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Study to establish the Ecodesign Working Plan 2015-2017 implementing Directive 2009/125/EC

Document comment relates to: Draft Task 2 Report – Horizontal measures

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Task 2 report	P.19	Horizontal measure on all devices containing significant amounts of plastics => minimum content of recycled plastic; plastics marking.	<p>In principle we have no objection to policies that try to promote and increase the recyclability of plastics used in display equipment, in fact manufacturers are already using recycled plastics in various ICT devices (without making public claims as it is not measurable and can thus not be verified) and the VA on IE contains clauses on the recyclability, plastic marking and polymer composition.</p> <p>The methods promoted by parts of the Commission /JRC in the TV regulation are completely inappropriate and will create serious market access problems and hamper further innovation.. The proposal from the EU Commission for a mandatory threshold for plastics is based on IEC TR 62635. The TR is a Technical Report and not a normative standard but contains several informative potential recycling scenarios' and related recyclability rates for plastic and additives. Depending on the selected scenario a product could achieve an 80% or a 40% recyclability rate for the plastics. The IEC working group provided input to the EU Commission that the TR is not intended to be used as a mandatory product design policy.</p> <p>The CENELEC safety standard EN 60065:2002/A11:2008 requires a V1 flammability classification for display enclosure materials. As a result, pure polymers like ABS, HIPS or PP (HB</p>	<p>Any consideration of a horizontal measure should be postponed until standards are available, in particular as a mandate to CEN/CENELEC is currently being issued. The availability of such a standard would put the discussion in the framework of an Ecodesign measure on a more solid basis.</p> <p>The currently proposed approach of a closed list of permitted plastics is a major barrier to innovation in a very innovative industry. Further it even bans new environmental better or recycled material.</p> <p>Minimum content of recycled plastic: Due to the diversity of plastics usage in products regulated under ErP and the current state of supply of recycled plastics a horizontal measure on plastics is inappropriate.</p>

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			<p>classification) can no longer be used and forces manufacturers to use flame retardant alternatives. Scenario's in the TR show a recyclability rate of 0% for automated recycling of plastic containing flame retardants. In order to meet a minimum threshold industry would either be forced to change to e.g. metals for enclosure materials or be non-compliant with the safety standard.</p> <p>Also this ignores the possibility that a new polymer may actually be as recyclable as one of the listed materials, but because there is no allowance for demonstrating or adapting the RCR%, it would effectively either kill the development of the technology, or simply exclude European buyers from access to it.</p> <p>For details please see the numerous DE position paper on non-energy requirements for displays.</p> <p>To drive the use of recycled plastic DE is involved in a EIP "Raw Material Commitment" project, which is (among many other things) to define target grades of recycled plastics to facilitate the procurement and usage of these by manufacturers.</p> <p><u>The minimum content of recycled plastic</u></p> <p>Because the suitable threshold values of the minimum content of recycled plastic differ very much depending on the product category, such requirements need to be discussed individually as a product-specific measure, not as a horizontal measure.</p> <p>For example, most of plastic materials in PCs are used as housing, on the other hand, imaging equipment has many internal plastic parts. Therefore, comparing with PCs, imaging equipment has a large number of parts and</p>	

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			<p>materials and those parts are selected according to their application. In addition, the necessary grades differ depending on the nature and purpose of each (internal) part. For plastics in small, integrated components the situation is yet again very different.</p> <p>For these reasons, the value for PCs cannot simply be applied in the same way to imaging or other ICT/CE equipment.</p> <p>Moreover, there is insufficient supply of post-consumer recycled plastic in the market. Because of this a requirement for a minimum recycled plastic content may cause unreasonable cost burden. The supply of recycled plastic is very limited in the market; industry cannot expect stable supply of them at present.</p> <p><u>Marking of plastics</u> Most display makers currently mark their plastic parts >100 gram following the ISO 1043-1 (polymer type) and ISO 1043-4 (FR code) on a voluntarily basis. From communications with recyclers we learned that they do not see an added value in the marking of plastics, as recycling technology development is moving towards high speed processes which allow automated detection and segregation of the plastic material. While older manual recycling technologies may still be in use, it is expected that they will soon become obsolete and unable to compete with modern efficient treatment plants responsible for the majority of WEEE processing within the ten years a display product would take to become WEEE. Detailed marking information is therefore not used or necessary for WEEE recycling purposes.</p>	<p>Marking of plastics:</p> <p>We urge the Commission to abstain from any measures on manufacturers, which have no value for the target group (recyclers). Based on our on discussion with recycler we doubt that a preparatory study will lead to any measure.</p>

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Task 2 report	P19	Horizontal measure on all devices containing permanent magnets.	<p>The draft ERECON report/DG ENTER) concludes that mobile phones are not the biggest problem when it comes to critical raw materials:</p> <p><i>The magnets contained in mixed electronics (eg- mobile phones, electric toothbrushes, shavers, drills etc.....) are often very small (less than 0.5g in a mobile phone), they are typically coated with nickel or a multilayer of Ni-Cu-Ni, they are glued into the component which forms part of the whole product, they are often resin bonded , the component itself forms part of a complicated architecture which is usually screwed together , the material is often in different positions within the product and the material is permanently magnetic. A large fraction of electronic goods are shredded to break apart the products into pieces which can be separated using standard recycling processes such as magnetic and electrostatic separation. However the magnets are very brittle and break apart during shredding of the product. The powder is still magnetic and therefore it tends to stick to the ferromagnetic components in the waste and to the shredder itself (see figure ---). Automatic detection and separation of different materials normally takes place after shredding. However this would not be possible for magnet containing scrap as NdFeB powder would be identified throughout the waste stream after shredding.</i></p>	<p>As magnets have recently been assessed by the ERECON we see little value in doing an additional preparatory study that is unlikely to lead to an implementing measure.</p>
Task 2 Report	P.19	Horizontal measure on battery powered electronic devices: Easy	<p>With respect to any non-energy efficiency requirements in product policy, DIGITALEUROPE insists on the importance of existing standards. Any standards should be based on reliable, accurate and reproducible procedures and methods. Product requirements set up should be measurable and verifiable. Standardisation can provide a mechanism for this. See also comment</p>	<p>Any consideration of a horizontal measure on the “easy” extraction of rechargeable batteries should be postponed until standards are available, in particular as a mandate to CEN/CENELEC is currently being issued. The availability of such a standard and the results from the PEF pilot would put the discussion in the framework</p>

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		extraction of rechargeable batteries in the recycling facility (not identical with the easy removability during use required by the battery directive).	<p>on PCBs extraction.</p> <p>We would also like to point to the on-going <u>PEF pilot on batteries</u>, which covers not only batteries in ICT products but also electric vehicles, e-bikes and power tools.</p>	of an Ecodesign measure on a more solid basis.
Task 2 Report	P.19	Horizontal measure on all electronic devices: Easy extraction of printed circuit boards and other resource relevant components (e.g. permanent magnets, display units).	<p>Setting “easy” extraction requirements would be realistic only if a) products were actually dismantled at the end of life (otherwise making any measurements would be fruitless); b) there was one standardized method for extraction of PCBs (otherwise there could be no repeatability); c) the method was well-established and unlikely to change over time (otherwise the value obtained when the product was first placed on the market would be unrelated to that obtain when it became WEEE). DIGITALEUROPE is of the opinion that none of the above criteria can be met at the moment and that trying to standardise treatment technologies would stifle innovation and make it less likely that environmentally beneficial innovations, such as extracting rare earth metals, would be developed.</p> <p>It should also be assessed if setting “easy” extraction requirements through product legislation will really bring additional benefits than those already being experienced under the WEEE Directive. Materials in mobile phones are already recycled very effectively today with high recycling rates.</p>	Any consideration of a horizontal measure on the “easy” extraction of rechargeable batteries should be postponed until standards are available, in particular as a mandate to CEN/CENELEC is currently being issued. The availability of such a standard would put the discussion in the framework of an Ecodesign measure on a more solid basis.

Stakeholder comments form DIGITALEUROPE

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			<p>Recycling is following price signals in the up taking markets and the level of material recovery (in a broad sense) depends more on the profitability of the recycling activity as a whole than on parameters the producers of products can influence by design. Standards relating to design for disassembly facilitating manual extraction of removable batteries in a certain time at end of life would not ensure that manual extraction really takes place in end of life treatment. The decisive factor is economic and depends on time but also labour costs and the benefit gained with dismantling instead of shredding. Recyclers, like any other industry, continuously work to improve efficiency.</p> <p>We would advise that research is made to see if any standards for extraction or end of life disassembly of key components already exist today. This would help to assess if it is feasible to make a standard in this area that would work in reality and that would provide a sound basis for market surveillance authorities to be able to check if a product meets the standard requirements, including imports from outside the EU.</p>	