star v5.0 may be applied at the same level, except in the case of discrete graphics processing units (GPUs) where no additional allowance shall be given.</p> <p><u>Assessment and verification:</u> The applicant shall declare compliance of the product with these requirements to the competent body.</p>

##### 3.1.1.1 Major proposed changes (First proposal)

<b>Proposed revised criteria (first proposal)</b>
<p>The energy-efficiency performance of computers shall meet the appropriate energy-efficiency requirements set out in the Agreement as amended by Energy Star v6.0.</p> <p>Tablet computers shall be exempted from energy savings requirements.</p> <p><u>Assessment and verification:</u> The applicant shall declare compliance of the product with these requirements to the competent body.</p>

- The criteria for energy savings are proposed to be aligned to the Energy Star program requirements for computers, version 6.0 which will be effective from 28 April 2014.
- The differences compared to Energy Star (exclusion of additional allowances for discrete graphics processing units (GPUs)) have been removed.
- As tablet PCs (slate computers) are not covered by Energy Star v6.0 (they are expected to be included in the next version of Energy Star) and as this product sub-group does not consume much electricity (estimated being around 4 kWh per year) it is proposed to exempt tablet PCs from the requirements on energy savings.

For more details cf. Task 4 report “Improvement Potential”, section 4.2.1.1 “energy efficiency”.

#### Consultation questions

- Should the criterion on energy savings include a dynamic approach in order to better react to market developments with regard to energy efficiency gains?
  1. Variant: “The energy-efficiency performance of computers shall meet the appropriate energy-efficiency requirements set out in the Agreement as amended by the most recently published Energy Star standard for computers on the date of application.”
  2. Variant: No later than 2 years after the criteria for EU Ecolabel for Computers have entered into force, the Commission shall evaluate the market penetration of Computers meeting the criterion on “energy efficiency requirement of Energy Star V6.0” and, if justified, present to the EUEB and Regulatory Committee an amendment of this criterion.
  3. Variant: “The energy-efficiency performance of computers shall meet and exceed the appropriate energy-efficiency requirements set out in the Agreement as amended by Energy Star v6.0 as follows:
    1. One year from the date of adoption of the Decision: 5-10% (tbd)
    2. Two years from the date of adoption of the Decision: 10-20% (tbd)”

#### 3.1.1.2 Stakeholder feedback and further evidence

##### Dynamic approach:

- According to the discussion at the first AHGW meeting, there was general support to **align the criteria with Energy Star v6.0 but on a dynamic basis**. An analysis of the market is required to support the criteria proposal. One has to consider that the revised criteria will not come into force until, at the very earliest, summer 2015. It is difficult to foresee how products will have developed

by then. In general above proposed Options 1 and 2 were considered to be the most favoured. However, in the case of Option 1 there is no clear schedule for when Energy Star revisions will take place, so in the meantime the market share of compliant models may rise to a significant market share. The ability to extend the validity of licenses will be important. It was clarified that license holders can submit new information in order to comply with revised criteria requirements. Further, DG Environment confirmed that the criteria must refer to a specific version of Energy Star, so that Option 1 referring to each the “most recently published Energy Star” is not feasible from a legal position. This also implies that for a dynamic approach the likelihood of future ECom support for Energy Star revisions needs to be taken into account.

- Written stakeholder feedback following the first AHWG meeting recommended on the one hand that criteria state that the product shall be 3<sup>rd</sup> party approved in accordance to the most recent version of Energy Star energy efficiency criteria; on the other hand, **Variant 2** was in favour. It was proposed that based upon up-to-date market data during the further discussion process, it shall be reassessed if Energy Star v6.0 can serve as an ambitious starting point when the EU ecolabel enters into force probably in summer 2015 (approximately 1 ½ years after applying Energy Star version 6.0).

#### Further research and evidence

- Comparing the **Base Allowances for the Typical Energy Consumption (TEC<sub>BASE</sub>)** of Desktop and Notebook computers within the current and upcoming Energy Star and Ecodesign versions (cf. Figure 1 and Figure 2), it can be seen that Energy Star version 6.0 currently has the lowest base allowances in all product sub-categories<sup>3</sup>. So from today’s point of view, basing the energy criteria for the EU Ecolabel on Energy Star version 6.0 seems

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<sup>3</sup> Please note that Energy Star Version 6.0 introduces new definitions of sub-categories, thus the products subsumed are not directly comparable. Nevertheless, the maximum TEC allowances provide an indicative comparison.

appropriate and is going beyond legally binding Ecodesign requirements starting from 2016.

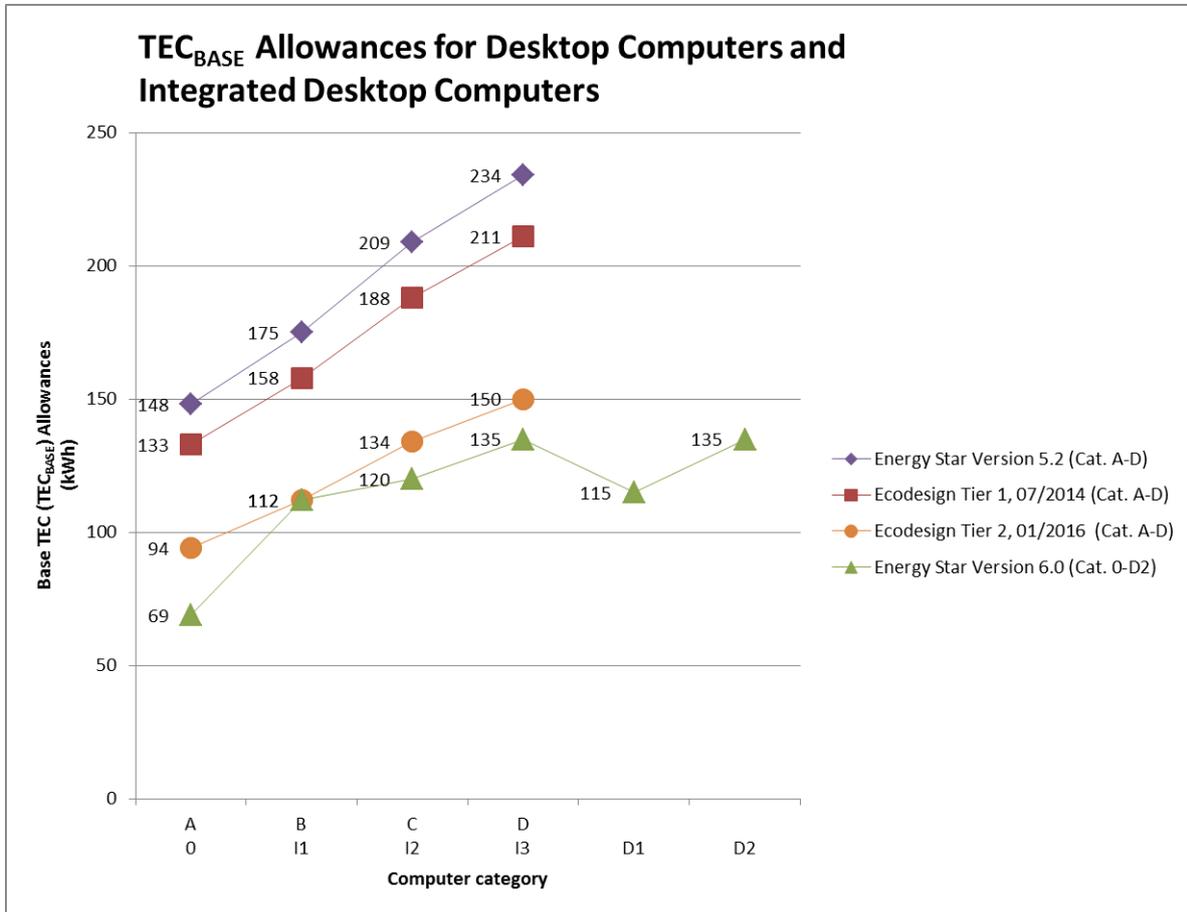
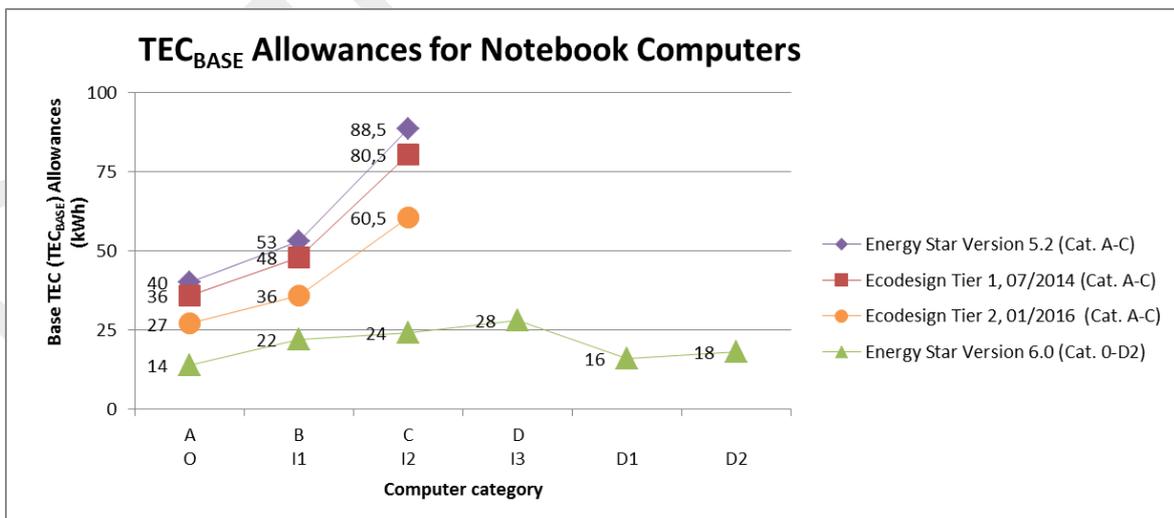


Figure 1: Comparison of TEC<sub>BASE</sub> Allowances of Energy Star versions 5.2 and 6.0 with Ecodesign Tier 1 and Tier 2 for Desktop and Integrated Desktop Computers



**Figure 2: Comparison of  $TEC_{BASE}$  Allowances of Energy Star versions 5.2 and 6.0 with Ecodesign Tier 1 and Tier 2 for Notebook Computers**

Allowances for discrete graphics processing units (GPUs):

According to written stakeholder feedback, allowances for discrete graphic adders can sometimes be huge and represent as much as the core consumption of the computer. Thus it is required to keep the existing sub-criterion not giving any allowance for discrete GPU. If this would not be supported, other options suggested:

- Leave the allowances for graphic adders as recommended in the draft criteria proposal, but set a maximum to the total amount of allowances (to make sure a highly consuming gaming PC with several graphic cards cannot get the Ecolabel). This maximum is proposed to be set at 90 W for Desktop PCs and 33 W for Notebook PCs. This would correspond to the allowance for one single G6 adder in Ecodesign Tier 2016 and be a similar approach to the power cap for the TV Ecolabel.
- Allow discrete graphic adders only if they are switchable or highly scalable (i.e. they are nearly consuming zero when the computer does not need them).

Further research and evidence

**Discrete graphics** are used for high performance professional and consumer applications (HD video, video gaming, 3D etc.) providing better picture quality and speed compared to **integrated graphics**, where the GPU is attached to or integrated into the computer's motherboard sharing resources with the central processing unit and system memory. Those are typically less powerful and slower, being sufficient for basic office applications, web browsing etc.

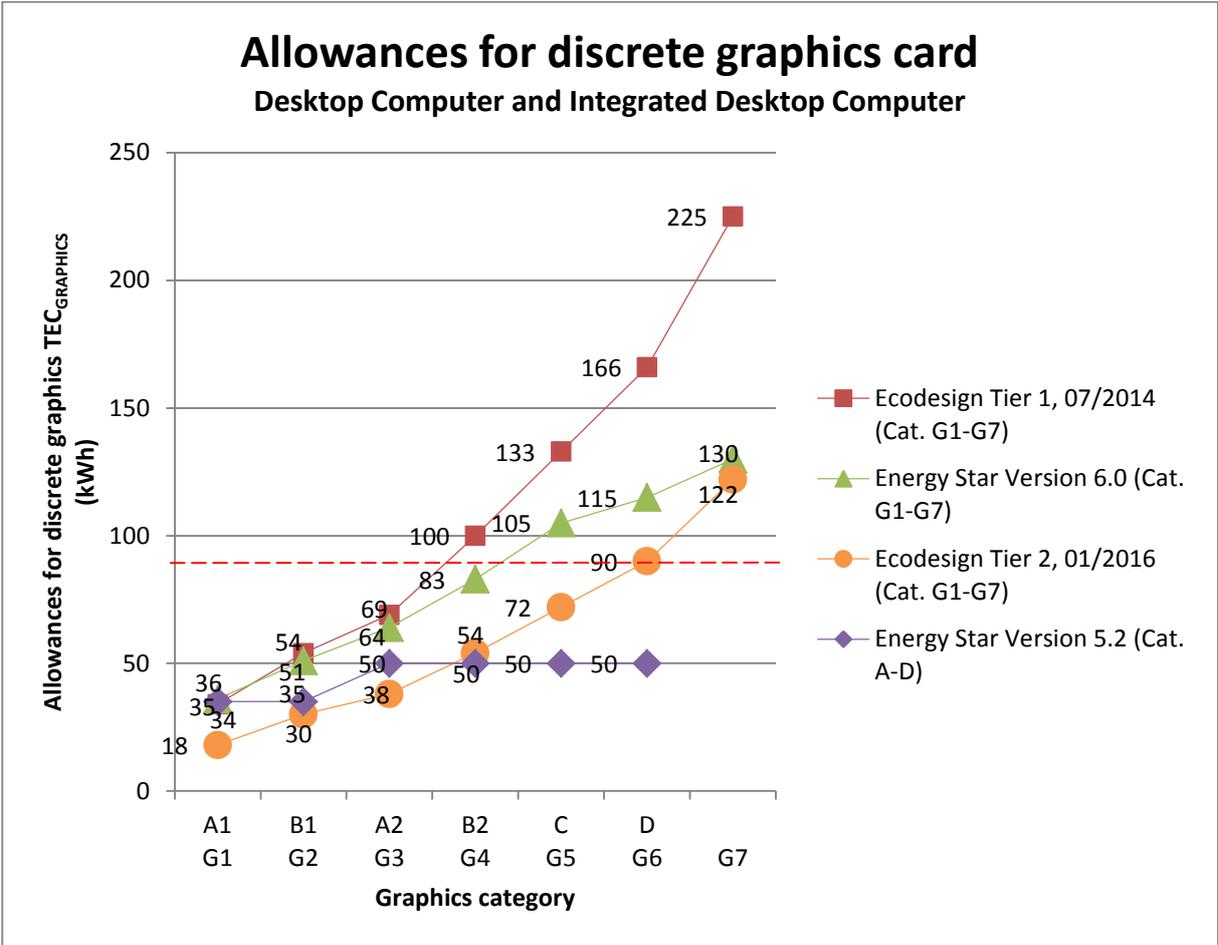
**Switchable graphics** provide a functionality that allows Discrete Graphics to be disabled when not required in favour of Integrated Graphics. For example<sup>4</sup>, switchable graphics are designed to switch the graphics operation between integrated graphics and discrete graphics without rebooting the notebook allowing

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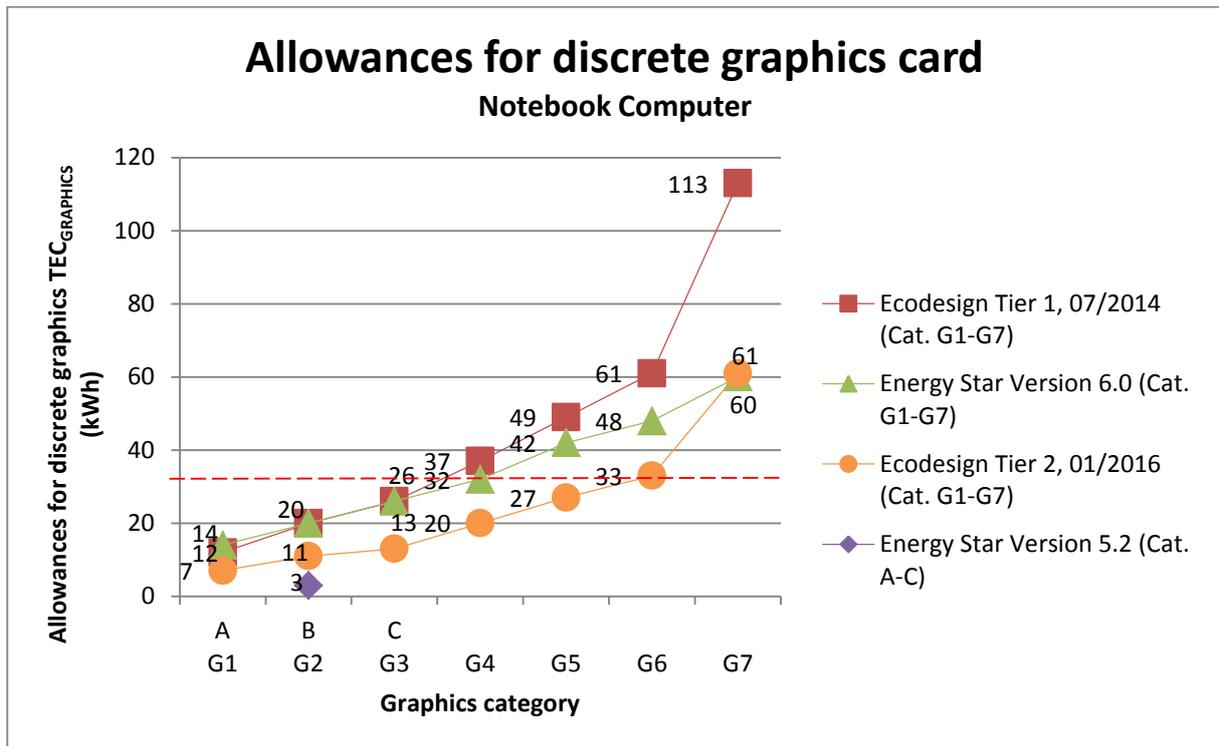
<sup>4</sup> Source: <http://www.amd.com/us/products/technologies/switchable-graphics/Pages/switchable-graphics.aspx>

the discrete card to be used for graphics intensive applications when under AC power (plugged into the power socket) and the integrated graphics to be used in battery mode, requiring less energy to operate and yielding improved battery life.

Figure 3 and Figure 4 provide a comparison of maximum allowances regarding the Typical Energy Consumption for graphics ( $TEC_{\text{GRAPHIC}}$ ) of Desktop and Notebook computers within the current and upcoming Energy Star and Ecodesign versions. It can be seen that Energy Star version 6.0 is nearly in line with Ecodesign Tier 1 starting from 1 July 2014 for the product sub-categories G1 to G3, i.e. rather not exceeding the legal requirements, whereas it is slightly stricter for the categories G4 to G7. Taking into account that the Ecolabel criteria will be implemented not before summer 2015, it is proposed to already align the allowances for discrete graphics cards of the EU Ecolabel to the values of Ecodesign Tier 2 thus preventing the Ecolabel falling back behind legally binding requirements from 1 January 2016.



**Figure 3: Comparison of  $TEC_{GRAPHIC}$  Allowances of Energy Star versions 5.2 and 6.0 with Ecodesign Tier 1 and Tier 2 for Desktop and Integrated Desktop Computers**



**Figure 4: Comparison of  $TEC_{GRAPHIC}$  Allowances of Energy Star versions 5.2 and 6.0 with Ecodesign Tier 1 and Tier 2 for Notebook Computers**

- **Verification:** A number of stakeholders expressed a strong preference for a test report to verify performance with the energy savings criteria.
- It is proposed to provide clear communicable criteria for this product group: Standby energy use = 0.0 Watt in full-charged and non-charge mode (even if left in plug!); Zero-charging, even if plugged, becomes more and more normal. And even only 0.2 Watt standby count up when plugged in for 24 hours in 100 million homes.

### 3.1.1.3 Second proposal for energy savings criteria

#### Proposed revised criteria (second proposal)

##### Energy savings

The energy efficiency performance of computers shall meet the appropriate energy-efficiency requirements set out in the Agreement as amended by Energy Star v6.0.

Capability adjustments allowed under the Agreement as amended by Energy Star v6.0 may be applied at the same level, except in the case of discrete graphics processing units (GPUs) where maximum additional allowance shall be given to

- Desktop Computers: 90 W;
- Notebook Computers: 33 W.

Tablet computers shall be exempted from energy savings requirements.

Assessment and verification: The computer must be tested according to the Energy Star v6.0 test methods for computers and the test report shall be submitted to the competent body with the application.

Note: No later than 2 years after the criteria for EU Ecolabel for Computers have entered into force, the Commission shall evaluate the market penetration of Computers meeting the criterion on "energy efficiency requirement of Energy Star v6.0" and, if justified, present to the EUEB and Regulatory Committee an amendment of this criterion.

##### Major proposed changes:

- The criteria for energy savings are aligned to the Energy Star program requirements for computers, version 6.0 which will be effective from 28 April 2014.
- According to stakeholder feedback, maximum values for additional allowances for discrete graphics processing units (GPUs) are proposed as allowances for discrete graphic adders sometimes represent as much as the core consumption of the computer. By setting this maximum allowances, highly energy consuming gaming PCs with several graphic cards (graphics categories G5-G7) will be excluded from getting the EU Ecolabel – comparable to the current EU Ecolabel power cap for very large TVs.
- A dynamic approach to the energy criteria has been included to provide the possibility to adjust and tighten them during the validity period of the EU Ecolabel in the face of a fast developing market.
- The assessment and verification has been changed from self-declaration to submission of a test protocol.

### 3.1.2 Criterion 1.2 – Power management

#### **Present criteria, Decisions 2011/337 and 2011/330**

The computer shall comply with the following power management requirements <sup>(1)</sup>:

(a) Power management requirements

Personal computers shall be shipped with the power management system enabled at the time of delivery to the customers. Power management settings shall be:

- (i) 10 minutes to screen off (display sleep);
- (ii) 30 minutes to computer sleep (system level S3, suspended to RAM) <sup>(2)</sup>.

(b) Network requirements for power management

(i) Personal computers with Ethernet capability shall have the ability to enable and disable wake on LAN (WOL) for sleep mode.

(c) Network requirements for power management (applies to personal computers shipped through enterprise channels only)

- (i) Personal computers with Ethernet capability must meet one of the following requirements <sup>(3)</sup>:
  - be shipped with WOL enabled from the sleep mode when operating on AC power, or
  - provide control to enable WOL that is sufficiently accessible from both the client operating system user interface and over the network if computer is shipped to enterprise without WOL enabled.
- (ii) Personal computers with Ethernet capability shall be capable of both remote (via network) and scheduled wake events from sleep mode (e.g. real time clock). Manufacturers shall ensure, where the manufacturer has control (i.e. configured through hardware settings rather than software settings), that these settings can be managed centrally, as the client wishes, with tools provided by the manufacturer.

**Assessment and verification:** The applicant shall provide the competent body with a declaration to certify that the computer has been shipped in the power management settings stated above or better.

<sup>(1)</sup> As defined in Energy Star v5.0 except for display sleep requirement.

<sup>(2)</sup> Not applicable to Thin Clients.

<sup>(3)</sup> Thin clients — only applies if software updates from the centrally managed network are conducted while the unit is in sleep or off mode. Thin clients whose standard framework for upgrading client software does not require off-hours scheduling are exempt from the requirement.

Notebook computers shall comply with power management requirements <sup>(1)</sup> as follows:

(a) Power management requirements

Notebook computers shall be shipped with the power management system enabled at the time of delivery to the customers. Power management settings shall be:

- (i) 10 minutes to screen off (display sleep);
- (ii) 30 minutes to computer sleep (system level S3, suspended to RAM).

(b) Network requirements for power management

(i) Notebook computers with Ethernet capability shall have the ability to enable and disable Wake on LAN (WOL) for sleep mode.

(c) Network requirements for power management (applies to notebook computers shipped through enterprise channels only)

- (i) Notebook computers with Ethernet capability shall meet one of the following requirements:
  - be shipped with Wake On LAN enabled from the sleep mode when operating on AC power, or
  - provide control to enable WOL that is sufficiently-accessible from both the client operating system user interface and over the network if notebook computer is shipped to enterprise without WOL enabled.

**Present criteria,  
Decisions 2011/337 and 2011/330**

(ii) Notebook computers with Ethernet capability shall be capable of both remote (via network) and scheduled wake events from Sleep mode (e.g. Real Time Clock). Manufacturers shall ensure, where the manufacturer has control (i.e. configured through hardware settings rather than software settings), that these settings can be managed centrally, as the client wishes, with tools provided by the manufacturer.

Assessment and verification: the applicant shall provide the competent body with a declaration to certify that the computer has been shipped in the power management settings stated above or better.

(<sup>1</sup>) As defined in Energy Star v5.0 except for display sleep requirement.

**3.1.2.1 Major proposed changes (first proposal)**

**Proposed revised criteria (first proposal)**

Computers shall comply with power management requirements as defined in Energy Star v6.0 except for display sleep requirement.

Display sleep: Power management settings for display sleep shall be 10 minutes to screen off.

Tablet computers shall be exempted from power management requirements.

Assessment and verification: the applicant shall provide the competent body with a declaration to certify that the computer has been shipped in the power management settings stated above or better.

- The criteria for power management are proposed to be aligned to the forthcoming new Energy Star program requirements for computers, version 6.0 which shall be effective from 2 June 2014.
- As tablet PCs (slate computers) are not covered by Energy Star v6.0 and as this product sub-group does not consume much electricity (estimated at around 4 kWh/year) it is proposed to exempt tablet PCs from the requirements on power management.

For more details cf. Task 4 report “Improvement Potential”, section 4.2.1.2 “power management”.

**Consultation questions**

- Should the current, stricter power management settings for display sleep (after 10 minutes instead of 15 minutes as required by Energy Star) be kept in the revised criteria?
- Are there any additional software solutions that can be pre-installed/promoted that provide more advanced guidance on power management for users, particularly for notebook users?

### 3.1.2.2 Stakeholder feedback and further evidence

According to the discussion at the first AHGW meeting, it was questioned what the benefit will be of moving from shipping a product with 10 minutes instead of 15 minutes to sleep mode. On the other hand, less than 10 minutes could lead people to switching off the sleep mode at all. A complete harmonization with Energy Star is suggested.

#### Further research / evidence

The Ecodesign Regulation 617/2013 for computers and computer servers legally requires from 1 July 2014 that “the computer shall be placed on the market with the display sleep mode set to activate within 10 minutes of user inactivity”.

According to written stakeholder feedback, it is proposed to include a criterion stating that a screen saver should not be enabled by default; currently, the effect that screen savers result in greater energy use is only addressed within the criterion on user information (c. section 3.7.1).

### 3.1.2.3 Second proposal for power management criteria

#### **Proposed revised criteria (second proposal)**

##### **Power management**

Computers shall comply with power management requirements as defined in Energy Star v6.0. Tablet computers shall be exempted from power management requirements.

Assessment and verification: The computer must be tested according to the Energy Star v6.0 test methods for computers and the test report shall be submitted to the competent body with the application.

#### Major proposed changes

- As the requirements for display sleep mode being activated after 10 minutes of user inactivity are becoming legally binding by the Ecodesign regulation starting from 1 July 2014, this exemption from the power management requirements of Energy Star v6.0 will be kept indirectly in the EU Ecolabel criteria.
- The assessment and verification has been changed from self-declaration to submission of a test protocol.

### 3.1.3 Criterion 1.3 – Internal power supplies

#### **Present criteria, Decisions 2011/337 and 2011/330**

Internal power supplies shall meet at least the energy efficiency requirements for internal power supplies set out by Energy Star v5.0.

Assessment and verification: The applicant shall declare the compliance of the product with these requirements to the competent body.

#### *3.1.3.1 Major proposed changes (first proposal)*

#### **Proposed revised criteria (first proposal)**

Internal power supplies of desktop PCs, integrated desktop PCs, desktop-thin clients, workstations and small-scale server shall meet at least the energy efficiency requirements of

- (a) 88% efficiency at 50% of rated output power;
- (b) 85% efficiency at 20% and 100% of rated output power;
- (c) Power factor = 0.9 at 100% of rated output power.

Internal power supplies with a maximum rated output power of less than 75W are exempted from the power factor requirement.

Assessment and verification: The applicant shall declare the compliance of the product with these requirements to the competent body. Additionally, a test protocol on the basis of the document “Generalized Test Protocol for Calculating the Energy Efficiency of Internal Ac-Dc and Dc-Dc Power Supplies, Revision 6.5” shall be provided to the competent body.

- The criteria for internal power supplies are proposed to exceed those of the currently developed Energy Star program requirements for computers, version 6.0 being effective from 28 April 2014. These correspond mostly to the so called 80plus-label, class bronze. For the revision, it is proposed to align the minimum requirements for internal power supplies to those of the 80plus-label, class silver, or possibly gold, as research suggests that there are a range of certified power supplies available in the market.
- The assessment and verification has been changed from self-declaration to submission of a test protocol.

For more details cf. Task 4 report “Improvement Potential”, section 4.2.1.3.

#### *3.1.3.2 Stakeholder feedback and further evidence*

At the first AHWG meeting, it was noted by JRC-IPTS that external power supplies have been omitted because the current Ecodesign requirements are understood to still be the strictest on the market. Moreover, they will be revised further based on a Code-of-Conduct developed by JRC.

For internal power supplies, according to the discussions of stakeholders at the first AHWG meeting, the potential additional cost of 80Plus compliance power supplies (PSU) needs to be considered. Feedback was given that consumers don't look to spend money on a better power supply. The difference between models certified with silver and gold and market sales needs to be explored further. There was a general feeling that in view of the need to attract license holders it was best to focus on the energy criteria on the overall system performance of the computer.

Further written stakeholder feedback following the discussions at the AHWG meeting

- On the one hand the proposal is being supported by some stakeholders to align the minimum requirements for internal power supplies to those of the 80plus-label class gold as research as it suggests that there are a range of certified power supplies available on the market;
- On the other hand stakeholders indicated that asking for the 80plus-Label class silver or gold might be too ambitious (too early yet) and too costly for applicants. In a very cost competitive market, customers are not willing to pay more for a slightly more energy efficiency PSU, which on the product system level might only reduce the energy consumption by a few % whilst the reduced energy bill (due to the high percentage of fixed energy fees) is hardly noticeable.
- Information on the cost difference between an 80+ bronze PSU compared to PSU with silver and gold standard was provided. For example, for a 300W power supply unit, changing from 80+ bronze to the 80+ silver standard would double the cost for consumers from around 5 to around 10 US Dollars.

**Table 3: Approximate pricing of Power Supply Units with different 80+ standards as of July 2013 (Source: Stakeholder input)**

<b>Efficiency Baseline APFC 68% Efficient</b>	<b>300 Watts Cost OEM/Consumer</b>	<b>460 Watts Cost OEM/Consumer</b>	<b>270 Watts Cost OEM/Consumer</b>
80+ Bronze	\$3.45/\$5.18	\$2.65/\$3.98	\$3.25/\$4.88
80+ Silver	\$6.90/\$10.35	\$8.22/\$12.33	\$6.00/\$9.00
80+ Gold	\$8.10/\$12.15	\$10.95/\$16.43	\$7.95/\$11.93
80+ Platinum	\$11.25/\$16.88	\$14.35/\$21.53	\$11.45/\$17.18

Finally, written stakeholder feedback indicated that there is a more recent version of the “Generalized test protocol for calculating the Energy Efficiency of Internal Ac-Dc and Dc-Dc Power Supplies” available, Revision 6.6 as of 2 April 2012<sup>5</sup>.

Further research / evidence

Energy Star generally follows the so called TEC approach, calculating the maximum total energy consumption (TEC) including all specific allowances for different components, inter alia internal power supply units. This means that when requiring stricter energy efficiency for the internal PSU, on the other hand higher specific allowances for PSU apply (see Table 4).

**Table 4: Power supply efficiency allowances (Source: Energy Star v6.0)**

Computer type	Minimum efficiency at specified proportion of rated output current				Allowance <sub>PSU</sub>
	10%	20%	50%	100%	
Desktop	0.81	0.85	0.88	0.85	0.015
	0.84	0.87	0.90	0.87	0.03
Integrated Desktop	0.81	0.85	0.88	0.85	0.015
	0.84	0.87	0.90	0.87	0.04

**3.1.3.3 Second proposal for internal power supplies criteria**

Proposed revised criteria (second proposal)
<p><b>Internal Power Supplies</b></p> <p>Internal power supplies shall meet at least the energy efficiency requirements for internal power supplies set out by Energy Star v6.0.</p> <p><u>Assessment and verification:</u> The applicant shall declare the compliance of the product with these requirements to the competent body. Additionally, a test protocol on the basis of the document “Generalized Test Protocol for Calculating the Energy Efficiency of Internal Ac-Dc and Dc-Dc Power Supplies, Revision 6.6” shall be provided to the competent body.</p>

Major proposed changes:

- The criteria for internal power supplies are aligned to the Energy Star program requirements for computers, version 6.0 being effective from 28 April 2014.

<sup>5</sup> Cf.

[http://www.plugloadsolutions.com/docs/collatrl/print/Generalized\\_Internal\\_Power\\_Supply\\_Efficiency\\_Test\\_Protocol\\_R6.6.pdf](http://www.plugloadsolutions.com/docs/collatrl/print/Generalized_Internal_Power_Supply_Efficiency_Test_Protocol_R6.6.pdf)

### 3.2 Cluster 2 – Hazardous substances

The research results from the background paper on hazardous substances in computers, displays and televisions has highlighted the need for an interpretation of Articles 6(6) and 6(7) of the Ecolabel Regulation (EC) 66/2010 that is workable for such complex products. These two Articles place restrictions on the presence of hazardous substances in ecolabelled products, using REACH and CLP as their main reference points.

The requirements of the Ecolabel Regulation have up until now been interpreted by a standard legal text addressing 'hazardous substances and mixtures' which has, since 2010, been added as a criteria for each product group. This can be seen in Criteria 5 of Decision 2011/337/EU for personal computers and Criteria 4 of Decision 2011/330/EU for portable computers (see below). This requirement has not yet been integrated into the television criteria.

#### Defining computers as complex articles

A computer or television comprises a number of different articles, or components. For example, a desktop computer would include a monitor, keyboard, hard drive, DVD reader/writer and power cable. In accordance with the Ecolabel Regulation it could therefore be considered to be a 'complex article' (i.e. an article composed of many individual articles). A definition is suggested as being:

*'An object composed of an assembly of different articles which during production is given a special shape, design, structure and component configuration which determine its function to a greater degree than does its chemical composition or its constituent articles'*

The Ecolabel Regulation also refers to homogenous parts of a complex article which could be interpreted to homogenous plastic and metals components. Whilst no specific definition can be found in REACH or CLP, the RoHS Directive 2011/65/EU defines a homogenous material as:

*'one material of uniform composition throughout or a material, consisting of a combination of materials, that cannot be disjointed or separated into different*

*materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes'*

Components or homogenous parts of a complex article may also be treated with or incorporate chemical mixtures or additives that impart specific functions to the sub-component or the product. For example:

- circuit boards and plastic housings may be required to have flame retardant properties;
- Plastic housings may contain colorants such as pigments;
- Power cables may contain plasticizers such as phthalates;
- Solder may contain metals such as antimony and beryllium;
- Lithium ion batteries contain hazardous electrolyte but are fundamental in achieving long notebook and tablet battery lives.

This distinguishment between articles, complex articles and chemical mixtures is important because it will influence how hazards within a computer product are assessed and verified.

#### *Proposed approach to hazard screening and criteria development for computers*

Subject to discussion with stakeholders it is proposed to apply a new approach to the computer product group. This would follow an adapted version of the proposed approach developed by JRC-IPTS for the EU Ecolabel's Horizontal Task Force on Chemicals.

An initial screening has been carried out of the bill of components/materials (see section 2.4 of the Hazardous Substances paper) followed by an initial identification of substance groups by their function (see also section 2.5). This reflects the broad approach outlined in the box below.

Case studies and restricted substance listings have been collated that will then enable the state-of-the-art in hazard substitution to be defined for these substance groups.

Additional input will also be required from stakeholders in order to identify substitutions that have been made and also, if required, to identify derogations that

may also be required if substitutions are not currently possible for technical reasons. According to the Ecolabel Regulation derogations are only to be granted

*"in the event that it is not technically feasible to substitute them as such, or via the use of alternative materials or designs, or in the case of products which have a significantly higher overall environment performance compared with other goods of the same category,"*

*And furthermore, additional rules apply to Substances of Very High Concern:*

*"No derogation shall be given concerning substances that meet the criteria of Article 57 of Regulation (EC) No 1907/2006 and that are identified according to the procedure described in Article 59(1) of that Regulation, present in mixtures, in an article or in any homogeneous part of a complex article in concentrations higher than 0,1 % (weight by weight)."*

*Substitution proposal and derogation request forms will be circulated to stakeholders following the first Ad-Hoc Working Group meeting on the 10<sup>th</sup> October 2013.*

#### **Proposed approach to the hazard screening of complex articles (first proposal)**

- Identification of the main homogenous materials within the bill of materials i.e. metals, alloys, polymers, glass, ceramics;
- Alloys and polymers to which no potentially hazardous additives, coatings or treatments have been applied are proposed for exemption, with reference to Article 23 of Regulation (EC) No 1272/2008 and Annex I point 1.3.4;
- Identification of functional additives, coatings and treatments that are related to components of the complex article. These should then be screened for hazards and/or risk of potential release;
- Separate screening of hazards associated with the chemistry of batteries;
- The identification of relevant Candidate List and Article 57 substances by reference to industry declaration lists, European Commission initiatives (e.g. Endocrine disruptors) and Member State intentions;
- Check that the alloys and/or polymers to which hazardous additives or treatments have been applied would pass design for recycling/dismantling requirements (see the Cluster 4 criteria proposals).

#### Screening and identifying substances and hazards

As a starting point for an investigation on the functional level the table below presents a preliminary overview of computer substance groups by function, and gives example substances for each of them. *Feedback is required from stakeholders in order to complete their identification and where in the product they may arise.*

Substance groups	Where in product? <i>To be completed by means of stakeholder input</i>	Substances (examples)
Flame retardants	e.g. PWB, plastic casing, housing, connectors	<ul style="list-style-type: none"> <li>• TBBP-A</li> <li>• Hexabromocyclododekan (HBCDD),</li> <li>• tris(2-chloroethyl)phosphate (TCEP)</li> <li>• Short and medium chain chlorinated paraffins (SCCP and MCCP)</li> </ul>
Colorants / dye / pigments	e.g. Plastic casing	<ul style="list-style-type: none"> <li>• Antimony and its compounds;</li> <li>• Lead/lead compounds</li> <li>• Azo dyes</li> <li>• Lead chromate molybdate sulfate red (C.I. Pigment Red 104)</li> <li>• Lead sulfochromate yellow (C.I. Pigment Yellow 34)</li> </ul>
Solder		<ul style="list-style-type: none"> <li>• Antimony or bismuth and its compounds</li> <li>• Cadmium/cadmium compounds</li> </ul>
Catalysts : a) flame retardant catalyst  b) curing catalyst for silicone resin and urethane resin		<p>a)</p> <ul style="list-style-type: none"> <li>• Antimony or beryllium and its compounds</li> </ul> <p>b)</p> <ul style="list-style-type: none"> <li>• Dibutyltin (DBT)</li> <li>• Dioctyltin (DOT)</li> </ul>
Plasticizer		<ul style="list-style-type: none"> <li>• Phthalates (including DEHP, BBP, DINP, DIDP, DNOP, DHNUP, DIHP)</li> <li>• Short Chain Chlorinated Paraffins (SCCPs)</li> </ul>
Additives (e.g. in metal, glass and plastics)		<ul style="list-style-type: none"> <li>• Phthalates (plasticizers in plastics)</li> <li>• Arsenic compounds (in glass)</li> </ul>
Adhesives		<ul style="list-style-type: none"> <li>• Phthalates</li> </ul>
Anti-corrosion surface treatments		<ul style="list-style-type: none"> <li>• Cadmium/cadmium compounds</li> </ul>
Lubricants / Surfactant		<ul style="list-style-type: none"> <li>• Phthalates</li> <li>• Nonylphenol</li> <li>• Nonylphenoethoxylates</li> </ul>
Anti-microbial agents/coatings		<ul style="list-style-type: none"> <li>• Selenium and its compounds,</li> <li>• Triclosan</li> <li>• Organotins Tributyl tin oxide (TBTO) Dibutyltin dichloride (DBTC) Dibutyltin (DBT) Dioctyltin (DOT)</li> </ul>
Ceramics		<ul style="list-style-type: none"> <li>• Beryllium oxide (BeO)</li> </ul>
Electrolytes (in batteries)		<ul style="list-style-type: none"> <li>• Bis(2-methoxyethyl) ether</li> </ul>

Substance groups	Where in product? <i>To be completed by means of stakeholder input</i>	Substances (examples)
Stabilizer		<ul style="list-style-type: none"> <li>• Cadmium/cadmium compounds</li> <li>• Lead/lead compounds</li> <li>• Dibutyltin (DBT) for PVC</li> <li>• Dioctyltin (DOT) for PVC</li> </ul>
Surface finish/treatment: Ink, paint, plating <sup>6</sup> ; anti-corrosion layer		<ul style="list-style-type: none"> <li>• Cadmium/cadmium compounds</li> </ul>
Fluorescence		<ul style="list-style-type: none"> <li>• Cadmium/cadmium compounds</li> </ul>

Relevant substance restrictions arising from this exercise would then be entered into a restricted substance list. This list would be specified to reflect the state-of-the-art within industry and ecolabel substance restrictions. It is likely that in the process the list would remove a range of hazards from the computer product, including Article 57 and 59 (Candidate List) SVHC's.

The list could be structured with reference to electronics industry declaration protocols such as the Joint Industry Guide (JIG) and IEC 62474. For example, the JIG establishes three criteria that determine whether substances shall be declared:

- **Criteria 1 – R (Regulated)**  
Substances that are subject to enacted legislation that (a) prohibits their use; or (b) restricts their use; or (c) requires reporting or results in other regulatory effects (e.g. RoHS).
- **Criteria 2 – A (For Assessment Only)**  
Substances that are likely to be subject to enacted legislation (e.g. Authorisation under REACH of SVHC's) but where the substance specific effective dates of the regulatory requirements are uncertain.
- **Criteria 3 – I (For Information Only)**  
Substances that are not regulated but where there is a recognised market requirement for reporting their content in computer products (e.g. to be in compliance with ecolabel criteria).

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<sup>6</sup> Surface covering in which a metal is deposited on a conductive surface

Substances used within computers would then need to be screened for the hazards listed in the table below. The preferred approach would be to screen at substance group level which, as illustrated by screening exercises in the background paper comparing flame retardants, allows for the comparison of substitutes. Given the complexity of the products existing studies will be used as far as possible.

<b>Acute toxicity</b>	
<b>Category 1 and 2</b>	<b>Category 3</b>
H300 Fatal if swallowed (R28)	H301 Toxic if swallowed (R25)
H310 Fatal in contact with skin (R27)	H311 Toxic in contact with skin (R24)
H330 Fatal if inhaled (R23/26)	H331 Toxic if inhaled (R23)
H304 May be fatal if swallowed and enters airways (R65)	EUH070 Toxic by eye contact (R39/41)
<b>Specific target organ toxicity</b>	
<b>Category 1</b>	<b>Category 2</b>
H370 Causes damage to organs (R39/23, R39/24, R39/25, R39/26, R39/27, R39/28)	H371 May cause damage to organs (R68/20, R68/21, R68/22)
H372 Causes damage to organs (R48/25, R48/24, R48/23)	H373 May cause damage to organs (R48/20, R48/21, R48/22)
<b>Respiratory and skin sensitisation</b>	
<b>Category 1a</b>	<b>Category 1b</b>
H317: May cause allergic skin reaction (R43)	H317: May cause allergic skin reaction (R43)
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled (R42)	H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled (R42)
<b>Carcinogenic, mutagenic or toxic for reproduction</b>	
<b>Category 1a and 1b</b>	<b>Category 2</b>
H340 May cause genetic defects (R46)	H341 Suspected of causing genetic defects (R68)
H350 May cause cancer (R45)	H351 Suspected of causing cancer (R49)
H350i May cause cancer by inhalation (R49)	
H360F May damage fertility (R60)	H361f Suspected of damaging fertility (R62)
H360D May damage the unborn child (R61)	H361d Suspected of damaging the unborn child (R63)
H360FD May damage fertility. May damage the unborn child (R60, R60/61)	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child (R62/63)
H360Fd May damage fertility. Suspected of damaging the unborn child (R60/63)	H362 May cause harm to breast fed children (R64)
H360Df May damage the unborn child. Suspected of damaging fertility (R61/62)	

Hazardous to the aquatic environment	
Category 1 and 2	Category 3 and 4
H400 Very toxic to aquatic life (R50)	H412 Harmful to aquatic life with long-lasting effects (R52/53)
H410 Very toxic to aquatic life with long-lasting effects (R50/53)	H413 May cause long-lasting effects to aquatic life (R53)
H411 Toxic to aquatic life with long-lasting effects (R51/53)	
Hazardous to the ozone layer	
EUH059 Hazardous to the ozone layer (R59)	

### Assessment and verification

Assessment and verification procedures would then need to be specified. It is proposed that these should reflect the supply chain management practices of front runner manufacturers and selected ecolabels with experience in this area (see 0). Initial findings from industry and ecolabel case studies suggest that this could include declarations for specific sub-components obtained from tier 1 suppliers and random analytical testing for specific substances or chemistries.

#### **Present criteria,**

#### **Decisions 2011/337 and 2011/330**

##### **“Hazardous substances and mixtures”**

In accordance with Article 6(6) of Regulation (EC) No 66/2010 the product or any part of it shall not contain substances referred to in Article 57 of Regulation (EC) No 1907/2006 nor substances or mixtures meeting the criteria for classification in the following hazard classes or categories in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council.

List of hazard statements and risk phrases: *see equivalent listing above*

The use of substances or mixtures which change their properties upon processing (e.g. become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies is exempted from the above requirement.

Concentration limits for substances or mixtures meeting the criteria for classification in the hazard classes or categories listed in the table above, and for substances meeting the criteria of Article 57(a), (b) or (c) of Regulation (EC) No 1907/2006, shall not exceed the generic or specific concentration limits determined in accordance with Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined, they should prevail over the generic ones.

Concentration limits for substances meeting criteria of Article 57(d), (e) or (f) of Regulation (EC) No 1907/2006 shall not exceed 0,1 % weight by weight.

The following substances/uses of substances are specifically derogated from this requirement: Homogenous parts with weight below 10 g: Nickel in stainless steel

Assessment and verification: for each part above 10 g the applicant shall provide a declaration of compliance signed by the suppliers of substances and copies of relevant Safety Data Sheets in accordance with Annex II to Regulation (EC) No 1907/2006 for substances or mixtures.

Concentration limits shall be specified in the Safety Data Sheets in accordance with Article 31 of Regulation (EC) No 1907/2006 for substances and mixtures.

**“Substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006”**

No derogation from the exclusion in Article 6(6) may be given concerning substances identified as substances of very high concern and included in the list foreseen in Article 59 of Regulation (EC) No 1907/2006, present in mixtures, in an article or in any homogenous part of a complex article in concentrations higher than 0,1 %. Specific concentration limits determined in accordance with Article 10 of Regulation (EC) No 1272/2008 shall apply in case it is lower than 0,1 %.

Assessment and verification: the list of substances identified as substances of very high concern and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006 can be found here:

[http://echa.europa.eu/chem\\_data/authorisation\\_process/candidate\\_list\\_table\\_en.asp](http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp)

Reference to the list shall be made on the date of application.

The applicant shall provide a declaration of compliance with this criterion, together with related documentation, such as declarations of compliance signed by the suppliers of substances and copies of relevant Safety Data Sheets in accordance with Annex II to Regulation (EC) No 1907/2006 for substances or mixtures. Concentration limits shall be specified in the Safety Data Sheets in accordance with Article 31 of Regulation (EC) No 1907/2006 for substances and mixtures.

**Proposed structure for the revised criteria (first proposal)**

**“Substitution of hazardous substances and mixtures in computers”**

The following structure is proposed for the criteria, which will also need to include the standard hazard listing and a legal reference to the requirements in the Ecolabel Regulation 66/2010:

- (a) Restricted substances in computers: A list would be compiled based on best practice by manufacturers and, as far as possible,
- Article 57 substances that have already been/are in the process of being substituted by leading manufacturers.
  - The listing would be appended as an appendix of the Ecolabel Decision. The listing would include the Article 6(6)/6(7) requirement to exclude Candidate List SVHC's and Article 57 substances.
- (b) Derogation framework: If the need for derogations is identified then these will, as far as possible, be structured according to the function of the substance and/or the relationship of the substance to a specific sub-component within a computer.
- Derogations will only be permitted for specific hazards if, after a screening of substance group substitutions, they are required.
  - The hazards derogated would be defined by the hazard profile and market status of substitution options.
  - Derogation conditions would be set that would be related to the point in the life cycle of the product where the hazard is most relevant.
- (c) Assessment and verification: This would be specified for the restricted substance listing and for the derogation framework (if required).
- It is to be discussed if a restriction list could be verified by random analytical testing and if so the frequency of this testing.
  - It is to be discussed the level at which verification of the classification/non-classification of substance groups within products could be workable. One possibility is for declarations to be obtained from tier 1 component suppliers.

### Consultation questions

- Could the overall approach, combining a substance list and a substance group approach to hazard screening and substitution/derogation, be workable for this product group?
- Are there other screening studies and/or examples of (implemented) substitution projects that we have not covered in the background report?
- What can be learnt from the experience of applicants/competent bodies for other ecolabels which have similar criteria? e.g. EPEAT, TCO
- Based on the experience of industry and existing ecolabels could the approach to assessment and verification be workable? Are there other examples of how this can work in a way that provides a high level of assurance?

### 3.2.1 Stakeholder feedback and further evidence

The main points arising from the 1st AHWG meetings for Computers and Televisions were as follows:

- Stakeholders understood that the criteria has to be ambitious, but the level of ambition has to stay within the limits of possibility. Even the present, less ambitious Television criteria, are difficult to realise.
- A critical point was the transparency of the supply chain. A computer or a TV is a complex article. Manufacturers are not used to verifying based on hazards but on specific substances.
- Care needs to be taken in looking to other Ecolabels' criteria as they have copied each other 'bad' criteria which are not necessarily implementable or scientific. Verification was also highlighted as an important area to strengthen. Third party verification of the hazardous substance criteria for the US EPA DFE programme and for Green Screen assessments were cited as good models.
- An approach focused on a prioritisation of the main components and functions related to the product was generally supported. Flame retardants and plasticisers, for example, should not be treated in a group but should be studied separately. Safety standards which include the use of FR, such as those for TV housings, have to be considered. Clear guidance would be needed for Competent Bodies on which components they would need to verify.
- Concern was expressed that the Ecolabel Regulation's Article 6(6) and 6(7) has a very broad scope and the scope for flexibility was questioned. For example, there could be over 700 pigments used to colour plastic. DG ENV highlighted the need to consult during the revision process on what is legally possible. Early feedback from Member States indicates a willingness to adopt a more flexible approach for electrical products.
- Substitution is expensive. Leading manufacturers therefore seek to anticipate future regulatory restrictions so as to minimise costs. However, substitutes should have a better hazard profile than those they substitute. The US Design for the Environment (DFE) programme, for example, has evaluated 32 flame

retardants, including halogenated and non-halogenated. Other studies and evaluations could also be referred to.

- Stakeholders highlighted the need to cover not only a black list of restricted substances but also a white list of substances which are substituting black substances, which could be a living dynamic list.

The main points arising from written stakeholder feedback received between September and November 2013 were as follows:

- There was concern that fundamentally the approach would not work because manufacturers have not implemented hazard-based restrictions. Concern was raised that Ecolabels have led manufacturers to make 'regrettable substitutions' for which there are major data gaps in their hazard profile.
- From 2011 onwards a major TV manufacturer could not apply for the Ecolabel because it was not possible to use main the flame retardant used in the plastic housings based on hazard restrictions.
- The industry manages well the absence of regulated substances and those of concern but has limited information on all substances in parts e.g. plastics additives and colorants. The scope of the criteria therefore needs to be limited in order to make progress.
- Restricting the use of SVHC in Ecolabel products makes sense. The SVHC restriction should be applicable to component level rather than homogeneous material level. To make the SVHC criteria workable, it is necessary to limit the scope of the 'homogenous' part to a manageable range (e.g. plastic parts over 25 grams, metal parts, etc.). A clear distinction is required between substances in mixtures, and substances in articles/complex articles.
- More information is needed on the inventory of hazardous substances included in TVs/computers. This information is the basis for any debate about substitution possibilities and barriers and respective needs for derogations.

Sources such as ENFIRO, Green Screen, SubSport and the US DfE project were highlighted as being important references.

- Green Screen in particular was highlighted as a means of evaluating, benchmarking and comparing the hazard profile of potential substitutes. Verification should be strengthened, moving away from self-declarations by OEM's to third party verified hazard evaluations and test reports for defined hazard end-points.
- There is the need to avoid the use of substances that will cause health and environmental impacts during the End of Life phase of these products e.g. in third world countries where the goods may be processed in dangerous conditions, harming the health of local people and damaging the environment. An EEA report on the issue was highlighted.

One formal derogation has been received to date - nickel in stainless steel, submitted by Eurofer - together with supporting technical information relating to the use of Antimony, Beryllium and non-halogenated flame retardants. A compilation of information and assessments relating to the Green Screen assessment tool was also provided.

#### Further research and evidence:

In order to analyse and gather further evidence related to hazards that may be present within the product, as well as substitutions and restrictions made by the industry, a sub-group was established as mandated at the first AHWG and two matrices were established as a means of compiling and structuring the information that will underpin the criteria proposal.

#### **Establishment of the sub-group**

An invitation to take part in the sub-group was sent out to registered stakeholders and EUEB members in November. The aim of the hazardous sub-group was defined as being to:

- Steer the overall approach to be taken with regards to the Ecolabel Regulation and the substitution potential of the best performing products on the market;
- Assist in developing a better understanding of the substitution potential for the product group;
- Review substitution information and derogation requests;
- Advise on how verification could work.

Based on the responses to the invitation the sub-group was structured to ensure a balanced representation from product manufacturers, industry specialists, EU member states and NGO's. The sub-group members are listed in Table 5. A first telephone meeting of the sub-group took place on the 26th February 2014 with full attendance and a further meeting is anticipated following the second AHWG. *For transparency the minutes have been made available to stakeholders.*

**Table 5: Computers and Display hazardous substance sub-group members**

Markus Stutz	Dell
Hans Wendschlag	Hewlett Packard
Claudia Albuquerque	LG
Steven Clayton	Samsung
Lein Tange	ICL-IP
Claus Ruediger	Bayer
Dr. Johanna Wurbs	UBA (Germany)
Søren Mørch Andersen	Danish EPA
Dirk Jepsen	Oekopol
Lauren Heine	Clean Production Action (USA)

*Participation as observers:*

Blanca Morales	EEB/BEUC
Bernd Kappenberg	CEFIC
Susanne Stark	VKI (Austria)

## Screening and evaluation of the comments and evidence base

In order to screen and evaluate the existing evidence compiled in the September 2013 background document on hazardous substances and new evidence submitted by stakeholders subsequent to this two matrices have been setup:

1. Candidate List and RoHS screening matrix: The IEC 62474 Declarable substance list for electrotechnical products<sup>7</sup> was used as the starting point for identifying substances from the most current ECHA Candidate List that may be relevant to computers and displays. The list is frequently updated by a dedicated team and is therefore understood to be accurate as well as assisting in screening the list. Substances of potential relevance were flagged and colour coded before being circulated to sub-group members to obtain further feedback on their use/non-use in products. The codings were as follows:
  - i. Substances that are already understood to have been eliminated from production;
  - ii. RoHS exemptions that may be relevant to the product group but their current/post-sunset date relevance is to be confirmed;
  - iii. Substances on which little is known about their potential relevance to the product group
  - iv. Substances not deemed relevant to the product group based on the available information.
2. Bill of materials and hazardous substance screening matrix: The evidence gathered to date was structured, firstly, according to substance groups, which can generally be seen to related to functions associated with components of the product, and secondly according to the components/sub-components where hazardous substances are/may be found. A summary of the evidence

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<sup>7</sup> International Electrotechnical Commission, *IEC 62474 - Material Declaration for Products of and for the Electrotechnical Industry*, <http://std.iec.ch/iec62474>

used to compile the matrix can be found in Table 6. This evidence is supplemented by feedback from product group stakeholders and sub-group members, including OEM's. An overview of how the matrix is structured and how it works is summarised in Table 6.

**Table 6: Main evidence base used to compile the screening matrix**

Screening	Evidence base
RoHS (recast) Directive	<ul style="list-style-type: none"> <li>• Relevance of exemptions identified from OEM restriction lists</li> </ul>
RoHS ATP	<ul style="list-style-type: none"> <li>• Oeko-Institut and Austrian EPA reports with recommendations on extended RoHS scope</li> </ul>
ECHA Candidate List	<ul style="list-style-type: none"> <li>• Substances of relevance to the product group using IEC 62474 Declaration List (see colour coded version appended)</li> <li>• ECHA and Member State risk assessments and dossiers (e.g. German BFR - PAHs)</li> </ul>
Substitution analysis	<ul style="list-style-type: none"> <li>• EU ENFIRO study of environment-compatible flame retardants</li> <li>• US EPA Printed Circuit Board and decaBDE evaluations</li> <li>• Green Screen assessments for TV enclosures and plasticisers</li> <li>• COWI and the Danish Technological Institute compilation for plastics</li> </ul>
Industry substitutions and restrictions	<ul style="list-style-type: none"> <li>• OEM chemical restriction lists (with a focus on SG members HP, Samsung, Dell, LG)</li> <li>• International Electronics Manufacturing Initiative (iNEMI)</li> <li>• EFRA and PINFA guides to flame retardant applications in electronic equipment</li> <li>• SubSport Case Story substitution database</li> <li>• OEM product and component specifications</li> </ul>

The analysis carried out using the matrix was used to derive the following outputs which form the basis for the scope and ambition level of first criteria proposal:

- **Current hazard benchmarks:** *Substances that are currently used or were used until recently in mainstream products.* For each substance the CAS number and, as far as possible, their hazard profile have been identified for comparative purposes.
- **Proposed substitution benchmarks:** *Substitutes for hazardous substances currently used in mainstream products that have been implemented, or are proposed for implementation, by leading manufacturers.* For each substance the CAS number and, as far as possible, hazard profile have been identified for comparative purposes.

- Proposed restrictions: *Substance or substance group restrictions that have been identified from OEM restriction lists or from risk assessment exercises by the European Commission, Member State or Intergovernmental bodies. Where a restriction is proposed:*
  - The specific substances, how they relate to the product and, where appropriate, a concentration limit are identified.
  - The potential to specify analytical testing of component parts to strengthen verification is flagged for follow-up and, if agreed to be appropriate in terms of the available test methods and burden for applicants, specification.
  - For some special cases possible derogation conditions are briefly flagged.

These outputs from the screening can be found in '*Functional need and substances currently used*' and '*best practices identified*' columns in the main screening matrix.

**Table 7: Indicative schema for the hazardous substance screening matrix**

Component or sub-component	Functional need and substances currently used	Best practice identified	Summary evaluation of evidence to support substitution or restrictions	Questions and information gaps
<b>Substance group x</b>				
Generally supply chain tier 2 or 3 components	Description of the function and its need as well as identification of the substances typically used.  Substances are also identified which may be used as the <u>hazard profile benchmarks for current practices</u> against which the improvement potential of substitutes may be compared.	<u>Substitutions made by industry and/or mandatory and voluntary restrictions</u> that have been implemented in leading products available on the market.  Substances are also identified which may be used as the <u>substitution hazard profile benchmarks</u> to set 'white list' derogations, as well as possible <u>restrictions on specific hazardous substances</u> .	Discussion of background evidence relating to different options for achieving the same function. Comparative evidence relating to substances and substance groups is summarised, in some cases with reference to US EPA and Green Screen assessments..  This evidence may be used to support criteria proposals to derogate the use of substances ( <i>the hazard white list</i> ) and/or restrict the use of substances ( <i>the hazard black list</i> ).	For follow-up with stakeholders in order to address information gaps

## **Grouping of the EU Ecolabel hazard list**

At the March meeting of the EU Ecolabel Board a final version of the Chemicals Horizontal Task Force approach to implementation of the hazardous substance criteria was tabled<sup>8</sup>. The approach was informally mandated for use in product groups.

Importantly the approach included a grouping of the hazard list which forms a reference for the criteria. This grouping is intended to better reflect the different levels of hazard as defined in the CLP classification rules. The Groups have also been designed to facilitate a better read across from the results of US EPA and Green Screen hazard assessments, which form part of the evidence base in the screening matrix.

The Groups are accompanied by a set of rules for the derogation of hazards, with Group 1 being the strictest and Group 3 being the most flexible. These rules can be found in the Horizontal Task Force approach paper. In all cases the emphasis is on the need to demonstrate the functional need for the use of a substance and the availability of substitutes.

*For reference the three groups are listed below:*

### **Group 1: Hazards subject to complete restriction**

Substances present in mixtures, in an article or in any homogeneous part of a complex article that meet the criteria of Article 57 of Regulation (EC) No 1907/2006 or that are identified according to the procedure described in Article 59(1) of that Regulation. This shall include the hazards listed below, as well as endocrine disruptors, neurotoxins and sensitisers of equivalent concern.

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<sup>8</sup> JRC-IPTS, *Findings of the EU Ecolabel Chemicals Horizontal Task Force – Proposed approach to hazardous substance criteria development*, 24<sup>th</sup> February 2014

<b>Carcinogenic, mutagenic or toxic for reproduction</b>	
<b>CLP Category 1A and 1B</b>	
H340 May cause genetic defects (R46)	
H350 May cause cancer (R45)	
H350i May cause cancer by inhalation (R49)	
H360F May damage fertility (R60)	
H360D May damage the unborn child (R61)	
H360FD May damage fertility. May damage the unborn child (R60, R60/61)	
H360Fd May damage fertility. Suspected of damaging the unborn child (R60/63)	
H360Df May damage the unborn child. Suspected of damaging fertility (R61/62)	

**Group 2: Priority hazards for restriction to which strict conditions shall apply**

Combinations of these hazards that also result in the substance being PBT (Persistent, Bioaccumulative and Toxic), or persistent or bioaccumulative, according to the definitions provided in Annex XIII of the REACH Regulation, shall be treated as Group 1 substances.

<b>Carcinogenic, mutagenic or toxic for reproduction</b>	
<b>CLP Category 2</b>	
H341 Suspected of causing genetic defects (R68)	
H351 Suspected of causing cancer (R49)	
H361f Suspected of damaging fertility (R62)	
H361d Suspected of damaging the unborn child (R63)	
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child (R62/63)	
H362 May cause harm to breast fed children (R64)	

<b>Acute toxicity</b>	
<b>CLP Category 1 and 2</b>	
H300 Fatal if swallowed (R28)	
H310 Fatal in contact with skin (R27)	
H330 Fatal if inhaled (R23/26)	
H304 May be fatal if swallowed and enters airways (R65)	

<b>Specific target organ toxicity (STOT)</b>	
<b>CLP Category 1</b>	
H370 Causes damage to organs (R39/23, R39/24, R39/25, R39/26, R39/27, R39/28)	
H372 Causes damage to organs (R48/25, R48/24, R48/23)	

<b>Hazardous to the aquatic environment</b>	
<b>CLP Category 1 and 2</b>	
H400	Very toxic to aquatic life (R50)
H410	Very toxic to aquatic life with long-lasting effects (R50/53)
H411	Toxic to aquatic life with long-lasting effects (R51/53)
<b>Hazardous to the ozone layer</b>	
H420	Hazardous to the ozone layer (R59)

<b>Respiratory and skin sensitisation (not proposed for general application to this product group, with limited exceptions)</b>	
<b>CLP Category 1</b>	
H317:	May cause allergic skin reaction (R43)
H334:	May cause allergy or asthma symptoms or breathing difficulties if inhaled (R42)

Group 3: Hazards to which greater flexibility may be applied in derogations

<b>Acute toxicity</b>	
<b>CLP Category 3</b>	
H301	Toxic if swallowed (R25)
H311	Toxic in contact with skin (R24)
H331	Toxic if inhaled (R23)
EUH070	Toxic by eye contact (R39/41)
<b>Specific target organ toxicity (STOT)</b>	
<b>CLP Category 2</b>	
H371	May cause damage to organs (R68/20, R68/21, R68/22)
H373	May cause damage to organs (R48/20, R48/21, R48/22)

<b>Hazardous to the aquatic environment *</b>	
<b>CLP Category 3 and 4</b>	
H412	Harmful to aquatic life with long-lasting effects (R52/53)
H413	May cause long-lasting effects to aquatic life (R53)

\* flexibility may be applied only if the fate of the product is not in the aquatic environment

### 3.2.2 First proposal for hazardous substances criteria

#### First criteria proposal

##### “Substitution of hazardous substances used in the main computer components”

###### 2(a) Substances of Very High Concern (SVHC’s)

The product shall not, unless specifically derogated, contain substances that:

- (i) Meet the criteria in Article 57 of Regulation (EC) No 1907/2006,
- (ii) Have been identified according to the procedure described in Article 59(1) of Regulation (EC) No 1907/2006 which establishes the candidate list for substances of very high concern.

These conditions apply to substances that carry out a function to the final product and to substances that may be present as impurities or contaminants. No derogation shall be given concerning substances that meet either of these two conditions, and which are present in an article or in any homogeneous part of a complex article in concentrations greater than 0,1 % (weight by weight).

Assessment and verification: Substances that are present in the final product shall be screened against the latest version of the candidate list published by ECHA. The applicant shall compile declarations of compliance from, as a minimum, tier 2 suppliers. Where a derogation has been granted then the applicant shall show that use of the substance is in compliance with the relevant concentration limits and derogation conditions.

###### 2(b) Restrictions based on hazard classifications

Hazardous substances that may be present in main components of the computer that, in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council or Council Directive 67/548/EC, meet the criteria for classification with the hazard classes or risk phrases listed in table 2.1 shall not be used unless they have been specifically derogated. The main components of a computer are defined as comprising:

- Printed Circuit Boards
- Central Processing Units and Graphics Processing Units (including cooling units)
- Electrical solder and metal contacts
- Electrical and data connections (internal and external)
- Data storage drives
- External cables and power packs
- External housing and enclosure materials
- External casing and surfaces of peripheral devices
- Notebook or tablet batteries
- Display screen glass
- Liquid Crystal Display unit
- Screen LED backlights

Homogeneous parts with a weight of below 25 g and the metal chassis of the product are excluded from the scope of this criterion.

The hazard classifications in Table 2.1 generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures apply. The most recent classification rules adopted by the European Union shall take precedence over the listed hazard classifications or risk phrases.

The use of substances or mixtures which change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies are exempted from the above requirements. This shall include polymers that have been modified to incorporate a function and additives which become covalently bonded with polymers.

Table 2.1: Restricted hazard classifications and risk phrases and their CLP categorisation

<b>Acute toxicity</b>	
<b>Category 1 and 2</b>	<b>Category 3</b>
H300 Fatal if swallowed (R28)	H301 Toxic if swallowed (R25)
H310 Fatal in contact with skin (R27)	H311 Toxic in contact with skin (R24)
H330 Fatal if inhaled (R23/26)	H331 Toxic if inhaled (R23)
H304 May be fatal if swallowed and enters airways (R65)	EUH070 Toxic by eye contact (R39/41)
<b>Specific target organ toxicity</b>	
<b>Category 1</b>	<b>Category 2</b>
H370 Causes damage to organs (R39/23, R39/24, R39/25, R39/26, R39/27, R39/28)	H371 May cause damage to organs (R68/20, R68/21, R68/22)
H372 Causes damage to organs (R48/25, R48/24, R48/23)	H373 May cause damage to organs (R48/20, R48/21, R48/22)
<b>Carcinogenic, mutagenic or toxic for reproduction</b>	
<b>Category 1A and 1B</b>	<b>Category 2</b>
H340 May cause genetic defects (R46)	H341 Suspected of causing genetic defects (R68)
H350 May cause cancer (R45)	H351 Suspected of causing cancer (R40)
H350i May cause cancer by inhalation (R49)	
H360F May damage fertility (R60)	H361f Suspected of damaging fertility (R62)
H360D May damage the unborn child (R61)	H361d Suspected of damaging the unborn child (R63)
H360FD May damage fertility. May damage the unborn child (R60, R60/61)	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child (R62/63)
H360Fd May damage fertility. Suspected of damaging the unborn child (R60/63)	H362 May cause harm to breast fed children (R64)
H360Df May damage the unborn child. Suspected of damaging fertility (R61/62)	
<b>Hazardous to the aquatic environment</b>	
<b>Category 1 and 2</b>	<b>Category 3 and 4</b>
H400 Very toxic to aquatic life (R50)	H412 Harmful to aquatic life with long-lasting effects (R52/53)
H410 Very toxic to aquatic life with long-lasting effects (R50/53)	H413 May cause long-lasting effects to aquatic life (R53)

H411 Toxic to aquatic life with long-lasting effects (R51/53)	
<b>Hazardous to the ozone layer</b>	
EUH059 Hazardous to the ozone layer (R59)	

*Assessment and verification:* The applicant shall obtain declarations of compliance from, as a minimum tier 2 suppliers. This shall declare that, where used in the listed components, the following substances do not meet the criteria for classification with one or more of the hazard classifications or risk phrases listed in table 2.1:

- Flame retardants
- Plasticisers
- Plastic stabilisers
- Plastic colorants
- Biocides in plastic and rubber
- Plastic contaminants
- Solders and metal contacts
- Thermal conductors
- Coolants
- Battery electrolytes
- External metals and coatings
- Screen glass fining agents
- Liquid crystals in displays
- LED doping and luminescence

Where substances are derogated in 2(c) or 2(d) then the declaration shall specifically identify those derogated substances and provide supporting evidence showing how the derogation conditions are to be met. The following technical information shall be provided to support the declaration of classification or non-classification for each substance:

- (i) For substances that have not been registered under Regulation (EC) No 1907/2006 or which do not yet have a harmonised CLP classification: Information meeting the requirements listed in Annex VII to that Regulation;
- (ii) For substances that have been registered under Regulation (EC) No 1907/2006 and which do not meet the requirements for CLP classification: Information based on the REACH registration dossier confirming the non-classified status of the substance;
- (iii) For substances that have a harmonised classification or are self-classified: SDS where available. If these are not available or the substance is self-classified then information shall be provided relevant to the substances hazard classification according to Annex II to Regulation (EC) No 1907/2006;
- (iv) In the case of mixtures: safety data sheets where available. If these are not available then calculation of the mixture classification shall be provided according to the rules under Regulation (EC) No 1272/2008 together with information relevant to the mixtures hazard classification according to Annex II to Regulation (EC) No 1907/2006.

SDS shall be completed in accordance with the guidance in Section 2,3,9,10, 11 and 12 of Annex II to Regulation (EC) 1907/2006 (requirements for the compilation of SDS).

### 2(c) Derogation of substances with an improved hazard profile

In accordance with Article 6(7) of Regulation (EC) No 66/2010 the substance groups in table 2.2 are specifically derogated from the requirements set out in Article 2(b) and in accordance with the associated derogation conditions.

Table 2.2. Derogation of substitutes with an improved hazard profile

Substance group	Sub-components	Hazard derogations	Derogation conditions
Flame retardants	Printed Circuit Boards	Not required	Control of associated hazardous reaction products.
	Internal connectors and switches	H413	-
	External power cables	Not required	-
	Plastic enclosures and casings	H412, H413	Control of PFOA emissions from PTFE production
	Recycled plastic in enclosures and casings	FR's and their synergists that are not restricted or identified as SVHC's	Declaration of FR and synergist present obtained from the component supplier.
Plasticisers	External cables	H411	-
	Recycled content (all components)	Substances present in recycle that are not SVHC's.	-

### 2(d) Restriction of substances in specified components

The final product and, where stipulated, specified components shall not contain the hazardous substances listed in table 2.3 at or above the specified concentration limits or according to the specified restrictions. The restrictions in the RSL take precedence over any derogations listed in Criterion 2(C).

Verification and testing requirements are specified in table 2.3. Laboratory testing, where required, shall be carried out for each production model. Testing shall be carried out annually during the license period in order to demonstrate ongoing compliance.

Table 2.3. Restriction of substances within components

Substance group	Restriction	Concentration limit
Plasticisers	DEHP, BBP, DBP, DIBP, DMEP, DIPP, DPP, DnPP and DnHP shall not be present in external cables and power packs.	A sum total concentration limit of 0.1% is proposed.
	Medium Chained Chlorinated Paraffins (MCCP's) Alkanes C14-17 shall not be present in external cables and power packs.	A sum total concentration limit of 0.1% is proposed.

Plastic stabilisers	Lead shall not be present in external cables, wires and connecting cords.	Concentrations at or greater than 300 ppm. <i>A test method is proposed to be specified.</i>
Plastic colourants	Colourants containing lead, chromium VI and cadmium, including those included in the Candidate List, shall not be used.	<i>The potential to specify testing is to be discussed.</i>
	Pigments and dyes used to colour ABS shall be colour fast.	<i>A migration test is to be identified.</i>
Biocides	Biocides intended to provide a hygiene (anti-bacterial) function shall not be added to keyboards and peripherals.	Self-declaration obtained from component suppliers.
Plastic contaminants	The 18 listed Polycyclic Aromatic Hydrocarbons (PAHs) shall not be present above individual and sum total concentration limits in the external surfaces of notebooks and tablets; peripheral keyboards, mice, stylus and trackpads; external power cables.	The following concentrations shall apply: <ul style="list-style-type: none"> <li>- Individual concentrations for the eight REACH restricted PAHs shall be 1 ppm</li> <li>- The sum total concentration of the 18 listed PAHs shall not be greater than 18 ppm</li> </ul>
Metal solder	RoHS exemption 7b for solder in small-scale servers shall not be granted to ecolabelled computers	Declaration by the manufacture detailing the alternative solder specified.
	The following RoHS exemptions shall be granted for ecolabelled computers: <ul style="list-style-type: none"> <li>- 6a-c: An alloying agent in steel, aluminium and copper (expires July 2016);</li> <li>- 7cii: In dielectric ceramic materials in capacitors (expires July 2016).</li> </ul>	-
Electrical contacts	RoHS exemption 8b shall not be granted to ecolabelled computers	Declaration by the manufacture detailing the alternative solder specified.

Ceramic heat conductors	Beryllium and its compounds shall not be used in parts at concentrations greater than 0.1%	Self-declaration obtained from component suppliers.
Coolants	Refrigerants in cooling systems shall not be classified as Ozone Depleting Substances (H420) or Controlled substances under the Montreal Protocol.	-
External metal parts	Nickel in stainless steel shall be restricted in-line with REACH where any external part will be in close and prolonged contact with the skin.	<i>Verification shall be by analytical testing for migration.</i>
External metallic coatings	Hexavalent chromium shall not be present in metallic coatings applied to parts of a computer.	<i>Verification shall be by analytical testing of coated parts.</i>
Screen glass	Arsenic and its compounds shall not be used in the manufacturing of screen glass and shall not be present at a concentration greater than 10 ppm.	<i>It is proposed that verification is obtained from the glass manufacturer.</i>

***Assessment and verification:*** The applicant shall provide a declaration of compliance with the restriction list in table x supported by evidence as applicable to the substances used to manufacture components within the final product. Testing, where required, shall be carried out upon application for each production model licensed and once a year thereafter, with results then communicated to the relevant competent body.

Failure of a test result during a license period shall result in retesting for the specific product line. If the second test fails then the license shall be suspended for the specific product line. Remedial action will then be required in order to re-instate the license.

**Summary of the how the proposal is formulated:**

- The scope of the criteria has been set in order to ensure that it can be complied with the best products on the market, reflects the practical potential for the substitution of hazards and can be verified with a high level of assurance.
- The scope is proposed to be narrowed to specific named components and substance groups that have been identified as being of high concern and which have been addressed by substitution initiatives.

- A lower cut-off limit of 0.1% is set for the consideration of CLP hazards in component parts. In-line with the practice within all other ecolabelling and reporting schemes for computer products a general weight-based cut-off for the scope of the criterion is proposed at 25g. Additionally it is proposed to exclude steel or aluminium chassis material that form the structure of a product.
  - The defined components – mainly understood to be manufactured by Tier 2 or 3 suppliers - are proposed to be recognised as *homogenous parts* for the purpose of applying the 0.1% cut-off limit for hazardous substances, such that verification shall be required for the part as whole in the case that specific restrictions or concentration limits are defined.
- In-line with Articles 6(6) and 6(7) of the Ecolabel Regulation (EC) 66/2010 a restriction is placed on the presence of substances placed on ECHA's Candidate List for authorisation (Substances of Very High Concern) being present in any component of the final product.
  - Provision is only made for the derogation of SVHC's under strict conditions and where a substance is present at concentrations less than 0.1%. It is understood that some OEM's intend to submit derogations. A strict deadline for derogations to be submitted shall be set at the AHWG2.
- A set of substance restrictions – a black list - have been identified from the hazard restriction lists of the leading OEM's that seek to limit or avoid the presence of substances of concern. The aim is to create a clear and visible control of these substances presented in a form that is familiar to OEM's and their suppliers. Functions that are not essential are also excluded where possible e.g. biocidal treatment of keyboards.
  - These restrictions are proposed to be verified for specific identified components. In some cases the restriction relates to possible exposure of the consumer to hazards. Where limit values are proposed then verification shall be according to laboratory testing using standardised IEC, EN or ISO test methods.

- Reflecting the practices of leading OEM's random laboratory testing is proposed for selected Candidate List substances (to be identified from the IEC 62474 Declaration List) and/or the Ecolabel's restriction list. This shall take place once a year during the license period.
- The initial findings from an analysis of substitutions made by leading manufacturers in order to minimise hazards present in their products has been used to establish a 'white list' hazard derogation framework. The aim of the framework is to identify from the EU Ecolabel hazard list those hazards that should be derogated in order to permit the hazard profile of the best products on the market to comply with the criterion.
- The framework is structured according to common substance groups that carry out specific and required functions in the product.

### **3.3 Cluster 3 – Lifetime extension**

The research results of Task 3 and Task 4 revealed that attention should be paid to the extension of the lifetime of computers in order to reduce the overall environmental impacts caused by ever shorter lifecycles, primary extraction and manufacturing processes.

In the current criteria documents, requirements that influence the lifetime of computers are spread across different discontinuous criteria (“lifetime extension”, “repairability”). To illustrate the importance of lifetime extension for computers, for the revision it is proposed to cluster the associated criteria, rearrange some of the sub-criteria and overall complementing them by some new proposals.

### 3.3.1 Criterion 3.1 – Expansion facilities

**Present criteria,  
Decisions 2011/337 and 2011/330**

**“Lifetime extension”:**

Personal computers shall have facilities that enable the following:

- (i) Exchangeable and upgradeable memory and graphic cards;
- (ii) Expansion capability: presence of at least four USB interfaces

Notebook computers shall have facilities that enable the following:

- (i) Exchangeable and upgradeable memory
- (ii) Expansion capability: presence of at least three USB interfaces as well as a connection for an external monitor.

The computer shall also be designed so that major components (including memory drives, CPUs and cards) can be exchanged and/or upgraded easily by the end-user. For example using snap, slide in/slide out or cartridge-style housing for components.

Assessment and verification: The applicant shall declare the product's compliance with these requirements to the competent body.

### 3.3.1.1 Major proposed changes (first proposal)

#### Proposed revised criteria (first proposal)

##### Capability enhancement / upgradeability

Computers shall have the following facilities to enable easy exchange to upgrade major components without the use of special tools by the end-user:

- (i) Desktop PCs:
  - Presence of at least 4 USB interfaces.
  - Installation and/or exchange of memory (for thin clients only applicable if equipped with a processor), storage capacity (not applicable to thin clients) and optical drives (not applicable to thin clients).
- (ii) Notebook PCs:
  - Presence of at least 3 USB interfaces as well as a connection for an external monitor
  - The memory shall be exchangeable or upgradeable.
  - Presence of a modular bay for an extra battery.
- (iii) Tablet PCs:
  - Presence of at least 1 USB interface.
  - Support for external monitor, keyboard and mouse.
  - The memory shall be exchangeable or upgradeable.

Assessment and verification: The applicant shall declare the compliance of the product with these requirements to the competent body.

- The components required to be upgradeable shall be defined more clearly to take into account major technical developments (to-date, certain components are not separately exchangeable any more).
- New: Inclusion of specific requirements for tablet computers.
- New: Notebooks shall provide a modular bay for an extra battery as this provides potential advantages in terms of lifetime extension and material efficiency (additional battery capacity, availability of battery spare parts, modular bay also usable for other applications, e.g. optical drives).

For more details cf. Task 4 report “Improvement Potential”, section 4.2.3.1 “expansion capability” and section 4.2.3.2 “upgradeability”.

#### Consultation questions

- Expansion capability: Are there any other technical solutions (USB host, hub, thunderbolt etc.) instead of a certain number of standard USB interfaces fulfilling the same requirement and therefore justifying a different formulation of the criterion?
- Is there any possibility for upgrading graphic cards, CPUs or other significant components? Are there differences between Desktop and Notebook PCs?

### 3.3.1.2 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, the proposals were felt to be too strict for ultrabooks (very light notebooks). There are some potential applicants that may encounter problems. It was questioned whether with 'the cloud' and external drives capability enhancements were still needed. One of the manufacturers stated that they had provided an additional battery bay but that this had not been successful. It was felt to be more important to provide a higher-quality battery. Tablet batteries were identified as being an issue. They cannot be easily removed to replace them. A view was expressed that tablet manufacturers should be forced to ensure this. Finally, for business users it must be possible to update and adapt to new software. This issue is particularly relevant to GPP.

Written feedback of stakeholders following the AHWG meeting suggested

- to not restricting the criterion for an external physical interface to USB to avoid discriminating between brands or connection techniques. It should be analysed if there are any other technical solutions (USB host, hub, thunderbolt etc.) instead of a certain number of standard USB interfaces fulfilling the same requirement and therefore justifying a different formulation of the criterion.
- Further, the requirement for a notebook for a “modular bay for extra battery” is asked to be clarified as “modular bay to permit battery change-over, e.g. to enable use of an additional or spare battery”. On the other hand, it is noted that the request that Notebook PCs must have an exchangeable and upgradeable memory and a modular bay for extra battery would not allow Ultrabooks to be certified and thus cutting off an important / widespread subgroup of notebooks.
- “Installation and/or exchange of storage capacity” is additionally proposed.
- The exchangeability and upgradeability of internal memory and batteries is asked to be included in the criteria set as these requirements are very important e.g. for the professional use of IT devices, i.e. GPP.
- The possibility for upgrading graphic cards, CPUs or other significant components should be further analysed, as well as possible differences between Desktop and Notebook PCs.

- It is informed that the Nordic Ecolabel include the following criteria for Tablet PCs (actually one licensee fulfilling the criteria):
  - A demand requiring that it must be possible to swap the battery (a swap by the supplier is OK). A replacement battery must be available as an option or a spare part. The battery replacement can be done at a repair shop.
  - A minimum requirement for storage capacity together with a demand for a storage expansion slot: For tablet computers the following is required:
    - Working memory (RAM) capacity shall be minimum 1 GB.
    - Storage capacity shall be minimum 16 GB
    - Storage expansion slot (example a SDHC slot)
    - Minimum 1 expansion port following industry standard for accessories.
    - Support for external monitor, keyboard and mouse.
- It is proposed to provide clear communicable criteria for this product group:
  - Easy replaceable battery (lifetime-extending feature)
  - Easy upgrade of memory (lifetime-extending feature)
  - Easy upgrade of storage by micro-SD card (lifetime-extending feature)

Further research and evidence:

- According to PCMag<sup>9</sup>, generally, **USB is the most widely used standard hardware interface for attaching peripherals (e.g. monitor, mouse, hard drives, keyboard, printer, camera, etc. ...) to a computer.** There are different types and formats of sockets depending of the devices being host or peripheral. Sockets of hosts (e.g. computers, hubs or chargers) are called “**Type A**”, and sockets of peripherals are “Type B” (e.g. printer, scanner), “Mini-B” (e.g. digital camera, hub) or **Type “Micro-B”** (e.g. tablet PCs, smartphones)<sup>10</sup>.

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<sup>9</sup> Cf. <http://www.pcmag.com/encyclopedia/term/53531/usb>

<sup>10</sup> For illustration of different types of sockets and plugs see for example [http://www.conrad.de/ce/de/content/steckertypen\\_im\\_ueberblick/Steckertypen-alle-Abbildungen-im-Ueberblick-Conrad-](http://www.conrad.de/ce/de/content/steckertypen_im_ueberblick/Steckertypen-alle-Abbildungen-im-Ueberblick-Conrad-)

- **Number of USB interfaces:** Experiences show that USB interfaces are susceptible to defects; if this happens at the mainboard, it is impossible to repair<sup>11</sup>. Thus, computers generally should have more than one USB port in order to provide substitutes for defect interfaces. For convenience, a larger number of USB ports should be available to connect the different necessary peripherals.
  - For **Desktop PCs**, a rough analysis of devices at the market showed that four to six USB ports are common; conventional notebooks usually provide three USB ports.
  - **Ultrabooks** being classified as notebooks as well, generally have less physical interfaces due to their slim and lightweight form factor. However, there are several ultrabooks from different brands on the market providing 3 USB interfaces (e.g. Samsung ATIV Book 7, Lenovo IdeaPads U-series, Asus Zenbook UX302, or Fujitsu Lifebook UH572 Ultrabook)<sup>12</sup>; the Gigabyte U2142 model (combined tablet/ultrabook) provides 4 USB ports.
  - **Tablet PCs** commonly have Micro-B interfaces, i.e. the devices are used as peripheral, not as host (see previous point above). Some Micro-USB ports are host-capable, meaning that USB devices like sticks, digital cameras or external hard drives can directly being connected to the tablet PC; however, for this functionality there is an additional adapter needed (“on-the-go (OTG) USB adapter”). Further, some peripherals need more power than provided by the micro-USB port so that they do not work steadily. An additional self-powered USB hub (see next point below) might solve that problem, but meaning the end of mobility of the tablet PC. Finally, USB OTG often lacks of a comprehensive driver support so that external devices are not recognized by the tablet<sup>13</sup>. For this reason, Micro-B interfaces are not recommended as expansion capabilities for tablet PCs.

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<sup>11</sup> Source: personal communication to editorial staff of computer magazine c't.

<sup>12</sup> Further models with 3 USB interfaces, see e.g.: [www.onlinekosten.de/computer/ultrabook](http://www.onlinekosten.de/computer/ultrabook)

<sup>13</sup> Source: <http://www.pcwelt.de/ratgeber/News-Tablet-PC-USB-Anschluss-am-Tablet-PC-7345291.html>

The larger USB Type A interfaces are more difficult to realize<sup>14</sup> in Tablet PCs due to the small and flat devices with commonly rounded off edges. However, there are some Tablet PCs with USB Type A interfaces on the market; examples are Microsoft Surface, Samsung Galaxy Tab 3 7.0, or Sony Vaio SVT1121B2EW; the Fujitsu Stylistic Q702 hybrid tablet and notebook PC provides 2 USB ports<sup>15</sup>. Especially for business consumers using tablet PCs in their working environment, USB interfaces for accessories and the support for an external display, keyboard and mouse seems to be of importance.

- **USB hubs** are typically used to extend the number of USB sockets (common e.g. four-port hub). Hubs can be self-powered, deriving their power from a wall outlet (providing up to 500 mA at each port) or bus-powered, plugging into the computer's USB bus and obtaining all their power from the bus (splitting the total 500 mA among all the ports and the hub itself, e.g. to only 100 mA at each port).<sup>16</sup> For the EU ecolabel criteria, USB hubs are not recommended as expansion facility due to the following reasons: They require an additional device / cable; there might be problems with the compatibility; some peripheral devices, e.g. external 2.5" hard drives, need more than the provided 100 mA (self-powered USB hub, i.e. additional power supply unit necessary).
- **USB 2.0 ↔ USB 3.0:** USB 3.0 is the most current version adopted in 2008. Compared to USB 2.0, USB 3.0 has larger data transfer rates (4.8 GBit/s instead of 480 Mbit/s). The power supply of external devices is 900 mA instead of 500 mA, so that peripherals with higher power demand can be connected without additional power supply (e.g. external hard drives). This would be especially useful for Tablet PCs due to their limited memory capacity. The energy demand of USB 3.0 is lower, as for example connected peripherals are

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<sup>14</sup> Further note, that tablet PCs only benefit from the faster transmission rate of USB Type A if the performance of the tablet processor is adequate; most tablets still have smartphone processors resulting in lower transmission rates at all.

<sup>15</sup> Further examples can be found at [www.onlinekosten.de/computer/tablet-pc-slate/2](http://www.onlinekosten.de/computer/tablet-pc-slate/2)

<sup>16</sup> Source: <http://www.pcmag.com/encyclopedia/term/53534/usb-hub>

only awakened from virtual sleep mode when being active. Generally, USB 3.0 is downstream compatible to USB 2.0 with exception of Type-B interfaces, as the design of the plugs is different. According to Computerwoche (2013)<sup>17</sup>, citing the market research company IDC, it is forecasted that in 2016 all PCs and Notebooks will be equipped with USB 3.0 interfaces. However, today USB 2.0 is still widespread. For the EU ecolabel criteria, it is recommended to require at least one USB 3.0 port as upcoming standard technology with major advantages. A rough analysis of devices at the market showed that many Desktop and Notebook PCs already apply at least one USB 3.0 interface.

- **Thunderbolt**, developed and mainly<sup>18</sup> used by Intel / Apple, is an interface for high-speed transfer of data and audio/video information with 10 GBit/s (for comparison: USB 2.0 has 480 MBit/s, USB 3.0 has 4.8 GBit/s). The next generation, Thunderbolt 2, is an update to the original Thunderbolt specification and takes the original's two 10 Gbps bi-directional channels and combines them into a single 20 Gbps bi-directional channel. The amount of data able to go through a Thunderbolt connection hasn't increased, but the throughput of a single channel has been doubled, allowing e.g. to stream a 4K video and write it to disk at the same time<sup>19</sup>. A disadvantage is the higher component cost for chips and cables (e.g. two meter of Thunderbolt cable 49 Euro) compared to USB (ten times lower)<sup>17</sup>. To connect USB peripherals to Thunderbolt interfaces, an additional USB adapter is needed.

According to Computerwoche (2013)<sup>17</sup>, citing the market research company IDC, it is forecasted that in 2016 around 16 percent of mobile computers and 13 percent of Desktop PCs will be equipped with Thunderbolt interfaces.

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<sup>17</sup> Source: <http://www.computerwoche.de/a/print/was-ist-usb-3-0,2518972>

<sup>18</sup> For example, HP uses Thunderbolt technology in some of its professional workstations and display products as well as in an ultrabook workstation; cf. <http://www8.hp.com/us/en/hp-news/press-release.html?id=1473065>; Dell plans to introduce Thunderbolt in its workstation segment in 2014; cf. [http://news.cnet.com/8301-1001\\_3-57618779-92/dell-workstations-could-embrace-thunderbolt-later-this-year/](http://news.cnet.com/8301-1001_3-57618779-92/dell-workstations-could-embrace-thunderbolt-later-this-year/); a list of further Thunderbolt-compatible devices can be found at [http://en.wikipedia.org/wiki/List\\_of\\_Thunderbolt-compatible\\_devices](http://en.wikipedia.org/wiki/List_of_Thunderbolt-compatible_devices)

<sup>19</sup> Source: <http://www.macworld.com/article/2083257/what-you-need-to-know-about-thunderbolt-2.html>

For the EU Ecolabel, Thunderbolt interfaces should not be discriminated or excluded as their high data rate is an important feature, especially for the connection of high resolution displays such as full HD, or 4k monitors. However, due to the high market relevance of peripherals with USB interfaces, computers should not use Thunderbolt as the only solution, but additionally to USB, e.g. as interface for an external monitor (see also next point).

- **Additional interfaces:**

- Due to ergonomic reasons, especially for mobile devices like Notebook or Tablet PCs with comparably small displays and keyboards or touch-sensitive control, and especially in business environments the support for connecting an external monitor, keyboard and mouse should be given. For displays, this could be realized by different interfaces, e.g. VGA, HDMI, DVI, DisplayPort, Thunderbolt etc. Interfaces for keyboard and mouse could still be PS/2, but today, they are increasingly connected by USB. For the EU Ecolabel, the additional interfaces for an external display, keyboard and mouse should not be further specified regarding their technology.
  - For Tablet PCs, e.g. the Nordic Ecolabel additionally requires a storage expansion slot (e.g. a SDHC slot) in addition to the built-in storage. According to Computerworld (2013)<sup>20</sup>, some manufacturers per se do not include an expansion slot in their devices referring to the increasing usage of online storage capacities via cloud. An IDC market analyst cited in that article indicates that most people are not that interested in using these expansion slots and they can negatively impact design, cost and usability.
- **Workstations and Small Scale Server** are designed for extensive and high-performance business solutions which already includes a high number of interfaces for peripherals per se (USB 2.0, USB 3.0, or Thunderbolt etc.)<sup>21</sup>.

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<sup>20</sup> See

[http://www.computerworld.com/s/article/9241181/Tablet\\_storage\\_Do\\_you\\_really\\_need\\_an\\_expansion\\_slot?pageNumber=1](http://www.computerworld.com/s/article/9241181/Tablet_storage_Do_you_really_need_an_expansion_slot?pageNumber=1)

<sup>21</sup> For an overview of mobile workstations and their equipment, see for example <http://www.notebookcheck.com/Top-10-Workstation-Notebooks.65535.0.html>

### 3.3.1.3 Second proposal for expansion facilities criteria

#### Proposed revised criteria (second proposal)

##### Expansion facilities

- (i) Desktop PCs and Thin Clients:
  - Presence of at least 4 USB interfaces, of which at least one USB 3.0.
- (ii) Notebook PCs and Mobile Thin Clients:
  - Presence of at least 3 USB interfaces, of which at least one USB 3.0.
  - One additional interface for an external monitor
- (iii) Tablet PCs:
  - Presence of at least 1 USB interface.
  - Support for external monitor, keyboard and mouse.

Assessment and verification: The applicant shall declare the compliance of the product with these requirements to the competent body.

#### Major proposed changes

- The title of this criterion has been changed to “expansion facilities” and by shifting the sub-criteria on upgradeability (memory etc.) to section 0 ‘repairability and upgradeability’ the focus has been clearly set on the presence of standardized interfaces to easily expand devices by external peripherals.
- USB has been proven to be the most widely used standard interface for attaching peripherals. Hubs and thunderbolt interfaces are not recommended as Ecolabel criteria per se as they demand additional devices / adapter, cables, might have problems with compatibility and, in terms of thunderbolt, have considerably higher component costs. On the other hand, thunderbolt can act as monitor connection and thus is not generally discriminated by the criteria.
- For desktop and notebook PCs, at least one USB 3.0 interface is required enabling larger data transfer rates and energy demand being lower.
- The required number of interfaces has not been changed compared to the first criteria proposal. For ultrabooks, a sub-category of notebooks, market analysis indicated several products with 3 USB-interfaces. For tablet PCs, the presence of a USB Type A interface seems more challenging due to the small form factor of the devices; however, the common Type Micro-B interface does not allow tablets to be used as host connecting other peripherals; market research shows that there are tablets on the market providing a USB Type A interface.

- The proposal to require for notebooks the presence of a modular bay for an extra battery has been deleted.
- A requirement on an additional storage expansion slot for Tablet PCs has not been added due to the increasing usage of online storage via 'cloud'.

Draft document

### 3.3.2 Criterion 3.2 – Lifetime of batteries

For notebook computers and tablet computers, the lifetime of the rechargeable batteries is a crucial and limiting factor to the overall lifetime of the whole product. Thus, the following new criteria are proposed for inclusion in the revised criteria documents for computers (user instructions on factors influencing the lifetime of batteries; application of a test method to ensure a minimum battery capacity for ecolabelled computer products). For more details cf. Task 4 report “Improvement Potential”, section 4.2.3.4 “Life-time of individual components”.

#### 3.3.2.1 First proposal for lifetime of batteries criteria

##### Proposed new criteria (first proposal)

###### Lifetime of batteries

Notebook computers and tablet computers shall have the following facilities to enable lifetime extension of rechargeable batteries: Information should be included in the user instructions and the manufacturer’s website to let the user know the factors influencing the lifetime of batteries as well as instructions for the user facilitating its prolongation.

Assessment and verification: The applicant shall declare the compliance of the product with these requirements and shall provide a copy of the instruction manual to the competent body. These user instructions should then be preloaded onto the notebook or tablet computer for the user to read and available for access on the manufacturer’s website.

##### Consultation questions

###### A test method to ensure a minimum battery capacity

In Germany, as part of revising the Blue Angel ecolabel criteria for mobile phones, the following test procedure has been applied in order to derive minimum requirements regarding the lifetime of rechargeable lithium batteries: Four different batteries per size and type shall be tested. All four tested batteries shall meet the requirements of the following test method.

###### Test Method:

C is the rated capacity given on the battery in ampere hours (Ah) as maximum capacity. The test starts (quasi the ‘zeroth’ cycle) with a discharge at 0.2 C until the cut-off voltage is reached (according to IEC/EN 61960: specified voltage under load where the discharge of one cell or battery is completed). The subsequent repeated charge and discharge shall be done in accordance with the specifications listed in the following tables. Different requirements are set for different applications.

###### Test Specifications for Rechargeable Lithium Batteries:

Cycle No.	Charge	Rest period after charge	Discharge	Rest period after discharge
1-399	Manufacturer specification	30 minutes	1.0 C to cut-off voltage	30 minutes
400	Manufacturer specification	1 hour	0.2 C to cut-off voltage	

The minimum discharge time for cycle 400 shall be 3.5 hours and the capacity delivered during cycle 400 shall be equal to 70 % of the rated capacity.

**Applied Test Specification for Rechargeable Lithium Batteries in Blue Angel ecolabel requirements for Mobile Phones:**

Cycle No.	Charge	Rest period after charge	Discharge	Rest period after discharge
1-149	Manufacturer specification	30 minutes	1.0 C to cut-off voltage	30 minutes
150	Manufacturer specification	1 hour	0.2 C to cut-off voltage	

The minimum discharge time for cycle 150 shall be 3.5 hours and the capacity delivered during cycle 150 shall be equal to 90 % of the rated capacity.

Consultation question: Discussion if one of the above introduced test specifications for rechargeable Lithium Batteries can also be required by the EU Ecolabel for notebook PCs and tablet PCs.

### 3.3.2.2 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, the high cost of the 400 cycle test presented (based on IEC/EN 61960) was highlighted, with up to 20,000 Euro quoted. Only large brands would be able to comply on this basis. The value of the shorter 150 cycle test was questioned as this would not necessarily be representative enough. Even this test is still long. Moreover, the applicability of the second (Blue Angel) approach to notebook and/or tablet batteries was questioned and will need to be checked.

It was asked if the test methods consider user behaviour. Intelligent charging was identified as an important issue to address. If a notebook is plugged into the mains power a long time the battery cycles then this will deteriorate the battery. A view was expressed that this may equally be a question of education (cf. section 3.7.1 on user instructions). A manufacturer highlighted the potential for green wash with battery claims. It was asked if there are international standards that manufacturers are using as the basis for their claims.

High capacity, long life batteries can be provided but they cost a lot more. Finally, the potential to provide consumers with information on solar charging equipment should be explored, as addressed as an option in EPEAT criteria.

#### Written stakeholder feedback following the first AHWG meeting:

- From an environmental perspective, durability of the batteries is seen as one of the most important quality aspects for notebooks and other portable devices.

Therefore, the inclusion of meaningful criteria regarding the “long-life” battery quality is a key issue for the revision of the criteria. Based on this consideration, any effort possible should be made to come up with a robust and, at least, indicative testing method for battery lifetime. An additional issue of similar importance is the need for technical solutions to avoid deterioration of the battery while the device is connected to the grid for long periods (e.g. while using a notebook with a clocking station).

- A battery lifetime declaration has already been discussed in relation to the non-energy related requirements under ErP, Lot3. Information to be provided by manufacturers would be the minimum number of loading cycles that the batteries can withstand (applying only to notebook computers); however, concern is that at present, there are no agreed international technical standards that deliver reproducible results allowing customers to make informed purchase decisions. Therefore this requirement is seen as neither suitable for the EU Ecolabel nor for GPP.
- The norm IEC/EN 61960 could probably be used only by big brands since it happens to be very expensive and it might request 6 months to 1 year just to test one battery. The option of the test for mobile phones’ batteries could be interesting since it seems quicker but it has to be considered that mobile’s batteries are smaller than notebook’s so maybe the test for notebook’s batteries wouldn’t fit with those reduced cycles and times.
- It is proposed a specification of a minimum number of charge cycles that the battery can deliver at acceptable performance. Extension of life prior to first repair (or replacement of battery) will maximise lifetime of the product. It is recommended that this is based on a minimum of e.g. 1 charge per day for the minimum guarantee length required by the ecolabel criteria. For example if the guarantee is 2 years,  $2 \times 365 = 730$  charge cycles to a certain high proportion of the original battery performance.

## Further research and evidence

### **Battery life and cycle length within today's market**

Battery lifetime declarations are now required to be made for notebooks under the non-energy related requirements of the Ecodesign Implementing Measure Regulation (EU) 207/2013 Annex II Part 7.1 'Information to be provided by manufacturers' (from 1<sup>st</sup> July 2014):

*(o) the minimum number of loading cycles that the batteries can withstand (applies only to notebook computers);*

Early declarations provide an indication as to the standard cycles and test methods used by OEM's. For example, Dell declares that all notebook and tablet batteries meet the accelerated endurance in charge/discharge cycles procedure of IEC EN 61960<sup>22</sup> retaining 60% capacity over 300 cycles. Commentators suggest that **300-500 cycles is the de facto standard for lithium ion batteries**<sup>23</sup>. The ITU (International Telecommunication Union) recently published Recommendation L.1010 on Green Batteries which proposes retention of **80% of capacity after 500 cycles as a benchmark for a long lasting battery**<sup>24</sup>.

A closer look at the market, however, reveals that longer battery life and cycle claims appear to be increasingly important, particularly for business machines. A review of leading products on the market, together with feedback from OEM's, suggests that battery life claims are the most frequently communicated to consumers. Of the notebook manufacturers that dominate the EU market share Acer, Dell, Asus, HP

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<sup>22</sup> Dell (2014) *ErP Lot 3 Technical documentation*,  
[http://www.dell.com/downloads/global/corporate/environ/comply/ErP\\_Lot\\_3\\_Public\\_Information.pdf](http://www.dell.com/downloads/global/corporate/environ/comply/ErP_Lot_3_Public_Information.pdf)

<sup>23</sup> Battery University, *How to prolong lithium based batteries*,  
[http://batteryuniversity.com/learn/article/how\\_to\\_prolong\\_lithium\\_based\\_batteries](http://batteryuniversity.com/learn/article/how_to_prolong_lithium_based_batteries)

<sup>24</sup> ITU, *Green batteries solution for mobile phones and other hand-held information and communication technology devices*, Recommendation ITU-T L.1010, February 2014,  
<http://www.itu.int/rec/T-REC-L.1010-201402-P>

and Toshiba all offer high end consumer or business models with over 7-8 hour battery life and 800 or 1000 cycle batteries. In some cases this also allows the OEM to provide an extended warranty for the battery itself of up to 3 years.

Publicly available market data to determine the selectivity of these specifications could not be located. Feedback from some OEM's, however, is that it is difficult to communicate longer cycles or battery lifetime to consumers, who are generally more interested in the **number of hours that a battery will give them 'off grid'**. This is therefore an important measure of a quality product for some purchasers. For 15 inch+ screen desktop replacements this can now extend to an estimated 7-8 hours+ (dependant on hardware combinations). For Ultrabooks it can extend from estimated 8-9 hours to up to 16 hours in one example.

Ultrabook models respond to consumer and business demand for longer battery life by combining battery technology with much reduced energy use. As a result most models can operate for a full working day without requiring a charge. This performance is based on battery packs formed from cylindrical or, more usually because of the form factor, prismatic or lithium polymer cells<sup>25</sup>. Prismatic lithium ion cells are more durable because they swell less upon charging, resulting in reduced degradation and a longer life span.

Manufacturers of cylindrical and prismatic batteries with greater capacity and longer cycles include Samsung<sup>26</sup>, Boston Power (supplying Asus)<sup>27</sup> and Amperex (supplying Apple)<sup>28</sup>. Boston Power carries the Nordic Swan Ecolabel for batteries, which requires 80% charge retention after 800 cycles<sup>29</sup>. Notable amongst the leading OEM's is Apple who offers 80% retention of charge after 1,000 cycles as standard on

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<sup>25</sup> Hewlett Packard, *Understanding lithium ion and smart battery technology*, [www.hp.com](http://www.hp.com)

<sup>26</sup> Samsung SDI, *Cells, packs and prismatic battery products*, <http://www.samsunglib.com/en/app/laptop.jsp>

<sup>27</sup> Boston Power, *Sonata cell*, <http://www.boston-power.com/resources/download/sonata-5300-data-sheet>

<sup>28</sup> Amperex Technology, <http://www.atlbattery.com/technology/en/technology-4.htm>

<sup>29</sup> Nordic Ecolabelling of Rechargeable Batteries, Version 4.2, December 2010 – 31 December 2015

new MacBook Pro and Air models<sup>30</sup>. The cost of these batteries is higher, with the costs for design/development/testing passed onto the OEM in the price of the battery, which may be up to 80% more expensive than 300-500 cycle performance. It has been highlighted by a leading lithium ion battery manufacturer that it is more important to specify longer cycle endurance for notebooks where the battery cannot be readily changed by the consumer.

**Extending battery life using intelligent charging**

The battery life cycle can be extended through the use of intelligent charging systems that control how a battery is charged and discharged, as well as power management of the computer. Battery life span degrades more rapidly if there is a deep charge and discharge i.e. if a battery is charged to near 100% capacity and is then subjected to near full discharge. Minimising the ‘depth of discharge’ will therefore extend the lifespan of the battery, as illustrated in Table 8.

**Table 8: Relationship between depth of discharge and number of cycles**

Depth of discharge	Discharge cycles
100% DoD	300 – 500
50% DoD	1,200 – 1,500
25% DoD	2,000 – 2,500
10% DoD	3,750 – 4,700

Source: Battery University (2014)

**Pre-installed software** is now provided with some notebooks, for example with Apple, Asus and Toshiba products, which rewrites the firmware of the battery can be **used to limit charging to approximately 80% of battery capacity**. This has the potential to extend the battery life cycle by >50%, although in practice this reduces battery life, i.e. usage hours during the day, which we have already highlighted as being important for consumers.

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<sup>30</sup> Apple, *Determining battery cycle count*, Accessed March 2014, <http://support.apple.com/kb/ht1519>

## **Benchmarking and verifying performance**

**Battery life** is verified using a range of **different software packages and test routines**. Consumer magazines and websites use a combination of the two, with some having developed their own bespoke routines, making comparability difficult. Tests include, for example, a wireless web browsing protocol<sup>31</sup> and a HD movie playback<sup>32</sup>. OEM's tend to make reference to business software such as Powermark<sup>33</sup> or Mobilemark<sup>34</sup> which simulate real-life scenarios and power demands. Limited information could be found at this stage to judge the relative merits of these benchmark tools.

In terms of **battery cycles** the **industry standard is IEC EN 61960**. IEC 61960 specifies both a standard endurance in cycles test at 0.2 I<sub>t</sub> A and an accelerated endurance in cycles test routine based on increased charge of 0.5 I<sub>t</sub> A within the tolerance of the battery. The latter was introduced into the last revision by CENELEC technical body CLC/TX 21X in 2011. An accelerated test based on EN 62660-1 is also understood to have potential for adaption to notebook and tablet batteries and is briefly discussed below.

### **The potential for accelerated testing to reduce time and cost**

Accelerated tests are possible for longer life cycle batteries, reflecting the need to reduce the time and cost of bringing new products to market. IEC EN 61960 adopts a higher charge rate for its accelerated option. This would enable, for example, for an 800 cycle claim to reduce the time for testing from 252 days to an estimated 153 days (see Table 9). This is, however, likely to be an underestimate as over many cycles the battery deteriorates and each cycle takes longer. An adjustment factor

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<sup>31</sup> Laptop Magazine, *Laptops with the longest battery life*, 31<sup>st</sup> March 2014, <http://blog.laptopmag.com/all-day-strong-longest-lasting-notebooks>

<sup>32</sup> Which? *How we test laptops*, <http://www.which.co.uk/technology/computing/guides/how-we-test-laptops/>

<sup>33</sup> Futuremark, *Powermark software*, <https://www.futuremark.com/benchmarks/powermark>

<sup>34</sup> BAPCo, *Mobilemark 2012*, <http://bapco.com/products/mobilemark-2012>

would therefore need to be applied. The potential for a reduction in costs have been requested from a major battery testing body.

**Table 9: Comparison of IEC 61960 endurance in cycle test options**

	<b>IEC 61960 cycle specification (400 cycles)</b>	<b>Extended cycle performance (800 cycles)</b>
Option 1: 0.2 I <sup>A</sup> (7.6.2)	126 days	252 days
Option 1: 0.5 I <sup>A</sup> (7.6.3)	76 days	153 days

It is understood that there are only a small number of battery manufacturers globally who supply the major notebook manufacturers, who in turn expect verification of battery cell or pack performance. So whilst the costs may appear high they should be seen in the context of securing volume orders to OEM's, suggesting that the costs are quickly absorbed as a prerequisite to supply the market.

Accelerated tests that combine increased charge rate and temperature can also be carried out<sup>35</sup>. Test specifications combining different variations in these parameters have been developed in the US for electric vehicle batteries, including in support of the 'Freedom Car' programme. Guidance has been developed by Government laboratories and by the vehicle industry<sup>36</sup>. It is understood that this approach can be used to model the projected life cycle performance over 15-years lifespan in 1-2 years.

This form of accelerated testing has been standardised in IEC 62660-1, which specifies a test at 45°C, however, concerns have been raised that these results cannot easily be extrapolated to batteries performance at room temperature and that this would exceed the design limit for many batteries.

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<sup>35</sup> Thomas.E.V, Bloom.L, Christophersen.J.P and V.S.Battaglia, *Rate-based degradation modelling of lithium ion cells*, *Journal of power sources*, 206 (2012), p-378-382

<sup>36</sup> Steffke, K., Inguva, S., Van Cleve, D., and Knockeart, J., *Accelerated Life Test Methodology for Li-Ion Batteries in Automotive Applications*, SAE Technical Paper 2013-01-1548

A major lithium ion battery manufacturer provided feedback that such tests are used by manufacturers to compare performance between their own product lines, but that they may not be appropriate for comparing the performance of different manufacturer's products because of the potential for variations in the tolerance of different battery designs to accelerated conditions such as higher temperatures. An organisation that carries out battery testing globally highlighted a further problem in that in order to supply to notebook or tablet OEM's a reference is preferred to an international test standard such as IEC 61960.

A test variation has been developed by a team from Universities in Belgium which is based on depth of discharge, which we have already highlighted as an important factor in battery lifespan and stability<sup>37</sup>. This may warrant further investigation.

### 3.3.2.3 *Second proposal for battery quality and lifetime criteria*

#### **Proposed new criteria (Second proposal)**

##### **'Battery quality and lifetime'**

- a) Notebooks shall provide the user with a minimum of 7 hours of battery life after the first full charge. This shall be benchmarked using Mobilemark software or equivalent.
- b) Notebook and tablet batteries shall meet the following cycle requirements:
  - (i) Models in which batteries can be readily changed by consumers shall maintain 80% of their original capacity after 750 charging cycles;
  - (ii) Models in which batteries cannot be readily changed by consumers shall maintain 80% of their original capacity after 1000 charging cycles.

This performance shall be verified according to the IEC EN 61960 'endurance in cycles' test carried out at 25°C and at a rate of either 0.2 I<sub>t</sub> A or 0.5 I<sub>t</sub> A (accelerated test procedure).

- c) The cycle performance requirement described in (b) may be achieved using pre-loaded software which partially charges the battery up to 80% of capacity. In this case the applicant shall pre-install the software in such a way that it is the default charging routine and they shall verify the charging cycle performance according to the requirements in (b). The maximum partial charge shall also provide a battery life that complies with sub-criterion (a).
- d) Information about known factors influencing the lifetime of batteries as well as instructions on how the user can prolong battery life should be included in pre-loaded energy management software, written user instructions and posted on the manufacturer's website.

Assessment and verification: The applicant shall provide a test method showing that the battery packs or cell types used in the product meet the specified battery life and charging cycles. Partial charging and the accelerated test method specified within IEC 61960 may be used to comply.

A demonstration version of the energy management software and text content of user instructions and website articles shall additionally be provided.

<sup>37</sup> Omar.N, Daowd.M, Hegazy.O, Mulder.G, Timmermans.J-M, Coosemans.T, Van de Bossche.P and J, Van Mierlo, *Standardisation work for the BEV and HEV applications: Critical appraisal of recent traction battery documents*, Energies, 2012, 5 p-138-156

Major proposed changes:

- Battery life is an important factor in consumers' choice of a notebook and so it is proposed to establish a minimum threshold for a good quality battery. This would reflect the performance of desktop replacements rather than ultrabooks in order to keep the requirement simple.
- Verification of the battery life is problematic due to the range of different methodologies and aspects used by consumer bodies and OEM's. The most comprehensive reference point is considered to be professional testing software but further input is required from stakeholders on how to select based on the underlying method used.
- The life span of the battery can be measured by the retention of rated capacity over a number of cycles. Whilst testing for endurance cycles under set conditions may not be fully representative of real life conditions in which a battery will operate, the routines set out in IEC 61960– both standard and accelerated –are considered to represent an international reference point for comparability of a batteries underlying performance potential.
- It is therefore proposed to introduce two benchmarks of excellence. The first 80% retention of capacity after 750 cycles for easily changed batteries, aligning with the recommendation of the ITU for 500 cycles but requiring partial charging to meet the requirement. The second 1,000 cycles for batteries that cannot readily be changed by a consumer, so as to minimise their potential to become a barrier to extended product life.
- Cycle endurance shall be verified according to IEC 61690 using either the standard or accelerated endurance cycle test routine. It shall be allowed for cells to be verified as this is more commonly carried out by the battery manufacturer whereas pack testing may be carried out or commissioned by the OEM.
- Moreover, in recognition of the importance of depth of discharge on battery lifespan it is proposed to specifically encourage partial charging as a means of complying with the ambitious cycle performance requirements. Compliance

with partial charging to extend the endurance shall, however, still deliver the same minimum battery life for the consumer.

- **Further investigation and feedback is requested on the potential for an additional accelerated test option based on standards from the electric vehicle sector or based on depth of discharge.**
- Given the influence of how a notebook is used on battery life the wording relating to user information has been expanded to include a requirement for a battery management system to be included within pre-installed power management software.

### 3.3.3 Criterion 3.3 – HDD reliability

Hard disk drives (HDD) are one of the computer components where according to WRAP (2011)<sup>38</sup> the most common faults are reported by several studies and product surveys. It is also understood that there can be significant variations in the reliability of HDD products. Several HDD products reviewed, as well as examples of OEM procurement procedures for HDD<sup>39</sup>, specify the reliability of HDD using metrics such as ‘Mean Time Between Failures’ and ‘Operating Shock’. For more details cf. Task 4 report “Improvement Potential”, section 4.2.3.4 “Life-time of individual components”.

#### Consultation questions

Besides criteria regarding easy access for repairability (see section 3.3.5) it should be discussed the feasibility of an Ecolabel criterion requiring a standardised test method being applied comparably indicating the reliability of HDD, for example using the indicators “Mean time between failures (MTBF)”, “Annualised Failure Rate (AFR)” or others relating to simulated environmental stresses such as ‘operating shock’.

#### 3.3.3.1 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, the ease of verification needs to be checked further if there is a metric or system that will suit all manufacturers and components. A specialist manufacturer commented that the same drives were used by small and large manufacturers. The issue was raised as to what would happen if the HDD failed despite a claim relating to failure rate being made and how this would be communicated to the consumer. A guarantee may be needed. In response it was noted that this will always be the case even with servers – a certain risk of failure is always present.

A manufacturer stated that there were standards for drives. These depend on market demands. The use of Solid State Drives, which have no moving parts and are therefore potentially more reliable and energy efficient, is a question of price versus capacity.

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<sup>38</sup> See <http://www.wrap.org.uk/sites/files/wrap/Laptop%20case%20study%20AG.pdf>

<sup>39</sup> Hewlett Packard, *Hard Disc Drive quality system – the driving force for reliability*, November 2006

Written stakeholder feedback following the first AHWG meeting indicated that the above mentioned indicators “Mean time between failures (MTBF)”, “Annualised Failure Rate (AFR) etc. are statistical numbers, which are of limited value for the individual product user.

Published HDD MTBF figures are an extrapolation of wear and tear on the physical components of many HDDs over a relatively short time. It is a statistical figure and MTBF on HDDs are often in excess of 1 million hours. The MBTF system is often unrealistic as MTBF may be quoted on new ranges of drives that could not have actually been tested at length in the field yet and it does not actually take into account the many reasons why a drive may fail, e.g. shock.

More usefully, some mobile computers have a feature which detects the possibility of an imminent shock using a built-in accelerometer and protects the mechanism of the hard drive. If HDD reliability is an issue that needs to be addressed, shock protection may be a better way of specifying it than MTBF. From a verification viewpoint, it is not seen how MTBF or AFR could be verified apart from auditing the method and data used to produce the figures. Shock protection might be better verified (e.g. drop tests) although it may be destructive.

It is agreed with the principle of specifying minimum reliability for key components such as HDD, as outputs from WRAP consumer research indicates that UK consumers welcome the "upgrade opportunity" presented by early failure in consumer electronic products. Finally, for the HDD the durability/reliability is very important from an environmental perspective (certainly as well from a user perspective). In this respect, the attempt to include meaningful quality criteria for HDDs is strongly supported.

#### Further research and evidence

##### **Follow-up OEM enquiry**

As a starting point a follow-up enquiry was made to OEM's with a view to gathering information in the following areas identified from stakeholder interaction:

- HDD quality and physical specifications:
  - Reliability and durability specifications
  - Physical design features including shock resistance in portable models
  - Evidence for the improvement potential of specifications and features
  - Verification of the improvement potential
- SSD quality specifications:
  - Whether SSD should be exempted from such a criterion
  - Reliability and durability specifications

Responses were received from four major OEM's who either manufacture HDD/SSD or outsource HDD/SSD manufacture. The main points are summarised in Table 10.

**Table 10: Summary of OEM feedback on HDD and SSD specifications**

<b>Hard Disc Drives (HDD)</b>	
Reliability and durability specifications	Responses confirmed a set of standard OEM requirements for quality control including: <ul style="list-style-type: none"> <li>• Error rate</li> <li>• Mean Time Between Failure</li> <li>• Annual Failure Rate</li> <li>• Load/unload endurance</li> </ul> Operating shock, vibration and temperature range were particularly highlighted for mobile applications. Most defects are related to shock and vibration.
Physical design features	For notebooks free-fall sensors (accelerometers) are used in some drives for business models. Shock absorption is also specified, in some cases instead of free-fall sensors.
Improvement potential of features	No information was provided to verify the improvement potential of the quality control parameters.
Verification	Standard quality control and supplier qualifications processes are used, with all HDD required meeting the same requirements for each OEM. In the case of portable HDD protection by shock absorption this is verified by notebook drop and vibration tests.
<b>Solid State Drives (SSD)</b>	
Exemption from the criterion?	In general SSD should be exempted from general quality requirements. Most HDD failures are related to moving parts, which SSD do not have.
Reliability and durability specifications	General reliability and durability parameters are still required as part of quality control for SSD e.g. error rate, MTBF, AFR.

Although a limited response was received this was from leading manufacturers in the market. The feedback suggests that similar quality parameters are applied across all HDD purchases for specific form factors, suggesting that comparisons would instead need to be made between HDD models or OEM requirements. However, no additional information was provided to facilitate this.

For notebooks, however, two physical design features were highlighted – free-fall sensors and shock absorption – which can be related based on field data to common stresses on a drive. SSD is an alternative solution because it has no moving parts.

### **Stationary drive durability and reliability**

The enquiry provided limited further information to inform criteria development. Whilst OEM's specify and procure drives based on a range of parameters there is not a clear picture as to their relative significance in terms of HDD reliability and durability. 'Mean Time Between Failure' (MTBF) was discussed at the first stakeholder meeting. It was highlighted that this was based on statistical calculation for specific HDD lines. This means that it cannot accurately be related to the performance of an individual HDD – for example, the potential for a failure during its operating life. It also raises an issue for new HDD lines which have an unproven track record.

A leading HDD manufacturer highlights that new HDD models tend to be designed and specified based on detailed analysis of previous models followed by accelerated life testing<sup>40</sup>. Parameters such as MTBF are therefore extrapolated from design and prototype testing and modelling. This issue is highlighted by Seagate in a commentary in which they suggest the use of Annual Failure Rate as a clearer indication of the probability of a HDD failing during its lifespan<sup>41</sup>. The AFR is calculated as follows:

$$AFR = 1 - \exp(- \text{Annual Operating Hours} / MTBF)$$

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<sup>40</sup> HGST, *HGST and hard disk drive reliability*, Whitepaper, November 2007.

<sup>41</sup> Seagate, *Diving into MTBF and AFR: Storage reliability specs explained*, 26<sup>th</sup> April 2010, <http://enterprise.media.seagate.com/2010/04/inside-it-storage/diving-into-mtbf-and-afr-storage-reliability-specs-explained/>

So a MTBF of 1,600,000 hours represents an AFR of 0.55% for any one HDD within the production line for that model.

A recently published study by US Company Backblaze, an on-line storage provider, is at a first sight a potentially useful benchmark of HDD performance<sup>42</sup>.

The study analysed a sample set of 27,000 HDD from Seagate, Hitachi and Western Digital. In total fifteen different models were analysed. Western Digital and Hitachi gave the best performance in terms of AFR ranging between 0.9% and 3.2% depending on HDD capacity. Their total proportion of the fleet was 47%. The best 20% of the HDD gave a performance of 0.9%.

The survey results have, however, been subject to criticism by industry specialists<sup>43</sup>. For example, the results represent 24 hour operation at servers, so features such as power up and power down, which may be of value to a consumer, may have exerted greater wear on the HDD used by Backblaze. The results also combine enterprise drives and consumer drives (the majority of the sample), and are heavily skewed by a number of Seagate HDD models that have acknowledged problems. MTBF and bit error rates are highlighted in a follow-up to a critique of the Backblaze survey which explores how to choose HDD, with a clear distinction required between performance for consumer and enterprise (server) applications<sup>44</sup>.

A study by Google in 2007 of server HDD of a sample of over 100,000 server drives<sup>45</sup> also refers also to Annualised Failure Rate (AFR) as a headline parameter but goes on to highlight the significance of how early scan errors start to appear. After the first

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<sup>42</sup> Backblaze, *What hard drive should I buy?*, January 21<sup>st</sup> 2014  
<http://blog.backblaze.com/2014/01/21/what-hard-drive-should-i-buy/>

<sup>43</sup> Newman, H, *Selecting disc drive: How not to do research*, Enterprise Storage Forum, 29<sup>th</sup> January 2014, <http://www.enterprisestorageforum.com/storage-hardware/selecting-a-disk-drive-how-not-to-do-research-1.html>

<sup>44</sup> Newman, H, *How to choose a hard drive*, 27<sup>th</sup> February 2014,  
<http://www.enterprisestorageforum.com/storage-management/how-to-choose-a-hard-drive-1.html>

<sup>45</sup> Pinheiro.P, Weber.W-D and L,Barroso. *Failure trends in a large disk drive population*, Proceedings of the 5<sup>th</sup> USENIX Conference on File and Storage Technologies, February 2007.

scan error a drive was 39 times more likely to fail within 60 days. First failures in reallocations and probational counts were similarly highlighted. However, these are not identified by Google as the main reasons for HDD failure. The study quotes a number of other studies with significant HDD samples sets in which AFR ranged from 1.9% to 6.0%.

### **Notebook drive protection features**

The two features highlighted by stakeholder feedback were investigated further.

**Free-fall sensors** are either fitted externally or internally to a HDD and detect a sudden motion associated with a fall. This then sends a signal to retract the magnetic head of the HDD so that it cannot physically damage the media's surface, thereby protecting the data.

Sensors can have a varying degree of response time, which will give different levels of protection depending on the height of the fall. A white paper by Dell from 2008 suggests that this can vary between 500 milliseconds and 150 milliseconds<sup>46</sup>. This represents the difference between protection from a fall of 122 cm and 12.5 cm, with the latter protecting against a notebook being dropped whilst being carried or from a desk.

A cross-check of specifications for free-fall sensor response in the portable HDD of four major manufacturers – Seagate, Western Digital, HGST and Toshiba – suggests a performance range of 150 – 300 milliseconds. In the worst case this would still protect against a drop whilst being carried by hand.

The use of **physical damping to protect against vibration and shock** was also highlighted by stakeholders, and has also been identified as a design feature of 'rugged' and 'semi-rugged' notebooks (see section 3.3.4). It is understood from commentators on semi-rugged specifications that HDD are generally placed near the

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<sup>46</sup> Dell, *Dell raises the bar in shock-resistant hard drives*, February 2008. [www.dell.com/innovation](http://www.dell.com/innovation)

base of a notebook but to protect them better it is required to mount them on dampers or for the HDD housing itself to be insulated<sup>47</sup>. The effectiveness of the former would need to be checked by a drop test of the notebook itself (see section 3.3.4) whilst the latter may be reflected in the tolerance of the HDD quoted in the manufacturers specifications.

A cross-check of specifications for operational and non-operational shock tolerance of notebook HDD of four major manufacturers – Seagate, Western Digital, HGST and Toshiba – suggests a performance range of 400 (operational) to 1,000 (non-operational) G force. The best performance found was 300 (operational) to 900 (non-operational). The extent to which this reflects additional damping that may be applied to the drive unit was not possible to discern. Also, the verification procedure was not detailed by each manufacturer. IEC 62131 is understood to provide a test method for vibration and shock applied to electro technical equipment, but its application by the HDD industry is to be confirmed.

A further feature identified from Western Digital is termed 'no touch ramp load' technology<sup>48</sup>. This is designed to ensure that magnetic head never touches the disc platter itself, with the potential to reduce wear and damage. More information is required in order to determine the potential benefit of this feature.

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<sup>47</sup> Notebook review, *Rugged laptops: Essential to business and home?*

<http://www.notebookreview.com/news/rugged-laptops-essential-to-business-and-home/2/>

<sup>48</sup> Western Digital, *WD Green desktop hard drives*,

<http://www.wdc.com/wdproducts/library/AAG/hires/ENG/a4/2178-771157.pdf>

### 3.3.3.2 First proposal for HDD durability and reliability criteria

#### Proposed new criteria (first proposal)

##### 'Data storage drive reliability and protection'

###### Stationary computers

The data storage drive or drives used in desktops, workstations and thin clients shall have an Annual Failure Rate (AFR) of less than 0.9%.

For small-scale servers the Annual Failure Rate shall be less than 0.6% and a Bit Error Rate of  $>1$  in  $10^{16}$  bits.

###### Portable computers

The primary data storage drive used in notebooks shall be designed to protect the drive and data from shock and vibration. The drive shall comply with one of the following:

- (i) The HDD drive head should retract within a maximum of 300 milliseconds upon detection of the notebook having been dropped.
- (ii) The HDD drive shall be designed to withstand a shock of 300 G (operating) and 900 G (non-operating)
- (iii) A Solid State Drive is installed.

*Assessment and verification:* The applicant shall provide a specification for the drive or drives integrated into the product. This shall be obtained from the drive manufacturer and shall be supported by a technical report verifying that the drive complies with the specified performance requirements.

##### Key aspects of the proposal:

- The title of the proposal has been changed to reflect coverage of both HDD and SSD as well the concepts of reliability and protection of data.
- It is proposed to introduce criteria for notebook drives based on the applicant choosing from a number of options. These options reflect choices that can be made to provide increased protection to the drive itself or the data in the event of an incident.
- Performance parameters have been described for a free-fall sensor and drive unit shock resistance. The former is a physical feature the presence of which would need to be verified. **The latter requires further input from industry in order to ensure the parameters adequately reflect an improved performance and to specify a verification method.** IEC 62131 appears to be a relevant option.

- A third notebook option of an SSD reflects the potential to eliminate moving parts, but comes at a higher cost than HDD technology, hence its optional status.
- Setting a criterion for stationary computers is a more difficult task as it is difficult to distinguish between different performance parameters because of a general lack of data, particularly for consumer applications. Studies and commentary of HDD selection do, however, suggest that MTBF or AFR, as well as error rates, are valid performance metrics.
- Based on studies with large sample sets and expert commentary it is proposed to set a criteria in which consumer products are required to meet an AFR benchmark and that servers meet an AFR benchmark and an error rate.
- The AFR benchmarks have been set based on real performance data and what is understood to be the best performing HDD products, however, **further input is requested from OEM's based on their qualification requirements.**
- Expert commentary suggests that because of their extended operating times error rates are only relevant, and at a higher benchmark, for servers. Again, **further input is requested from OEM's.**

### 3.3.4 Criterion 3.4 – Notebook durability testing

The preliminary technical reports for revision of the Ecolabel criteria summarised research by WRAP which identified common components that may fail in computers. Accordingly proposals have been made for disk drives and batteries. A key factor to consider beyond the resilience of individual components is, however, the real-life conditions and stresses that a product may be subjected to.

With notebooks computers set to shortly become the most common form factor for computers in the market the conditions to which computers are exposed to have changed significantly. Notebooks may be exposed to a range of stresses and environmental conditions depending on whether they are used by students, business travellers or out in the field on, for example, industrial sites.

An initial scoping of initiatives and design specifications by major OEM's intended to bring more durable notebook models to the market revealed a range of possible test routines and design features.

A more detailed investigation was therefore carried out with the intention of identifying:

- 1) The most common accidents and environmental stresses that notebooks are exposed to;
- 2) Which aspects of a notebook are most likely to be at risk or tend to fail due to exposure to accidents and environmental stress;
- 3) Test methods and routines that are used by OEM's to benchmark performance aspects for more durable models;
- 4) The prevalence of more durable models within product ranges and any distinctive design features they may incorporate.

The findings have been used to inform a first criteria proposal which would enable the Ecolabel to be awarded to notebook models that are physically more robust, are more likely to last a minimum 2-3 warranty period without major failures and which have a lower Total Cost of Ownership (TCO).

### 3.3.4.1 Background research and evidence

#### **Failure and repairs required as a result of common accidents and stresses**

Literature on notebook durability mainly relates to 'rugged' and 'semi-rugged' laptop specifications in the US market. 'Rugged' and 'semi-rugged' notebooks are mainly defined with reference to the US Department of Defence's MIL-STD-810G test standards<sup>49</sup>. Two relevant market research studies were identified:

A study by warranty providers Squaretrade of 30,000 new laptops over their first three years of ownership was referenced in the Preliminary report in October 2013<sup>50</sup>. The study highlighted a hardware failure rate of 20.4% and accidental damage of 10.6%. It was also highlighted a significant variation in reliability between leading brands, ranging from 15.6% to 25.6%.

The most directly relevant study was carried out by market analysts IDC and sponsored by Panasonic, who manufacture the leading 'Rugged' notebook<sup>51</sup>. The study was based on a survey of 300 businesses in the USA. The study found that on average each year:

- 14.2% of notebooks required repair or replacement due to physical failure,
- 9.5% of notebooks required repair or replacement due to an accident.

The **most commonly damaged component** was the **keyboard** (72%) followed by the **screen** (66%), **battery** (58%) and **hard disk drive** (51%). Damage could therefore encompass multiple components. Where the damage was the result of an accident the most common causes were being dropped whilst being carried (72%), followed by some kind of liquid spillage (66%) and a fall from a desk or table (55%). Of most significance from the IDC study is the claimed extension of lifespan for a semi-rugged notebook, on average from 2 years 5 months to 3 years 6 months.

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<sup>49</sup> Endpoint Technologies Associated, *Redefining rugged: Assessing the spectrum of durability in the notebook market*, USA, 2008 and 2011

<sup>50</sup> Squaretrade Inc, *1 in 3 laptops fail over 3 years*, USA, November 16th 2009  
[http://www.squaretrade.com/html/pdf/SquareTrade\\_laptop\\_reliability\\_1109.pdf](http://www.squaretrade.com/html/pdf/SquareTrade_laptop_reliability_1109.pdf)

<sup>51</sup> IDC, *The Business case for ruggedized PC's*, USA, June 2012

However, a direct correlation between this lifespan extension and the relative importance of specific design features is not possible to identify.

A range of consumer surveys of notebook reliability are also carried out by, amongst others, Which? (UK), Consumer Report (USA) and PC World (UK and USA). Despite surveying very large samples of consumers they are of limited value in identifying physical cause and effect of failure as they tend to focus on headline reliability rates and quality of customer service.

### **Test methods and benchmarks of durability**

The terms 'rugged' and 'semi rugged' can be seen as the first attempt to define durability benchmarks for notebooks. Endpoint Technologies (2011) define them with reference to the US Department of Defence's MIL-STD-810G test standards<sup>52</sup> and the IP65 (Ingress Protection) standards<sup>53</sup>.

The study defines a five point numeric scale which it uses to grade notebook durability. The scale relates to the level of compliance with MIL-STD-810G and the International Protection standards for dust and water ingress, as well as whether compliance has been third party verified. The lower tiers of the range encompassing 'semi-rugged' and 'business rugged' are likely to be of most relevance to the Ecolabel, whilst 'rugged' and 'ultra-rugged' can be seen to reflect high cost products specially designed for military and field applications, such as Panasonic's Toughbook, which is the only product to achieve the 'ultra-rugged' category.

The tests and their associated performance benchmarks for 'semi-rugged' relate to:

- Drop
- Vibration
- Shock

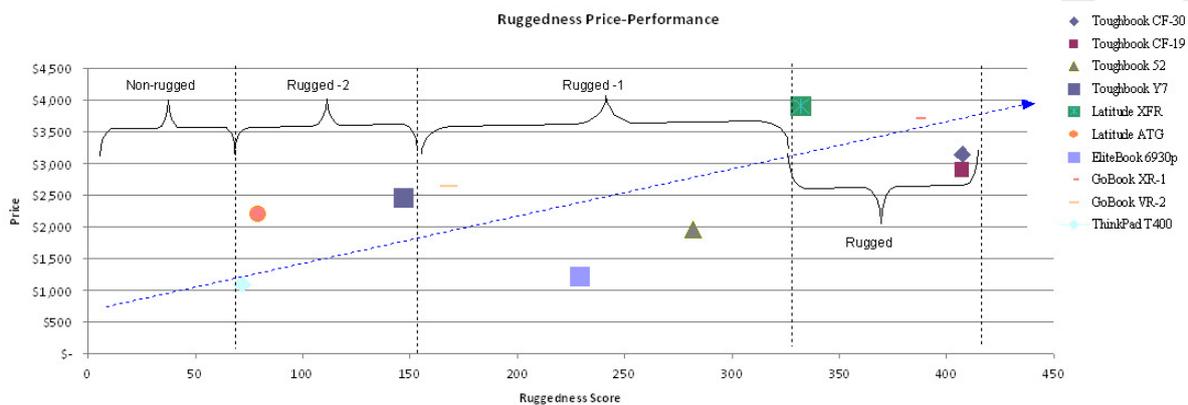
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<sup>52</sup> US Department of Defence, *Test method standard MIL-STD 810G*, 31<sup>st</sup> October 2008

<sup>53</sup> UL, *Environmental ratings for enclosures based on Ingress Protection (IP) Code designations*, <http://www.ul.com/global/eng/pages/offering/services/hazardouslocations/ref/ingress/>

- Pressure at varying altitudes
- Temperature over a range between  $-29^{\circ}\text{C}$  to  $+60^{\circ}\text{C}$
- Temperature shock
- Humidity

The price:performance of products by Panasonic, GD-Itronix, HP, Dell and Lenovo can be seen in Figure 5.



Source: Endpoint Technology Associates (2011)

**Figure 5: Price versus performance of products assessed on the rugged scale**

The Endpoint study defines high end specifications for notebooks with a focus on environmental stress. A scoping of test routines applied to mainstream business and consumer notebooks products by the most significant notebooks manufacturers by EU market share reveals a similar set of tests related to specific design improvements.

Some additional tests related to everyday functionality are also added, such as the durability of the keyboard and screen lid hinge. The tests applied by each manufacturer are summarised in Table 11. Information in the public domain on test routines applied by Apple could not be found.

It is understood that a number of the manufacturers listed have the tests carried out by testing bodies, thereby ensuring that performance is third party verified. TUV is an

example of a test body carrying out durability and so-called HALT (Highly Accelerated Life Tests) tests. In other cases such as Asus the tests are carried out in-house.

**Table 11: Indicative sample of manufacturers' durability tests**

Manufacturer	Durability tests and methods	Models to which they are applied
HP <sup>54</sup>	MIL-STD-810G standards: <ul style="list-style-type: none"> <li>Drop, shock, vibration, dust, humidity, altitude, temperature range, temperature shock</li> </ul> Additional internal test specifications: <ul style="list-style-type: none"> <li>Keyboard strokes (7 year simulation)</li> <li>Screen/lid open-close (6 year simulation)</li> </ul>	HP Elitebook  All business models
Asus <sup>55</sup>	Internal test specifications: <ul style="list-style-type: none"> <li>Drop, shock and vibration tests</li> <li>Temperature range</li> <li>Keyboard strokes simulation</li> <li>Screen pressure test</li> </ul>	All models. Commercial models achieve higher performance
Toshiba <sup>56</sup>	Internal test specifications: <ul style="list-style-type: none"> <li>Drop, shock and vibration tests</li> <li>Temperature range</li> <li>Screen pressure test</li> </ul>	Portege and Tecra models
Lenovo <sup>57</sup>	MIL-STD-810G standards: <ul style="list-style-type: none"> <li>Drop, shock, vibration, dust, humidity, altitude, temperature range, temperature shock</li> </ul>	Lenovo x131e/140e (student models) L/T/W Thinkpad models
Dell <sup>58</sup>	MIL-STD-810G standards: <ul style="list-style-type: none"> <li>Drop, shock, vibration, dust, humidity, altitude, temperature range, temperature shock</li> </ul> Additional test specifications: <ul style="list-style-type: none"> <li>IEC 60529 dust ingress</li> <li>Keyboard spill test</li> </ul>	Selected Latitude models  Selected Latitude models
Acer <sup>59</sup>	Unspecified internal standards: <ul style="list-style-type: none"> <li>Drop, shock, vibration, dust, humidity, altitude, temperature range, temperature shock</li> <li>Screen/lid open-close</li> </ul>	Business models

<sup>54</sup> Hewlett Packard (2012) *Testing the business ruggedness and reliability of HP Elitebook notebook PC's*, Technical white paper

<sup>55</sup> Asus, *Product guide: August – September 2013*

<sup>56</sup> Toshiba, *Easyguard protection*, Accessed March 2014, [https://www.toshiba.co.uk/innovation/generic/easyguard\\_protection/](https://www.toshiba.co.uk/innovation/generic/easyguard_protection/)

<sup>57</sup> Lenovo, *Thinkpad laptops and ultrabooks*, <http://shop.lenovo.com/us/en/laptops/thinkpad/>

<sup>58</sup> Dell, *Latitude 6420u ultrabook summary of environmental testing*, October 2012, <http://partnerdirect.dell.com/sites/channel/Documents/Dell-Latitude-6430u-Ultrabook-Environmental-Testing-Product-Guide.pdf>

<sup>59</sup> Acer, *Built to last: ready for business*, Accessed March 2014, [http://www.acer.com/professional-products/en\\_GB/index\\_legacy.html](http://www.acer.com/professional-products/en_GB/index_legacy.html)

## Durable models and design features

It is understood that test routines are used to improve the design of notebooks so as to make them more durable. This can include more robust single components but it can also focus on the layout and junctions between components in order to, for example, better absorb impacts<sup>60</sup>. In the process of identifying the test routines of the EU's leading manufacturers a series of common design features were also identified. These, together with the products ranges or models in which they are incorporated, are summarised in Table 12. They have been grouped as they relate to the common accidents and reasons for failure identified by IDC (2011).

Based on feedback from selected manufacturers it is understood that a combination of durability tests and improved design specifications provides the confidence to give 2 or 3 year warranties with new products.

**Table 12: Sample of product design features specified for improved durability**

Durability factor	Design feature	Product ranges
Accidental drop	<ul style="list-style-type: none"> <li>Strengthened case, e.g. magnesium alloy, carbon fibre</li> <li>Shock and vibration absorbent internal enclosure lining</li> </ul>	<ul style="list-style-type: none"> <li>Lenovo T series</li> <li>Dell Inspiron</li> <li>HP Elitebook</li> <li>Toshiba Portege and Tecra</li> </ul>
	<ul style="list-style-type: none"> <li>HDD redesign of location and incorporation of shock protection dampers</li> <li>HDD accelerometer to retract magnetic head in the case of a sudden fall</li> </ul>	<ul style="list-style-type: none"> <li>Acer business models</li> <li>Toshiba Portege and Tecra</li> <li>Asus B-Series</li> <li>Lenovo X131/140e</li> </ul>
	<ul style="list-style-type: none"> <li>Solid State Drive (SSD) instead of HDD to eliminate moving parts</li> </ul>	<ul style="list-style-type: none"> <li>Toshiba Portege and Tecra</li> <li>Apple Macbook Pro and Air</li> <li>Dell Latitude models</li> </ul>
Liquid spillage	<ul style="list-style-type: none"> <li>Spill resistant keyboard with elimination of possible drainage points</li> </ul>	<ul style="list-style-type: none"> <li>HP Elitebook</li> <li>Toshiba Portege and Tecra</li> <li>Asus B-Series</li> <li>Lenovo Thinkpads and X131/140e</li> </ul>
Screen breakage	<ul style="list-style-type: none"> <li>Pressure absorbent casing</li> <li>Screen reinforcement, e.g. glass fibre, toughened glass</li> </ul>	<ul style="list-style-type: none"> <li>Asus all models</li> <li>HP Elitebook</li> <li>Dell Latitude</li> </ul>
Keyboard lifespan	<ul style="list-style-type: none"> <li>Durable keyboard specifications</li> </ul>	<ul style="list-style-type: none"> <li>Apple Macbook Pro</li> <li>HP Elitebook</li> <li>Asus all models</li> <li>Dell Inspiron</li> </ul>

<sup>60</sup> Notebook Review, *Rugged laptops: Essential to business and home?* 25<sup>th</sup> May 2010, <http://www.notebookreview.com/news/rugged-laptops-essential-to-business-and-home/>

### 3.3.4.2 First proposal for Notebook durability criteria

<b>Proposed new criteria (first proposal)</b>		
<b>'Durability testing for notebook computers'</b>		
The applicant shall submit the notebook model for durability testing. The notebook shall be verified to pass the performance benchmarks and function accordingly during and after each test as specified below.		
<b>Durability test</b>	<b>Test conditions and performance benchmark</b>	<b>Reference for test method</b>
Drop	122 cm drop height onto a 5.0 cm of plywood surface on concrete, 4-6 drops per sample to a total of 26 drops covering each face, edge and corner. The notebook is non-operational during the test but shall function following the test.	MIL-STD-810G, 516.6, Procedure IV
Shock	40g for 18 tests each applied to Bottom, Left and Back side. The notebook is non-operational during the test but shall function following the test	MIL-STD-810G, 516.5, Procedure I For further review of equivalence: IEC 60068
Vibration	20-2000 Hz, 1.04 Grms, 1 hour applied to Bottom, Left and Back side. The notebook is to be operational during and after the test.	MIL-STD-810G, 514.6, Category 24 For further review of equivalence: IEC 60068
Temperature	Three 24 hour exposure cycles for each extreme in a test chamber -29°C and 63°C The test to be repeated for an operational and non-operational notebook. The notebook shall be checked that it functions following each routine.	MIL-STD-810G, 501.5, Procedure II For further review of equivalence: IEC 60068
Water ingress	0.2 litres of water is to be poured evenly over the main body of the open keyboard face of the notebook, drained after 3 seconds, inverted on its side for 45 seconds and then tested after 2 minutes. The notebook is to be operational during and after the test.	MIL-STD-810G, 506.5, Procedure III For further review of equivalence: IEC 60529
Screen pressure	25kg loading to be applied to the centre of the screen lid with the notebook placed on a flat surface. The screen to then be inspected for lines, spots and cracks.	<i>No formal reference: stakeholder input required. Potential to refer to panel pressure test methods.</i>
Keyboard accelerated life	10 million random keystrokes simulation for <i>(to be specified)</i> product samples. The keys to then be inspected for their integrity.	<i>No formal reference: stakeholder input required.</i>
<b>Assessment and verification:</b> The applicant shall provide test reports showing that the model has been tested and has met the benchmarks for durability. Testing and verification shall be carried out by a third party.		

Key aspects of the proposal:

- It is proposed that initial basic set of durability tests are specified, reflecting those commonly commissioned by the leading OEM's with products in the EU market.

These tests are proposed to be specified to reflect the most common accidents and environmental stresses as identified by the IDC (2011) study and as specified by OEM's. The test routine is proposed to encompass: Drop, Shock, Vibration, Temperature extremes, Water ingress protection (to protect from spillages). In addition a screen pressure test to guarantee screen robustness and an accelerated life test for keyboards are proposed to be specified.

- The starting references for the test methods are the US MIL-STD-810G and the IP (International Protection)/IEC 60529 standards for ingress protection (water and dust). EN 60068 contains a series of environmental test methods that require further review for possible substitution of the reference to the US MIL standard and Ingress Protection standards in order to provide a more definitive and comparative reference.
- For each test a routine has been described, adapted as a starting point mainly from MIL-STD-810G and OEM interpretations of these procedures, together with a performance benchmark or duration for the test. The number of samples of models to be tested and the inspection routines for integrity of the product following testing are to be detailed further.
- However, in cross referencing the MIL standard, the Endpoint Technology 'rugged' definitions and examples of OEM test routines there is not a consistent read across. The related IEC standards 60529 and the 60068 series therefore require further review.
- The screen pressure test and accelerated life test for keyboards will require bespoke testing routines and benchmarks to be established based on further input and discussions with OEM's and testing bodies.
- The tests and resulting performance are proposed as being carried out and verified by a third party in order to provide comparability and assurance.

### 3.3.5 Criterion 3.5 – Upgradeability and Repairability

To avoid an early replacement of the whole computer in the case of worn out or defective single components, the upgradeability and repairability of products are major factors that can facilitate a lifetime extension. Thus it is proposed to place a focus on the revision of these criteria.

#### **Present criteria, Decisions 2011/337 and 2011/330**

##### **“User repairability”:**

The applicant shall provide clear instructions to the end-user in the form of a manual (in hard or soft copy) to enable basic repairs to be undertaken. The applicant shall also ensure that spare parts are available for at least five years from the end of production of the personal computer and/or computer monitor / notebook computer.

Assessment and verification: The applicant shall declare the product’s compliance with these requirements to the competent body together with a copy of the repair manual.

#### 3.3.5.1 Major proposed changes (first proposal)

#### **Proposed revised criteria (first proposal)**

##### **Repairability:**

For the purpose of undertaking repairs and replacements of worn out parts, or to upgrade older parts and components, the following criteria shall be fulfilled:

- (a) Design for repair: All major repairable/replaceable components of computers, if applicable, such as hard drive, CD/DVD and Blue-ray drive, printed circuit board, memory, screen assembly, LCD backlight, keyboard, mouse pad, rechargeable battery, cooling fan, catches and hinges shall be easily accessible and exchangeable by the use of universal tools (i.e. widely used commercially available tools).  
*As a minimum the following should be used: simple access panels provided for key components and screw numbers minimised (e.g. by lugs and slots). Screw heads standardised with no more than three head sizes. Removable electrical connectors (e.g. clip, screw) should be used rather than soldered or crimped joints where access is required. The following should not be used: self-tapping screws, irreversible snap-fits or adhesives where access is required. Tamper-proofing (such as plastic covers or labels) should only be used to ensure authorised repair under warranty and should not inhibit other repairs outside of the warranty period.*
- (b) Repair manual: The applicant shall provide clear instructions in form of a repair manual (in hard or soft copy) to enable replacing of these key components.
- (c) Availability of spare parts: The applicant shall ensure that spare parts, including rechargeable batteries (if applicable), are available for at least five years following the end of the computer model production.
- (d) Reasonable repair costs: The applicant shall ensure that the cost of individual spare parts is less than 20% (LCD assembly: less than 60%) of the cost of a new machine.
- (e) Repair Service / Information: Information should be included in the user instructions or the manufacturer’s website to let the user know where to go to obtain professional repairs and servicing of the computer, including contact details as appropriate.

Assessment and verification: The applicant shall declare the compliance of the product with these requirements to the competent body. Additionally, the applicant shall provide a copy of the repair manual, a copy of the user instructions, and a list with prices of available spare parts.

- The link to the end-user has been removed; today's products become increasingly complex and often the right to claim under guarantee becomes invalid when repairs are executed by persons who are not authorised.
- Design for repair: Detailed requirements for major components that shall be easily exchangeable have been included. The focus is instead on those components that appear to have a high failure rate. The term "easily accessible and exchangeable" has been illustrated with clear examples.
- A new criterion on reasonable repair costs has been proposed in order to avoid costs of single spare parts being more expensive than the purchase of a whole new computer product.

For more details cf. Task 4 report "Improvement Potential", section 4.2.3.3 "Repairability / Warranty / Service".

Consultation questions
<ul style="list-style-type: none"> <li>• In general: does a commercial guarantee in case of products' defects facilitate the repair, i.e. lifetime prolongation, or are the defect devices simply being exchanged for new products?</li> <li>• Should an additional commercial guarantee by the brand owner be required (e.g. TCO: 1 year, EPEAT: 3 years)?</li> </ul>



### 3.3.5.2 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, there was a general feeling that the proposal can be supported but the original reference promoting basic repairs by the consumer should be retained where they are possible and do not invalidate the warranty. Safety should also be addressed, so that only those repairs that can be carried out safely and with no risk should be highlighted. A distinction should be made between components that can be repaired and those that can be replaced. Moreover, a distinction shall also be made between those that can be carried out by consumers and those by professional services.

The issue of competition in professional repairs was highlighted. If it is only permitted for the manufacturer to provide the repair service then this will limit competition and may not help to reduce costs. Franchising and/or agreements with manufacturers might be something to support. The criteria should be non-discriminatory.

There was a general feeling that a limit on repair costs for components would be very difficult to make work.

Longer guarantees for certain components were highlighted as being important but may be problematic for batteries. EPEAT exempts batteries from such a requirement. In the case of some computers they are simply replaced – this must be possible to do by the consumer. The cost of extra guarantees will require consideration.

It was asked whether the study team has access to information on why computers breakdown. This should directly inform the lifetime extension criteria. A study by WRAP in the UK looked specifically at why computers breakdown. The study team confirmed that this reference has been taken into account when drafting the proposal for revised criteria. It was further suggested that cables and chargers may be an area to look at.

Written stakeholder feedback following the first AHWG meeting suggested permitting that spare parts do not have to be those originally designed for the product but that **"backwardly compatible" parts** are also acceptable.

For product safety and liability reasons, there is required the need to make a clear **distinction between user and professional repair actions**. It is seen that for end-users the availability of professional repair options to fix day-to-day problems with the devices by reasonable costs is an important fact for a substantial prolongation of the use time. To stimulate such costly services, in addition to the requirements proposed in the current criteria document, a requirement to guarantee easy access to the necessary repair information, diagnostic tools and spare parts to third party reuse or repair shops or organisations.

Regarding **reasonable repair costs** it was stated that it is difficult to dictate prices to the market. Given that after only a few years the whole product value is 20% of the original purchase price there may be other more effective ways to prolong life<sup>61</sup>. After the warranty period has expired, replacement parts are likely to be sourced from aftermarket or 2nd-hand sources (e.g. eBay). Providing a list with the price of

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<sup>61</sup> Source: WRAP Report "The value of consumer electronics for trade-in and re-sale"; March 2013; [http://www.wrap.org.uk/sites/files/wrap/Value%20of%20consumer%20electronics\\_trade%20in%20\\_re\\_sale%2013%2008%2020.pdf](http://www.wrap.org.uk/sites/files/wrap/Value%20of%20consumer%20electronics_trade%20in%20_re_sale%2013%2008%2020.pdf)

available spare parts would be very difficult to have from applicants, as these prices also depend on who is the final purchaser: GPP or private buyer request different prices for the same products. Further, prices are very dynamic, they vary within countries, between countries and over time for the same product, typically lower prices at the end of a specific product model lifetime. Also, the proposed criterion is stated to be impossible for the Competent Bodies to assess and control. Instead of the proposed requirement on the price of spare parts, it is proposed to have **information about the manufacturing year** on the computer thus the user would have some idea when the availability of spare parts will run out. Regarding the **availability of spare parts**, one of the stakeholders recommended 3 instead of the proposed 5 years. **Longer product guarantees** are preferred as a better indicator of intended minimum first life. For example, WRAP research (HWP200-301)<sup>62</sup> indicated that UK consumers welcome longer guarantees from manufacturers, as this indicates confidence that their products have a long lifetime.

**Batteries** need to be easily removed without the risk of damaging the product during the action, by the end user or service provider alike facilitating this e.g. by restricting glued in critical components.

#### Further research and evidence

The **upgradeability** of computer products differs significantly;

- Desktop computers, desktop workstations and small scale server: still certain components can be more or less be easily upgraded (HDD, SSD, memory) or expanded by additional slots (graphics),
- Notebooks:
  - HDD/SSD, memory, CD/DVD/Blu-ray drive, rechargeable battery: some are easily be upgradeable, some are already glued in
  - Videocards for notebooks are not exchangeable separately, as mainly on-board graphic processing unit (GPU), i.e. integrated on motherboard

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<sup>62</sup> Source: WRAP GB Report “Electrical and electronic product design: product lifetime”; January 2013; <http://www.wrap.org.uk/sites/files/wrap/WRAP%20longer%20product%20lifetimes.pdf>

- Ultrabooks as sub-category of notebooks: The thinner and smaller the form factor, the more complicated is an exchange and upgradability of components; for the reason of saving space, most components are fixed by being glued in.
  - Mostly, neither HDD/SSD nor RAM is exchangeable against new components; either ultrabooks are secured with special screws or the RAM is soldered up with the motherboard<sup>63</sup>. Example for good upgradeability of HDD and RAM: ASUS Zenbook UX32DV<sup>64</sup> (onboard *plus* removable RAM).
  - Rechargeable batteries are mostly fixed and only replaceable by manufacturers. Examples for best practice: ASUS Zenbook UX32DV<sup>64</sup>, Dell Latitude 6430u and Sony Vaio T13<sup>65</sup>
- In general: Motherboard and CPU are rather more difficult to exchange for upgrades; the exchange of the CPU is theoretically possible, however, meanwhile it is often soldered up with the motherboard for the reason of better heat dissipation.<sup>66</sup>

Regarding longer product **guarantees**,

- WRAP research (HWP200-301)<sup>62</sup> conducted six qualitative focus groups and a nationally representative survey of 1,104 consumers of household electrical appliances in England and Wales; based on that, the study concluded that the provision of longer standard guarantees or warranties is likely to be central to maximising consumer pull for longer lifetimes. They are seen by consumers as a show of faith by the manufacturer in the lifetime of their product. However, participants in the qualitative focus groups of the study also expressed a strong preference for longer guarantees or warranties that would enable them to have the product in question replaced rather than repaired if it did break down.

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<sup>63</sup> Sources: [www.com-magazin.de/praxis/hardware/20-fakten-zu-ultrabooks-7388.html](http://www.com-magazin.de/praxis/hardware/20-fakten-zu-ultrabooks-7388.html); [www.heise.de/newsticker/meldung/Oeko-Logo-EPEAT-winkt-Ultrabooks-durch-1729666.html](http://www.heise.de/newsticker/meldung/Oeko-Logo-EPEAT-winkt-Ultrabooks-durch-1729666.html)  
15.10.2012

<sup>64</sup> Source: [www.ifixit.com/Teardown/Asus+Zenbook+UX32VD+Teardown/10120](http://www.ifixit.com/Teardown/Asus+Zenbook+UX32VD+Teardown/10120)

<sup>65</sup> Source: [www.onlinekosten.de/news/artikel/50054/2/Ultrabook-Beratung-Vor-und-Nachteile-der-duennen-Dauerlaeufer](http://www.onlinekosten.de/news/artikel/50054/2/Ultrabook-Beratung-Vor-und-Nachteile-der-duennen-Dauerlaeufer)

<sup>66</sup> [www.gamestar.de/hardware/praxis/notebooks/2323984/notebook\\_tuning\\_teil\\_1.html](http://www.gamestar.de/hardware/praxis/notebooks/2323984/notebook_tuning_teil_1.html)

- The website [www.onlinekosten.de/computer/computer-defekt](http://www.onlinekosten.de/computer/computer-defekt) gives an overview of standard warranties provided by different manufacturers, see following table. The information provided indicates that the defect devices are generally taken back from the manufacturer for doing repairs in the first instance, thus facilitating the prolongation of lifetime.

**Table 13: Overview of standard warranties provided by different manufacturers**

Manufacturer	Standard warranty				Opening of hardware allowed?
	PCs	Notebooks/Netbooks	Notebook battery	Monitors	
Acer	<ul style="list-style-type: none"> <li>Consumer PCs: 1-2 years</li> <li>Business PCs: 1-3 years</li> </ul>	<ul style="list-style-type: none"> <li>Notebooks: 1-2 years</li> <li>Netbooks: 1 year</li> </ul>	6 months	<ul style="list-style-type: none"> <li>Consumer LCDs: 2 years</li> <li>Professional LCDs: 3 years</li> </ul>	Upgrade of hardware not generally forbidden, but defects caused by improper repairs or incorrect components not covered by warranty
Apple	Generally 1 year				Allowed, when in handbook the exchange of components like RAM or HDD are described explicitly; if not in the manual, hardware may only be opened by Authorized Apple Service Provider (AASP)
Asus	2 years	2 years	1 year	3 years	Exchange of RAM and HDD allowed
Dell	Service against payment of a fee: 1 year				Components like RAM, HDD or cards are allowed to exchange
Fujitsu	2 years	2 years	1 year	3 years	Yes, e.g. RAM; generally warranty covers only original configurations
HP	2 years for certain product series	2 years for certain product series	Excluded from standard warranty	n.a.	Upgrade of hardware not generally forbidden, e.g. RAM, but defects caused by improper repairs or incorrect components not covered by warranty
Lenovo	1-3 years depending on model	1-3 years depending on model	1 year	n.a.	Yes, e.g. RAM
LG	2 years	2 years	6 months	3 years	No, only by authorized / specialized dealers

Manu- facturer	Standard warranty				Opening of hardware allowed?
	PCs	Notebooks/ Netbooks	Notebook battery	Monitors	
Toshiba	n.a.	1-3 years depending on model	1 year	n.a.	Upgrade of hardware not generally forbidden, e.g. RAM, but defects caused by improper repairs or incorrect components are not covered by warranty

Regarding **repairability**,

- Market analysts of IDC carried out a study sponsored by Panasonic based on a survey of 300 businesses in the USA. The study found that on average each year 14.2% of notebooks required repair or replacement due to physical failure, and 9.5% of notebooks required repair or replacement due to an accident. The most commonly damaged component was the keyboard (72%) followed by the screen (66%), battery (58%) and hard disk drive (51%).<sup>67</sup>
- WRAP research (HWP200-401)<sup>61</sup> especially for Tablet PCs analysed that there are many different standards from device to device as the market is evolving fast for this product type. This currently makes repair difficult as parts are not easily available or interchangeable. This may improve as the market matures and only a few product types become the norm. Repair costs are high, relative to residual value, because of the high volume of screen damage that is incurred over all the model types.
- The study 'Disassembly analysis of slates: Design for repair and recycling evaluation' by Fraunhofer IZM (2013)<sup>68</sup> aimed to assess the ease of dismantling slates by experimental teardowns of in total 21 different devices under test, including disassembly processes, difficulty and need for special tools, identification of good D4R examples (design for repair, refurbishment, reuse

<sup>67</sup> IDC, *The Business case for ruggedized PC's*, USA, June 2012

<sup>68</sup> Cf. [http://www.izm.fraunhofer.de/content/dam/izm/de/documents/News-Events/News/2013/urn\\_nbn\\_de\\_0011-n-255111-18-1.pdf](http://www.izm.fraunhofer.de/content/dam/izm/de/documents/News-Events/News/2013/urn_nbn_de_0011-n-255111-18-1.pdf)

and recycling) and reflection on suitable product information from manufacturers that would be of value to repairers, refurbishers and recyclers.

- As **regular tools**, Fraunhofer IZM defined in their study screwdrivers, metal and plastic spatula, pliers and tweezers. **Special tools** are: screwdrivers with special heads (e.g. torx), heat gun, thermal pad, soldering iron etc.
- With respect to a repair scenario, the study identified **robust clips and screws as feasible design solution supporting damage-free opening** and closing of a slate. The use of adhesive was found to be suboptimal but possible, requiring cleaning and applying new adhesive when closing the device again.
- For battery removal, two design options were found: a battery housing (type of tray) made out of plastics or metal being attached with an average of four **screws** to the device; and on the other hand the battery being directly glued mostly with two strips of adhesives into the device. Whereas the glued option required a very delicate approach to lifting the battery and requiring a cleaning process, the screws were found to have a slight advantage in terms of reversibility and safety. A practicable solution for adhesives was found to be a small non-adhesive strip at the end of the adhesive tape attached to the backside of the battery which allowed the adhesive tape to be easily pulled off to remove the battery. Further, batteries with a **connector cable** to the mainboard were easier to replace than those with soldered wires.
- For the dismantling of the mainboard and the display unit, Fraunhofer IZM indicated connectors and screws as favourable design options facilitating the reversibility of the process. However, the report states that the front glass touch panel and the display panel are always glued together, sometimes additionally enveloped in metallic tape. The display module is furthermore attached (e.g. with glue, screws) to an outer frame or an inner frame. To separate the front glass from the display panel one option is to use heat to dissolve the glue that connects the two panels. If double side

tape is used (thicker foam material), the material more likely gets ripped and comes off unevenly, with a replacement needed in a repair scenario.

Further, a simple separation of both parts with a spatula in various cases ended up in breaking the thin front glass.

- **For independent repair shops**, but partly also for independent recyclers Fraunhofer IZM stated it would be of high interest to get hold of **information about the opening mechanism in advance** to save time and more important in case of repair to avoid damage to the surface and parts.

### 3.3.5.3 Second proposal for upgradeability and repairability criteria

#### Proposed revised criteria (second proposal)

##### Upgradeability and Repairability:

For the purpose of upgrading older components or undertaking repairs and replacements of worn out components or parts, the following criteria shall be fulfilled:

- (a) Design for upgrades and repair: The following components of computers, if applicable, shall be easily accessible and exchangeable by the use of universal tools (i.e. widely used commercially available tools as screwdriver, spatula, plier, or tweezers):
  - (i) HDD/SSD,
  - (ii) Memory,
  - (iii) Rechargeable battery,
  - (iv) Screen assembly and LCD backlight,
  - (v) Keyboard and mouse pad, and
  - (vi) Cooling fan.

*Indicatively, the following should be used: simple access panels provided for key components and screw numbers minimised (e.g. by lugs and slots). Screw heads standardised with no more than three head sizes. Detachable electrical connectors (e.g. clip or screw) should be used rather than soldered or crimped joints where access is required. The following should not be used: self-tapping screws, irreversible snap-fits or adhesives where access is required. Tamper-proofing (such as plastic covers or labels) should only be used to ensure authorised repair under warranty and should not inhibit other repairs outside of the warranty period. Special tools include e.g. screwdrivers with special heads (e.g. torx), heat gun, thermal pad, soldering iron.*

- (b) Repair manual: The applicant shall provide clear disassembly and repair instructions (e.g. hard or soft copy, video) being publicly available, to enable a non-destructive disassembly of products for the purpose of replacing key components or parts for upgrades or repairs.
- (c) Repair Service / Information: Information should be included in the user instructions or the manufacturer's website to let the user know where to go to obtain professional repairs and servicing of the computer, including contact details as appropriate. Service should not be limited exclusively to applicant's Authorized Service Providers.
- (d) Availability of spare parts: The applicant shall ensure that original or backwardly compatible spare parts, including rechargeable batteries (if applicable), are publicly available for at least five years following the end of the computer model production.
- (e) Warranty: The applicant shall provide an additional three year warranty or service agreement for the computer product; for rechargeable batteries, if applicable, the period should be at least one year.

Assessment and verification: The applicant shall declare the compliance of the product with these requirements to the competent body. Additionally, the applicant shall provide

- A copy of the warranty or service agreement.
- A copy of the repair manual
- A copy of the user instructions

### Major proposed changes

- The proposed criteria for reasonable repair costs have been deleted.
- The components that have to be exchangeable have been further detailed based on further research and evidence; for repairs, keyboards, screen, battery and HDD are of relevance, for upgrades HDD/SSD, memory and battery.
- The listed joining techniques and connections have been changed from being a 'minimum requirement' in the first criteria proposal to be proposed as 'indicatively'. Further research<sup>69</sup> revealed no verifiable proof that certain joining techniques such as adhesives are destructive to the products or components per se.
- An explicit distinction between repairs that might be undertaken by end-users and others only by professional repair services has not been made. Clarification is often provided in the product manual which repairs might be done by the consumer without affecting the manufacturers' guarantee/warranty (cf. Table 13).
- However, feedback from stakeholders proposed to support customer's choice for third party reuse or repair shops or organisations. In order to facilitate them easy access to the necessary repair information, diagnostic tools and spare parts, the criteria on spare parts and repair manual have been specified by having to be "publicly available"; the criterion on repair service includes a requirement that it must not be limited exclusively to applicant's Authorized Service Providers.

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<sup>69</sup> For example the study 'Disassembly analysis of slates: Design for repair and recycling evaluation' by Fraunhofer IZM (2013), or iFixit ([www.ifixit.com/Teardown/Asus+Zenbook+UX32VD+Teardown/10120](http://www.ifixit.com/Teardown/Asus+Zenbook+UX32VD+Teardown/10120))

- Repair manual: video demonstration of disassembly has been added as possibility.
- The criteria on availability of spare parts have been further detailed regarding the possibility of being “original or backwardly compatible”. The number of five years, however, has not been shortened as partly being required. For computer products, it seems that the type of models changes every year; in order to facilitate a real lifetime *prolongation*, the availability of spare parts for 3 years would only address the average lifetime of computers.
- A new sub-criterion regarding a manufacturer’s warranty additionally to the legal guarantee is proposed aligning it to the current EPEAT criteria for product longevity of computers, however specifying it to explicitly cover rechargeable batteries. Further research indicated that most manufacturers already offer such service taking back defect devices for repairing them, thus facilitating the prolongation of lifetime of computer products.

### 3.3.6 Criterion 3.5 – Data deletion

Second hand usage can prolong the overall usage and lifetime of computers. However, a barrier to IT devices being given for second hand usage could be the end-users' concern on possible misuse of private data still stored in the devices. Thus, a new criterion on data deletion is proposed.

For more details cf. Task 4 report "Improvement Potential", section 4.2.3.5 "Second hand usage / secure data wiping".

#### 3.3.6.1 First proposal for data deletion criteria

##### Proposed new criteria (first proposal)

###### Data deletion:

- To allow a second use of the computer, the device shall be designed so as to allow the user to completely and safely delete all personal data by himself without the help of fee-required software or special tools. This can be achieved by either physically removing the data storage (e.g. memory card, Hard Disk Drive) or with the help of software provided by the manufacturer or a third party free of charge. When using software, the deletion process shall at least include an overwriting of all the data stored with a random pattern. Software solutions from the manufacturer or a third party must be available free of charge for at least five years following the end of the computer model production.
- The applicant shall provide clear instructions to the end-user in form of a manual (in hard or soft copy) to enable personal data deletion.

Assessment and verification: The applicant shall declare compliance of the product with these requirements and additionally provide a copy of the user instructions to the competent body.

#### 3.3.6.2 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, there is a wide variety of methods for data resetting allowing a user to restore the computer to factory settings. The criteria will need to be more specific and is particularly relevant to GPP. This is because in some cases data can still be recovered. Some Government departments such as Defence have strict technical requirements to ensure that this cannot occur. Freeware exists but it doesn't wipe the data as many times. Advanced software exists which writes random patterns to the HDD but is costly. Even if the HDD is damaged or removed this may not prevent the computer from being re-used.

Written stakeholder feedback following the first AHWG meeting:

- The proposal is agreed by one of the stakeholders. Justification: New computers are more frequently configured/partitioned to have a start-up disc (C:) and a data disc (D:). A mechanism to “Restore to factory settings” is not uncommon and will often present the user with a choice of a full reset or only the start-up disc. Software solutions to erase data are freely available and some provide solutions considered to be very secure. A link to several examples is provided<sup>70</sup>.
- It is recommended that this section is expanded to specifically include solid state memory in addition to mechanical units such as HDD. To prolong lifetime all memory in the product must be able to be erased and reset in accordance with international data security standards. It is accepted that this may be through a proprietary or licensed software platform. It is suggested that any software is made available through the internet or online store to ensure that any user, anywhere, can carry out the data deletion. However, it has to be taken into account how this compares with security requirements of public sector and corporate organisations e.g. for multiple wipes/re-writes of random data to prevent subsequent access or reconstruction of data. Anecdotal information that inability to securely wipe whole memory of certain tablets and smartphones prevents UK asset management companies from guaranteeing data removal to CESG standards & therefore meeting their obligation in data removal. Such design leads to excess shredding/recycling of products that are inherently re-usable. Further example is the decision by Google to publish the hack codes for Google devices to enable developers to identify novel approaches to device use (and re-use).
- Reliable software granting that all data are completely cancelled is very expensive. This would eventually result into higher price of the final PC for a feature that the consumer might not need to use

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<sup>70</sup> <http://pcsupport.about.com/od/toolsofthetrade/tp/free-data-destruction-software.htm>

- It is suggested to delete this criterion as it not seems to be under the control of ecolabels.
- There are many responsible initiatives for 2nd hand use, to erase data and refurbish for certain social projects. It is proposed as criteria that the brand should be involved in an initiative as part of their take back policy within the country of the original sale.

### Further research and evidence

Complete deletion of data without allowing any data recovery, is only possible by multiple overwriting algorithms of the drive with different bit patterns. Several standards have been defined for those software based approaches, for example<sup>71</sup>:

- 5220.22-M-Standard by the US Ministry of Defence, AFSSI-5020 by the US Air Force (3-times overwriting; first: zero; second: one value; third: random character);
- AR 380-19 by the US Army (3-times overwriting; first: random character, 2<sup>nd</sup>: specified character, e.g. zero; 3<sup>rd</sup>: complement of the specified character, e.g. one);
- RCMP TSSIT OPS-II by the Royal Canadian Mounted Police (7-times overwriting; first: zero; second: one; third: zero; 4<sup>th</sup>: one; 5<sup>th</sup>: zero; 6<sup>th</sup>: one; 7<sup>th</sup>: random character);
- VSITR-Standard of the German Federal Office for Information Security (BSI) (7-times overwriting; first: random bit pattern; 2<sup>nd</sup> to 6<sup>th</sup>: reversed bit pattern, i.e. zero is replaced by one and one is replaced by zero; 7<sup>th</sup>: overwriting by fixed '01010101' pattern)
- Bruce-Schneier algorithm (7-times overwriting; first: zero; second: one; 3<sup>rd</sup> to 7<sup>th</sup>: random character);
- Peter-Gutmann algorithm (35-times overwriting, random character).

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<sup>71</sup> Sources: BITKOM (2008): "Leitfaden zum sicheren Datenlöschen"; Version 2.0; [www.bitkom.org/files/documents/Leitfaden\\_Sicheres\\_Datenloeschen\\_Version\\_2-0\\_vom\\_300508.pdf](http://www.bitkom.org/files/documents/Leitfaden_Sicheres_Datenloeschen_Version_2-0_vom_300508.pdf); <http://pcsupport.about.com/od/toolsofthetrade/tp/free-data-destruction-software.htm>

Software for effectively wiping data from the Hard Disk Drive might be approved. This seems to be done nationally; e.g. in UK, software can be approved by CESG (Communications-Electronics Security Group). For media sanitisation, the certification follows so called “Security characteristics for data sanitisation”<sup>72</sup>, e.g.

- “Overwriting tools for magnetic media v1.6” from May 2012 which overwrites information from a piece of magnetic media prior to reuse.<sup>73</sup>
- “Degaussers v2.5” from May 2012 which sanitises data on magnetic media forms such as hard disk drives and tapes such that confidentiality is maintained<sup>74</sup>.
- “Flash based Media v0.3” from August 2011 which sanitises all flash-based storage media such as solid-state hard drives, USB 'Thumb' drives and SD cards.<sup>75</sup>

On the other hand, irretrievable data sanitization can be done by physically destroying storage media using one of the following methods:

- Shredding;
- Degausser (demagnetization);
- Thermally destruction.

BITKOM (2008) provides the following recommendations:

- If Hard Disk Drives should be re-used, e.g. in another department, return to a leasing company or re-sale, they should be overwritten with an applicable software tool, at least three times, or seven times for highly sensitive data.
- For highly sensitive data, generally physical destruction should be preferred.
- The data deletion should be completely documented in a tamper-proof report.

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<sup>72</sup> Cf. <http://www.cesg.gov.uk/servicecatalogue/CPA/Pages/Security-Characteristics.aspx>

<sup>73</sup> Cf. [http://www.cesg.gov.uk/publications/Documents/overwriting\\_tools\\_for\\_magnetic\\_media\\_sc.pdf](http://www.cesg.gov.uk/publications/Documents/overwriting_tools_for_magnetic_media_sc.pdf)

<sup>74</sup> Cf. [http://www.cesg.gov.uk/Publications/Documents/data\\_sanitisation-degaussers.pdf](http://www.cesg.gov.uk/Publications/Documents/data_sanitisation-degaussers.pdf)

<sup>75</sup> Cf. [http://www.cesg.gov.uk/Publications/Documents/data\\_sanitisation\\_flash\\_based\\_storage.pdf](http://www.cesg.gov.uk/Publications/Documents/data_sanitisation_flash_based_storage.pdf)

According to the German Federal Office for Information Security, however, modern Solid State Disks (SSD), Hard Disk Drives (HDD) or combinations (SSHD) use highly complicated mechanisms in order to handle failures; they deny the access of software applications, including data sanitization software, to the defect memory areas; further, hard disks allow the application of protected hard disk segments (host protected areas, HPA), i.e. normally being not visible to an operating system.<sup>76</sup>

### 3.3.6.3 *Second proposal for data deletion criteria*

Against the background of further evidence provided in the section above, a criterion for a *software based* data sanitization seems not applicable as irretrievable data deletion cannot be absolutely guaranteed.

Instead, for a complete and safe deletion of data to allow a second use of the computer, the device shall be designed so that the HDD or SSD can be easily removed without causing defects to the overall computer device; this requirement is already covered by criterion 3.5, 'upgradeability and repairability'.

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<sup>76</sup> [https://www.bsi-fuer-buerger.de/BSIFB/DE/MeinPC/RichtigLoeschen/richtigloeschen\\_node.html](https://www.bsi-fuer-buerger.de/BSIFB/DE/MeinPC/RichtigLoeschen/richtigloeschen_node.html)

### 3.4 Cluster 4 – End-of-life management: Design and material selection

Similar to the cluster lifetime extension, the research results of Task 3 and Task 4 revealed that high attention should also be paid to the end-of-life (EoL) management of computers to reduce the overall environmental impacts since secondary resources from recycling can substitute primary production. In the current criteria documents, requirements affecting the EoL-management of computers are spread across different discontinuous criteria (“Recycled content”, “Design for disassembly”). To illustrate the importance of EoL for computers, for the revision it is proposed to cluster and rearrange the associated criteria.

#### Present criteria, Decisions 2011/337 and 2011/330

##### “Recycled content”:

The external plastic case of the system unit, monitor and keyboard shall have a post-consumer recycled content of not less than 10% by mass.

*Assessment and verification:* The applicant shall provide the competent body with a declaration stating the percentage post-consumer recycled content.

#### Present criteria, Decisions 2011/337 and 2011/330

##### “Design for disassembly”:

The manufacturer shall demonstrate that the personal computer/monitor can be easily dismantled by professionally trained personnel using the tools usually available to them, for the purpose of undertaking repairs and replacements of worn out parts, upgrading older or obsolete parts, and separating parts and materials, ultimately for recycling or reuse. To facilitate dismantling:

- (a) Fixtures within the personal computer shall allow for its disassembly, e.g. screws, snap-fixes, especially for parts containing hazardous substances;
- (b) Circuit boards, and/or other precious metal-containing components, shall be easily removable using manual separation methods both from the product as a whole and from specific components (such as drives) that contain such boards to enhance recovery of high value material;
- (c) All plastic materials in covers/housing shall have no surface coatings incompatible with recycling or reuse;
- (d) Plastic parts shall be of one polymer or be of compatible polymers for recycling and have the relevant ISO 11469 marking if greater than 25 g in mass;
- (e) Metal inlays that cannot be separated shall not be used;
- (f) Data on the nature and amount of hazardous substances in the personal computer shall be gathered in accordance with Council Directive 2006/121/EC and the Globally Harmonised System of Classification and Labelling of Chemicals (GHS).

*Assessment and verification:* A test report shall be submitted with the application detailing the dismantling of the personal computer. It shall include an exploded diagram of the personal computer labelling the main components as well as identifying any hazardous substances in components. It can be in written or audio-visual format. Information regarding hazardous substances shall be provided to the competent body in the form of a list of materials identifying material type, quantity used and location.

### 3.4.1 Criterion 4.1 – Material selection and information

#### 3.4.1.1 Major proposed changes (first proposal)

##### Proposed revised criteria (first proposal)

###### “Material selection and information”

- (a) Variety of plastics: Plastic parts with a mass greater than 25 grams shall consist of a single polymer or a polymer blend compatible with recycling. A maximum of 4 types of plastic may be used for these parts. Plastic cases may consist of two separable polymers or polymer blends at the most.
- (b) Surface coating / metal inlays:
  - (i) Personal computers: All plastic materials used for covers/housing shall have no surface coatings / metal inlays incompatible with recycling or reuse;
  - (ii) Notebook computers: It shall be allowed to apply a metal coating to plastic case parts if such a coating is technically required. However, no electroplating shall be allowed.
- (c) Content of recyclates: The external plastic case of the system unit, monitor and keyboard shall have a content of post-consumer recyclates material of not less than 10% by mass.
- (d) Material information facilitating recycling:
  - (i) Plastic parts with a mass greater than 25 grams shall be marked in accordance with ISO 11469 and ISO 1043, sections 1-4. For plastic parts > 200 grams, the marking should be large enough and located in a visible position in order to be easily identified by workers of specialised recycling firms.
  - (ii) Data on the nature and amount of hazardous substances in the computer shall be gathered and provided in accordance with Council Directive 2006/121/EC and the Globally Harmonised System of Classification and Labelling of Chemicals (GHS).

###### Assessment and verification:

The applicant shall declare compliance of the product with these requirements to the competent body.

The applicant shall provide the competent body with an exploded diagram of the computer in written or audio-visual format, labelling the main components, especially plastic parts greater than 25 grams in mass, as well as identifying any hazardous substances in components.

The information shall include documentation to prove the conformity to the above mentioned ISO standards and additional specifications of the marking (dimension and position).

Information regarding hazardous substances shall be provided to the competent body in the form of a list of materials identifying material type, quantity used and location.

The applicant shall provide the competent body with a declaration stating the percentage post-consumer recycled content. In case of surface coating / metal inlays, the applicant shall provide the competent body with a declaration proving the technical demand.

#### Major proposed changes

- The different sub-requirements under the current criteria ‘recycled content’ and ‘design for disassembly’ have been rearranged and renamed ‘material selection and information’ and ‘design for recycling’ (see section 3.4.2).
- The criterion ‘variety of plastics’ has been detailed, taking the current Blue Angel criteria for Personal Computers and Notebook Computers as basis.

- The criterion 'surface coating' has been specified for notebook computers with derogation, where legal requirements technically necessitate surface coating in relation to electromagnetic compatibility (EMC).
- The criterion 'Material information facilitating recycling' specifies marking requirements.
- The assessment and verification requirements have been specified according to the new criteria structure.

For more details cf. Task 4 report "Improvement Potential", section 4.2.4.2 "End-of-life management of computer products".

#### 3.4.1.2 *Stakeholder feedback and further evidence*

According to the discussions of stakeholders at the first AHWG meeting, a number of practical issues were identified.

- The first was suitability for recycling. This would ideally avoid the use of black plastic as it cannot be picked up by spectroscopic equipment.
- Plastics with **recycled content** are a problem for GPP. This is because there is not an analytical method to verify that the product contains recycled material. The verification assumes 100% control of the raw material. A project in Belgium called QA-CER was referred to as a possible model for verification. The availability of post-consumer recycled content was also highlighted as well as potential hazardous substances in recyclates. In this respect the polymer must be treated the same as virgin material. It was questioned just how beneficial a 10% recycling requirement was.
- End-of-life criteria should also be identified for metals but it is easier to specify criteria for plastics.
- It was highlighted that in line with the Waste Framework Directive the criteria on material selection should equally promote re-use.
- Different opinions were given on the value of **marking**. Some concerns were raised as to whether marking of plastics was really of value if shredding was to be used for recovery. On the other hand feedback from re-processors and

dismantlers suggested that it was of value. Reference was made to an analysis of 600 televisions which showed that 13% of plastics CE markings were incorrect. This provoked different opinions but in general this was felt to represent a high level of assurance for re-processors.

- The **reference to ISO 1043** does not make a specific reference to substances added to the polymer; it only refers to flame retardant classes. What is needed are the CAS numbers.
- The value of reducing the **number of plastics** used was questioned. This is because composites can be used which mean that less material can be used for the same function. The criterion only makes sense if it results in fewer raw materials being used.

Overall it was felt that the criteria on easily dismantling were more important in combination with a focus on recovery of critical metals. However, from a political point of view to not address recycled plastics content is something that would need to be explained. A practical solution would be to allow for high recycled content claims to be made using 'Box 2' of the Ecolabel, allowing content claims to be written next to the flower.

#### Written stakeholder feedback following the first AHWG meeting...

- The proposed criteria (a), (b) and (d (i)) are explicitly supported by one of the manufacturers. On the other hand, the proposed criteria under (d (ii)) are not supported as 2006/121/EC applies to substances and preparations (mixtures) and NOT to substances in articles. It should clearly be separated between substance/ mixtures and substances in articles/ complex articles.
- **Variety of plastics:**
  - Plastic composition should be easy and cost-effective through currently available industry techniques. Many recyclers shred plastics; some then carry out automated separation. WRAP research<sup>77</sup> on separation techniques showed that factors such as pigment selection can interfere with

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<sup>77</sup> Cf. <http://www.wrap.org.uk/content/separation-mixed-weee-plastics-0>

automated separation processes (e.g. use of certain black pigments prevents recognition by NIR sorters). Equally, if the parts are to be separated manually, the speed with which the plastic can be removed and separated is vital.

- Beyond a reduction of polymer types to be used, also limitation of functional additives is a key prerequisite for any closed loop recycling attempt.
- Plastic parts of one polymer may facilitate recycling – if they are recycled, what is often not the case for plastic parts coming from computers – but will not facilitate dismantling. Reducing the number of plastics to favour recycling, can result in a higher consumption of raw materials and the generation of more waste. It can indeed impede the use of more performing materials in more demanding parts. This is contrary to the priority given to prevention. Limiting the number of plastics makes only sense when it doesn't result in an increase of material use. It should also be taken into consideration that progress is continuously made in sorting technology for mixed plastics waste, so that attention should be better focused on the separation of these plastics (design for recycling). This is seen as another example of a very unscientific criterion that excludes whole families of materials not taking into account improved performance. Laminates and composite plastics may also be much more resource efficient than single polymer plastics. They are seen to be discriminated without any proof based on life cycle analysis showing that their use results in a higher environmental impact than non-laminated and single polymer plastics. An example is provided: Co-extruded films (HYTEC and HYBRIDEX films) are based on new grades of virgin materials (thin-gauge film grades). The thickness could be reduced by 40% while keeping the required properties. This film is 20% cheaper, uses less non-renewable resources and makes on average 20 % of the turn-over of the company (Klerk's Plastic Industrie B.V.) in the Netherlands. Discriminating laminates and composite plastics will prevent innovation; slow down technical progress; be contradictory to the aim to minimize non-renewable material use.

- **Surface coating:**

- Neither desktops nor notebooks cases/housings shall have surface coatings (or even electroplated layers) nor have metal inlays. According to stakeholder feedback, the opening clauses “incompatible with recycling” and “technically required” should be skipped. The first one being not meaningful with respect to the variety of current recycling processes and the second being too imprecise.
- It is not seen how the absence of surface coating of plastics could facilitate a mechanical action like dismantling. It shall be explained what about coatings of non-plastic materials is.
- It should be specified in more detail what is considered a proof that certain plastic with surface coating is recyclable.

- **Content of recyclates:**

- The proposed criteria for recycled content, sub-criteria (c), is not supported by one of the manufacturers as it neither can be verified, nor controlled. In GPP, these arguments are extremely important, see European Court of Justice, ECJ case Wienstrom, case C-448/01.
- The imposed minimum recycled content of the external plastic case of the system unit does not address a main environmental impact, is not feasible for performance reasons and should therefore be removed. There is no justification for placing such criteria on the casing material.
- There is not enough recyclable plastic material available. Since sourcing such material in the required volume and quality could prove difficult for manufacturers, such criteria would effectively deter uptake of the label. Besides availability, there may also be other technical obstacles. If plastics constitute the outside layer of a computer or other product (laminated or not), stringent appearance requirements may require highly consistent raw materials, which exclude recycled materials.
- Further, fixed targets for recycled content have not proven to be a measure for minimizing environmental impact. There are cases where nearly 100%

recycled content is easily possible and is the state of the art and others where 5% recycled content leads to poor performing products and additional waste and environmental burdens. Recycling and specified recycled content is not always better from the environmental point of view. A life-cycle benefit from used recycled materials cannot automatically be assumed, but would be dependent on the plastics type and the impacts of the collection/recycling process.

- In an iPad tablet computer only 10 grams of plastic are present on 662 grams total weight. This means that less than 2 % of the total weight is plastic. For tablet computers in general about 10 % w/w or less are plastics (data from the presentation at the ad hoc working group on 10/10/2013). It is believed by one of the responding stakeholders that imposing a minimum of 10 % recycled content for a material that only accounts for 2 to 10 % of the total weight (which means that, at the end, only 0.2 % to 1 % of a computer is recycled plastic material) clearly fails to address a main environmental impact, as EU Ecolabel criteria are meant to do.
- TCO Development informed about their current Optional demands: TCO Certified Edge demands a PCC of 65% for displays and 50% for All-in-one PCs. According to their impression, more vendors are becoming committed to deliver post recycled plastic meeting performance requirements which have been considered a major obstacle in the past. TCO Certified to date has three display brands that achieve +65% PCC and three All-in-One PC brands that achieve +50%.
- One MS stakeholder is in favour in keeping this criterion; maybe lowering to 5% could be an improvement; they are not sure that the focus should be shifted to the recycling of metals, because the recycling rate of metals is already very high (for example printed circuit boards can be taken out before shredding). It is proposed to involve the recycling sector in this discussion.

- Public Waste Agency of Flanders (OVAM) confirmed that recyclates are available on the market, not enough if it would be mandatory for all computers but the EU Ecolabel only aims at 20% of the market and could be a good instrument to drive the market towards the use of recyclates.
- Regarding the verification of recycled content a certification scheme QA-CER started in Belgium. The certification distinguishes 3 levels of certification. Recyclates could also be screened for the presence of certain hazardous substances.
- Another MS stakeholder asked if the minimum amount (10%) is based on empirical findings that manufacturers can meet this criterion and is justified although the technical report states that "generally, however, using PCC in IT products presents significant challenges due to the unique structural, performance, and cosmetic requirements associated with these applications"? The criterion has appeared to be an obstacle even for past licence holders to keep the EU Ecolabel.
- While it is important to encourage the use of recycled plastics, it is suggested that enforcing 10% inclusion in external parts is unreasonable. It is recommended changing the requirement to include internal parts. WRAP trials have shown that often recycled plastics are most suited to internal components where colour, gloss levels, etc. are less stringent. The only ecolabelled computer to date, iameco v3, does not use external plastic parts - an indication that 10% recycled content and acceptable aesthetics are not yet practical.
- From an environmental perspective a much higher recycled content than the current 10% should be stimulated. Environmental stakeholders welcome any proposal allowing real front running companies to communicate in a meaningful way real recycling solutions ( e.g. recycled content > 80%).

- **Material information:**

- WEEE Directive Article 15 clearly requires information on re-use, recycling and nature & location of hazardous components. It is suggested that this scheme requires best practice in providing this information.
- Additional to the proposed criteria, the inclusion of critical raw materials in the components of the products shall be identified with type and amount of such materials in respective documentations (recycling pass) in order to support more target recalling activities in the future.
- In contrast to what is written sometimes, labelling of plastic parts will NOT ease the dismantling of computers. Marking of plastic parts: does not facilitate the dismantling; does not help automatic identification and automatic separation of the plastic parts; does not help recycling. In this application, marking of plastic parts, whatever the weight, does not make any sense and should not be a criterion. The same criterion was removed from the EU ecolabel criteria for fridges in October 2009 and the recently developed Blue Angel criteria for refrigerating, does not include this requirement. The indication was that the markings do not particularly aid the recycling of the plastics in modern recycling facilities. In reality, at the end of life of computers, the LCD screen is separated for mercury recovery; the printed circuit board and the battery are separated (WEEE Directive requirement). The remaining metals and plastics go to a shredder and hence marking of plastic parts makes no sense. The proposal also fails to take into account the fact that there are very few – if any – plastic parts of more than 200 grams.

### Further research and evidence

- The study 'Disassembly analysis of slates: Design for repair and recycling evaluation' by Fraunhofer IZM (2013)<sup>78</sup> indicates on the basis of an interview with a recycler that plastics are separated in white (including light grey) plastics which are of significantly higher recycling value, and black plastics. Metal foils attached to plastic parts reduce the value of the plastics fraction, and might be given to an additional shredding process for separation. Coating and plastics parts attached to bulk plastics parts reduce the value of the plastics fractions PC/ABS, white mixed plastics and black mixed plastics from the perspective of the dismantler. Meaning that mono material plastic housing parts without coatings, inserted metal windings, metal shields attached are better to recycle than composite materials.
- On the other hand, according to Köhnlechner (2014)<sup>79</sup>, plastic sorting technologies can increasingly cope with black coloured plastics. Amongst others, sorting based on density separation as well as electrostatic properties of different polymer types can achieve high quality output for ABS and HIPS<sup>80</sup> – independent from the plastic colour.
- The Label TCO certified edge (version 1.2 for displays) requires a minimum content for post-consumer plastics of 65 % with exemptions for panels, electronic components, cables, connectors, PWBs, insulating mylar sheets and labels due to insufficient replacement. This also means that the weight of these items is not included when calculating the total weight of the plastic in the product in this requirement. The TCO database currently contains 89 products with 45 certifications compliant with this specification (date: 27.03.2014). This is further to the high level of recycled post-consumer plastic content being claimed by manufacturers such as Lenovo in the Task 4 report.

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<sup>78</sup> Cf. [http://www.izm.fraunhofer.de/content/dam/izm/de/documents/News-Events/News/2013/urn\\_nbn\\_de\\_0011-n-255111-18-1.pdf](http://www.izm.fraunhofer.de/content/dam/izm/de/documents/News-Events/News/2013/urn_nbn_de_0011-n-255111-18-1.pdf)

<sup>79</sup> Source: Köhnlechner, R.: Erzeugung sauberer PS- und ABS-Fraktionen aus gemischtem Elektronikschrott. In: Thome-Kozmiensky, K.T.; Goldmann, D.: Recycling und Rohstoffe, Volume 7. Munich, 2014.

<sup>80</sup> HIPS: High Impact Polystyrene; ABS: Acrylnitril-Butadien-Styrol

- Concerns were raised at the first AHWG about the verification of recycled content. An example of a traceability system was provided by the Belgian Competent Body. The QA-CER system is a third party verified quality management system developed by a Belgian certification body and the Flemish Plastics Centre<sup>81</sup>. The system is based on ISO 9001, as well the EN standards EN 15347 relating to the characterisation of waste polymers<sup>82</sup> and EN 15343 relating to the traceability of waste polymers<sup>83</sup>. The standard EN 15343 is of particular interest as an underlying reference for QA-CER as it described a system for tracing polymer waste flows recognising that a system for analytical testing to verify recycled content does not exist.
- Research by Peeters et al.<sup>84</sup> has highlighted the importance of considering the flame retardants incorporated into plastic components, particularly casings and enclosures, as these are added to the polymer to provide fire protection. The study looked at PC/ABS, which is understood to be commonly used in computer casings (where plastics are used). Problems with the stability of the polycarbonate component arise because of the need to use water-based density separation techniques for shredded black plastics. In the scenario examined an 82% pure PC/ABS could be obtained post shredding, density and optical separation. However, in reality the plastic recovered is required to achieve a V1 fire rating and to achieve a so-called 'yellow card' for the recyclate, certifying its fire rating. The result is a recommended upper limit of recycled content of 10%.
- Manufacturers may instead choose a metal casing, for the purposes of ensuring toughness and durability of the product (e.g. cast aluminium, magnesium oxide)

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<sup>81</sup> QA-CER, *QA-CER certification of the quality management system for recycling and production companies*, Version 1, January 2013

<sup>82</sup> CEN, *Recycled plastics – characterisation of plastics wastes*, EN 15347, December 2007.

<sup>83</sup> CEN, *Plastics recycling traceability and assessment of conformity and recycled content*, EN 15343, December 2007.

<sup>84</sup> Peeters.J.R, Vanegas.P, Tange.L, Van Houwelingen.J and J.R.Duflou, *Closed loop recycling of plastics containing Flame Retardants*, *Journal of Resources, Conservation and Recycling*, 84 (2014) p-35-43

and avoiding the need for treatments or additives to provide fire protection. Metal casings may not necessarily be readily recyclable. The alloy used may present problems for smelting.

### 3.4.1.3 *Second proposal for material selection criteria*

#### **Proposed revised criteria (second proposal)**

##### **“Material selection and information to improve recyclability”**

(a) Variety of plastics:

- (i) Plastic parts with a mass greater than 25 grams may consist of a single polymer or a polymer blend compatible for the recycling. The compatibility for recycling shall be verified.
- (ii) Overall in the product there shall be a maximum of 4 types of plastic used of plastic parts with a mass greater than 25 grams.
- (iii) Plastic used for housings and enclosures shall consist of a maximum of two polymers in a form that is compatible with recycling. The compatibility for recycling shall be verified.

(b) Surface coating / metal inlays: Plastic materials used for housings and enclosures shall have no surface coatings or metal inlays.

(c) Material information to facilitate recycling: Plastic parts with a mass greater than 25 grams shall be marked in accordance with ISO 11469 and ISO 1043, sections 1-4. The CAS number of flame retardants shall additionally be marked FR (ISO 1043-4 code)-CAS. For plastic parts > 200 grams, the marking should be large enough and located in a visible position in order to be easily identified by workers of specialised recycling firms.

Exemptions are made in the following cases:

- (i) Where the marking would impact on performance or functionality of the plastic part including screen light guides;
- (ii) Where parts cannot be marked because there is not enough available appropriate surface area for the marking to be of a legible size to be identified by a recycling operator;
- (iii) Where marking is technically not possible due to the moulding method; or
- (iv) Where the addition or location of marking causes unacceptable defect rates under quality inspection, leading to unnecessary wastage of materials

(d) Recycled content: Plastic parts of the housings and enclosures as well as of structural elements with a mass > 25 grams shall have a total content of post-consumer recyclates material of not less than 10% by mass. Where the post-consumer recyclate content is higher than 25% a declaration may be made in the text box accompanying the Ecolabel (see Criterion 7.2). Recycled content shall be demonstrated according to the requirements of ISO 15343. Recyclates may contain flame retardants that are specifically derogated in Criterion 2(c). Printed circuit boards as well as transparent plastics that form part of display units are exempted from this requirement.

(e) Closed loop recyclability rate of plastic containing flame retardants: The potential for closed loop recycling in a new electronic product of plastic required to meet fire protection standards shall be greater than 10%.

- (f) Recyclability of metal enclosures: The recyclability of metals and alloys used for casings shall be verified.

Assessment and verification:

The applicant shall provide the Competent Body with an exploded diagram of the computer in written or audio-visual format. This shall identify the plastic parts greater than 25 grams in mass, their polymer composition and compatibility for the recycling, as well as associated markings and identifications of flame retardants.

The information shall be supplemented by documentation to showing conformity to the above mentioned ISO standards, specifications of the marking (dimension and position) and, where applicable, exemptions. A technical justification shall be provided where an exemption applies.

The applicant shall provide the Competent Body with documentation verifying traceability for the post-consumer recycled content according to the above mentioned ISO standard.

The recyclability of the housing and enclosures shall be verified by a declaration from a permitted treatment operation in accordance with Article 23 of Directive 2008/98/EC (the WEEE Directive) that there is an end-market for the materials.

Major proposed changes

- The heading has been changed from “Material selection and information” to “Material selection and information to improve recyclability”.
- **Surface coating / metal inlays**: The requirement has been tightened and there are no exemptions considered for the use of coatings for metal inlays.
- **Recycled content**: The requirement is not limited to external plastics any more but now applies to all plastic parts and structural elements > 25 grams. To avoid misunderstandings, transparent plastic parts of display units such as PMMA light guides and printed circuit boards are exempted from this requirement. The threshold of 10 % remains unchanged because although the example of TCO Certified Edge Displays shows that there are a certain number of products being able to fulfil this criterion although there are still practical problems faced by even front runner manufacturers in consistently meeting a higher requirement. Instead it is proposed that – following the example of cotton content claims in the textile product group, where a higher content can be demonstrated – there is an option to display this in Box 2 next to the Ecolabel. This would provide a benefit to manufacturers wishing to work towards a high recycled content, without placing an overall burden which could reduce the selectivity of the Ecolabel.

- **Verification of recyclate content:** Concerns were raised at the first AHWG about the verification of recycled content. Given the existence of EN 15343 which provides a system for tracing the original and flows of waste polymers it is proposed that this is introduced as a third party verification required for recycled polymer content. It is to be discussed further with manufacturers whether the information currently collected to verify recycled content claims is sufficient to enable verification according to EN 15343.
- **Material information facilitating recycling:** Although some stakeholder comments claimed that plastic marking has little influence on recycling practices, other stakeholders reported that recyclers do use this information for their sorting activities. As the marking is widely established in practice, it is suggested to retain this requirement. In the new proposal, exemptions are made for cases where technical limitations or restrictions result in marking not being feasible. For example, transparent plastic parts of display units such as PMMA light guides, which are understood to be easy to identify, and printed circuit boards are exempted from this requirement. A technical justification shall be provided where an exemption applies. In addition it is proposed that the CAS number of any flame retardant incorporated into the plastic is marked according to the suggested notation.
- **Recyclability of plastic containing flame retardant:** There is the potential for a contradiction between the incentive within the criteria to increase the recycled content of plastics and a predicted future increase in the WEEE derived recyclate on the market containing flame retardants. Depending on the final ambition level of the hazardous substance Criterion 2.x this may restrict the use of certain recyclate. However, if a flame retardant is restricted in the Ecolabel because of concerns relating to, for example, incineration in end of life phase then it would seem beneficial to permit continued functional use within recyclate. It is therefore proposed that, subject to the FR not being restricted under REACH, identified as an SVHC on the ECHA Candidate List or restricted under EU End of Waste criteria, they shall be permitted within recyclate.

- **Metal used for enclosures:** It is understood that certain alloys and associated coatings which may be used instead of plastic for enclosures may present recycling problems. It is proposed that the applicants verify the recyclability of their material choice. Further information is, however, required from stakeholders in this area.

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### 3.4.2 Criterion 4.2 – Design for dismantling and recycling

#### 3.4.2.1 *Major proposed changes (first proposal)*

As laid out in the Task 4 report, manual dismantling is an important means to improve material recovery of, in particular, precious and critical metals, thus reducing the overall impacts of computer products. This can be facilitated by appropriate design. Nevertheless, the current requirements are not very specific regarding the dismantling process and the key components affected. Here, proposals developed by JRC-IES in support of implementation of the Ecodesign Directive (Ardente & Mathieux 2012) and approaches taken by other ecolabels (in particular Blue Angel RAL-UZ 78a) are more specific. Thus, it is suggested to introduce more specific requirements for the most relevant components of computers in terms of material recovery of precious and critical metals, which are

- Printed circuit boards > 100 cm<sup>2</sup>
- Displays > 100 cm<sup>2</sup>
- Rechargeable batteries.

This selection is based on the WEEE-Directive, which requires recyclers to separate these components during end-of-life management<sup>85</sup>.

Additional components identified as hot spots by the LCA analysis could also be added to the criteria. The following revised formulation is proposed:

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<sup>85</sup> Although the WEEE-Directive also requires separate treatment of other components (e.g. external electrical cables, plastic containing brominated flame retardants, mercury containing backlights), these fractions are of less relevance for the European Ecolabel as some constitutes are excluded from labelled products (e.g. plastic containing brominated flame retardants, mercury containing backlights) or do not represent any challenge in dismantling processes (e.g. external electric cables).

### Proposed revised criteria (first proposal)

#### “Design for disassembly and recycling”

For recycling purposes computers shall be designed so that

- (a) They shall facilitate easy (manual) disassembly in order to separate rechargeable batteries (if applicable), display units >100 cm<sup>2</sup> (if applicable) and printed circuit boards >100 cm<sup>2</sup>.
- (b) An efficient (manual) disassembly of display units >100 cm<sup>2</sup> (if applicable), rechargeable batteries (if applicable) and printed circuit boards >100 cm<sup>2</sup> by a specialised firm can be carried out using widely used commercially available tools (i.e. pliers, screw-drivers, cutters).
- (c) One person alone shall be able to disassemble display units >100 cm<sup>2</sup> (if applicable), rechargeable batteries (if applicable) and printed circuit boards >100 cm<sup>2</sup>.
- (d) Electrical modules shall be easily removed from the case.

#### Assessment and verification:

The applicant shall declare compliance with the requirements to the competent body.

The applicant shall provide a ‘test disassembly report’ to the competent body including disassembly procedures and tools needed for the disassembly supported by either:

- Test results verifying the time (in seconds) required for the different steps to disassemble the components during the testing. The timing shall be verified by a third party, which can include specialised recycling firms or testing bodies.
- Verification by a specialised recycling firm that the requirements of the criteria can be fulfilled. Firms shall be a permitted treatment operation in accordance with Article 23 of Directive 2008/98/EC.

The report may be submitted either in writing or by photo, drawing or in video format.

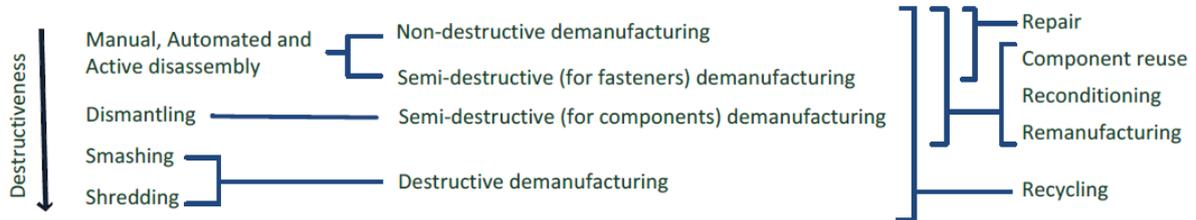
#### Major proposed changes

- The criterion ‘design for disassembly’ has been renamed ‘design for disassembly and recycling’; the focus of this criterion is now clearly set on recycling by removing the introduction “...for the purpose of undertaking repairs and replacements of worn out parts, upgrading older or obsolete parts...”. Typically dismantling for repair or upgrade purposes is carried out significantly different from dismantling for recycling: While the first one requires caution to avoid any damage, the latter can widely accept damage to parts as it solely aims at recycling. Thus, the structure of the requirements should clearly distinguish between both purposes. For this reason, requirements for the access and exchange of components for repair and/or upgrade are specified under ‘upgradeability and repairability’ (cf. section 3.3.5). In that sense, Peeters et al. (2012)<sup>86</sup> provides a very helpful structure of different demanufacturing processes, distinguishing between non-destructive, semi-destructive and

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<sup>86</sup> See <https://lirias.kuleuven.be/bitstream/123456789/348771/1/i-sup2012>

destructive demanufacturing, depending on the purpose (repair, reuse, recycling), see Figure 6.



**Figure 6: Overview of different demanufacturing processes and their level of destructiveness**  
(Source: Peeters et al. 2012)

- Some of the sub-requirements under the current criterion ‘design for recycling’ have been moved to the new proposed criterion ‘material selection and information’ (cf. section 3.4.1).
- The components being relevant in terms of LCA hot spots and material recovery of precious and critical metals have been specified.
- The disassembly process has been specified (specialised firm, one person alone, use of universal tools).
- For the assessment and verification, the provision of a ‘test disassembly report’ has been proposed with two options for third party verification.

Ideally, as proposed by JRC-IES (Ardente & Mathieux 2012) for televisions and LCD displays<sup>87</sup>, the above listed requirement would also incorporate a threshold for the disassembly time in seconds for the different specified parts and components.

However, according to Ardente & Mathieux (2012), the testing and verification of such a dismantling-time benchmark would require a detailed standardised test and measurement procedure as the manual dismantling time depends on various factors:

- Minimum working experience of disassembler or operators (e.g. number of years working in the sector);
- Pre-conditions for the measurement (e.g. knowledge of the product’s structure and location of the part to be disassembled, including access to relevant

<sup>87</sup> Ardente, F.; Mathieux, F.: Integration of resource efficiency and waste management criteria in European product policies – Second phase. Report no 2, Application of the project’s method to three product groups. Joint Research Centre – Institute for Environment and Sustainability, Ispra, 2012

information from manufacturers as videos and exploded diagrams of the product);

- The sequence of the steps in the disassembly;
- Tools or machine / equipment to be used for the disassembly (e.g. common tools and machines in use in recycling plants for dismantling);
- Typology and precision of instruments used for measurement of the time;
- Uncertainty of the measurement and tolerance of the results.

As such a test and measurement procedure is not currently available, and pending further guidance in support of the Ecodesign process, the above listed criteria would either have to be specified in the User Manual for the product group or other means for verification would need to be specified. An alternative proposal for verification by registered specialised firms is therefore proposed.

For more details cf. Task 4 report “Improvement Potential”, section 4.2.4.2 “End-of-life management of computer products”.

#### Consultation questions

- Have similar testing procedures based on timed dismantling or verification by dismantlers been developed in other countries or regions?
- Could the alternative proposal for verification by specialised dismantlers be workable and if so, would any supporting requirements or procedures need to be introduced into the criteria or the User Manual?
- Are there other examples of verification procedures for this type of criteria that may be relevant?

#### 3.4.2.2 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, timing for dismantling was felt to be challenging. The timing could simply be a tick box or figure to record for verification purposes. This approach could work where there is closer connection between manufacturers and the end-of-life phase for products. The product will only be dismantled in 3-4 years time ahead.

Not only manual dismantling should be considered but also the detoxification of the key components such as printed circuit boards.

It was noted that a similar criteria is to be incorporated into Ecodesign for Televisions and that this may inform a new ISO standard for dismantling.

Clarification was requested on the size of circuit boards for dismantling which was indicating a 100 cm<sup>2</sup> threshold. The main board contains the majority of the precious metals. The threshold should be clarified as to whether it refers to the total area of boards or individual board sizes.

An alternative proposal was made to set a requirement to recover a high proportion of the metal content. This would require consideration of where the metal parts are within the computer. It was noted that metal scrap with a 30% residual polymer content is acceptable for smelters.

Finally, it was proposed that the potential for a reduction in the amount of critical metals could also be considered.

*Written stakeholder feedback following the first AHWG meeting*

- It is suggested to clarify that this is disassembly for recycling only.
- A maximum time limit to indicate "cost-effective separation of components and materials" based on testing with existing manual recycling processes is recommended. It is essential that this requirement includes a maximum time limit, or else it does not provide adequate indication of how easy "easy" really is. Different targets would be required for laptop and tablet computers. It is accepted that specific methodologies for time can be elusive. However, if a manufacturer is able to demonstrate that a disassembly expert can separate the key components within e.g. 60 seconds, this improves the chance of a high-quality manual recycling process being implemented (even if in reality it takes a typical recycling operative twice as long.)
- There exists a stockpiling of panels due to what recycling firms consider the uneconomical extraction of the mercury due to intricate dismantling and risk for spill. If CCFL are continued to be permitted, then an easy extraction of the lamps and mercury shall be demanded.
- Missing: A restriction on halogens as part of the polymer facilitates separation and reuse. Glued in or in-moulded are for example also demanded in TCO Certified Displays.

- The proposed criteria should be checked carefully as WEEE has some 'pre-treatment' requirements which are legally required. If the suggested ecolabel requirement is identical with WEEE it can be removed as ecolabel criteria should only address non-legal requirements.
- The criteria proposed for (easy) disassembly is generally supported because separate treatment of the respective components allows a much higher efficiency of the following material recycling steps. But the proposed requirement (d) "Electrical modules shall be easily removed from the case." needs to be phrased more clearly and possibly a more differentiated way regarding the various kind of products covered (desktops, notebooks, tablets). E.g. beside circuit boards, HDD contain relevant shares of critical raw materials and should be treated separately. For notebooks and (even more) for tablets, it might be appropriate to consider ongoing developments for their targeted treatment (focussing on a quantitative recovering of the included critical raw materials). This would contribute to the formulation of more precise requirements on design for recycling supporting such treatments in further revisions of the Ecolabel.
- Another publication was recommended as providing more information on design for disassembly<sup>88</sup>

#### Further research and further evidence

Based on the feedback from stakeholders, follow-up research focused on the potential to support the recovery of critical raw materials and other relevant materials. The research aimed at identifying materials and components that should be prioritised for the EoL treatments, reflecting the approach taken by JRC-IES in support of the draft revision of the Ecodesign Implementing Measure for Televisions (and Displays) EC/642/2009<sup>89</sup>.

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<sup>88</sup> See <https://lirias.kuleuven.be/bitstream/123456789/348771/1/i-sup2012>

<sup>89</sup> European Commission, Integration of resource efficiency and waste management criteria in European product policies: Application of the project's methods to three product groups, JRC-IES, November 2012

## Identifying Critical Raw Materials from an EU perspective

A first step is to define and identify Critical Raw Materials (CRM). The availability of Critical Raw materials has been highlighted as a strategic policy issue by the European Commission. Under the EU Raw Materials Initiative a working group has identified and listed the Critical Raw Materials from a geo-political and economic point of view<sup>90</sup>. The list is based on a time horizon of ten years, so geological scarcity was not a central consideration, with the increasing demand for products containing CRM's cited instead as an important factor. Recyclability and the potential for substitution were also factors considered in the creating the initial list.

**Table 14: Initial list of critical raw materials at EU level**

Antimony	Indium
Beryllium	Magnesium
Cobalt	Niobium
Fluorspar	PGMs (Platinum Group Metals) <sup>a</sup>
Gallium	Rare earths <sup>b</sup>
Germanium	Tantalum
Graphite	Tungsten

Notes:

- a) *Platinum, palladium, iridium, rhodium, ruthenium and osmium*
- b) *Yttrium, scandium, and the 'lanthanides' - lanthanum, cerium, praseodymium, neodymium, promethium, samarium, europium, gadolinium, terbium, dysprosium, holmium, erbium, thulium, ytterbium and lutetium*

Lithium and chromium were at the time on the borderline of being identified as CRM. However, the list is currently being revised by the Commission and it is understood their economic importance and supply risk have shifted, bringing them within the definition of 'criticality'<sup>91</sup>.

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<sup>90</sup> European Commission, *Critical raw materials for the EU*, Report of the Ad Hoc Working Group on defining critical raw materials, DG Enterprise and Industry, 30<sup>th</sup> July 2010

• <sup>91</sup> Mattia Pellegrini, *DG Enterprise & Industry: Raw Materials Initiative – Criticality Study*, Presentation to EU-U.S. Expert Workshop on Raw Material Flows & Data, 6-7 November 2013

Of direct relevance to development of this EU Ecolabel criterion is the recommendation made within the 2010 report that policy actions are undertaken to 'make recycling of raw materials-containing products more efficient' including 'mobilising end of life products with critical raw materials for proper collection'. A specific recommendation is also made that:

*'...overall material efficiency of critical raw materials should be achieved by...minimising raw material losses into residues from where they cannot be economically-recovered.'*

### **Identifying metal, CRM and plastic components of life cycle significance**

The preliminary background reports for the revision of the EU Ecolabel and GPP criteria for computer products published in October 2013 contained a screening of LCA (Life Cycle Assessment) studies for desktop, notebook and tablet computers<sup>92</sup>. The aim of this screening was to identify comprehensive, quality studies that would support the identification of 'hot spots' of environmental impact in the life cycle of these products.

These studies have been screened further in order to identify hot spots relating to specific metals, CRM's or plastics. The results are summarised in

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<sup>92</sup> Cf. <http://susproc.jrc.ec.europa.eu/computers/stakeholders.html>, Task 3 report

Table 15 below. Whilst many of the studies did not provide sufficiently detailed analysis to identify hot spots in greater detail than main components, it was in some cases possible to identify additional hot spots because these were presented within the analysis (for example, Maga et al 2012) or through interrogation of the system networks arising from the LCA modelling (for example, Cirotto and Franze 2011).

Draft document

**Table 15: Screening of LCA evidence for relevant metals or plastics**

Study	Component hot spots	Sub-component hot spots	Metals (including CRM's), and other relevant materials
<b>Notebook computers</b>			
Ciroth, A and J,Franze (2011)	<p>The normalised results for climate change, human health, human toxicity and fossil depletion highlighted the:</p> <ul style="list-style-type: none"> <li>• Motherboard</li> <li>• LCD module</li> </ul>	<p>Identified from one or more of the normalised mid-points are:</p> <ul style="list-style-type: none"> <li>• LED backlight (all three midpoints)</li> </ul>	<ul style="list-style-type: none"> <li>• Gold in PCB's</li> <li>• Copper in Integrated Circuits and LCD modules</li> <li>• Tin in LED lamps</li> </ul>
Siddarth.P, Liu.R, Schischke, K and L,Stobbe (2012)	<p>Aluminium, copper and iron are assumed to be recovered.</p> <p>'Business as usual' and 'high recovery rate' scenarios are used to examine the sensitivity based on variations in the recovery of:</p> <ul style="list-style-type: none"> <li>• Gold (40-93%),</li> <li>• Silver (40-87%)</li> <li>• Palladium (40-91%)</li> </ul> <p>A variance in Greenhouse Gas Emissions of 0.5 – 0.9% was estimated.</p>	<p>It is not possible to identify sub-component hot spots from the published study.</p>	<ul style="list-style-type: none"> <li>• Aluminium and steel in the chassis and housing</li> <li>• Gold, silver and palladium in PCB's</li> </ul>
<b>Desktop computers</b>			
Song.Q, Wang.Z, Li.J, and W.Yuan (2013)	<p>The normalised results for a desktop unit, represented by ten LCIA indicators using the CML method highlighted, in descending order of importance, the:</p> <ul style="list-style-type: none"> <li>• Motherboard</li> <li>• Power Supply Unit</li> <li>• Optical drive</li> <li>• HDD</li> <li>• Steel and aluminium in the housing</li> </ul> <p>The motherboard and LCD unit are significant in terms of the separate LCD screen unit.</p>	<p><i>It is not possible to identify sub-component hot spots from the published study.</i></p>	<ul style="list-style-type: none"> <li>• Tin, nickel and copper are identified as being significant in terms of resource depletion</li> <li>• Extraction of arsenic and cadmium were identified as the most significant contributors to water pollution.</li> </ul>
Duan.H, Eugster.M, Hischer.R, Streicher-Porte.M and J,Li (2008)	<p>The normalised results for the end-points resources, ecosystem quality and human health highlighted, in descending order of importance, the:</p> <ul style="list-style-type: none"> <li>• Motherboard</li> </ul>	<p><i>It was not possible to identify sub-component hot spots from the published study.</i></p>	<p><i>It was not possible to identify specific materials from the published study.</i></p>

Study	Component hot spots	Sub-component hot spots	Metals (including CRM's), and other relevant materials
	<ul style="list-style-type: none"> <li>• Power Supply Unit</li> <li>• Optical drive</li> <li>• HDD</li> <li>• Cables</li> </ul> <p>The LCD unit and electronics are significant in the separate LCD screen unit.</p>		
Maga.D, Hiebel.M and C,Knerman (2012)	<p>Based on characterised results for Global Warming Potential, human toxicity and aquatic ecotoxicity:</p> <ul style="list-style-type: none"> <li>• Motherboard (desktop and LCD)</li> <li>• Power Supply Unit</li> <li>• Optical drive</li> <li>• LCD module</li> </ul>	<p>The analysis of a thin client identified the following sub-components as significant based on their contribution to GWP:</p> <ul style="list-style-type: none"> <li>• Integrated Circuits: The silicon wafer and gold</li> <li>• Capacitors and coils: Aluminium, copper and iron,</li> <li>• Panel plating: Copper, nickel and chromium (specific to the housing)</li> <li>• Casing: Steel sheet</li> <li>• Backlighting: LED's</li> <li>• Controller board (DIMM memory module)</li> </ul>	<ul style="list-style-type: none"> <li>• Gold, copper, aluminium and iron are identified in relation to circuitry and capacitors;</li> <li>• Steel, copper, nickel and chromium are identified in relation to the casing and plating</li> <li>• Cross referencing to Ciroth and Franze (2012) may suggest tin in relation to LED's</li> </ul>

### Critical metals and raw materials inventory

A number of bills of materials (BOM) for computer products were identified and presented in the background report on Hazardous Substance published in September 2013<sup>93</sup>. Aside from metal and plastic associated with enclosures and the chassis these did not identify CRM occurrence within product sub-components. Literature was therefore reviewed in order to identify a bill of materials for CRM's.

Indicative BOM's for a notebook computer and a desktop computer have been identified based on analysis by Oeko-Institut<sup>94</sup>.

<sup>93</sup> Cf. <http://susproc.jrc.ec.europa.eu/computers/stakeholders.html>, Hazardous substance report

<sup>94</sup> Oeko-Institut, *Recycling critical raw materials from waste electronic equipment*, Commissioned by the North Rhine-Westphalia State Agency for Nature, Environment and Consumer Protection, 24th February 2012 and Oeko-Institut, *Informal e-waste management in Lagos, Nigeria – socio-economic impacts and feasibility of international recycling operations*, UNEP SBC project, June 2011

It can be seen from the BOM that CRM's are concentrated in a small number of main components, primarily the motherboard, batteries, HDD, optical drives and LED backlights. Sub-components can then be identified that would then require extraction in order to recover the CRM's – for example, capacitors containing tantalum, magnets containing neodymium, LED cells containing gallium.

**Table 16: Indicative occurrence of high value metals and CRM's in an indicative notebook computer**

Metal	Content per notebook (mg)	LCA hot spot	EU CRM	Occurrence in the notebook
Cobalt	65,000		✓	Lithium ion batteries
Neodymium	2,100		✓	HDD motors and accelerators (70%) Loudspeakers (30%)
Tantalum	1,700		✓	Motherboards capacitors (90%) Other PCB capacitors (10%)
Silver	440	✓		Motherboard (57%) Other PCB's (43%)
Praseodymium	270		✓	HDD accelerators (53%) Loudspeakers (47%)
Gold	100	✓		Motherboard (54%) Other PCB's (46%)
Dysprosium	60		✓	HDD accelerators
Indium	40		✓	Display and LED Backlights
Palladium	40		✓	Motherboard (64%) Other PCB's (36%)
Platinum	4		✓	HDD platters
Rare Earths <sup>a</sup>	2.48		✓	LED backlights
Gallium	1.6		✓	LED backlights

Notes:

a) Yttrium, gadolinium, cerium, europium

**Table 17: Indicative occurrence of high value metals and CRM's in an indicative desktop computer (without display)**

Metal	Content per desktop (mg)	LCA hot spot	EU CRM	Occurrence in the notebook
Steel	6,737.50	✓		Chassis and enclosure
Plastics	1,579.55			Enclosure, cables, peripherals
Aluminium	550.21	✓		Chassis, capacitors, HDD platters
Copper	413.225	✓		Circuitry, cables, capacitors
Zinc	25.94			-
Tin	19.57	✓		Solder
Antimony	18.58		✓	Solder, flame retardants
Nickel	12.70	✓		Metal plating
Neodymium	5.87		✓	HDD motors and accelerators Loudspeakers
Silver	1.70			Motherboard and other PCB's
Gold	0.26	✓		Motherboard and other PCB's
Palladium	0.12		✓	Motherboard and other PCB's
Chromium	0.02			Coatings
Ceramics & others	366.04			Heat sinks, power supply units and capacitors

### Market potential for dismantling and CRM recovery

Whilst it is possible to identify components and sub-components for selective extraction it does not follow that their extraction is currently economically or technically feasible. Relevant market commentary on the potential for their recovery and recycling has therefore been briefly reviewed summarised in order to inform the identification of components and sub-components for which recycling is a realistic prospect either now or within the validity period for the Ecolabel criteria. The three main sources are Oeko-Institut<sup>95</sup>, JRC-IES<sup>96</sup> and WRAP<sup>97</sup>. Other sources are referenced where relevant.

<sup>95</sup> Oeko-Institut, Recycling critical raw materials from waste electronic equipment, Commissioned by the North Rhine-Westphalia State Agency for Nature, Environment and Consumer Protection, 24th February 2012

The collection of WEEE in Europe has grown rapidly since the introduction of the WEEE Directive in 2003 and this is set to increase further as the recast WEEE Directive is transposed at a European level. Treatment centres tend to be a mixture of large processing centres handling a wide range of different types of WEEE and niche operators concentrating on a few or even single streams. Centres may consist of a combination of manual dismantling and sorting of components with bulk shredding and detoxification (e.g. mercury removal from LCD screens)<sup>96</sup>. Selected components may then be sent to specialist smelters (e.g. PCB's) or be subject to automatic or manual separation (e.g. plastics).

The main plastics fraction (e.g. PC/ABS casing), steel and aluminium chassis, alloy casings (painted or unpainted), rechargeable lithium ion batteries, capacitors with a diameter larger than 2.5 cm, external power cables and Printed Circuit Board's larger than 10 cm<sup>2</sup> are generally extracted and passed on to the relevant markets for materials recycling.

From a resource point of view, leading actors in the specialist metals and CRM market claim that some manual pre-treatment, including complete removal of PCBs and other components such as HDD's, followed by subsequent recovery of the precious metals would enable a significantly more efficient recovery of various metals, CRM's and REE's<sup>97</sup>. Taking silver, gold and palladium as examples the recovery rate could be increased in selected scenarios from 12-26% to 90%.

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<sup>96</sup> European Commission, *Report n° 2. Application of the project's methods to three product groups (final)*, JRC-IES, November 2 01 2

<sup>97</sup> WRAP, *Strategic raw materials, recovery capacity and technologies*, Final report, 26<sup>th</sup> March 2012, UK.

<sup>98</sup> Meskers.C.E.M and C.Hagelüken, *The impact of different pre-processing routes on the metal recovery from PC's*, Conference paper *Resource management and technology for material and energy efficiency*, EMPA Materials Science and Technology, September 2009.

<sup>99</sup> C. Hagelüken and C. E. M. Meskers, *Complex life cycles of precious and special metals*, Chapter 10 from *Linkages of Sustainability* (2010) Strüngmann Forum Report, Edited by Thomas E. Graedel and Ester van der Voet.

A recent industry survey conducted by WRAP suggested that to a great extent removal by manual treatment of HDD (82%), circuit boards (88-94%), plastics incorporating brominated flame retardants (82%), capacitors (79%), speakers (75%) and LCD displays (88%) already takes place, although it is not clear the extent to which this can be taken to be representative of the picture across the EU.

### **Plastic casings**

While there is no legal requirement in the EU for computer enclosures to meet a specific level of fire protection it is understood that plastic casings are specified to meet a V1 (FR4) standard. The market value of a plastic casing containing flame retardants that meets a specified fire protection standard is not currently clear. JRC-IES states in their Ecodesign case study that plastics containing flame retardants are generally not recyclable after shredding, as evidenced by IEC 62635. A recent study on industry trials suggested that a purity rate up to 82% can be achieved for the separation of some plastics, as PC/ABS containing phosphorus FR's<sup>100</sup>. This result is based on optical and density-based sorting treatments of plastics after shredding.

Technically there is not understood to be a barrier to use of this recyclate, although the plastic and the incorporated FR must first be identified, and such separation for recycling is not yet commonplace. Despite the prevalence of shredding the recent REWARD/EFRA pilot study highlights the importance of plastics marking and the provision of information about the FR's used as being important to facilitate recovery and recycling<sup>101</sup>.

### **Printed Circuit Boards (PCB's)**

The main economic aim of recovering PCB's is to recover the copper, gold, silver and palladium. Currently, CRMs are primarily recovered from circuit boards at large metal refining facilities designed to handle complex streams of metal containing wastes<sup>102</sup>.

They can then be refined from copper alloys. Although a range of additional metals

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<sup>100</sup> Peeters et al. (2013)

<sup>101</sup> EFRA (2013) *Recycling of plastics from LCD television sets*

<sup>102</sup> Van Kamp.M and A, Vasseur, *Raw materials sustainability: Collaborating towards a better world*, Presentation to the Future Circular Materials Expo, Sweden, 2013

are obtained by this route other critical metals such as tantalum in capacitors are lost in this process – so-called ‘dissipative losses’. Successful recovery of CRM’s such as tantalum would require the prior separation and removal of related sub-components, such as tantalum capacitors. This type of sub-component extraction is only carried out on a pilot scale. It is understood that the economics of separation are marginal and that some pilots may have been discontinued.

### **LCD/LED display units**

Displays are usually recycled thermally in waste incineration plants or in the Waelz kiln process for steel mill dust. The organic components (liquid crystals, polarisation filters, resins) are generally shredded and may then be incinerated, and the glass along with the oxidized metals remains bound in an inert slag. The indium contained in the displays is generally lost through dissipation<sup>103</sup>.

Several pilot and laboratory technologies have been already developed for Indium<sup>104</sup> and rare earths<sup>105</sup> recovery. However there are currently no large scale recycling facilities for the separation and refining of indium from the display units and the rare earths from the background illumination. The very low indium content and lack of another significant metal to recover in each LCD unit makes the economics of recovery very challenging. However, with indium supplies being dependant on lead or tin extraction there is the potential for exposure of the electronics sector to price volatility.

In view of the need to protect future supplies of indium, Germany is understood to be considering storage of dismantled display units for recycling at a later date. It has been postulated that some form of chemical leaching process might in the future be more promising than a smelting process.

The rare earth elements contained in the luminescent materials are currently not recycled. Up until now the luminescent materials and rare earth elements contained

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<sup>103</sup> See Oeko Institut (2012)

<sup>104</sup> Kye-Sung Park, Wakao Sato, Guido Grause, Tomohito Kameda, Toshiaki Yoshioka. *Recovery of indium from  $In_2O_3$  and liquid crystal display powder via a chloride volatilization process using polyvinyl chloride*. *Thermochimica Acta* 2009

<sup>105</sup> See HydroWEEE projects

in display units e.g. yttrium, europium, terbium, were sent to landfill following shredding. However, several mobile pilot plants are being developed to recover metals like copper, manganese, zinc, yttrium, indium from WEEE by hydrometallurgical processes.

### **LED backlights**

The CRM's and rare earth metals used in the manufacture of LED backlight units are related to doping and luminescence. They can include indium, gallium, cerium, europium, yttrium and gadolinium. The weight per substance typically amounts to only  $\mu\text{g}$ 's per LED. There is no current reliable information on the potential to recycle LED chips.

### **PMMA display light guide**

The plastic light guides within an LCD display constitute a large proportion of the plastic used in a TFT display. In particular the PMMA light guide has been identified as a sub-component that is readily identified and which is readily recyclable according to IEC 62635. However, JRC-IES identified that without prior manual separation the PMMA light guide, together with other large technical plastic layers from within the display unit, may be dispersed among other shredded fractions as it is difficult to then separate by density. On the other hand, PMMA sorted from other fractions before shredding can be recycled for the production of new boards of the same quality.

### **Hard Disk Drives (HDD's)**

Attention is increasing on the potential to recover REE's from HDD's. Whilst the physical quantity per HDD is relatively low the large volume of drives manufactured is understood to make them a potentially attractive recovery stream. The larger 3.5 inch HDD format used in desktop computers, servers and datacentres are of potentially greater interest in terms of the quantity of materials for recovery.

Their physical design can, however, hamper recovery of Rare Earth Metals such as neodymium from magnets. Amongst the problems cited include their compact design, the type/range of screws used and the use of glues to attached plastic enclosures to metal housings. The loss of REE content can therefore be high because HDD's may enter mechanical shredding routes.

Industry initiatives to recover REE's from HDD's can be identified. A rapid recovery process is, for example, being developed by Hitachi, a major HDD manufacturer, which would enable eight times faster recovery than a manual route. It is also noteworthy that Solid State Drives (SSD) typically contain only 0.001% w/w REE compared to 0.2% w/w for HDD.

### **Lithium ion batteries**

Lithium ion batteries are addressed by the collection requirements under the Batteries Directive 2006/66/EC but it is understood that their recovery rate is currently low, with a recent report claiming as low as 5%<sup>106</sup>. This is understood to largely be the result of a significant stock held by consumers. The Batteries Directive specifically highlights the importance of ease of recovery for batteries stating in Article 11 that:

*'Member States shall ensure that manufacturers design appliances in such a way that waste batteries and accumulators can be readily removed.*

*Appliances into which batteries and accumulators are incorporated shall be accompanied by instructions showing how they can be removed safely...'*

As this issue is of high significance to both product lifespan and resource recovery it is therefore proposed to be addressed within the frame of the EU Ecolabel. The potential for OEM take back routes that ensure that batteries are smelted to recover cobalt is to be discussed further.

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<sup>106</sup> ENDS Europe, *Low recycling rates for lithium batteries criticised*, 14<sup>th</sup> February 2013

## Establishing a comparable test method for timed dismantling

Reference is proposed to analysis and discussion led by JRC-IES to develop a standardised method for the measurement of the timing of dismantling. The timing for this process is likely to extend beyond the programme for adoption of the new EU Ecolabel criteria for computers.

- In the interim an extraction method to ensure comparability would therefore need to be outlined in the User Manual based on the work to date by JRC-IES<sup>107</sup>. Outline steps for the method are for example described in Box 1.

### Box 1: Outline steps for the measurement of the time for the extraction of certain target parts in electronic displays

#### Terms and definitions

- *Target parts*: Parts and/or components that are targeted for the extraction process.

#### Operating conditions for the extraction

- *Extraction sequence to be followed*: The Extraction sequence to be followed has to be set out prior to the measurement. The sequence shall be documented and provided to the third party carrying out the extraction.
- *Tools for extraction*: The extraction operations should be performed using manual or power-driven standard tools.

#### Extraction time measurement

- *Measurement sample*: The sample of EEE to be used for the measurement shall be undamaged.
- *Measurement*: The extraction time measurement consists of the measurement with an instrument of the time elapsed between the starting of the first operation listed in the extraction sequence documentation and the end of the last one.

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<sup>107</sup> Joint Research Centre – Institute for Environment and Sustainability - “Analysis of dismantleability”  
- draft 2014

### 3.4.2.3 Second proposal for dismantling and recycling criteria

#### Proposed revised criteria (second proposal)

##### “Design for dismantling and recycling”

For recycling purposes computers shall be designed so that:

- (a) For the following components an efficient manual disassembly by one person in a specialised company shall be possible to carry out using widely used commercially available tools (i.e. pliers, screw-drivers, cutters and hammers as defined by ISO 5742, ISO 1174, ISO 15601):

##### All products

- (i) Printed Circuit Boards relating to computing functions  $>10 \text{ cm}^2$

##### Stationary computer products

- (i) Internal Power Supply Unit  
(ii) HDD drives

##### Portable computer products

- (i) Rechargeable battery

##### Displays (where a display is integrated into the product enclosure)

- (i) Printed Circuit Boards  $>10 \text{ cm}^2$   
(ii) Thin Film Transistor unit and film conductors in display unit  $>100 \text{ cm}^2$   
(iii) LED backlight units

The applicant shall measure and specify the required manual dismantling time for those components relevant to the product.

- (b) At least two of the following components shall also be efficiently manually disassembled with reporting of the additional time requirement based on the fastest identified sequence following on from (b):
- (i) Printed circuit boards  $\leq 10 \text{ cm}^2$  and  $> 5 \text{ cm}^2$   
(ii) Tantalum-capacitors  $\geq 2 \text{ mm} \times 2 \text{ mm} \times 3 \text{ mm}$  from printed circuit boards in (a) and (b)  
(iii) HDD drive (portable products)  
(iv) Speaker units (notebooks and integrated desktops)  
(v) Optical drives (where applicable)  
(vi) Polymethyl Methacrylate (PMMA) film light guide (where the screen size is  $>15$  inches)

##### Assessment and verification:

The applicant shall provide a ‘test disassembly report’ to the competent body including the adopted disassembly sequence (steps and procedures), identification of the optional components selected, the reported timings and the tools needed for the disassembly. Reference shall be made to the extraction timing method outlined in the user manual.

The reported timings for disassembly and the related disassembly sequence shall be provided for verification by either:

- (i) A third party, testing body.  
(ii) A specialised recycling firm that is a permitted treatment operation in accordance with Article 23 of Directive 2008/98/EC.

The report may be submitted either in writing or in digital format, supported by photos, drawings and/or videos.

Major proposed changes:

- The heading has been changed from “design for disassembly and recycling” to “design for dismantling and recycling”.
- The threshold for the extraction of printed circuit boards has been lowered from 100 cm<sup>2</sup> to 10 cm<sup>2</sup> as this is in line with the relevant threshold of the current WEEE-Directive. A lower threshold is also introduced in order to reflect the potential for smaller PCB’s in devices such as tablets.
- The identification of components has been expanded and made more specific in order to reflect the LCA hot spots, CRM/REE occurrence and market potential identified by the follow-up research. It is proposed that a core set of components are set as requirements for all products and are subject to a timed extraction according to the specified sequence, with variation between stationary and portable products, as well as those with integrated displays.
- A separate list of components and, where relevant, sub-components that are more challenging to extract are also identified. It is proposed that in order to draw attention to their importance applicants shall demonstrate a timed extraction for a minimum number of these components or sub-components, which in some cases are specific to certain product form factors.
- A requirement on measuring the dismantling time is retained throughout. This approach is proposed by the Commission for introduction into Ecodesign requirements for electronic products, being an important proxy for economic first stage manual dismantling.
- Verification for the timed extraction of components is proposed to be flexible with two alternative options presented - a third party option and a ‘real-life’ option in a WEEE treatment facility. The latter option mirrors a similar verification option for dismantling criteria 4.1.1.3, 4.3.1.5, 4.3.1.7 and 4.3.2.1 in the EPEAT standard for computers (IEEE 1680.1).
- It is proposed that the manufacturer establishes a suitable dismantling sequence for its product, and then uses this as the basis for commissioning the testing/measurement of the timing (to verify compliance to the criteria). The

testing would therefore be carried out by a third party knowing in advance the sequence suggested by the manufacturer.

- The potential for a manufacturer to self-verify in their own labs is not felt to be appropriate because it would represent optimised conditions whereas in real-life a dismantler may have to deal with a wide variety of models without the benefit of an OEM's familiarity with their own product.
- The proposal does not contain any time-related benchmarks. Instead the applicant shall report on the timing achieved by the third party following the extraction time measurement methodology to be provided in the User Manual.

### 3.4.3 Criterion 4.3 – Packaging

#### **Present criteria, Decisions 2011/337 and 2011/330**

Where cardboard boxes are used, they shall be made of at least 80 % recycled material.  
Where plastic bags are used for the final packaging, they shall be made of, at least, 75 % recycled material or they shall be biodegradable or compostable, in agreement with the definitions provided by the EN 13432 or equivalent.

Assessment and verification: a sample of the product packaging shall be provided on application, together with a corresponding declaration of compliance with this criterion. Only primary packaging, as defined in European Parliament and Council Directive 94/62/EC, is subject to the criterion.

#### **Consultation questions**

- The technical analysis and literature review of LCA studies (see Task 3) clearly shows that the packaging of computers and displays is of negligible relevance with regard to environmental impacts. Against this background it shall be discussed if this criterion should be retained?

#### 3.4.3.1 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, it was felt that this is an environmental policy issue and that cardboard with a high recycled content is not difficult to achieve – although the practical % threshold varied between 60% and 80% depending on the availability of the recycled feedstock.

#### Written stakeholder feedback following the first AHWG meeting

- If it is decided to include packaging, a complete harmonization with EPEAT, the IEEE1680.2 standard is recommended.
- One of the MS stakeholders proposed to keep the criterion if it is feasible for the applicants. Given the amount of packaging from all computers sold the impact is not negligible (however insignificant). In order to ensure consistency with other EU policies, the requirements set out should remain unchanged.
- The requirements on plastic packaging in the different EU Ecolabel product groups are confusing, both quantitatively and qualitatively. The percentages vary from zero to 100 % of a variety of materials such as recycled material, recyclable material, renewable material, biodegradable material, compostable material, etc.
- It should be proven that packaging has a major influence on the sustainability impact of the whole system (content + packaging) if criteria should be set. For

computers, as for many other energy using products, the impact of the packaging over the full life cycle is usually marginal. The technical analysis and literature review of LCA studies clearly shows that the packaging of computers is of negligible relevance with regard to environmental impacts. If this is true and the EU Ecolabel criteria should address main environmental impacts, then there should not be criteria on packaging.

- There are strong doubts on the feasibility of this requirement regarding a minimum percentage of recycled material for packaging. The proposed percentage is definitely too high for plastics and for many other packaging materials. A fixed minimum percentage of recycled material for the different plastics used in packaging is neither feasible nor acceptable for the industry, because it does not allow guaranteeing the required level of quality and performance. A lower performance of the packaging will result in increased likelihood of damaging the packed product, and hence will increase the amount of waste. Such a criterion would discriminate/exclude most plastics from being used as packaging materials for this product group.
- The use of recycled material is environmentally beneficial only if: material losses in the recycling loop are limited; the substitution ratio is higher than about 0.7 (i.e. 1 part of recycled material replacing about 0.7 parts of virgin material). When the virgin material performance is improved in such a way that the thickness can be reduced, then the use of recycled material may become environmentally more damaging. We are very sceptical about using recycled content as a criterion for plastic packaging in EU Ecolabel criteria. Also for packaging, a life-cycle benefit from used recycled materials cannot automatically be assumed, but would be dependent on the plastics type and the impacts of the collection/recycling process. Besides, computers are not packaged on 'plastic bags'. They may be protected by a plastic film which must ensure effective protection from humidity, dust, etc. Using recycled material in such relatively thin, but very protective, films may not be possible. Since we do not see any comparative life cycle analysis showing that the requirement of "at

least, 75% recycled material “, is beneficial for the environment, we ask to remove this requirement.

- Comments on “biodegradable or compostable” plastic bags for packaging: Biodegradability or compostability, according to EN 13432, is not a guarantee of superior environmental performance. It only guarantees that the material, if discarded in the right waste fraction, collected and adequately managed, will disappear as water and CO<sub>2</sub>, which means no resource saving. The inadequately managed fraction that will end in landfill will generate methane. Methane is a greenhouse gas more than 20 times more powerful than CO<sub>2</sub>. We advise using for packaging the most sustainable packaging material as proven by a life-cycle analysis for the respective application. Recycling content or biodegradability can be part of a life-cycle analysis, but per se they are no indicators for a more sustainable or "greener" packaging. It is questionable whether biodegradable packaging for computers brings any environmental advantage. We wonder where the life cycle assessments are, guaranteeing that these two criteria will reduce the impact on the environment. Again, by lack of scientific proof, we ask to remove the requirements for biodegradable and compostable material.

#### Further research and evidence

##### **Compostable plastics**

The term “biodegradable” is not equivalent to “compostable”. Whereas biodegradability is an inherent property that is independent of time and space, compostability is specifically related to the conditions in a composting plant.

Compostability is the ability of biological degradation in a defined time under controlled conditions in a composting plant. The European standard (EN 13432 standard for bioplastic packagings and EN 14995 for plastic waste) requires 90% degradation within 90 days.

According to UBA (2012) there was criticism because typical rotting times in reality are often shorter than 12 weeks, the period for which biodegradability was tested. In these cases it was possible that packaging components were not fully degraded thus

decreasing the value of the compost. Even if biodegradable plastics are fully degraded they do not have an added value from ecological perspective as they disintegrate into water and CO<sub>2</sub> and do not provide any nutrients to the compost<sup>108</sup>. Relating to the energy balance composting is not effective as no energy is recovered as long as it does not go into biogas production systems where energy can partly be recovered. However, according to an interview with an expert from the German Federal Environment Agency (UBA)<sup>109</sup>, the separation techniques of composting plants are not so elaborated that they can distinguish between conventional and biodegradable plastics. Plastics are generally disturbing and thus sorted out.

### **Biodegradable plastics**

A current study commissioned by the German Federal Environment Agency “Analysis of the environmental impact of biodegradable plastic packaging” evaluated a total of 85 life cycle assessments, studies and professional articles with a view to all of the environmental pros and cons of every type of packaging (UBA 2012)<sup>110</sup>. The study resulted that biodegradable plastics used in packaging, which are made from renewable biomass sources, do not prove to offer an overall ecological advantage. Whereas their CO<sub>2</sub> emissions and consumption of petroleum of bioplastics are lower, they are negative in a number of other environmental areas particularly through the use of fertilisers: The farming and processing of the plants used in packaging cause more severe acidification of soil and eutrophication of water bodies than the production of common plastic packaging. Moreover, they cause higher levels of particulate emissions.

Further, the study revealed that packaging made of biodegradable plastics was also unsuccessful in retail. During the 2009 period covered in the study, the market share

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<sup>108</sup> Source: Interview with Franziska Krüger, expert for plastic recycling at German Federal Environment Agency (UBA); cf. [http://www.planet-wissen.de/alltag\\_gesundheit/werkstoffe/kunststoff/biokunststoffe.jsp](http://www.planet-wissen.de/alltag_gesundheit/werkstoffe/kunststoff/biokunststoffe.jsp)

<sup>109</sup> Source: [http://www.deutschlandfunk.de/mogelpackung-bioplastiktute.697.de.html?dram:article\\_id=78835](http://www.deutschlandfunk.de/mogelpackung-bioplastiktute.697.de.html?dram:article_id=78835)

<sup>110</sup> Cf. <http://www.umweltbundesamt.de/en/press/pressinformation/bioplastics-not-superior>; study: <http://www.umweltbundesamt.de/sites/default/files/medien/461/publikationen/4446.pdf>

of bioplastics packaging was a maximum of 0.5 per cent. Germany consumed a total of 2,645 million tonnes of plastic packaging in 2009.

The study was commissioned to determine whether the special provisions for biodegradable plastic packaging introduced by the German Packaging Ordinance are still defensible from an ecological viewpoint. The overall conclusion of the study was that bioplastic bags have no ecological advantages over common plastic bags. Reusable bags made of fabrics and other durable materials are in fact the real ecological alternative.

#### 3.4.3.2 *Second proposal for packaging criteria*

##### **Proposed revised criteria (second proposal)**

###### **“Packaging”**

Where cardboard boxes are used, they shall be made of at least 80 % recycled material.

Where plastics are used for the final outer packaging, they shall be made of at least 75 % recycled material. Plastics used for protectively covering the product within the outer packaging are exempted from this requirement.

*Assessment and verification:* a sample of the product packaging shall be provided on application, together with a corresponding declaration of compliance with this criterion. Only primary packaging, as defined in European Parliament and Council Directive 94/62/EC, is subject to the criterion.

##### Major proposed changes

- According to stakeholder feedback and further evidence, it is proposed to delete the requirement concerning biodegradable or compostable plastic materials as they did not prove to be of environmental benefit.
- Regarding the requirement of using recycled plastic materials, an exemption has been added for plastic materials that are used for protecting the computer product against damage (e.g. shock absorbance).

### 3.5 Cluster 5 – Corporate production / supply chain management

Within the hotspot analysis for computer products, some additional issues concerning environmental as well as social impacts were identified. Within this context it shall be discussed if the revision of the EU ecolabel for computers shall also introduce new requirements on corporate responsibility, meaning that they cannot be implemented and verified at product level but would need to be implemented at production level, possibly during production stages not carried out by the applicants themselves.

#### 3.5.1 Criterion 5.1 – Labour conditions during manufacturing

##### 3.5.1.1 First proposal for criteria on labour conditions during manufacturing

#### Proposed options for a new criterion (first proposal)

##### Option (a): No social criteria at all

##### Option (b): Labour conditions during manufacturing

The applicant shall have a code of conduct or a comparable policy that requires adherence to the core labour standards of the International Labour Organisation (ILO Core Labour Standards). This code of conduct and/or policy shall also address the assembly-stage of the production even in cases the assembly is not carried out by the applicant. The applicant shall ensure that the code of conduct is communicated to all suppliers / subcontractors (up to the level of product assembly) together with a requirement that these shall also comply with a code of conduct that follows the ILO Core Labour Standards.

*Assessment and verification:* The applicant shall declare compliance with these requirements (for example implementation of OECD Guidelines for Multi-National Enterprises “Recommendations on human rights and on employment and industrial relations” or of the United Nations Global Compact: “Principles on Human rights and Labour”) and shall provide a copy of the code of conduct and a description of the implementation process at tier 1 suppliers/sub-contractor level (up until assembly).

##### Option (c): Labour conditions during manufacturing

Fundamental principles and rights with respect to universal human rights, as specified in the applicable core labour standards of the International Labour Organisation (ILO Core Labour Standards) shall be complied with during manufacturing (assembly) of the European eco-labelled products.

*Assessment and verification:*

Option (1): The applicant shall declare the compliance with these requirements to the competent body.

Option (2): The applicant shall declare the compliance with these requirements to the competent body and provide evidence by third-party verified certification of tier 1 production sites (up until assembly), e.g. by SA8000 or other standards that contain the ILO Core Labour Standards. This shall include site visits by auditors for all tier 1 production sites in the supply chain (up until assembly) for the licensed products. Site visits shall take place upon application and subsequently during the license period if new production sites are introduced.

Note: Requirements regarding the social labour conditions during manufacturing are difficult to integrate in ecolabel criteria, especially in terms of assessment and verification.

Recent examples show that the reputation of the overall Ecolabel might be at risk if breaches of social labour conditions of ecolabelled products become known.

For more details cf. Task 4 report “Improvement Potential”, section 4.2.5.1 “General CSR criteria: Challenges for the implementation by ecolabels”.

#### Consultation questions

- Should a criterion addressing labour conditions be included?
- Which further social aspects might be required beyond the ILO Core Labour Standards (e.g. wages, working time, occupational health & safety)?
- Are there specific hot spots in the supply chain that might provide for a more focused criterion? (see also proposed criteria 5.3)
- Which verification mechanisms shall apply in order to best ensure compliance with the required criteria?

#### 3.5.1.2 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, this criteria proposal was generally supported by stakeholders, including by manufacturers who have been developing their own initiatives in this area. A Protocol Code of Conduct signed by 16 manufacturers in 2004 was referred to.

It was felt that the criteria should have strong verification in order to avoid problematic situations. As an example, a recent case relating to TCO certification scheme and Samsung was referred to. Even if a scandal occurs this would serve to highlight the issues. Some criteria are better than no criteria.

It was discussed, however, if these criteria would need to be mandatory? If a strict verification is implemented it may be difficult for all manufacturers to follow.

#### Written stakeholder feedback following the first AHWG meeting

- The inclusion of a criterion on labour conditions seems to be generally supported by the stakeholders.
- It is asked to have a uniform approach how to write the social criteria in different criteria documents.

- The criterion is welcomed by one of the CBs preferring either option b) or c) with sub-option 1. Also from the outcomes of the “Horizontal Task Force on social and ethical criteria for the EU Ecolabel- March 2013”, it is understood that third-party verification can be way too expensive (“SA 8000: 10,000 € per production site for three years”).
- One of the MS stakeholders is in favour of option (b) as it sets a standard but doesn’t put an excessive burden on the applicant to prove compliance with it. Verification by a third party is proposed to be demanded perhaps in the next revision period.
- According to feedback from a manufacturer it should be further discussed if one incident related to one applicant for the TCO ecolabel should lead to the conclusion not to require social criteria for computers at all. The positive side of the TCO social criteria is that there are now 15 companies that have certified displays for which compliance to these social criteria is a condition (criteria version 6.0). All of these companies have worked hard to demonstrate compliance to these requirements by annually showing an independent external audit report. Thus the inclusion of social criteria into the EU Ecolabel is supported. If included, a complete harmonization with TCO is recommended.
- CSR criteria should at least be in line with public and private procurement demands and for credibility be 3rd party verified. CSR is either a progressive approach such as EICC code of conduct and validated audit process for members or SA8000 certification of factories (not headquarters) where a certain standard is reached before certification is issued. Global compact and GRI do not guarantee a level of implementation at factory level without factory audits. EICC membership does not assure a level of implementation at factory level that is controlled by a 3rd party. If the progressive improvement methodology is chosen then to move forward from adopting principles, an agreement should be entered where the brand follows a code of conduct that is based on labour standards and principles that includes social and ethical production and where also exists a structured CSR policy of control routines for monitoring their

production facilities. CSR demands as these create a tool for brands and facilitate the sharing of information between the supplier, purchaser and a 3rd party (“3 way interest group”). At a stage of setting a minimum level of verified social commitment, progressive improvement is not a proof of good working conditions but it should be seen as a phase of ambitious 3rd party follow-up audits that communicates to stakeholders that social issues are important.

- To not push the industry into CSR for the reason of avoiding criticism is seen as sending the wrong signal to stakeholders.
- TCO Certified is 3rd party verified. If compliance is questioned (as one incident has been at TCO) then it in part is often dependent on a misunderstanding that can lead to a productive dialogue and perhaps future criteria improvements. TCO Development, as part of a watchdog system, is dependent on external information and will open a dialogue with informants and - if there are causes - start an investigation into the claims.
- It is recommended to avoid the phrase ‘guarantee compliance’ as this cannot be done without progressive improvement. It should be worked from the base up to know where to bring about positive change in the facilities where the certified products are manufactured.
- It has to be clearly communicated, to which tier of the supply chain the criteria are addressed to bring progressive improvement and where reasonable efforts are accepted. A network of approved 3rd party expert CSR verifiers will be needed to control the quality of the 3rd party audits are in line with demands and can review corrective action plans (CAPs) for their corrective effectiveness.
- The suggestion of being involved in other initiatives which more target the most relevant social hot spots could be a good approach, however brands may be unwilling to accept yet another initiative involvement, so there is the need to assess those where they are already involved in. Perhaps this is an option that should be included as a complementary option to conducting audits, such as the proposed tier (optional) scheme.

- There is no mention of the advancements created by the new TCO Certified CSR criteria: It is communicated to the stakeholders that social issues are important by setting a minimum level of verifying social commitment. It is communicated that TCO Development is primarily verifying the brand owner's procedures for promoting legal and human labour standards throughout the supply chain as specified in the mandate, but control audits for now are limited to the final production (1st tier). Here a brand shall conduct independent audits and address all findings (violations to the TCO mandate) with a corrective action plan (CAP). To date TCO Development cannot guarantee that violations don't occur but they are verifying a structured CSR policy and control routines toward production facilities. By entering in an agreement with TCO Development the brand agrees to annual 3rd party audits at supply factories and the sharing of audit reports, findings and corrective actions plans between the buyer, supplier and 3rd party (TCO Development and approved assessors) and also spot checks. It has taken some brands over 1.5 years to implement the necessary changes to their Code of Conducts and production control routines to be in-line with TCO Certified (even though brands have been involved with more established CSR initiatives for a long time). To date there are 17 brands TCO Development works with and requires that they annually demonstrate their commitment toward improving working conditions for socially responsible production at supplier level.

#### Further research and evidence

The international **standard SA8000**<sup>111</sup> is an auditable certification standard. Based on international workplace norms of International Labour Organisation (ILO) conventions, the Universal Declaration of Human Rights and the UN Convention on the Rights of the Child, it entails nine elements to measure social compliance (cf. Table 18). The third party accredited certification scheme foresees audits being conducted by approved SA8000 auditors.

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<sup>111</sup> See <http://www.sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937>

**Table 18: SA8000 standard and their basis of ILO fundamental and further labour conventions**

SA8000	8 ILO fundamental labour conventions	Further ILO labour conventions relevant to SA8000 implementation and auditing
<p><b>Child Labour:</b> No use or support of child labour; policies and written procedures for remediation of children found to be working in situation; provide adequate financial and other support to enable such children to attend school; and employment of young workers conditional.</p>	<ul style="list-style-type: none"> <li>• <b>Minimum Age</b> Convention (No. 138)</li> <li>• <b>Worst Forms of Child Labour</b> Convention (No. 182)</li> </ul>	
<p><b>Forced and Compulsory Labour:</b> No use or support for forced or compulsory labour; no required 'deposits' - financial or otherwise; no withholding salary, benefits, property or documents to force personnel to continue work; personnel right to leave premises after workday; personnel free to terminate their employment; and no use nor support for human trafficking.</p>	<ul style="list-style-type: none"> <li>• <b>Forced Labour</b> Convention (No. 29)</li> <li>• <b>Abolition of Forced Labour</b> Convention (No. 105)</li> </ul>	
<p><b>Health and Safety:</b> Provide a safe and healthy workplace; prevent potential occupational accidents; appoint senior manager to ensure OSH; instruction on OSH for all personnel; system to detect, avoid, respond to risks; record all accidents; provide personal protection equipment and medical attention in event of work-related injury; remove, reduce risks to new and expectant mothers; hygiene- toilet, potable water, sanitary food storage; decent dormitories- clean, safe, meet basic needs; and worker right to remove from imminent danger.</p>		<ul style="list-style-type: none"> <li>• Occupational Safety and Health Convention (No. 155)</li> <li>• Occupational Health Services Convention (No. 161)</li> <li>• Safety in the Use of Chemicals at Work Convention (No. 170); Prevention of Major Industrial Accidents Convention (No. 174)</li> <li>• Asbestos Convention (No. 162); White Lead (Painting) Convention (No. 13); Radiation Protection Convention (No. 115); Benzene Convention (No. 136)</li> <li>• Occupational Cancer Conv. (No. 139); Guarding of Machinery Conv. (No. 119); Maximum Weight Conv. (No. 127); Maternity Protection Conv. (No. 183 rev.); Medical Examination of Young Persons (Industry) Conv. (No. 77)</li> </ul>

SA8000	8 ILO fundamental labour conventions	Further ILO labour conventions relevant to SA8000 implementation and auditing
<p><b>Freedom of Association and Right to Collective Bargaining:</b> Respect the right to form and join trade unions and bargain collectively. All personnel are free to: organize trade unions of their choice; and bargain collectively with their employer. A company shall: respect right to organize unions &amp; bargain collectively; not interfere in workers' organizations or collective bargaining; inform personnel of these rights &amp; freedom from retaliation; where law restricts rights, allow workers freely elect representatives; ensure no discrimination against personnel engaged in worker organizations; and ensure representatives access to workers at the workplace.</p>	<ul style="list-style-type: none"> <li>• <b>Freedom of Association</b> and Protection of the Right to Organise Convention (No. 87)</li> <li>• Right to Organise and <b>Collective Bargaining</b> Convention (No. 98)</li> </ul>	<ul style="list-style-type: none"> <li>• Workers' Representatives Convention (No. 135)</li> <li>• Collective Bargaining (No. 154)</li> </ul>
<p><b>Discrimination:</b> No discrimination based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age. No discrimination in hiring, remuneration, access to training, promotion, termination, and retirement. No interference with exercise of personnel tenets or practices; prohibition of threatening, abusive, exploitative, coercive behaviour at workplace or company facilities; no pregnancy or virginity tests under any circumstances.</p>	<ul style="list-style-type: none"> <li>• <b>Discrimination</b> (Employment and Occupation) Convention (No. 111)</li> <li>• <b>Equal Remuneration</b> Convention (No. 100)</li> </ul>	<ul style="list-style-type: none"> <li>• Workers with Family Responsibilities Conv. (No. 156); Vocational Rehabilitation and Employment (Disabled Persons) Conv. (No. 159); Indigenous and Tribal Peoples Conv. (No. 169); Maternity Protection Conv. (No. 183); Migration for Employment Conv. (No. 97 rev.); Night Work (Women) Convention (Nr. 89 rev.)</li> </ul>
<p><b>Disciplinary Practices:</b> Treat all personnel with dignity and respect; zero tolerance of corporal punishment, mental or physical abuse of personnel; no harsh or inhumane treatment.</p>		
<p><b>Working Hours:</b> Compliance with laws &amp; industry standards; normal work-week, not including overtime, shall not exceed 48 hours; 1 day off following every 6 consecutive work days, with some exceptions; overtime voluntary, not regular, not &gt; 12 h/w; required overtime only if negotiated in CBA.</p>		<ul style="list-style-type: none"> <li>• Hours of Work (Industry) Convention (No. 1)</li> </ul>
<p><b>Remuneration:</b> Respect right of personnel to living wage; all workers paid at least legal minimum wage; wages sufficient to meet basic needs &amp; provide discretionary income; deductions not for disciplinary purposes, with some exceptions; wages and benefits clearly communicated to workers; paid in convenient manner – cash or check form; overtime paid at premium rate; prohibited use of labour-only contracting, short-term contracts, false apprenticeship schemes to avoid legal obligations to personnel.</p>		<ul style="list-style-type: none"> <li>• Minimum Wage Fixing Convention (No. 131)</li> </ul>
<p><b>Management Systems:</b> Facilities seeking to gain&amp;maintain certification must go beyond</p>		

<b>SA8000</b>	<b>8 ILO fundamental labour conventions</b>	<b>Further ILO labour conventions relevant to SA8000 implementation and auditing</b>
simple compliance to integrate the standard into their management systems & practices.		

Draft document

The SA8000 standard includes the **eight fundamental labour conventions but goes far beyond them** including also principles on health and safety, disciplinary practices, working hours, remuneration (by especially addressing “living wages” and “overtime payment” linking to some major hot spots of the ICT manufacturing industry) and management systems.

Further, the standard strives towards **feasible implementation** of; for example, the Principle on Freedom of Association and Right to Collective Bargaining. In situations where the Right to freedom of association and collective bargaining are restricted under law, SA8000 standard still requires companies to allow workers to freely elect their own representatives. Furthermore, in cases where above mentioned fundamental rights are restricted under law SA8000 still requires that employers, as to the actions of their companies and suppliers, have the responsibility to allow the workplace to be one where workers can fully and without fear of retaliation exercise their right to unimpeded collective representation<sup>112</sup>. No discrimination against personnel being engaged in worker organizations shall be ensured; and representatives’ access to workers at the workplace shall be ensured. With these specific additions and amendments to the ILO Core Labour standards, being able to be applied to any company, of any size, anywhere in the world, the SA8000 standard is viewed as the most globally accepted independent workplace standard<sup>113</sup>.

According to EICC (2012)<sup>114</sup>, the industry initiative Electronic Industry Citizenship Coalition’s **(EICC) code of conduct** is applied by 60 manufacturers which voluntarily committed to ensure that working conditions in the electronics industry supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. However, WSI (2012)<sup>115</sup> identified some significant weaknesses of the EICC code of conduct:

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<sup>112</sup> SA8000 © Consolidated Guidance – Freedom of Association and Right to Collective Bargaining

<sup>113</sup> Cf. [www.sgs.com/~media/Global/Documents/Brochures/SGS\\_SSC\\_NG\\_SA\\_8000\\_web\\_LR.pdf](http://www.sgs.com/~media/Global/Documents/Brochures/SGS_SSC_NG_SA_8000_web_LR.pdf)

<sup>114</sup> Cf. <http://www.eicc.info/documents/EICCCodeofConductEnglish.pdf>

<sup>115</sup> WSI (2012): Wirtschafts- und Sozialwissenschaftliches Institut (WSI) in der Hans-Böckler-Stiftung: Öffentliche Beschaffung von IT-Mitteln (PCs) unter Berücksichtigung sozialer Kriterien; WSI-Diskussionspapier Nr. 183. Düsseldorf, 2012. Cf. [http://www.boeckler.de/index\\_wsi.htm](http://www.boeckler.de/index_wsi.htm)

- The labour standards are not based on the fundamental ILO labour conventions but rather on the national laws which might be weaker in some countries.
  - Especially regarding the Freedom of Association and Right to Collective Bargaining, the EICC codex falls behind the ILO and the SA8000 standards.
  - Further, the codex only implies regional minimum wages and not wages sufficient to meet basic needs (“living wages”).
  - The right on employment security is not included at all.
- The monitoring is mainly based on self-evaluation; a systematic independent external audit is not part of the codex. In the monitoring process, no independent trade unions or labour rights organisations are included. Controls of the self-evaluation of suppliers are only taking place on a random basis.

The current **CSR criteria of TCO Development** include ILOs eight core conventions 29, 87, 98, 100, 105, 111, 138, and 182, the UN Convention on the Rights of the Child, Article 32, the health and safety legislation in force in the country of manufacture, and the labour law, including rules on minimum wage and the social security protection in the manufacturing country. In situations where the right to freedom of association and collective bargaining are restricted under law, workers shall be permitted to freely elect their own representatives. The verification mechanism is based on four different options (a) to (d):

- (a) The Brand owner is a member of EICC and provides documented proof of third party audits conducted at production facilities of TCO certified products.
- (b) The Brand owner is SA8000 certified **or** carrying out the production at SA8000 certified facilities and provides documented proof of third party audits conducted at production facilities of TCO certified products.
- (c) The Brand owner shall complete the self-documentation according to a questionnaire provided by TCO Development and provide documented proof of third party audits conducted at production facilities of TCO certified products.
- (d) The Brand owner applies for a 12 month grace period by sub-mitting a signed declaration stating which option above (a, b or c) shall be implemented by them and an estimation of when all the necessary documented proof will be available.

According to WSI (2012)<sup>115</sup>, the linkage to the eight ILO core conventions, the explicit addressing of options in cases where freedom of association and collective bargaining are restricted under law, as well as the more explicitly regulated monitoring approach go far beyond that of EICC. However, WSI (2013) sees optimization potential with regard to the following aspects:

- In case of weaker national laws, the TCO standards are hardly going beyond the ILO core conventions as for example aspects as living wages or social security are not addressed.
- Option (b) allows the interpretation or possibility that a headquarter of a brand company, situated in a Western developed country, could be SA8000 certified to fulfil the criteria on verification.

From perspective of Germanwatch, an independent development and environmental organization in Germany with focus and deep expertise on CSR activities in the supply chain, which has been interviewed by the study team on 19 March 2014, membership in EICC and self-declaration would not be a sufficient option as verification mechanism.

### 3.5.1.3 *Second proposal for social supply chain criteria*

<b>Proposed new criterion (second proposal, Option A)</b>
<p><b>Labour conditions during manufacturing (required)</b></p> <p>The applicant shall demonstrate that the product is manufactured under working practices that promote good labour relations and working conditions by proving that more than 90% of the first-tier suppliers (final product assembly) comply with the following ILO Conventions:</p> <p>a) <b>Child Labour:</b></p> <ul style="list-style-type: none"> <li>i. ILO Core Convention “Minimum Age” (No. 138)</li> <li>ii. ILO Core Convention “Worst Forms of Child Labour” (No. 182)</li> </ul> <p>b) <b>Forced and Compulsory Labour:</b></p> <ul style="list-style-type: none"> <li>i. ILO Core Convention “Forced Labour” (No. 29)</li> <li>ii. ILO Core Convention “Abolition of Forced Labour” (No. 105)</li> </ul> <p>c) <b>Freedom of Association and Right to Collective Bargaining:</b></p> <ul style="list-style-type: none"> <li>i. ILO Core Convention “Freedom of Association and Protection of the Right to Organise” (No. 87)</li> <li>ii. ILO Core Convention “Right to Organise and Collective Bargaining” (No. 98)</li> </ul> <p>d) <b>Discrimination:</b></p> <ul style="list-style-type: none"> <li>i. ILO Core Convention “Discrimination (Employment and Occupation)” (No. 111)</li> <li>ii. ILO Core Convention “Equal Remuneration” (No. 100)</li> </ul> <p>e) <b>Working Hours:</b></p> <ul style="list-style-type: none"> <li>i. ILO Convention “Hours of Work (Industry)” (No. 1)</li> </ul>

f) **Remuneration:**

- i. ILO Convention “Minimum Wage Fixing” (No. 131)
- ii. **Living wage:** The applicant shall ensure that wages paid for a normal work week shall always meet at least legal or industry minimum standards and shall be sufficient to meet the basic needs of personnel and to provide some discretionary income; with reference to SA8000 Consolidated Guidance “Remuneration” regarding definition, implementation, auditing and evidence of compliance

Assessment and verification:

The applicant shall declare compliance with these requirements to the Competent Body providing the copies of the certificates of Accredited Certification Bodies (CBs) accredited by Social Accountability Accreditation Services (SAAS) showing the compliance with the above requirements in more than 90% of the first-tier suppliers (final product assembly).

Additionally, the applicant shall provide to the Competent Body

- A list of first-tier suppliers representing at least 90% of procurement expenditure for final product assembly of computers.
- The independent social audit reports to verify that he is fulfilling its obligations according to this mandate.

Additionally, the applicant shall publish the independent social audit reports of the first-tier suppliers online to provide evidence to interested consumers.

Major proposed changes

- Despite feedback from manufacturers asking for a “slight” version not putting an excessive burden on the applicant to prove compliance with the criteria (i.e. code of conduct, self-declaration), the study team recommends – when implementing criteria on labour conditions during manufacturing into the EU Ecolabel at all – these should be adequate, effective and verifiable.
- According to expert judgement, a basic linkage to the 8 fundamental ILO labour conventions and the (often weaker) national labour laws would not be sufficient enough to address the social hot spots being specific to computers’ manufacturing processes, especially those on working hours and remuneration.
- Thus, as minimum criteria the 8 ILO core conventions are proposed, added by two further ILO conventions on working hours and remuneration, together with an independent third-party auditing scheme.
- In terms of remuneration, ILO’s Minimum Wage Fixing Convention 131 (1970) specifies in Article 3 (a) and (b) that the following two elements are taken into consideration in determining the minimum wage:

- 1. “The Needs of workers and their families taking into account the general level of wages in the country, the cost of living, social security benefits, and the relative living standards of other social groups;
- 2. Economic factors, including the requirements of economic development, levels of productivity, and the desirability of attaining and maintaining a high level of employment.”

According to SA8000<sup>116</sup>, they experienced that in most countries these two considerations are odds and may not be weighted equally in the determination of the minimum wage. To attract foreign investment and international buyers, countries may emphasize economic growth and development. Minimum wages are often set to compete with low cost suppliers in other countries and not to promote workers’ interests. Therefore, many countries have minimum wage levels that do not meet the basic needs of workers and their families. These wages also frequently do not reflect inflation and other factors that affect actual standards of living. Lack of enforcement of even these minimal rates of pay is common, forcing workers to work excessive overtime just to earn the legal minimum wage. Due to this reason, the proposed EU Ecolabel criteria include an additional requirement on “living wage” being sufficient to meet the basic needs of personnel and to provide some discretionary income. For definition of “living wages”, interpretations, implementation, auditing and evidence of compliance, reference is made to the SA8000 Consolidated Guidance on Remuneration<sup>117</sup>.

- Regarding assessment and verification, the fulfilment of requirements shall be verified by providing certificates of independent accredited certification bodies.
- The social requirements are proposed not to address the whole supply chain but only first-tier suppliers (final product assembly). This is due to the fact that first-tier suppliers (contract manufacturers) more and more act vertically within the supply chain from purchasing to final assembly (cf. WKI 2012). Further,

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<sup>116</sup> Source: [http://www.sa-intl.org/\\_data/n\\_0001/resources/live/SA8000Remuneration.pdf](http://www.sa-intl.org/_data/n_0001/resources/live/SA8000Remuneration.pdf)

<sup>117</sup> See [http://www.sa-intl.org/\\_data/n\\_0001/resources/live/SA8000Remuneration.pdf](http://www.sa-intl.org/_data/n_0001/resources/live/SA8000Remuneration.pdf)

social aspects regarding hotspots of raw materials extraction will be addressed more specifically by criterion 5.2 'Use of conflict-free minerals'.

- For most manufacturers, the final assembly of their ICT products takes place at a limited number of contract manufacturers. Providing a list of first-tier suppliers summing up to at least 90% of procurement expenditure for final assembly (see for example Apple's information on suppliers<sup>118</sup>) would facilitate the Competent Bodies to cross-check with the availability of independent audit reports as also being required for verification. Online publication of audit reports would improve the overall transparency of the ICT supply chain.

#### Proposed new criterion (second proposal, Option B)

##### Labour conditions during manufacturing (optional)

The applicant shall demonstrate that the product is manufactured under working practices that promote good labour relations and working conditions by proving that more than 90% of the first-tier suppliers (final product assembly) comply with the following principles (derived from SA8000, including ILO all fundamental as well as further relevant labour conventions):

- g) **Child Labour:** No use or support of child labour; policies and written procedures for remediation of children found to be working in situation; provide adequate financial and other support to enable such children to attend school; and employment of young workers conditional.
- h) **Forced and Compulsory Labour:** No use or support for forced or compulsory labour; no required 'deposits' - financial or otherwise; no withholding salary, benefits, property or documents to force personnel to continue work; personnel right to leave premises after workday; personnel free to terminate their employment; and no use nor support for human trafficking.
- i) **Health and Safety:** Provide a safe and healthy workplace; prevent potential occupational accidents; appoint senior manager to ensure OSH; instruction on OSH for all personnel; system to detect, avoid, respond to risks; record all accidents; provide personal protection equipment and medical attention in event of work-related injury; remove, reduce risks to new and expectant mothers; hygiene- toilet, potable water, sanitary food storage; decent dormitories- clean, safe, meet basic needs; and worker right to remove from imminent danger.
- j) **Freedom of Association and Right to Collective Bargaining:** Respect the right to form and join trade unions and bargain collectively. All personnel are free to: organize trade unions of their choice; and bargain collectively with their employer. A company shall: respect right to organize unions & bargain collectively; not interfere in workers' organizations or collective bargaining; inform personnel of these rights & freedom from retaliation; where law restricts rights, allow workers freely elect representatives; ensure no discrimination against personnel engaged in worker organizations; and ensure representatives access to workers at the workplace.
- k) **Discrimination:** No discrimination based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age. No discrimination in hiring, remuneration, access to training, promotion, termination, and retirement. No interference with exercise of personnel tenets or practices; prohibition of threatening, abusive, exploitative, coercive behaviour at workplace or company facilities; no pregnancy or virginity tests

<sup>118</sup> Cf. <http://www.apple.com/supplier-responsibility/our-suppliers/> and [http://images.apple.com/supplier-responsibility/pdf/Apple\\_Supplier\\_List\\_2014.pdf](http://images.apple.com/supplier-responsibility/pdf/Apple_Supplier_List_2014.pdf)

under any circumstances.

- l) **Disciplinary Practices:** Treat all personnel with dignity and respect; zero tolerance of corporal punishment, mental or physical abuse of personnel; no harsh or inhumane treatment.
- m) **Working Hours:** Compliance with laws & industry standards; normal work-week, not including overtime, shall not exceed 48 hours; 1 day off following every 6 consecutive work days, with some exceptions; overtime voluntary, not regular, not > 12 h/w; required overtime only if negotiated in CBA.
- n) **Remuneration:** Respect right of personnel to living wage; all workers paid at least legal minimum wage; wages sufficient to meet basic needs & provide discretionary income; deductions not for disciplinary purposes, with some exceptions; wages and benefits clearly communicated to workers; paid in convenient manner – cash or check form; overtime paid at premium rate; prohibited use of labour-only contracting, short-term contracts, false apprenticeship schemes to avoid legal obligations to personnel.
- o) **Management Systems:** Facilities seeking to gain and maintain certification must go beyond simple compliance to integrate the standard into their management systems & practices.

Assessment and verification:

The applicant shall declare compliance with these requirements to the Competent Body providing the copies of the certificates of Accredited Certification Bodies (CBs) accredited by Social Accountability Accreditation Services (SAAS) showing the compliance with the above requirements in more than 90% of the first-tier suppliers (final product assembly).

Additionally, the applicant shall provide to the Competent Body

- A list of first-tier suppliers representing at least 90% of procurement expenditure for final product assembly of computers.
- The independent social audit reports to verify that he is fulfilling its obligations according to this mandate.

Additionally, the applicant shall publish the independent social audit reports of the first-tier suppliers online to provide evidence to interested consumers.

Major proposed changes

- Despite feedback from manufacturers asking for a “slight” version not putting an excessive burden on the applicant to prove compliance with the criteria (i.e. code of conduct, self-declaration), the study team recommends – when implementing criteria on labour conditions during manufacturing into the EU Ecolabel at all – these should be adequate, effective and verifiable.
- According to expert judgement, a basic linkage to the 8 fundamental ILO labour conventions and the (often weaker) national labour laws would not be sufficient enough to address the social hot spots being specific to computers’ manufacturing processes.
- On the other hand, the nine elements of the SA8000 standard, based on the 8 ILO core conventions but adding further relevant requirements and providing modified options for cases where the national law restricts those rights, together

with an independent third-party auditing scheme, are seen as best practicable option to date. Thus, a general linkage to the nine principles as used by the SA8000 standard builds the basis for this criterion, however not referencing to SA8000 directly.

- Regarding assessment and verification, the fulfilment of requirements shall be verified by providing certificates of independent accredited certification bodies.
- The social requirements are proposed not to address the whole supply chain but only first-tier suppliers (final product assembly). This is due to the fact that first-tier suppliers (contract manufacturers) more and more act vertically within the supply chain from purchasing to final assembly (cf. WKI 2012). Further, social aspects regarding hotspots of raw materials extraction will be addressed more specifically by criterion 5.2 'Use of conflict-free minerals'.
- For most manufacturers, the final assembly of their ICT products takes place at a limited number of contract manufacturers. Providing a list of first-tier suppliers summing up to at least 90% of procurement expenditure for final assembly (see for example Apple's information on suppliers<sup>119</sup>) would facilitate the Competent Bodies to cross-check with the availability of independent audit reports as also being required for verification. Online publication of audit reports would improve the overall transparency of the ICT supply chain.
- Complying with the principles of SA8000 is proposed not to be defined as minimum requirement / exclusion criteria but as option for complying manufacturers to highlight this fact besides the label.

### 3.5.2 Criterion 5.2 – Use of 'conflict-free minerals' during production

#### 3.5.2.1 *First proposal for conflict-free minerals criteria*

<b>Proposed new criterion (first proposal)</b>
<p><b>'Conflict-free minerals' in electronics</b></p> <p>The applicant shall support the responsible sourcing of "conflict-free minerals" from the African Great Lakes Region for use in their computer products.</p> <p><u>Assessment and verification:</u> The applicant shall declare the compliance with these requirements and</p>

<sup>119</sup> Cf. <http://www.apple.com/supplier-responsibility/our-suppliers/> and [http://images.apple.com/supplier-responsibility/pdf/Apple\\_Supplier\\_List\\_2014.pdf](http://images.apple.com/supplier-responsibility/pdf/Apple_Supplier_List_2014.pdf)

shall provide additionally a description of the way he engages in responsible sourcing projects in the African Great Lakes Region (e.g. membership in a voluntary industry initiative, e.g. the Public Private Alliance, the Conflict-Free Tin Initiative or the Solutions for Hope Project) to the competent body.

Computer products contain a wide range of scarce resources which are largely mined in the Democratic Republic of Congo, a conflict region, and according to sources under dangerous conditions, without sufficient maintenance of health and safety standards and in some cases by children. However, instead of a criterion to exclude of the use of conflict minerals, bearing in mind the potential impact of a de facto embargo of minerals from a whole region that is economically and socially dependent on the mining industry, for the EU ecolabel revision a process oriented approach has been proposed to stimulate sustainable sourcing.

For more details cf. Task 4 report “Improvement Potential”, section 4.2.5.2.1 “Minimising the risk of using ‘conflict metals’ in electronics”.

#### *3.5.2.2 Stakeholder feedback and further evidence*

According to the discussions of stakeholders at the first AHWG meeting, this criteria proposal was generally supported, including by manufacturers who have been developing their own initiatives in this area. The activity in this area was stimulated by the US Dodd-Frank Act which requires disclosure of the source of metals.

It was seen as important to make the link to specific initiatives on the ground.

Examples included the Tin Source Initiative and the Tantalum Initiative.

A request was made for a clear definition of ‘responsible sourcing’ although this was felt to be sufficient to encompass a range of projects in the region.

Written stakeholder feedback following the first AHWG meeting indicates that criteria must be worded carefully and compliance verification is a challenge. Also it should be defined which conflict minerals are covered. In GPP these criteria would be mainly appropriate as a contract performance clause.

Further research and evidence show that the requirement needs to specify the materials in scope, which is mostly defined as tin, tantalum, tungsten and their ores and gold. Responsible sourcing projects can be specified geographically by defining activities carried out within on the fringes of the resource-conflict hot spot (the

eastern parts of the Democratic Republic of the Congo) and by their compliance with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, which was specifically tailored to the responsible sourcing of tin, tantalum, tungsten and gold.

### 3.5.2.3 *Second proposal for conflict-free minerals criteria*

#### **Proposed new criterion (second proposal)**

##### **'Conflict-free minerals' in electronics**

The applicant shall support the responsible sourcing of "conflict-free minerals" from the African Great Lakes Region. In this context, the material scope encompasses tin, tantalum, tungsten and their ores and gold.

*Assessment and verification:* The applicant shall declare the compliance with these requirements and shall provide additionally a description of the way he engages in responsible sourcing projects in the African Great Lakes Region for at least one of the above listed conflict minerals to the Competent Body. As responsible sourcing projects, all activities carried out within the Democratic Republic of the Congo that aim to source minerals in accordance with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* are eligible (e.g. the Public Private Alliance for Responsible Minerals Trade, the Conflict-Free Tin Initiative, and the Solutions for Hope Project).

#### Major proposed changes

- The section "[...] for use in their computer products" *has been* removed as this significantly limits the possibilities of companies (e.g. activities in the great Lakes Region that lead to responsible sourcing did not yet yield material output should also be able to qualify for this requirement).
- The scope is further specified (tin, tantalum, tungsten and their ores and gold).
- It is specified that applicants have to engage in activities that address at least one of the above listed materials.
- The definition of 'responsible sourcing projects' was further specified and encompasses projects carried out within the Democratic Republic of the Congo being in accordance with the widely recognised *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*.
- The focus on the Democratic Republic of the Congo is justified by the fact that the DR Congo is the primary conflict region and the region where mineral

mining and trading are closely linked to conflict. Although the other countries of the Great Lakes Region are covered by relevant policy instruments (e.g. Dodd-Frank Act Section 1502), this has to do with fact that these countries might act as transit countries for smuggled ores from the DR Congo. Generally, it is widely recognised that a focus on the DR Congo has the highest development priority.

Draft document

### 3.6 Cluster 6 – Further criteria

#### 3.6.1 Criterion 6.1 – Noise

Present criteria, Decisions 2011/337 and 2011/330
<p>The 'Declared A weighted Sound Power Level' (re 1 pW) of the personal computer, in accordance with paragraph 3.2.5 of ISO 9296, shall not exceed</p> <ol style="list-style-type: none"> <li>(1) 40 dB (A) in the idle operating mode,</li> <li>(2) 45 dB (A) when accessing a hard disk drive.</li> </ol> <p>The 'Declared A weighted Sound Power Level' (re 1 pW) of the notebook computer system unit, in accordance with paragraph 3.2.5 of ISO 9296, shall not exceed</p> <ol style="list-style-type: none"> <li>(1) 32 dB (A) in the idle operating mode,</li> <li>(2) 36 dB (A) when accessing a hard disk drive.</li> </ol> <p><u>Assessment and verification:</u> the applicant shall provide the competent body with a report, certifying that the levels of noise emissions have been measured in accordance with ISO 7779 and declared in accordance with ISO 9296. The report shall state the measured levels of noise emissions in both idle operating mode and when accessing a disk drive, which shall be declared in accordance with paragraph 3.2.5 of ISO 9296.</p>

The following table provides an overview how different ecolabel criteria implement noise requirements.

**Table 19: Existing noise requirements in ecolabel criteria**

	EU Ecolabel	Blue Angel	Nordic Swan	TCO	EPEAT
<b>Desktop PCs</b>	<ul style="list-style-type: none"> <li>• Idle operating mode: 40 dB (A)</li> <li>• HDD enabled: 45 dB (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Idle operating mode: 38 dB (A)</li> <li>• HDD enabled: 42 dB (A)</li> <li>• Optical drive enabled: 50 dB (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Idle mode: 38 dB (A)</li> <li>• Operating: 42 dB (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Idle mode: 39 dB (A)</li> <li>• Operating mode: 44 dB (A)</li> </ul> <p>Valid for desktop PCs with integrated moving parts, such as motor driven HDD, fans etc. <i>If the product does not emit prominent discrete tones a higher declared A-weighted sound power level is accepted but shall not exceed</i></p> <ul style="list-style-type: none"> <li>• Idle mode: 42 dB (A)</li> <li>• Operating mode: 47 dB (A)</li> </ul>	No noise criteria at all
<b>Notebook PCs including Tablet PCs</b>	<ul style="list-style-type: none"> <li>• Idle operating mode: 32 dB (A)</li> <li>• Hard-disk drive enabled: 36 dB (A)</li> </ul>	<ul style="list-style-type: none"> <li>• Idle operating mode: 35 dB (A)</li> <li>• Hard-disk drive enabled: 40 dB (A)</li> <li>• Optical drive</li> </ul>	<ul style="list-style-type: none"> <li>• Idle mode: 35 dB (A)</li> <li>• Operating: 40 dB (A)</li> </ul> <p><i>Valid for</i></p>	<ul style="list-style-type: none"> <li>• Idle mode: 35 dB (A)</li> <li>• Operating mode: 39 dB (A)</li> </ul> <p><i>Valid for notebook PCs with integrated moving parts, such as motor</i></p>	No noise criteria at all

	EU Ecolabel	Blue Angel	Nordic Swan	TCO	EPEAT
		enabled: 48 dB (A) <ul style="list-style-type: none"> <li>Netbooks: The sound power levels of the netbook shall be reported for statistical purposes in accordance with ISO 7779.</li> </ul>	<i>Notebook PCs + Thin clients</i>	<i>driven HDD, fans etc.</i> <i>If the product does not emit prominent discrete tones a higher declared A-weighted sound power level is accepted but shall not exceed</i> <ul style="list-style-type: none"> <li>Idle mode: 38 dB (A)</li> <li>Operating mode: 42 dB (A)</li> </ul>	

### 3.6.1.1 Major proposed changes (first proposal)

#### Proposed revised criteria (first proposal)

The 'Declared A weighted Sound Power Level' (re l pW) of the computer, in accordance with paragraph 3.2.5 of ISO 9296, shall not exceed

- (1) in the idle operating mode (the measurement can be dropped if no fans are installed, e.g. CPU fans, power supply fans, computer system fans):
  - a. 38 dB (A) for desktop computers,
  - b. 32 dB (A) for notebook computers;
- (2) when accessing a hard disk drive (the measurement can be dropped if no mechanical hard disk drive is installed):
  - a. 42 dB (A) for desktop computers,
  - b. 36 dB (A) for notebook computers;
- (3) when optical drive enabled (the measurement can be dropped if no optical drive is installed):
  - a. 50 dB (A) for desktop computers,
  - b. 48 dB (A) for notebook computers.

Assessment and verification: the applicant shall provide the competent body with a report, certifying that the levels of noise emissions have been measured in accordance with ISO 7779 and declared in accordance with ISO 9296. The report shall state the measured levels of noise emissions in idle operating mode, when accessing a disk drive and when optical drive enabled (if applicable), which shall be declared in accordance with paragraph 3.2.5 of ISO 9296. In case of different configurations of identically constructed units the measurements have to be performed on the loudest individual components.

- Based on the most current Blue Angel ecolabel criteria for personal computers and notebook computers,
  - For personal computers the slightly stricter limit values have been taken;
  - For personal and notebook computers limit values for when an optical drive is enabled have been included.
- Exemptions have been included for the measurements in cases where fans, mechanical hard disk drives or optical drives are not installed.

- Regarding assessment and verification, in case of different configurations of identically constructed units the measurements shall be allowed to be performed on the loudest individual components to avoid measurements for each individual configuration.

#### 3.6.1.2 *Stakeholder feedback and further evidence*

According to the discussions of stakeholders at the first AHWG meeting, the extra tests should not be a problem. There was concern that the lowering of some of the limit values could have very high costs, thus more market information was requested to support the case for stricter criteria.

Sound power should be expressed in sound power and measured in bells and not decibels. This causes confusion in the market (check ISO 9296 where the noise should be measured).

#### Written stakeholder feedback following the first AHWG meeting

- The proposal is supported by one of the stakeholders.
- Another stakeholder remarks that a lowering of the sound power level of 2 dB like from 40 to 38 is something that the human ear cannot detect but that requires more expensive components to be used in the PC. If deciding to go for stricter values this economic factor should be kept in mind.
- The proposed partly stronger limit values for noise are not supported by one of the stakeholders because: a) not too many products comply b) the lower levels are not appreciated in relation to the increased cost. Also, the desktops limits have been copied from the German Blue Angel, who currently only have one license. For Notebooks these limits are from the EU Ecolabel, at present no certified products. For the optical drive measurements: copied from Blue Angel, currently only one license. Not required according to applicable ECMA and ISO standards. Results in extra test cost, not justified for a rare operational mode. Suggest skipping (very few persons use the optical disk today). Finally, according to applicable ISO and ECMA standards, sound power shall be expressed in Bel not Decibel.

- It is asked to check the 2010 version of ISO 7779 address that the noise level of an optical drive might be very dependent on the type of disc.
- One of the answering stakeholders disagrees with the argumentation of a certain stakeholder during the first AHWG meeting that lowering the A-Weighted Sound Power Level by 2 dB is not meaningful due to the following reasoning: Based on the document written by Professor Steven Errede, Department of Physics, University of Illinois at Urbana-Champaign, Illinois (The Human Ear Hearing, Sound Intensity and Loudness Levels) it is believed that “The Just Noticeable Difference (JND, in dB) in our human hearing is on average - 0.5 dB. It varies between 1.4 and less than 0.4 (see graph on page 22). It changes depending on the frequency. An example of the noise spectrum of a cooling fan is provided<sup>120</sup>. Assuming that most of the noise is produced by the cooling fan and taking the exemplary noise spectrum into account, the Just Noticeable difference would be between 0.8 and 1 dB at 40dB. Against this background the stakeholder asked that it should be investigated if the existing criteria are strict enough. A Dutch study<sup>121</sup> is provided as further evidence which is proposed to give a good indication which levels are preferable in a work environment. It should be considered if it is necessary to set different levels for different types of computers. For example small scale servers (new in the scope), if not placed in the workspace, can produce more sound. Tablets generally don't make much noise so more strict criteria would be preferable. Workstations on the other hand are larger than small laptops. This means they can use a larger fan that can spin at a lower speed than small fans in small laptops.
- The website Notebookcheck.net<sup>122</sup> is provided by one of the answering stakeholders as further evidence indicating noise emissions of different products. Next to the measurements there is always an appreciation given, which is proposed to be used as indication which noise levels are good. The

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<sup>120</sup> See [http://en.wikibooks.org/wiki/Engineering\\_Acoustics/Noise\\_from\\_cooling\\_fans](http://en.wikibooks.org/wiki/Engineering_Acoustics/Noise_from_cooling_fans)

<sup>121</sup> See [http://www.nen.nl/pdfpreview/preview\\_126140.pdf](http://www.nen.nl/pdfpreview/preview_126140.pdf)

<sup>122</sup> See <http://www.notebookcheck.net/Laptop-Search.8223.0.html#results>

table below gives an overview of the noise emissions of the tablets that have been reviewed in the above database.

**Table 20: Further evidence provided by stakeholder feedback: Noise emissions of different Tablet computers (Source used: [www.notebookcheck.net](http://www.notebookcheck.net))**

Model	Type	Noise Emission
Prestigio MultiPad PMP5080B	Tablet	Idle med: 0 dB(A)
Dell Streak 7	Tablet	Idle med: 0 dB(A)
Archos 101	Tablet	Idle med: 0 dB(A)
Viewsonic ViewPad 10s	Tablet	Idle med: 0 dB(A)
Apple iPad	Tablet	Idle med: 0 dB(A)
Microsoft Surface Pro 2	Tablet	Idle med: 27 dB(A)
Samsung Galaxy Tab 10.1v	Tablet	Idle med: 27 dB(A)
Fujitsu Stylistic Q550	Tablet	Idle med: 27 dB(A)
Acer Iconia Tab A200	Tablet	Idle med: 27 dB(A)
Acer Iconia Tab W500 Keydock	Tablet	Idle med: 29.3 dB(A)
Fujitsu Stylistic Q572	Tablet	Idle med: 30.4 dB(A)
Samsung Series 7 XE700T1A-H01DE	Tablet	Idle med: 30.8 dB(A)
Asus Eee Slate EP121-1A013M	Tablet	Idle med: 31.4 dB(A)
Gigabyte S1080	Tablet	Idle med: 37.3 dB(A)
<b>AVERAGE</b>	<b>Tablet</b>	<b>19, 1dB (A)</b>

**Table 21: Further evidence provided by stakeholder feedback: Noise emissions of different Workstations (Source used: [www.notebookcheck.net](http://www.notebookcheck.net))**

Model	Type	Noise Emission
Dell Precision M4500 Core i7-940XM	Workstation	Idle med: 28.2 dB(A)
Dell Precision M4600	Workstation	Idle med: 28.6 dB(A)
Dell Precision M4700	Workstation	Idle med: 30.7 dB(A)
Dell Precision M4800	Workstation	Idle med: 28.2 dB(A)
Dell Precision M6600	Workstation	Idle med: 29.6 dB(A)
Dell Precision M6700	Workstation	Idle med: 29.6 dB(A)
Dell Precision M6800	Workstation	Idle med: 29.2 dB(A)
MSI GT60 0NG-405DE	Workstation	Idle med: 35.8 dB(A)
HP EliteBook 8470w B5W63AW-ABD	Workstation	Idle med: 32.4 dB(A)
HP Elitebook 8540w	Workstation	Idle med: 32.8 dB(A)
HP EliteBook 8560w-LG660EA	Workstation	Idle med: 33.3 dB(A)
HP EliteBook 8570w LY550EA-	Workstation	Idle med: 32.9 dB(A)

Model	Type	Noise Emission
ABD		
HP EliteBook 8570w B9D05AW-ABD	Workstation	Idle med: 34.7 dB(A)
HP Elitebook 8740w 820QM/FX2800M	Workstation	Idle med: 33.4 dB(A)
HP EliteBook 8770w DreamColor	Workstation	Idle med: 32.7 dB(A)
Schenker XIRIOS W710	Workstation	Idle med: 37.6 dB(A)
Schenker XIRIOS W712	Workstation	Idle med: 36.8 dB(A)
MSI GT60 0NG-294US	Workstation	Idle med: 35.8 dB(A)
Lenovo Thinkpad W510 4319-29G	Workstation	Idle med: 34.1 dB(A)
Lenovo ThinkPad W520	Workstation	Idle med: 32.4 dB(A)
Lenovo ThinkPad W530-N1K43GE	Workstation	Idle med: 33.6 dB(A)
Lenovo Thinkpad W701 2500-2EG	Workstation	Idle med: 31.4 dB(A)
Fujitsu Celsius H700	Workstation	Idle med: 35.1 dB(A)
Fujitsu Celsius H710 WXP11DE	Workstation	Idle med: 29.2 dB(A)
Fujitsu Celsius H920	Workstation	Idle med: 33.6 dB(A)
Toshiba Tecra S11-11H	Workstation	Idle med: 33.3 dB(A)
<b>Average</b>	<b>Workstation</b>	<b>32.5 dB(A)</b>

According to the stakeholder, if tablets were considered to be under the notebook noise emission limit within the EU Ecolabel, all but one would pass (limit 32dB). This is seen as a clear indication that the noise emission levels should be differentiated.

#### Further research and evidence

#### **Difference between Sound Pressure Level and Sound Power Level**

For noise emissions of products, two different indicators have to be distinguished<sup>123</sup>:

- **Sound Pressure Level:** A noise level or sound level is usually a sound pressure level, a measure of the small pressure fluctuations in the air superimposed on the normal atmospheric pressure. Noise levels produced by a machine or a piece of equipment can be easily measured with a sound level meter. The meter shows the sound pressure level at the measurement position.

<sup>123</sup> Source: <http://silent.se/pc/iso-9296.php>

The sound level depends on how far away the meter is from the machine, and on the measuring environment. For example, is the machine outdoors, in a large room or in a small room, and does the room contain soft furnishings or are the walls hard and bare? This sound level is important because it relates to the loudness of the sound and to the potential damaging effect on hearing.

- **Sound Power Level:** A sound power level on the other hand is a measure of the total noise radiated by the machine in all directions. It is a property of the machine and is essentially independent of the measuring environment. Sound power levels are useful to equipment manufacturers, buyers, installers, and users for:
  - Calculating the sound pressure level from a machine, or several machines, at a given distance in a given environment, such as a factory, workshop, office or the home.
  - Comparing the noise output from different machines.
  - Setting specifications for the maximum permitted noise from a machine.
  - Comparing machines before and after modifications to reduce the noise.

These differences have to be carefully taken into account when discussing EU Ecolabel criteria and comparing benchmarks. For example, the examples of noise emissions for Tablets and Workstations provided above by written stakeholder feedback (cf. Table 20 and Table 21) are based on measuring the Sound *Pressure* Level<sup>124</sup> and thus not applicable for comparison with the proposed EU Ecolabel criteria which are based on Sound Power Level (it is not possible to calculate the sound power level from just one sound pressure level value as sound power level is calculated based on many sound pressure level values).

### **Differences between bels (B) and decibels (dB)**

Generally, a decibel is a tenth of a bel: 1 B = 10 dB. The ISO 9296 standard “Acoustics – Declared noise emission values of computer and business equipment”

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<sup>124</sup> Cf. Measurement method at <http://www.notebookcheck.net/Our-Test-Criteria.15394.0.html>

is used for declaration of acoustic noise emissions of information technology. It specifies reporting statistical maximum values of the A-weighted sound power levels in decibel; and to report measurements taken according to ISO 7779<sup>125</sup>.

However, although ISO 9296 specifies reporting of A-weighted sound power levels (as well as sound pressure levels) in **decibel**, which most consumers are aware of as unit, the computer industry as only product group decided to declare sound power levels in bel to avoid confusion between decibels for sound power level and decibels for sound pressure level.

### **Benchmarks for noise emissions**

An indicative research has been done if there are any computer products on the market fulfilling the proposed requirements at all. However, data on noise emissions (i.e. sound power level measured in accordance to ISO 7779) are not common information within the technical specifications of computer products. As the manufacturer HP provides a broad range of public available IT Eco declarations<sup>126</sup> for its products (Desktop PCs, Workstations, Notebook and Tablet PCs), the research has been focussed on those products assuming that products of other manufacturers have similar performances. The lists are non-exhaustive but provide a good overview that quite a large number of current models would be able to meet the requirements.

### **Notebook PCs, Tablet PCs and Mobile Workstations**

Especially for Notebook PCs, the existing criteria with 3.2 bel (idle mode) and 3.6 bel (operation mode) are the lowest compared to other ecolabelling schemes.

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<sup>125</sup> The ISO 7779 standard, "Acoustics -- Measurement of airborne noise emitted by computers and business equipment", is the international accepted one used for measuring noise emissions from personal computer system units, hard disks and other storage media. Source: <http://silent.se/pc/iso-9296.php>

<sup>126</sup> Cf. <http://www.hp.com/hpinfo/globalcitizenship/environment/productdata/iteconotebook-o.html>;  
<http://www.hp.com/hpinfo/globalcitizenship/environment/productdata/itecoworkstatio.html>;  
<http://www.hp.com/hpinfo/globalcitizenship/environment/productdata/itecodesktop-pc.html>

**Table 22: Declared A-weighted sound power levels  $L_{WAd}$  (B) of a range of current HP notebook models (Source: HP IT Ecodeclarations)**

<b>Notebook (document date)</b>	<b>Idle Mode (benchmark: 3.2 bel)</b>	<b>Operating Mode (benchmark: 3.6 bel)</b>
Compaq 14 Notebook PC (2013)	1.8	4.1
Compaq 14 Touchsmart Notebook PC (2013)	1.8	4.1
Compaq 15 Notebook PC (2014)	3.0	3.1
Compaq Mini CQ10 (2012)	2.6	2.6
Compaq Presario CQ45 (2012)	2.9	3.1
Compaq Presario CQ58 (2012)	2.8	3.3
HP SpectreXT (2012)	3.5	3.5
HP 1000 Notebook PC (2012)	2.9	3.1
HP 14 Notebook PC (2013)	1.8	4.1
HP 15 Notebook PC (2014)	3.0	3.1
HP 2000 Notebook PC (2012)	2.8	3.3
HP 215 G1 Notebook PC (2013)	3.3	3.3
HP 240 G2 Notebook PC (2013)	1.8	4.1
HP 242 G1 Notebook PC (2013)	2.52	2.7
HP 250 G3 Notebook PC (2014)	3.0	3.1
HP 255 G3 Notebook PC (2014)	2.5	2.5
HP 350 G1 Notebook PC (2014)	2.6	3.1
HP Elitebook 820 G1 Notebook PC (2013)	2.96	3.13
HP Elitebook 840 G1 Notebook PC (2013)	3.3	4
HP Elitebook 850 G1 Notebook PC (2013)	3.27	4.03
HP Elitebook 8770w Mobile Workstation (2013)	3.3	3.9
HP Elitebook Folio 1040 G1 Notebook PC (2013)	2.8	2.8
HP Elitebook Revolve 810 G2 Notebook PC (2013)	2.9	2.9
HP ElitePad 1000 G2 (2014)	2.0	2.0
HP ElitePad 900 (2014)	2.6	2.6
HP Envy 14 Sleekbook (2013)	3.4	3.4
HP Envy m6 Notebook PC (2014)	3.4	3.9
HP Pavilion 10 Notebook PC (2014)	3	3.2
HP Pavilion 17 TouchSmart Notebook PC (2014)	2.7	2.7
HP Pavilion Chromebook 14 PC (2013)	3.4	3.4
HP ProBook 450 G1 Notebook PC (2013)	3.2	3.2
HP Split 13x2 Notebook PC (2013)	3.0	3.3
HP ZBook 17 Mobile Workstation (2013)	2.9	2.9

## Desktop PCs, Integrated Desktop PCs and Workstations

For Desktop PCs, the first proposal for revised noise criteria has been aligned to the stricter requirements of the ecolabel Blauer Engel (idle mode: 3.8 instead of current 4.0 bel; operation mode: 4.2 instead of current 4.5 bel).

**Table 23: Declared A-weighted sound power levels  $L_{WAd}$  (B) of a range of current HP desktop models (Source: HP IT Ecodeclarations)**

Desktop PC (document date)	Idle Mode (proposed: 3.8 bel)	Operating Mode (proposed: 4.2 bel)
Compaq 18 All-in-One PC (2014)	3.4	3.5
HP 110 Desktop PC / Compaq 100 Desktop PC (2014)	3.82	4.03
HP 18 All-in-One PC (2014)	3.4	3.5
HP 19 All-in-One PC (2014)	3.5	3.5
HP 20 All-in-One PC (2014)	3.5	3.5
HP 200 G1 MT Business PC (2014)	3	4
HP 202 G1 MT Business PC (2014)	3.4	3.5
HP 205 G1 All-in-One Business PC (2014)	3.43	3.45
HP EliteDesk 800 G1 Ultra-slim Desktop Business PC (2013)	3.6	3.6
HP EliteDesk 880 G1 Tower Business PC (2013)	3.6	3.6
HP Envy 700 Desktop PC (2013)	3.92	4.35
HP Envy Phoenix 810 Desktop PC (2014)	4	4.1
HP Pavilion 21 TouchSmart All-in-One PC (2014)	2.8	2.9
HP Pavilion 500 Desktop PC (2014)	3.5	3.9
HP Pavilion Slimline 400 Desktop PC (2013)	3.45	4.24
HP Pavilion23 All-in-One PC (2014)	2.8	2.9
HP ProDesk 400 G1 Microtower Business PC (2013)	3.7	3.6
HP ProDesk 485 G1 Microtower Business PC (2013)	4.0	4.1
HP ProDesk 600 G1 Tower Business PC (2013)	3.6	3.6
HP ProOne 400 G1 AiO Business PC (19.5" Non-Touch) (2014)	3.6	3.6
HP ProOne 400 G1 AiO Business PC (21.5" Touch) (2014)	3.2	3.3
HP Z1 Workstation G2 (2014)	2.96	3.2
HP Z230 SFF Workstation (2014)	3.3	3.3
HP Z230 Tower Workstation (2014)	3.3	3.3
HP Z620 Workstation (2012)	3.3	3.9

### 3.6.1.3 Second proposal for noise criteria

#### Proposed revised criteria (second proposal)

The 'Declared A weighted Sound Power Level' (re l pW) of the computer, in accordance with paragraph 3.2.5 of ISO 9296, shall not exceed

- (a) For desktop computers including integrated desktop computers and workstations
  - i. Idle Mode: 3.8 bel (the measurement can be dropped if no fans are installed, e.g. CPU fans, power supply fans, computer system fans)
  - ii. Operation mode: 4.2 bel (the measurement can be dropped if no mechanical hard disk drive is installed)
- (b) For notebook computers including tablet computers and mobile workstations
  - i. Idle mode: 3.2 bel (the measurement can be dropped if no fans are installed, e.g. CPU fans, power supply fans, computer system fans)
  - ii. Operating mode: 3.6 bel (the measurement can be dropped if no mechanical hard disk drive is installed)

Assessment and verification: The applicant shall provide the competent body with a test report, certifying that the levels of noise emissions have been measured in accordance with ISO 7779. The report shall state the measured sound power levels in idle and operating mode, which shall be declared in accordance with paragraph 3.2.5 of ISO 9296. In case of different configurations of identically constructed units the measurements have to be performed on the loudest individual components.

#### Major proposed changes

- Small scale servers are not covered by this requirement as it is assumed that they will generally be located in a separate room with no permanent workplaces.
- Thin Clients are indirectly excluded from this requirement as they are constructed with no fans or hard disks so that they do not create background noise emissions being typical for PCs.
- It is proposed to declare the measured sound power levels in Bel not Decibel as being common practice in ICT industry to avoid confusion between decibels for sound power level and decibels for sound pressure level.
- The optical drive measurement has been deleted as optical drives today are rarely and/or only for short, definite periods used (e.g. for installation purposes)
- The limit values of the first revised criteria proposals have been kept in the second proposal as indicative market research showed they can be reached by a number of products.

### 3.6.2 Criterion 6.2 – Ergonomics

Currently, there are no fitness for use criteria associated with the EU Ecolabel. TCO Certified 2012 for Desktops, Notebooks, All-in-One PCs and Tablet PCs as well as TCO Certified Displays contain criteria regarding visual ergonomics (image detail, luminance, luminance contrast, reflection and screen colour) and work load ergonomics (inter alia vertical tilt and vertical height for AiO-PCs); the Nordic Swan ecolabel aligns to TCO Displays and Notebooks criteria with regard to ergonomics and includes some own requirements for tablet PCs.

Consultation questions
<ul style="list-style-type: none"><li>• Should the EU ecolabel for computers include criteria for (visuable and/or workload) ergonomics, e.g. aligning them to the TCO criteria?</li></ul>



#### 3.6.2.1 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting, it was felt that the TCO criteria could form a good starting point and if the criteria proposal is adopted then harmonisation with TCO would be preferable. The cost benefits of certain criteria require careful consideration. This criteria area could be more relevant to GPP, where people are using computers for longer hours.

Written stakeholder feedback following the first AHWG meeting:

- Aligning criteria for ergonomics to TCO Development criteria is recommended as the criteria and test methods are very established, transparent and relevant.
- The proposal is supported under the condition that it should be made 100% identical with TCO 6.0 including a mutual recognition agreement.
- Ergonomics criteria can be introduced but if we want to give impulse to this EU Ecolabel product group it is asked not to align too much to other private labels which are more known and widespread than the EU Ecolabel in this sector and that could, at the end, be preferred by the applicants instead of the Ecolabel just because better known on the market and maybe because they require less number of criteria to comply with.

### 3.6.2.2 *Proposal for ergonomics criteria*

Despite stakeholders' feedback generally agreeing to add requirements on ergonomics, aligning them to TCO criteria, the study team decided in the view of a large number of further relevant criteria not to include a new criterion on ergonomics to the product group computers.

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### 3.6.3 Criterion 6.3 – Emission of fluorinated GHG during LCD production

#### 3.6.3.1 *First proposal for fluorinated GHG criteria*

##### **Proposed new criterion (first proposal)**

###### **Fluorinated GHG emission during LCD production**

Computers with integrated LCD panel must be produced in a way that the fluorinated greenhouse gases  $\text{NF}_3$  and  $\text{SF}_6$ , if part of the production process, are abated by a system that is an integrated part of the production process.

*Assessment and verification:* The applicant shall declare the compliance with these requirements and shall additionally provide a description of the implementation process at suppliers/sub-contractors (i.e. LCD panel makers) to the competent body.

Fluorinated greenhouse gases (GHG) are among the most potent and persistent GHG contributing to global climate change; they are relevant in the manufacture of semiconductors, light emitting diodes and LCD flat panel displays. As it is currently difficult to set product-related criteria addressing these emissions (difficulties in comparing panel suppliers' F-GHG emissions due to a lack of consistency in estimating emissions, estimating emissions reductions, and in monitoring the efficacy of installed abatement systems), within the EU ecolabel revision a process oriented approach is therefore proposed, based on a proposal in the current revision of the Nordic Ecolabelling criteria for television displays.

For more details cf. Task 4 report “Improvement Potential”, section 4.2.5.2.2 “Minimizing the use of F-gases in the production”.

#### 3.6.3.2 *Stakeholder feedback*

According to the discussions of stakeholders at the first AHWG meeting, the problem of the availability of data and consistency was briefly discussed. However, the discussion was mainly put on hold for the Televisions and Displays AHWG. Written feedback following the first AHWG meeting of one of the stakeholders indicates support of the inclusion of this criterion.

#### 3.6.3.3 *Second proposal for fluorinated GHG criteria*

In the view of a large number of further relevant criteria, the study team decided NOT to include a new criterion on fluorinated greenhouse gases to the product group computers.

### 3.7 Cluster 7 – Information

#### 3.7.1 Criterion 7.1 – User instructions

##### **Present criteria,**

##### **Decisions 2011/337 and 2011/330**

The [personal computer and computer display] / [notebook computer] shall be sold with relevant user information that provides advice on its proper environmental use. The information shall be located in a single, easy-to-find place in the user instructions as well as on the manufacturer's website. The information shall include in particular:

- (a) Energy consumption: TEC value in accordance with Energy Star v5.0, as well as the maximum power demand in each operating mode. In addition, instructions must be provided on how to use the devices energy-saving mode;
- (b) Information that energy efficiency cuts energy consumption and thus saves money by reducing electricity bills and that unplugging your [personal computer or computer display] / [notebook computer] reduces energy consumption to zero;
- (c) The following indications on how to reduce power consumption when the [personal computer and/or computer display] / [notebook computer] are not being used:
  - (i) Putting the [personal computer and computer display] / [notebook computer] into off mode will reduce energy consumption but will still draw some power;
  - (ii) Reducing the brightness of the screen will reduce energy use;
  - (iii) Running the disk fragmentation on the [computer] / [notebook computer] will reduce energy use and increase the life of your [personal computer] / [notebook computer] (this is not applicable to solid state device machines);
  - (iv) Screen savers can stop [personal computer monitors] / [notebook displays] from powering down into a lower power mode when not in use. Ensuring that screen savers are not activated on [computer monitors] / [notebook computers] can therefore reduce energy use;
- (d) Information should be included in the user instructions or the manufacturer's website to let the user know where to go to obtain professional repairs and servicing of the [personal computer and/or computer display] / [notebook computer], including contact details as appropriate;
- (e) End-of-life instructions for the proper disposal of [personal computers and/or computer displays] / [notebook computers] at civic amenity sites or through retailer take-back schemes as applicable, which shall comply with Directive 2002/96/EC of the European Parliament and of the Council.
- (f) Information that the product has been awarded the EU Ecolabel with a brief explanation as to what this means together with an indication that more information on the Ecolabel can be found at the website address <http://www.ecolabel.eu>
- (g) Any instruction/repair manual(s) should contain recycled content and should not contain chlorine bleached paper.

Assessment and verification: the applicants shall declare the compliance of the product with these requirements to the competent body.

### 3.7.1.1 Major proposed changes (first proposal)

#### Proposed revised criteria (first proposal)

The computer shall be sold with relevant user information that provides advice on its proper environmental use. The information shall be located in a single, easy-to-find place in the user instructions as well as on the manufacturer's website. The information shall include in particular:

- (a) Energy consumption: TEC value in accordance with Energy Star v6.0, as well as the maximum power demand in each operating mode. In addition, instructions must be provided on how to use the device's energy-saving mode;
- (b) Information that energy efficiency cuts energy consumption and thus saves money by reducing electricity bills and that unplugging your computer reduces energy consumption to zero;
- (c) The following indications on how to reduce power consumption when the computer is not being used:
  - (i) Putting the computer into off mode will reduce energy consumption but will still draw some power;
  - (ii) Reducing the brightness of the screen will reduce energy use;
  - (iii) Periodically applying the computer's disk defragmentation function will reduce energy use and increase the lifetime of the computer (this is not applicable to solid state device machines);
  - (iv) Screen savers can stop computer displays from powering down into a lower power mode when not in use. Ensuring that screen savers are not activated on computer displays can therefore reduce energy use;
  - (v) Charging tablet computers via USB-interface by another desktop or notebook computer might increase the energy consumption in case of leaving the desktop or notebook computer in an energy-consuming idle-mode for the sole reason of charging the tablet computer.
- (d) Information that extension of the computer's lifetime reduces the overall environmental impacts.
- (e) The following indications on how to prolong the lifetime of the computer<sup>127</sup>:
  - (i) Information to let the user know the factors influencing the lifetime of batteries as well as instructions for the user facilitating its prolongation (only applicable to mobile computers powered with rechargeable batteries).
  - (ii) Clear instructions in form of a repair manual to enable replacing of key components for upgrades or repair.
  - (iii) A list of available spare parts with current prices.
  - (iv) Information to let the user know where to go to obtain professional repairs and servicing of the computer, including contact details as appropriate;
  - (v) Clear instructions to enable a permanent deletion of personal data from the computer to facilitate a possible second hand usage.
- (f) End-of-life instructions for the proper disposal of computers, including separate instructions for the proper disposal of rechargeable batteries, at civic amenity sites or through retailer take-back schemes as applicable, which shall comply with Directive 2012/19/EU of the European Parliament and of the Council.
- (g) Information that the product has been awarded the EU Ecolabel with a brief explanation as to what this means together with an indication that more information on the Ecolabel can be found at the website address <http://www.ecolabel.eu>
- (h) Any instruction/repair manual(s) should contain recycled content and should not contain chlorine bleached paper.

**Assessment and verification:** the applicants shall declare the compliance of the product with these requirements to the competent body.

<sup>127</sup> Depending on the final decision on sub-criteria in section 3.3

- Aligning the information on energy consumption with the most current Energy Star version taken as basis for the energy criteria.
- Information that charging tablet computers via the USB-interface of another desktop or notebook computer can increase the energy consumption in case of leaving the desktop or notebook computer in idle-mode for the sole reason of charging the tablet computer.
- Inclusion of information requirements including detailed instructions for the extension of the computer's lifetime.
- Inclusion of information requirements regarding the proper disposal of rechargeable batteries

#### 3.7.1.2 Stakeholder feedback and further evidence

According to the discussions of stakeholders at the first AHWG meeting...

Written stakeholder feedback following the first AHWG meeting ask to check if there is any evidence to indicate that the benefits of periodically running disc fragmentation outweigh the energy use in doing so.

The proposal discussed at the AHWG meeting to include guidance not to charge tablets using a notebook USB port or USB port from desktop computers is supported.

The requirement for recycled content in instruction/repair manuals may have unintended consequences (e.g. prevent the use of an alternative media than paper)

#### 3.7.1.3 Second proposal for user instructions criteria

##### Proposed revised criteria (second proposal)

###### “User instructions”

The computer shall be sold with relevant user information that provides advice on its proper environmental use. The information shall be located in a single, easy-to-find place in the user instructions as well as on the manufacturer's website. The information shall include in particular:

- (a) Energy consumption: TEC value in accordance with Energy Star v6.0, as well as the maximum power demand in each operating mode. In addition, instructions must be provided on how to use the device's energy-saving mode;
- (b) Information that energy efficiency cuts energy consumption and thus saves money by reducing electricity bills and that unplugging your computer reduces energy consumption to zero;
- (c) The following indications on how to reduce power consumption when the computer is not being used:
  - (i) Putting the computer into off mode will reduce energy consumption but will still draw some power;
  - (ii) Reducing the brightness of the screen will reduce energy use;

- (iii) Screen savers can stop computer displays from powering down into a lower power mode when not in use. Ensuring that screen savers are not activated on computer displays can therefore reduce energy use;
  - (iv) Charging tablet computers via USB-interface by another desktop or notebook computer might increase the energy consumption in case of leaving the desktop or notebook computer in an energy-consuming idle-mode for the sole reason of charging the tablet computer.
  - (d) Information that extension of the computer's lifetime reduces the overall environmental impacts.
  - (e) The following indications on how to prolong the lifetime of the computer:
    - (i) Information to let the user know the factors influencing the lifetime of batteries as well as instructions for the user facilitating its prolongation (only applicable to mobile computers powered with rechargeable batteries).
    - (ii) Clear disassembly and repair instructions to enable a non-destructive disassembly of products for the purpose of replacing key components or parts for upgrades or repairs.
    - (iii) Information to let the user know where to go to obtain professional repairs and servicing of the computer, including contact details as appropriate. Service should not be limited exclusively to applicant's Authorized Service Providers.
  - (f) End-of-life instructions for the proper disposal of computers, including separate instructions for the proper disposal of rechargeable batteries, at civic amenity sites or through retailer take-back schemes as applicable, which shall comply with Directive 2012/19/EU of the European Parliament and of the Council.
  - (g) Information that the product has been awarded the EU Ecolabel with a brief explanation as to what this means together with an indication that more information on the Ecolabel can be found at the website address <http://www.ecolabel.eu>
  - (h) Any print-versions of instruction/repair manual(s) should contain recycled content and should not contain chlorine bleached paper. To save resources, online versions should be preferred.
- Assessment and verification:** The applicants shall declare the compliance of the product with these requirements to the competent body and shall provide a link to the online-version or a copy of the user instructions / repair manual to the Competent Body.

### Major proposed changes

- The criterion on applying the disk defragmentation function has been removed as increasingly the operating system and HDD/SSD are organising the data management by themselves.
  - The provision of a list of available spare parts with current prices has been deleted as this has not been seen as practicable by stakeholders (cf. 3.3.5)
  - The requirement on clear instructions to enable a permanent deletion of personal data from the computer to facilitate a possible second hand usage has been deleted; cf. section 3.3.6 on data deletion.
  - Sub-criterion (h) has been specified regarding print-versions with additional advice to prefer online versions of repair manuals to save resources.
- The assessment / verification have been amended by the provision of a copy and/or link to the user instructions.

### 3.7.2 Criterion 7.2 – Information appearing on the Ecolabel

#### **Present criteria, Decisions 2011/337 and 2011/330**

Optional label with text box shall contain the following text:

- ‘- high energy efficiency
- designed to facilitate recycling, repair and upgrading
- mercury-free backlights (if computer displays)’.

Assessment and verification: the applicant shall declare the compliance of the product with this requirement, and shall provide a copy of the Ecolabel as it will appear on the packaging and/or product and/or accompanying documentation to the competent body.

#### 3.7.2.1 *Major proposed changes (first proposal)*

##### **Proposed revised criterion (first proposal)**

Optional label with text box shall contain the following text:

- ‘- high energy efficiency
- mercury-free backlights (if the product contains an LED display)
- designed to be more durable and upgradeable
- designed to facilitate recycling.’

Assessment and verification: the applicant shall declare the compliance of the product with this requirement, and shall provide a copy of the Ecolabel as it will appear on the packaging and/or product and/or accompanying documentation to the competent body.

- Explicit focus on extended lifetime (formerly repair and upgrading) with distinguishment between the aspects of lifetime and recycling.

#### 3.7.2.2 *Stakeholder feedback and further evidence*

Written stakeholder feedback following the first AHWG meeting proposes that responsible sourcing (related to 5.2) and social responsibility (related to 5.1) could also be mentioned in the optional statements.

#### 3.7.2.3 *Second proposal for information appearing on the Ecolabel*

##### **Proposed revised criterion (second proposal)**

Optional label with text box shall contain the following text:

- high energy efficiency
- mercury-free backlights (if the product has an LED display)
- designed to have a longer lifetime
- designed to be easy to recycle
- contains *xy%* post-consumer recycled content (only when being higher than 25%)

Assessment and verification: the applicant shall declare the compliance of the product with this requirement, and shall provide a copy of the Ecolabel as it will appear on the packaging and/or product and/or accompanying documentation to the competent body.

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