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

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EuRIC welcomes the inclusion of material efficiency requirements on the draft Regulation for Ecodesign requirements for servers and data storage products (Grow Lot 9), in particular the requirements to **ensure easy dismantling/disassembly** and to provide **information on the critical raw materials.**

More specifically, and to complements the impact and cost assessment made by DG Grow and the consultants in charge of the preliminary study:

Annex II section 1.2:

* The wording in subsection 1.2.1 should be kept as it is, so as to specify that “*welding or firm gluing is not used as joining or sealing techniques for the following types of component, when present* […]”, in order to ensure consistency with the text proposed in Annex III of the draft Regulation on Ecodesign for displays.

**Gluing and welding** together different types of material 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.

The alternative text proposed by Digital Europe should not replace the original text as it avoids the mention of the terms gluing and welding.

We also disagree with the addition of the following sentence “*Exemptions apply where non-removable joining and sealing techniques are required to assure safety, quality or functionality”*, which is too broad, and basically exempts the manufacturers of ensuring removability of the components without proper justification. Moreover, the preliminary study shows that these design requirements are mostly already in effect for the majority of products, thus leading to zero to low cost for manufacturers. The text proposed by the Commission is needed to ensure that the design continues to allow easy dismantling.

Finally, the forecasted 1% increase in recycling should not be regarded as a reason for manufacturers to discard these removability requirements: it is exactly because most of the requirements to ease dismantling are already implemented that the recycling is expected to stay stable. By keeping the wording proposed by the Commission, we will ensure that the newest techniques developed also take into account the end-of-life stage of the products.

* The sentence “*Accessing components shall be ensured by documenting the sequence of dismantling operations needed to access the targeted components, including for each of these operations: type of operation, type and number of fastening technique(s) to be unlocked, and tool(s) required*;” is particularly welcomed. 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 II section 3.3:

* EuRIC welcomes the requirement for manufacturers to provide the weight per product and the indication of the components in which **Cobalt, Neodymium and Palladium** are present.

This information will allow recyclers to anticipate the volumes of such materials in the equipment reaching end-of-life, hence promoting the development of processes to separate these materials once profitable to do so.

The forecasted 1% increase in recycling servers seems underestimated, at least when considering the long term.

* As already stated above, it is seen as a very positive step that the information on the operations, type and number of fastening techniques and tools required would be made available on a website upon registration by recyclers dealing with these products when they reach end-of-life.

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| Through its Member Recycling Federations from 20 EU and EFTA countries, EuRIC represents today over:   * 5,500 companies generating an aggregated annual turnover of about 95 billion €, including large companies and SMEs, involved in the recycling and trade of various resource streams; * 300,000 local jobs which cannot be outsourced to third EU countries; * An average of 150 million tons of waste recycled per year (paper, metals, glass and beyond).   Recyclers play a key role in a circular economy. By turning wastes into resources, recycling is the link which reintroduces recycled materials into the value chains again and again. |