

DIGITALEUROPE, EuroVAprint and ITI reaction to the expiration of the EU-US agreement on ENERGY STAR®

Brussels, 24 May 2018

The tech sector is surprised and disappointed with the expiration of the agreement between the European Commission and the Government of the United States for the EU ENERGY STAR Programme for office equipment. As key stakeholders in this programme, the undersigned associations regret the lack of consultation with Industry on this topic and would like to share their concerns with disruptions this could cause in the ICT market in Europe. Additionally, no assessment of the effectiveness of the programme has been shared that supports the decision to discontinue it.

The EU ENERGY STAR programme has had a successful impact over its 15 years of operation and has been a key element in the promotion of office equipment energy efficiency in the EU, being recognized as an important differentiator by consumers and commercial procurers alike. Ending unilaterally the agreement sends the wrong message to the market and particularly without a focus on the top 25% energy performing equipment. Minimum market entry performance mandates will prevail and energy savings potential will be lost. Public procurement should continue to be encouraged to “lead by example” and procure the best energy performing products.

The criteria set by the ENERGY STAR programme have also significantly guided EU regulatory framework for ICT, serving as a framework for Ecodesign implementing measures (e.g. Computer Ecodesign and Imaging Equipment Voluntary agreement). This programme has been an important enabler for the ICT sector, providing a stable convergence of regulatory methodologies on both sides of the Atlantic. The undersigned associations would like to restate that such convergence is critical for the sector, and would encourage the European Commission not to deviate significantly from those common methodologies in the future, with whatever regulatory actions that might be considered necessary for office equipment.

Another area where EU ENERGY STAR has played a crucial role for the EU market is Sustainable Public Procurement. Market data clearly shows that ENERGY STAR is the most common and most relevant criterion used in European tenders for procurement of energy efficient products (please refer to data provided in Annex). The tech sector is therefore concerned with the impact that expiration of the agreement will have for procurement in the EU. Considering the fragmentation of the commercial ecolabel market in the ICT sector and the lack of relevance of the EU Ecolabel in this space, it is now unclear how Sustainable Public Procurement can be encouraged to support energy efficiency similar to what was achieved through ENERGY STAR. In absence of any effective EU level ecolabels that could replace ENERGY STAR (currently there are no EU Ecolabel licenses for ICT products) this could lead to the undesirable result of national ecolabel fragmentation, which could cause increased costs, unnecessary complexity and market confusion.

Even though the EU-US agreement on ENERGY STAR has expired, the European Commission should not prevent manufactures' use of the ENERGY STAR logo on their products and marketing material. The ENERGY STAR Programme has led to the development of more energy efficient products, and will therefore contribute to achieve the EU's 2030 Energy Strategy. Moreover, ENERGY STAR is the world's most

recognized and referred ecolabel: European consumers and businesses will continue to require it from manufacturers when making purchasing decisions.

This is why the undersigned associations request the European Commission to not prevent manufacturers who sell products in the EU to voluntarily keep the ENERGY STAR logo on their products, thus accepting products officially registered with ENERGY STAR registration programmes elsewhere.

Regardless of eventual political consideration around the ENERGY STAR programme, our members would like to clarify that our sector remains committed to the ENERGY STAR Programme and is engaged with the development of new and revised criteria with US EPA and other stakeholders. It continues to be a very successful programme that maintains a lead ensuring relevancy with respect to top 25% performing product in each specific product category.

Industry is seriously concerned with the prospects of abolishing the ENERGY STAR Programme as a tool to transform the EU ICT sector and the vacuum it creates, and would appreciate full involvement in the process of discussing next steps.

Annex

European Eco Labels and IT Eco Declarations

Current status

Ecolabels	No of certified IT products	Categories	Comment
EU Eco label	Zero	IT products. No licenses since 2011.	IT industry not interested
Nordic Swan	225	Imaging Equipment	Brother, Sharp and Toshiba
	Zero	Computers	No licenses
TCO	3376	Displays	All major brands
	273	Computers	HP, Dell and Lenovo
Blue Angel	877	Imaging Equipment	All major brands
	Zero	Computers	Only a few keyboards are certified
US EPEAT	1737	Imaging Equipment	All major brands
	1700	Computers and Displays	All major brands
IT Eco Declaration	Several thousand	All IT product categories	All major brands
Energy Star	2892	Imaging Equipment	All major brands
	2470	Computers	All major brands
	1135	Displays	All major brands

Business Impact of Green Procurement

Demand for ecolabels and IT Eco Declarations – Supported green tenders for EMEA – million \$

Ecolabels & IT Eco Declarations	2014	2015	2016	2017
EU Eco label	1	63	---	168
Nordic Swan	100	304	14	42
TCO	577	136	290	656
Blue Angel	878	1038	445	302
EPEAT	501	316	461	1170
IT Eco Declaration	1084	1175	1170	747
Energy Star	1464	2056	1264	1021

ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies.

DIGITALEUROPE's members include in total over 35,000 ICT Companies in Europe represented by over 60 Corporate Members and 39 National Trade Associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

ABOUT EuroVAprint

EuroVAprint represents Europe's leading manufacturers of imaging equipment, accounting together for over 97% of the EU market for personal and office equipment. It is committed to environmental sustainability and improvement, as set out in the 2011 Voluntary Agreement in the context of the 2009 Energy-Related Products Directive. Its members are Brother, Canon, Epson Europe, Hewlett Packard, Konica Minolta, Kyocera Document Solutions, Lexmark, Oki, Sharp, Toshiba and Xerox. Further information is available at www.eurovaprint.eu.

ABOUT ITI

The [Information Technology Industry Council \(ITI\)](#) is the premier advocacy and policy organization for the world's leading innovation companies. ITI navigates the constantly changing relationships between policymakers, companies, and non-governmental organizations to promote creative policy.