# Position on eco-design for displays: resource efficiency requirements

EuRIC welcomes the inclusion of resource efficiency requirements on the draft Ecodesign regulation on electronic displays, in line with Ecodesign Working Plan 2016-2019[[1]](#footnote-1), given the important resource saving potential to be achieved when making design fit for re-use and recycling.

Eco-design is a crucial tool to foster dismantling and recycling of waste electronic and electrical equipment (WEEE). More than 80% of the environmental impact of a product is determined at the design stage[[2]](#footnote-2). Hence, thinking recycling at design stage is instrumental to ease the preparation for re-use and recycling of products once they reach end of life and ultimately enable the circular economy. The importance of extending the scope of eco-design to resource efficiency was acknowledged in the EU Action Plan for Circular Economy calling for “comprehensive commitments on ecodesign”[[3]](#footnote-3), and specifically refers to “mandatory product design and marking requirements to make it easier and safer to dismantle, reuse and recycle electronic displays (e.g. flat computer or television screens).” The Council in its conclusions of June 2016 stressed the importance of eco-design by urging “*the Commission to include appropriate measures to improve the durability, reparability, reusability, possibilities to use recycled materials, upgradability and recyclability of products in the EU Ecodesign regulations, and other legislation as appropriate, before 2020*”[[4]](#footnote-4). EuRIC naturally supports eco-design requirements and published in August 2016 concrete proposals on eco-design for WEEE, available on its [website](http://www.euric-aisbl.eu/position-papers/download/174/149/32).

The priorities identified by a number of experts from WEEE recycling companies to improve sustainable design relate to:

* Reducing, whenever technically feasible, hazardous substances at the design stage;
* Better enforcing rules on product labelling to ease depollution at the recycling stage;
* Promoting simple solutions at the assembly stage of products to ease their dismantling at end of life stage;
* Support the use of recycled content, in particular of recycled plastics, to pull the demand for recycled materials in new products and support the transition towards a circular economy, through targets which can be increased overtime, as it has been done for recycling.

Regrettably, no information linked to recycled content has been included in the draft Ecodesign regulation on electronic displays

Concerning the draft Ecodesign regulation on electronic displays, EuRIC particularly welcome the following requirements:

Annex III section 1:

* **Gluing and welding** together different types of material obviously hinders the possibility to separate material streams which is a pre-condition to quality recycling. This is increasingly problematic as new technologies such as Magnetic Pulse Welding (MPW) are developed, making the materials almost impossible to separate at end-of-life stage.
* To ease dismantling, solutions relying on mechanical binding should always be preferred, and when not feasible, double-sided adhesive or soluble adhesive should be used. We welcome the requirement to avoid welding or gluing for the components listed under this section.
* The requirement for manufacturers to **document the sequence of dismantling operations** to access the components is welcomed as well. Readily available information presented in a standardized manner to have an operational utility is a first and important step towards eco-design. It is a pre-condition to an efficient and swift dismantling and a pre-requisite to quality recycling. It is also in line of article 15 of the WEEE Directive on “information for treatment facilities”, yet to be implemented.

Annex III section 2:

* Marking of plastic parts to specify **the type of polymer** (subsection 2.1), and especially marking of the **type of flame retardant** (subsection 2.2)contained in the plastic parts is a positive development, which will allow the recyclers to separate the plastic containing flame retardant at the dismantling stage by visual inspection. Moreover, more ambitious marking requirements are needed. Manual dismantling/ disassembly is becoming increasingly expensive and in this context, more ambitious requirements such as the use of plastic additives allowing to improve the separation via sensors (e.g. infra-red) should be implemented.
* **The Mercury and Cadmium logo** (subsections 2.3 and 2.4) will allow safer dismantling and help the recyclers comply with the requirements to remove mercury containing components set in Annex VII, section 1 of Directive 2012/19/EU.

Annex IV - Information requirements:

Ensuring prolonged access to information is essential.

The period of **15 years** is considered to be **an absolute minimum** with regard to the duration for which the document summarizing (i) the general and (ii) technical information as well as (iii) repair and end of life documentation has to be kept available. A longer period would ensure that recyclers have access to the necessary information for an efficient dismantling and recycling of electronic displays, in particular taking into consideration the continuous efforts to prolong the lifetimes of electronic products.[[5]](#footnote-5)

Annex IV section 3:

* The **diagram of the product** proposed in subsection 3a and the instructions on the **sequence of operations to remove the components** proposed in subsection 3b will improve the recyclability of the products by allowing the recyclers to efficiently and easily separate the components and the plastic parts containing flame retardants. This is undoubtedly a positive development.
* We also welcome the subsection 3d on the **information on toxic, ecotoxic and precious substances.** Having information on the toxic and ecotoxic substances is necessary to insure the safety of the operators working in recycling plants as well as to allow proper handling and disposal of the components containing such substances. For what concerns the precious substances such as indium, requiring manufacturers to give information on the substances, location of all components containing each and the quantities will undoubtedly encourage the development of industrial processes to recover such substances from the components.

1. [Ecodesign Working Plan 2016-2019](http://ec.europa.eu/energy/sites/ener/files/documents/com_2016_773.en_.pdf), p. 6 [↑](#footnote-ref-1)
2. Ecodesign your future – How ecodesign can help the environment by making products smarter, European Commission, 2012 : http://bookshop.europa.eu/en/ecodesign-your-future-pbNB3109210/ [↑](#footnote-ref-2)
3. [Closing the loop - An EU action plan for the Circular Economy](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52015DC0614), pp. 3-4 [↑](#footnote-ref-3)
4. [Council conclusions - Closing the loop - An EU action plan for the Circular Economy](http://data.consilium.europa.eu/doc/document/ST-10518-2016-INIT/en/pdf), p. 7 [↑](#footnote-ref-4)
5. [DRAFT REPORT on a longer lifetime for products: benefits for consumers and companies](http://www.europarl.europa.eu/committees/en/imco/draft-reports.html?ufolderComCode=IMCO&ufolderLegId=8&ufolderId=08292&linkedDocument=true&urefProcYear=&urefProcNum=&urefProcCode=) [↑](#footnote-ref-5)