DIGITALEUROPE comments on the Display regulation revision

Scope, definition, requirements and labelling implications

Brussels, 11 August 2014

DIGITALEUROPE, as the voice of the Consumer and Information Technology Industry in Europe, would like to outline with this paper the continuing concerns and problems that DIGITALEUROPE has identified with the direction that the revision of the regulations seems to be heading and suggests potential solutions for the main items.

1. SCOPE

Industry acknowledges the European Commission's decision supported by the majority of the Member States to merge televisions (TV) and computer monitors into a single regulation only for these particular product groups, under the condition that some specific displays intended for specialized professional application will be exempted.

DIGITALEUROPE would also like to request that products already under the scope of other product specific Implementing Measures, such as notebooks and integrated desktop computers are clearly excluded from the scope of this regulation.

We also recognize the need to have a regulation with solid and future-proof definitions and would therefore like to put forward some suggestions for these definitions, namely for the following product categories:

1.1. High Performance Displays

DIGITALEUROPE welcomes that High Performance Display products shall be exempt from the scope of the regulation since they require more energy to provide a higher level of performance, including an increased colour range/colour accuracy, wider viewing angles and higher resolution. With this set of features, high performance displays are often used in specialised applications such as engineering (particularly computer aided design), architecture, and photography/video and graphic design. High performance displays are sold in relatively low volumes due in large part to their high cost.

DIGITALEUROPE therefore proposes the following changes to the proposed definition:

A High Performance Display is a monitor that has all of the following features and functionalities:

a. A contrast ratio of at least 1000:1 measured perpendicular to the plane of the screen and maintained to a minimum contrast ratio of 60:1 at the limits of a horizontal viewing angle of at least 85°, with or without a screen cover glass;
b. A native resolution greater than or equal to 2.3 megapixels (MP);
c. A colour gamut of 72%;
d. A pixel response time commensurate with the frame rate of the image, including 3D imaging;

e. A brightness uniformity of >75% across the image (based on a 9 point grid measurement);
f. A viewing angle greater than or equal to 178° (at contrast ratio of min. 1:10);
g. A diagonal size greater than or equal to 61 cm (24 inches).

1.2. Digital Signage Displays (Public Displays)

DIGITALEUROPE also welcomes the exemption of Digital Signage Displays from the scope of this regulation. In our understanding a "digital signage display" is not only a public/signage display, but rather a whole display application, typically controlled by personal computers, media players or servers. A typical application is an airport flight information display system.

It also covers collaboration displays that is designed to be used exclusively in commercial/business applications to display commercial or business information (e.g., meeting documents, or slide shows, in primarily, such as, but not restricted to corporate meeting rooms or classrooms).

Regarding the technical differentiators used in this definition, we realize that some have been suggested as possible technical features of such products in our position paper from October 2012. However, this was never intended to represent an exhaustive list of features, to be present in all signage products in the market.

Therefore DIGITALEUROPE suggest that the following differentiators, as used in the Australian MEPS, are used as specifications present in all Digital Signage Displays:

a. Product has a screen size of 81 cm (32 inches) or above.
b. The product is marketed as a product that is intended to be viewed by more than one user at a time.
c. The product is not intended for desktop use.
d. The product is not supplied with a means of allowing it to be freestanding.
e. The product requires installation on a fixed basis.

Additionally, the specific ID to address the selected display screen (for example in display groups up to 25 units), could also be used as a differentiator present in all Digital Signage Displays.

Regarding the remaining differentiators proposed they should be added to the 2nd list of features that may also be present (but are not mandatory differentiators).

1.3. Broadcast Monitors

DIGITALEUROPE also welcomes the exemption of Broadcast Monitors from the scope of this regulation. Industry suggests that the definition for Broadcast Monitors should cover professional use by Broadcasters or Video Production Houses.

Current definition:

'Broadcast monitor' means an electronic display that is designed and marketed for professional use in television or broadcast production rooms, and whose specification shall include all of the following functions and features:

DIGITALEUROPE
Rue de la Science, 14 B-1040 Brussels [Belgium]
T. +32 (0) 2 609 53 10 F. +32 (0) 2 431 04 89
www.digitaleurope.org | info@digitaleurope.org | @DIGITALEUROPE_
Transparency register member for the Commission: 64270747023-20

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Suggested change:

'Broadcast monitor' means an electronic display that is designed and marketed for professional use by Broadcasters or Video Production Houses for video content creation, and whose specification shall include all of the following functions and features:

DIGITALEUROPE would also like to see a clear differentiation between products defined as Broadcast monitors and High Performance Displays.

1.4. Medical Monitors

DIGITALEUROPE would like to point out to the fact that the referenced directives and regulations will change soon. Therefore an addition is suggested:

'Medical monitors and other medical devices' means electronic displays and other products covered by the scope of *below Directives and their amendments*:"

1.6 Future 8K TV products

Targeting the 2020 Olympics, the Japanese public broadcaster NHK (Nippon Hoso Kyokai) announced a plan for the 8K broadcasting implementation. As there is currently no data available on this technology, we recommend either an exemption or discussing the 8K issue around Tier 2 timing in the view of Tier 3, or after the product introduction.

2. STANDBY AND OFF MODE REQUIREMENTS

DIGITALEUROPE would like ensure that all products in scope of the future regulation (including Computer displays) should be removed from scope of EC 1275/2008, just like televisions.

3. NETWORK STANDBY REQUIREMENTS

DIGITALEUROPE would like to reiterate the interpretation issues we are facing with the wording in the new requirements for network standby and power management, set as an amendment to regulation 642/2009 by regulation 801/2013. This refers specifically to the following wording,

The power management function, or a similar function, shall be activated, unless all wireless network ports are deactivated. In that case the power management function, or a similar function, shall be activated if any one of the network ports is activated.

(c) A networked television that has one or more standby modes shall comply with the requirements for these standby mode(s) when all wireless network ports are deactivated.

DIGITALEUROPE would like to ask for a clarification and/or an amendment in revision of the regulation.

4. POWER MANAGEMENT REQUIREMENTS

DIGITALEUROPE would like to request that application of the current Automatic power down (APD) requirement under the 642/2009 regulation (power down within 4 hours without user interaction) is limited to products with a tuner. In this way it would avoid that this requirement applies to products to which it would be inappropriate for their intended use. Such is the case for Computer Monitors where they are designed to obey a power-down command from the host computer (as supported by the DVI, HDMI, and DP protocols) and don't rely on user interaction as defined in the current regulation.

5. NON-ENERGY REQUIREMENTS

DIGITALEUROPE would once more like to reiterate the arguments of our past position papers (March 2013, February 2013 and December 2012) regarding our concerns with the proposed non-energy requirements to be included in the Ecodesign regulation for displays.

Our industry has invested significantly in the past 10 years in technical changes that have already resulted in an impressive 83% reduction in material use; with transformation from a CRT dominated market in 2002 to today's LED dominated market.. Display manufacturers are seeking practical solutions for setting non-energy requirements, and we are already proposing the phase-out of CCFL for LCD television, and voluntary introduction of a mercury-free logo to support consumer choice and better management of hazardous materials in recycling processes.

However DIGITALEUROPE cannot support the introduction of the following requirements:

Manual disassembly of key components

In general we have serious concerns with the proposal on disassembly times, not only with regard to the time length itself but also with the verifiability, the impact on innovation, the administrative burden, and above all, the demonstrable environmental benefit.

Marking of plastics

Although most display makers currently mark their plastic parts >100 gram following the ISO 1043-1 (polymer type) and ISO 1043-4 (FR code) standards on a voluntarily basis, Manufacturers will face serious legal difficulties from Suppliers to obtain all the information required by the current draft proposal. Also the added value of this requirement in the future might be questionable, considering developments in recycling technologies towards automated detection and segregation of the plastic material types.

Recyclability rate for plastics

The requirement on use of plastics with minimum recyclability rate, base on a closed list of polymers with nominal recyclability rate scores could hamper innovation in product design and resource efficiency. The fact that all polymers not included in this list are considered to have a 0% recyclability rate would restrict their use and limit the design options in new product development. New technologies currently under development, such as flexible and transparent displays could therefore not be allowed in the EU market due to this limitation in polymer selection available to designers.

Indium declaration

DIGITALEUROPE
Rue de la Science, 14 B-1040 Brussels [Belgium]
T. +32 (0) 2 609 53 10 F. +32 (0) 2 431 04 89
www.digitaleurope.org | info@digitaleurope.org | @DIGITALEUROPE_
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DIGITALEUROPE is uncertain of the added value of this requirement. At this moment there is no viable recycling process to recover indium from displays, and considering the low economic value of indium, there are doubts that this will ever be economically feasible. Additionally, Industry expects the use of indium to be reduced in upcoming display technologies (OLED uses half of the indium used for LCD). Nevertheless, DIGITALEUROPE is willing to consider declaring Indium in order to promote future developments in recovery processes.

6. ENERGY LABELLING IMPLICATIONS

DIGITALEUROPE would like to highlight the conclusions of the Consultation Forum regarding the need to avoid any downgrading of Energy Class of products currently on the market with the current review of the Ecodesign and Energy Label regulation. Although we accept the conclusion to extend the scope to the Energy Label regulation in order to include computer monitors, we believe this is not the time for a full rescale of the Energy Label, either by complete change in EEI threshold for Energy Classes or by changing the current formulas for calculation.

Although we acknowledge that the use of different equations for Ecodesign and Energy Label might not be ideal, we believe this is necessary in order to avoid the confusion in the market caused by rescaling exercises. This is even more relevant considering the expected changes to be introduced by the revision of the Energy Label Directive. We believe that any rescaling should only happen under this New Directive, which would avoid two rescaling exercises in such close period.

However DIGITALEUROPE recognizes the need to increase the longevity of the current Energy Label, and would support the rescaling of the top Energy Class threshold as currently proposed. This would ensure that the top class is only populated by a small share of the highest energy efficient displays.

For more information please contact:
Sylvie Feindt, DIGITALEUROPE's Environmental Policy Director
+32 2 609 53 19 or Sylvie.feindt@digitaleurope.org

DIGITALEUROPE
Rue de la Science, 14 B-1040 Brussels [Belgium]
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ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 59 corporate members and 36 national trade associations from across Europe. Our website provides further information on our recent news and activities: http://www.digitaleurope.org

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