Raising standards for consumers

The Consumer Voice in Europe

BEUC AND ANEC COMMENTS FOLLOWING THE ECODESIGN CONSULTATION FORUM MEETING ON COMPUTERS OF 19 MARCH 2024

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Summary

- BEUC and ANEC welcome the efforts made by the European Commission to develop new up-to-date Ecodesign and energy labelling requirements for computers. These products are important presence in the daily lives of consumers (especially laptops) and must still become more sustainable by design to limit their overall impact on the environment and on consumers' pockets.
- Ecodesign measures for computers should take inspiration from those already adopted for smartphones and tablets, with a focus on increased durability, repairability and upgradability of devices.
- The new energy label for computers should be clear and simple and focus on the most important aspects that could influence consumers' more sustainable choice.
- More transparency on the price of spare parts should be guaranteed, either through the repair score or a separate information requirement.

General comments

The revision process of the current Ecodesign Regulation for computers has been delayed by several years and it is now high time that new and up-to-date rules are developed and become applicable. We very much welcome the efforts made so far by the European Commission to address the challenges identified in the 2018 Preparatory Study and are satisfied by the solutions identified and presented to stakeholders during the Consultation Forum meeting of 19 March.

Computers are taking a central place in the daily life of European consumers and the negative environmental impact associated to these products is worrying. The average lifetime of computers is rather short (on average 7 years, as found by the Italian consumer organisation Altroconsumo in a recent consumer survey[1]). This means products are quickly discarded, creating unnecessary waste, and requiring additional resources (energy and material) to manufacture new products.

To face these challenges, it is essential that the new Ecodesign rules make computers more long-lasting by increasing their durability, repairable and upgradability. Among ICT devices, laptops are the most likely to be purchased second-hand, which is an additional reason to increase their durability and upgradability over time.

Recent figures show that laptops are gaining popularity, while desktop computers are generally preferred for gaming and mining.[2] We believe it is important to take these market developments and consumers' preferences into account, to ensure the most appropriate Ecodesign and energy labelling measures are developed for this product group.

Material Efficiency - Ecodesign

We very much welcome the proposed measures to improve the material efficiency of computers, though increased durability, reliability, and repairability.

In a recent survey[3], the Italian consumer organisation Altroconsumo found that battery and hard disk failures are among the most reported problems by consumers, but laptops are also often prematurely replaced to catch up with newer and better performing models.

This is because most laptops are currently not easily upgradable (e.g. it is difficult to install a faster hard disk drive, and changing modules of RAM), making them prematurely obsolete. While we understand that manufacturers increasingly opt for soldered RAM to keep laptops thin and

[1] Altroconsumo Inchieste - February 2024
[2] https://www.statista.com/statistics/272595/global-shipments-forecast-for-tablets-laptops-and-desktop-pcs/ ; https://www.techtarget.com/searchenterprisedesktop/definition/desktop-computer#:~:text=Desktop%20computers%20are%20commonly%20used,users%20to%20do%20their%20jobs.
[3] Altroconsumo Inchieste - February 2024

lightweight, this also impacts their upgradability. We urge the European Commission to develop measures that improve computers' upgradability, for example by enabling changing modules of RAM and memory, and ensure manufacturers inform users of when this is possible.

Ensuring a longer battery lifetime is probably the most important aspect to ensure computers are used for longer. We strongly support the proposed minimum requirement for battery endurance (800 cycles with at least 80% remaining capacity), which should also be coupled with an Ecodesign requirement making the battery easily replaceable at the same time. On top of this, we also call for including the value of battery endurance per cycle on the energy label, as it is currently done in the energy label for smartphones and tablets (more in section 3 below). A requirement on battery management should also be evaluated to allow consumers to optimise battery charging, improving battery endurance.

Failures to keyboards are also reported as common reasons to prematurely discard an otherwise functioning laptop. We support the proposal to introduce an abrasion test for the keyboard and we recommend also testing mechanical problems that could occur at the same time. Resistance to water and dust is an important aspect to prevent mechanical failures to the keyboard. Therefore, we favour setting minimum ingress protection requirements under Ecodesign. We also recommend enabling easy replaceability of keys.

The availability of spare parts, software updates and operating system support should be ensured for longer than the currently proposed 7 years (e.g. at least 10 years from the end of product placement on the market), to enable and encourage longer use of computers by consumers. We also fully support the proposal to provide non-discriminatory access to professional repairers and where applicable end-users to any software tools needed to ensure full functionality of those spare parts and of the device during and after repair. A short delivery time is also critical to ensure repair, as those consumers who urgently need their computer (e.g. for work) may buy a new one instead of repairing it if the necessary spare parts take too long to arrive.

Finally, we welcome the proposed measures to tackle the issue of serialisation of spare parts, which is currently a major barrier to independent repair for many ICT products. When developing the specific requirement, we recommend adopting a stronger language to avoid that the measure is too easily eluded by manufacturers.

OUR KEY RECOMMENDATIONS

- We urge the European Commission to develop measures that **improve computers' upgradability**, for example by enabling changing modules of RAM and memory, and ensure manufacturers inform users of when this is possible
- We strongly support the proposed **minimum requirement for battery endurance**, which should be coupled with an Ecodesign requirement making the battery easily replaceable at the same time. Information on battery endurance per cycle should also be included on the **energy label**.
- **Spare parts should be made available for at least 10 years**, to enable and encourage longer use of computers by consumers.

- On the issue of **spare parts serialisation**, we recommend adopting a stronger language to avoid that the measure is too easily eluded by manufacturers.

Material Efficiency – Energy Label

We very much welcome the proposal to introduce an energy label for computers, which would include important information on products' reliability and repairability in the lower part. We have some recommendations to improve the label's clarity and ensure the most relevant information to encourage a more sustainable choice is included:

- **Type of application**: It is important that energy consumption is displayed per type of application as it is a necessary element of the test procedure. In addition, this will allow to show that higher performance products may not be as efficient at delivering normal office/home functionality (e.g. normal web browsing/word processing etc).
- **Label design**: while we see the value in displaying the energy consumption class per type of application, we recommend conducting research and testing with consumers to identify a clearer display of the scale. We are worried that the icons currently proposed to distinguish home/office use and professional use (gaming, mining) are not clear and risk confusing consumers on their meaning. It is unlikely that energy efficiency will be the key criterion to influence consumers' choice for computers (even more so for consumers purchasing them for gaming/mining purposes). We therefore call on the European Commission to assess alternative ways to display the top part of the energy label, simplifying it, e.g. including a single energy efficiency scale and not two, as currently proposed.
- **Battery endurance**: we believe an important piece of information is currently missing from the proposed energy label for computers: the battery endurance per cycle. Longer battery endurance per cycles is generally synonymous of longer battery duration overall. Both pieces of information are extremely useful for consumer. We suggest integrating information about the real battery life duration, as it is currently done in the energy label for smartphones. We are aware that this piece of information may not be relevant for all computers, e.g. desktop computers, which are used plugged in. However, as indicated above, laptop computers are more popular among consumers, and it is important that the energy label contains the most relevant information for them to make an informed choice.
- **Resistance to accidental drops**: we do not find this piece of information extremely relevant for consumers in the case of computers. We believe it could eventually be substituted by information on the battery endurance per cycle, should there be the need to accommodate one or the other due to space constraints on the label. In fact, drop resistance could be examined for laptops particularly as a potential Ecodesign requirement, yet not essential for the Energy Label. Information about resistance to accidental drops could alternatively be included in the accompanying technical documentation.

OUR KEY RECOMMENDATIONS

- The European Commission should **simplify the top part of the energy label**, possibly displaying a single energy efficiency scale and not two, as currently proposed.
- We recommend integrating information about the **battery endurance per cycle**, as it is currently done in the energy label for smartphones. This piece of information could substitute the icon related to resistance to accidental drops, which is not extremely relevant for consumers in the case of computers.

Repairability score and information on price pf spare parts

We support the development of a repair score for computers, as, if correctly designed and implemented, it can be a useful tool for consumers who currently lack any adequate means to compare the repairability of products.

For a repair score to be effective, it must be designed in a way that it only rewards manufacturers that go beyond minimum Ecodesign requirements. Otherwise, the risk is to mislead consumers and not to encourage manufacturers to improve the repairability of their products. We call on the European Commission to take inspiration from the methodology used for the repairability score of smartphones and at least match the same level of ambition.

We wish to recall that the price of spare parts is a key criterion for an effective repair score, as cost of repair (including the cost of repair services, e.g. installation) is often the main driver influencing whether consumers choose to replace or repair a product.[4] According to a survey conducted by our German member vzbv, 88% of consumers expect that a repair score with a high rating would mean that the cost of repair of a product would be significantly lower when buying a new product.[7] It is therefore crucial to examine integrating the cost of repair in the score, or the tool risks losing relevance and effectiveness for consumers.

Should the Commission decide not to include this criterion on the repair score for methodological reasons, we would urge them to investigate alternative ways to increase transparency on this aspect. For example, by introducing a new information requirement on the price of spare parts, which should be clearly visible to consumers through EPREL, alongside information about the repair score.

As shown in a dedicated study by the French consumer organisation UFC-Que Choisir on the French repair score, consumers struggled to find information on the criteria behind the score. For this reason, we believe it would be important to include information on the specific criteria and weighting behind the EU score also in the public interface of EPREL. While not all consumers might be interested in this additional information, we believe more transparency on these

[4] This is reflected in the findings gathered by consumer organisations, such as through the webtool trop vite use' where consumers can directly report this data. This is a bottom-up approach that provides valuable insights into consumers' frustrations when products break down as well as whether they attempted repair and how their experience went.

aspects would be beneficial for the tool's trustworthiness and could be useful for third party organisations (such as national consumer organisations) when advising consumers on the best choice to make.

OUR KEY RECOMMENDATIONS

- We support the introduction of a **repair score for computers**. If correctly designed and implemented, this tool can be very useful for consumers.
- The **price of spare parts** is a key criterion for an effective repair score. We urge the Commission to assess ways to include it in the EU repair score methodology, including for computers.

Energy consumption and energy labelling

We welcome the development of a new tool for measuring computers' energy efficiency in active mode, which was presented during the meeting. As we understand this tool will be used to develop Ecodesign and energy labelling requirements for computers, we wish to recall some general messages:

- The Ecodesign and energy labelling Regulations should refer to a representative metric to establish energy efficiency requirements, considering both the short and long idle states and the active state.
- The new energy efficiency requirements (and the energy label) should not promote more powerful computers, with an overall higher energy consumption, or have a negative effect on overall performance.
- The energy label should be as clear and simple for consumers as possible and reflect, to the extent possible, the different "modes" computers may be in (active/idle). E.g. both short and long idle are included in the active state test procedure and weighted appropriately.
- The classes on the energy label should be developed in a way that leaves the A-class initially empty and avoids overpopulation of a few energy classes, as this risks misleading consumers.

OUR KEY RECOMMENDATIONS

- We welcome the development of a new tool for measuring computers' **energy efficiency in active mode.**
- We recommend ensuring that Ecodesign and energy labelling Regulations refer to a **representative metric** to establish energy efficiency requirements and that the **energy label** is as clear and simple for consumers as possible and reflect, to the extent possible, the different "modes" computers may be in (active/idle).

Next steps

We call on the European Commission to promptly finalise the draft Regulations and to convene another Consultation Forum meeting to discuss them together with stakeholders. We urge the Commission to share the working documents with stakeholders at least one month in advance of the meeting, to allow for adequate preparation.

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