|  |
| --- |
| **Ecodesign Consultation Forum on servers and data storage products (GROW Lot 9)** |

Consultation Forum held at the European Commission on Friday, 17th February 2017.

The aim was to gather the feedback of the stakeholders on the draft regulation setting **potential ecodesign requirements for servers and data storage products.** Apart from the representatives from the Member States, were present:

- the manufacturing industry (delegation of 8 representatives from Digital Europe)

- the recycling/reuse industry: EERA, RREUSE, Free ICT…

- NGOs: EEB and ECOS.

The topic of **material efficiency,** that is of interest for us, is rather controversial and was discussed in the second half of the meeting.Servers and data storage products are a very specific category of WEEE, but it is crucial to ensure that the material efficiency requirements set for this category are satisfactory, because it is the first time that such requirements are set (following the adoption of the Circular Economy Package) and the decision taken for servers might serve as a basis for the upcoming regulations on electronic displays / personal computers.

The European Commission proposed four material efficiency requirements:

-Improve design for dismantling, reuse and recycling, and recovery (no firm gluing or welding / information on disassembly operations needed to access the targeted components).

-Securing data deletion: (make data deletion tool available with the product when placed on the market).

-Securing firmware update availability.

-Critical raw material (CRM) information (total weight per product of critical raw material i.e. Cobalt, Neodymium, Palladium).

The most disputed points were:

**-Dismantling requirements:** Digital Europe and the Adhesive and Sealant industry (FEICA) disagreed with the text proposed by the Commission and proposed an alternative version. This alternative version, supported by the Commission, was heavily criticized by some MS and some recycling/reuse stakeholders.

🡺Action: Find the text proposed by Digital Europe and draft a written comment.

**-Critical raw material information:** Digital Europe is opposed to the CRM information requirements, but the Commission seemed to be more on the side of the recyclers on this matter.

🡺Action: Draft a written comment to clearly state our position on the matter.

**Follow-up:** The stakeholders are invited to send their comments **in writing within 4 weeks**. The Commission will re-draft the proposals according to the comments. After an inter-service consultation, the draft will be available for commenting during a public consultation. The discussion and the vote of the regulatory Committee should occur Q3/4 of 2017.