



Co-funded by the Intelligent Energy Europe Programme of the European Union

## CompliantTV Workshop: Recommendations on EU Policy Level

Venue: Digital Europe - 14, rue de la Science, 1040 Brussels.

Date: June 22, 2015. Time: 13:00 – 17:00hrs

### Present:

Alban Burgholzer, Austrian Energy Agency (AB)

Benoit Tinetti, BIO by Deloitte (BT)

Patrik Beks, Re/genT (PB)

Randolph van Kasteren, Re/genT (RvK)

Heinz Lemke, VDE (HL)

Sylvie Feindt, Digital Europe (SFe)

Rudolf Heinz, IPI (RH)

Gergana Dimitrova, TUB (GD)

Nuno Santos, LG/Digital Europe (NS)

Stewart Muir, Energy Saving Trust (SM)

Sergio Ferreira, EASME (SF)

Juraj Krivosik, SEVEn, (JK)

Paolo Tosoratti, European Commission (PT)

Bob Harrison, CLASP Europe (BH)

Rene Kemna, VHK (RK)

Angeliki Malizou ANEC/BEUC (AM)

### Apologies:

Alun Jones, ECOS

Stephen Fernandes, Intertek

Ewout Deurwaarder, European Comission, DG Energy

### 1. Welcome, introductions, agenda

- AB welcomed the group to the workshop and thanked Digital Europe for hosting the meeting. Round table introductions took place. The agenda was introduced; no amendments were made to the agenda.
- AB gave background to the CompliantTV project objectives, activities and outcomes. A USB stick was circulated to delegates containing relevant documents (guidelines and brochures) produced by the consortium.

### 2. Laboratory Testing of TVs

- GD presented on the results of CompliantTV laboratory testing, and policy recommendations to be made by the project arising from the testing.
- An output from the testing work package was that different interpretations of the legislation on Automatic Power Down (APD) exist; whilst the directive specifies 4 hours as the time period, it is not defined whether this indicates completion of, or the start of the APD process.
- GD defined the split made by the project between 'A' and 'non-A' brands
- Step 2 testing was carried out for suspicious cases – 3 further units were tested

- Test batches 2 and 3 included a greater proportion of non-A brands than in batch 1. In addition a greater emphasis was placed on TV models that are available in multiple countries
- The project had reason to believe there may be compliance issues with TVs featuring multiple tuners – therefore testing sought to address this
- GD presented step 1 results and a diagram of the process flow for scenarios where testing was passed or failed, and procedures for communication with the manufacturer over this.
- Some issues were found with sourcing TV models for follow-up testing after a failed result, due to the TV no longer being on the market
- 13 non-compliances were seen – 8 due to APD and 5 due to Peak Luminance Ratio (PLR). All non-compliances seen were for non-A brands
- No real trends were seen on non-compliance according to the price of the TV
- As well as technical measurements, checks were made on the compliance of associated documentation; 52% of products did not comply on the fiche and 65% were non-compliant on the provision of information on websites. 28% had non-compliance in the format of the energy label that accompanied the set
- GD gave a summary of remedy actions undertaken. The CompliantTV consortium includes an internal remedy action board to review action taken
- Batch 4 testing is taking place now – 6 models that previously failed and were subject to remedy actions are included in this.
- SF asked if there been cases where the non-compliance case had been reported to the MSA where the remedy action had not been acceptable. There is no example in the project yet of this, but it could happen in batch 4 testing. All test results are being communicated to MSAs.
- SFe cited that there were some cases where the manufacturer had gone out of business during the test program, removing the possibility of further testing
- SF asked if there were any trends failures from manufacturers from particular regions. Failures have been seen from Spanish and Italian-manufactured TVs (including one Italian own-brand TV). Despite this, it was pointed out by RK that components of TVs actually consuming power are no longer manufactured inside the EU
- NS asked for further detail on what some of the non-compliances on information requirements consisted of. One example seen was a missing second decimal place in the reporting of standby power consumption, but this was not considered significant. Many manufacturers claim <0.5W in their declaration of this, rather than reporting an exact figure. This reduces the likelihood of a failed measurement that is outside tolerance limits but still below the 0.5W threshold.
- No non-compliance was seen for on-mode or standby power testing
- HL reported that in one cases, APD had to be activated by the user. As mentioned above, for some sets, the APD process began after 4 hours (a 1 minute tolerance period for this was allowed in the testing). Remedy action for this would be carried out on the TVs internal timer, rather than it being a technical issue.

### 3. Shop Inspections

- AB presented the deck of slides from the shop inspections, defining the methodology used, the types and numbers of shops visited, failure categories, the ‘unit’ and ‘model’ approaches for counting TVs and assessing the compliance rate, the results and difference between the two rounds, and follow-up actions, including contact with the retailers and MSAs and remedy actions
- An overall increase in compliance was seen between the two rounds (10%, by model)
- In round 2 there were a higher number of TVs seen, likely as visits were carried out around Christmas when more boxed TVs are typically present
- SF asked why some stores had seen decreased compliance after round 1 and the project’s communications. Data was shown summarising all stores by percentage increase and decrease; as some stores had a relatively small number of TVs present, only a few non-compliances could have

what would appear to be a large decrease when measured in percentage terms. In addition there may have been issues with changes in management in stores between the two rounds. Some stores saw a small decrease in round two, but still scored highly in both rounds. An example was cited of a store in the Czech Republic who engaged strongly with the project (including visiting SEVEn) and achieved 100% compliance; this was achieved with the MSA also involved in the process – it was a good learning from the follow-up procedure that working with the store in tandem with the MSA had a strong effect on compliance.

- Discussion was had on the interpretation of the directive which states that “every TV at the point of sale must be labelled” and how CompliantTV interpreted this in the case of unlabelled boxed TV models featured alongside a representative, labelled, unboxed model. JK reported that inspections were stricter on this point in round 2, but that this case was seen as being compliant by MSAs.
- NS asked whether there is an obligation for manufacturers to print the label on boxed TVs. Currently there is no obligation.
- While ‘DIY’ printed labels are not considered to be endemic, there is concern about certain retailers modifying and printing their own label – this is thought to be done to remove the need to open product boxes to access the label.
- JK pointed out that many retailers are not yet complying with online labelling regulations. It was reiterated among the consortium that display of the label and fiche online only applies to products placed on the market after 1/1/15. NS reported that LG provided the label in digital form to retailers before 1/1/15 so retailers could comply straight away. The date of placing on the market of products remains a piece of information that is difficult to obtain and there is currently no centralised list that contains this information, although manufacturers can provide this. It was considered that currently there is no strong deterrent against retailers’ non-compliance in online labelling, although JK reported some fines have been levied in the Czech Republic of the order of several thousand Euros. The concept of a centralised product database to assist all parties in this area was discussed by the group, which would have the option for retailers to obtain required documents and point consumers towards from websites, as well as detailing the date when products were placed on the market. Points in favour of this included: lower administrative burden on retailers and easier regulation (retailers would not have an excuse not to comply). Concerns were raised as to whether retailers would actually incorporate the database into their websites. The discussion on a central database was re-visited later in the meeting.
- Discussion took place on what the retailer should do in practice if labels are damaged or removed in-store regarding obtaining a new one and if the fiche should be made accessible in physical shops in cases where it is included in the manual. The retailer retains ultimate responsibility in this case.

#### 4. On-mode power consumption, Automatic Power Down, Peak Luminance Ratio

- HL presented on the project’s work on on-mode power consumption, defining terms, and detailing measurement methods with respect to modes selected, broadcast content and conditions
- RK asked on stabilisation time for testing to ensure LEDs had reached thermal equilibrium – times used for TVs are shorter than those used for LED lamps (usually ~100 hours). HL confirmed that 30 minutes stabilisation time for TVs was found to be effective in almost all cases, although the maximum stabilisation time that was seen for a TV was around 1.5 hours.
- HL went through the testing approach and issues encountered as per the slide deck
- A question was raised on the volume setting during testing as increasing the volume in some cases was found to affect the power consumption significantly (in one case by as much as 10W – after contact the manufacturer admitted this model had an error). In the project’s testing, ‘out of the box’ settings with the volume at 30% were used; BH queried this as the sound setting stipulated in the relevant standard, IEC 62087 Ed. 3, specifies “an audible” setting”. The IEC working group’s rationale for not specifying a test setting of a specific percentage of full volume was that there was no correlation between this and the sound power produced by different TV models. An alternative of specifying zero volume or mute introduced the possibility of a ‘special’ mode being switched in to

disable power to the sound circuitry. There is further guidance in IEC 62087 suggesting an alternative sound setting providing 50mW at 1kHz into a resistive load equivalent to the loudspeaker impedance. However, in discussion it was made clear that this was not done in the project's testing as it requires an intrusive and elaborate technical set up and is often impracticable with modern TV band-split multi loudspeaker systems or when testing a large number of TVs.

- BH also asked what the meeting's thoughts were on a qualification of on-mode set-up that would allow a TV's sound system to be disabled for the on-mode testing of the product's display efficiency and MEPS conformance. This was deemed to be a useful consistent alternative that could be considered in future.
- HL showed the group graphs of power variation during the testing in certain scenarios that occurred. Strong variation was seen in Plasma/OLED sets tested.
- RH gave a reminder of the regulations on automatic power down. It is considered that the current regulations leave room for interpretation in the specification of 4 hours for APD. A transition phase to a lower power mode was typically seen in testing. CompliantTV's conclusion and recommendation on this is that the time for APD should be stipulated with a defined measurement tolerance, including that for a transition phase. CompliantTV recommends a tolerance period of 5 minutes as part of the 4 hour period.
- It was also recommended that if a set fails on APD, 3 more should not be tested as the chance of these also failing on this is high enough to not warrant further tests.
- HL presented on Peak Luminance Ratio, defining terms, covering testing specifics, tolerance limits, and menu options. CompliantTV used the 3-bar pattern in testing. If there was a fail, the project liaised with manufacturers to find the test they used. HL went through issues uncovered by testing, including types of TVs where power limiting did and did not occur.

## 5. Hard-off power switch, Energy Efficiency Index, Annual Power Consumption

- RH presented on issues that CompliantTV found with this; there is currently no definition of 'easily visible' in the regulations, although the current draft ecodesign regulation does consider side and top visibility views.
- CompliantTV makes recommendations for this in the form of a 1cm wide panel to house the switch – see slide deck for diagrammatic representation of this.
- Digital Europe disagreed with this proposal. Discussion took place as to whether it was necessary to set requirements around hard-off switches anymore, as standby consumption is generally very low for current models, and there was less need to emphasise the option of a physical switch. NS believed the added value of this recommendation and the energy saving potential of seeking to make it more visible was low. It was also discussed whether the hard-off switch tick-box should be removed from the energy label entirely. AM raised the concern that standby consumption may be higher if the TV was set up in fast-start mode. It was also raised that if the TV is in network standby, due to this regulation there was not a possibility for a TV in network standby mode to escape compliance to the standby limits.
- RvK presented on Energy Efficiency Index (EEI). Regarding the EEI calculation formula and the  $P_{\text{basic}}$  term in the equation this can vary due to the presence of tuners. It is CompliantTV's recommendation that this should be better defined and the ADCO definition is more appropriate and could be made a consistent value of 20W.
- The second issue uncovered was the definition of luminance reduction - this requires a clearer definition in the regulations in the application of automatic brightness control
- A trend was seen that often measured on-mode power was lower than that declared on the label



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## 6. Publicly Available information

- On website requirements, the only issue seen in this area was that where mercury was not present manufacturers often omitted the second decimal place. This was not considered a fail or a significant issue by the consortium.
- Some issues were seen with the label class arrow height being smaller than specified in the regulation. However there is concern that if the arrow is too wide it may occupy more than one letter on the scale. It was thought this could be addressed through a corrigenda to the regulations and is not considered a serious issue.
- Some required manufacturer energy information is present but considered hard for consumers to find
- Some issues were seen with rounding errors for on-mode power not reporting to the first decimal place
- Many manufacturers were seen to report standby consumption as <0.5W. This is not considered a non-compliance when found to be correct in measurements, but removes the possibility of the TV failing on tolerance limits whilst still measuring below 0.5W.

## 7. Open Discussion

- JK asked for clarification on the wording of the regulation with regard to the supply of the fiche (it is specified the label must be printed and supplied in stores). The fiche is sometimes also available installed on the TV display. The regulation uses the term 'is made available'. It was considered that electronic distribution was acceptable and it was not necessary for it to be compulsory to provide it in printed form. Discussion followed as to whether the fiche is considered to be a useful document and one that consumers consult when making purchasing decisions; whether it should be removed from the regulations, and whether it would be an effective addition to an online product database
- A discussion took place on future introduction of a centralised product database. This would cover a number of product groups across multiple nations (including TVs), with access for stakeholders such as manufacturers, retailers and MSAs. A route for consumers to access through apps and web interfaces was also considered.

Concerns were raised by Digital Europe on such a database including potential issues with access rights, languages, effective capture of updates in legislation, the need to keep it updated, and the volume of work in building and populating.

In favour of the database, reasons cited were that it would be preferable to the current situation by centralising all data and reducing the burden on stakeholders (eg reduce the number of places retailers would have to go to find information) and it would help with regulation (if, for example, products could only be placed on the market once they had been included in the database). Regarding translation, it was raised that only category headings would need to cover multiple languages (most data would be numeric) and much of the data required would already be in existence.

The possibility of merging with other existing databases, such as Ecopliant, was also discussed. Several attendees including the project advisor expressed support to the idea that merging all relevant projects' databases so as to be able to review all products tested in one place would be beneficial.

Workshop closed at 17:00