

Remissammanställning för

Datorer

Utkast till version 7

Marts 2013



Nordisk Miljömärkning

Svanmärkta Datorer - Remissammanställning

048/Version 7, 13 mars 2013

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1 Sammanställning av inkomna svar

Land	A. Bara kommentarer.	B. Stöder förslaget.	C. Stöder förslaget med kommentarer.	D. Avstår från yttrande.	E. Förkastar förslaget med motivering.	Totalt
Danmark	1			1	1	3
Sverige	7	1			2	10
Finland		2		1		3
Norge			1	3		4
Island						
Totalt	8	3	1	5	3	20

Tabell 2: Danska remissvar.

Remiss-instans	A. Bara kommentarer.	B. Stöder förslaget .	C. Stöder förslaget med kommentarer.	D. Avstår från yttrande.	E. Förkastar förslaget med motivering.
Forbrugerombudsmanden				X	
DET ØKOLOGISKE RÅD					X
Miljöstyrelsen	X				
Σ Danska svar:	1			1	1

Tabell 3: Svenska remissvar.

Remiss-instans	A. Bara kommentarer.	B. Stöder förslaget .	C. Stöder förslaget med kommentarer.	D. Avstår från yttrande.	E. Förkastar förslaget med motivering.
BillerudKorsnäs					X
Energimyndigheten		X			
Fujitsu + bilaga	X				
GreenIT	X				
Iggesund Paperboard AB					X
Lenovo + bilaga	X				
Miljöstyrningsrådet	X				
HP	X				
EU Green Public Procurement (HP) (Se ovan?)	X				
Jordens vänner		X			
Skogsindustrierna (Swedish Forest Industries Federation)	X				
EFRA					
Σ Svenska svar:	7	2			2

Tabell 4: Finska remissvar.

Remiss-instans	A. Bara kommentarer.	B. Stöder förslaget .	C. Stöder förslaget med kommentarer.	D. Avstår från yttrande.	E. Förkastar förslaget med motivering.
Åbo Akademi / Datacentralen			X		
Finnish Environment Institute			X		
Kuluttajatutkimuskeskus				Avstår	
Σ Finska svar:			2	1	3

Tabell 5: Norska remissvar.

Remiss-instans	A. Bara kommentarer.	B. Stöder förslaget .	C. Stöder förslaget med kommentarer.	D. Avstår från yttrande.	E. Förkastar förslaget med motivering.
Direktoratet for naturforvaltning				X	
Havforskningsinstituttet				X	
Klima- og forurensningsdirektoratet			X		
Det konglige barne-, likstillnings- og inkluderingsdepartement				X	
Σ Norska svar:			1	3	

2 Kommentarer till kriterierna, i detalj

Generella kommentarer

Lenovo

Lenovo opinion: We would like to see a more scientific approach. With this we mean that requirements not based on science shall be on your list of deletion. On top of this list of non science based requirements is MPR. Even EU label has deleted it!
At the same time we must listen to our customers, so some non-science based requirements such as requirements on halogens can likely be smart to keep.

Finnish Environment Institute

SYKE proposes that possibilities for requiring carbon footprint estimate will be clarified for the next revision of the criteria, and that this is now informed in the criteria set as one of forthcoming subjects. SYKE used carbon footprint as an award criteria in it's own tender competition for laptops, and it seems that computer manufacturers have knowledge to estimate this, especially if informed well beforehand. The methodology that was used as well as experiences of the tender award can be found at:

www.environment.fi/syke/co2calculators > JUHILAS > JUHILAS IT-calculator
Webropol www.environment.fi/syke/co2calculators > JUHILAS > FE36/2011
Carbon Footprint Calculators for Public Procurement

Nordisk Miljömärknings kommentar

In the next revision of the criteria for computers Nordic Ecolabel will evaluate the possibilities to have energy requirements for the production of the product. Carbon footprint is one way to work with these issues.

HP

EU GPP - eco labels – eco label criteria Most public procurers are aware that asking for eco label certified products is not allowed in public procurement. At the same time, many seem to believe that all of the imbedded eco label criteria are suitable candidates for public procurements. This is not correct as each single criterion must meet the legal provisions of article 23 of 2004/18/EC and some other basic principles. In short, GPP criteria must be based on scientific information, be possible to quantify, verify and control. Also, the environmental attribute must be linked to the subject matter of the contract. To increase the quality of all future Nordic Swan criteria, we recommend that criteria like energy efficiency and noise, suitable in GPP, be highlighted in your final criteria document.

Nordisk Miljömärknings kommentar

Nordic Ecolabelling is working towards making the criteria suitable for public procurement. We will probably have a guide for the criteria document for public procurement.

Produktgruppsavgränsning

2.1.1 Vad kan Svanemärkas?

Inga kommentarer

2.1.2 Vad krävs för att bli svanenmärkt?

Inga kommentarer

2.1.3 Krav kapitel 1

K1 Beskrivning av Datorn

Inga kommentarer

K2 On/Off strömbrytare

Inga kommentarer

2.1.4 Krav kapitel 2

K3 Energianvändning dator

Miljöstyrelsen

Bør følge Ecodesign/energimärkning eller energy star, men også være dynamiske (desuagtet at disse tre nævnte ordninger ikke altid er helt så dynamiske). Ny modeller indenfor en licens skal have stillet relevante og opdaterede energikrav. Det kan f.eks.

ske ved at krav til energiforbrug i on-mode skærpes med 5 eller 10% for hvert år. Miljøstyrelsen mener, at miljømærket EEE udstyr skal være LET adskilleligt og ikke kun adskilleligt.

DET ØKOLOGISKE RÅD

Vi ser gerne forsat at der er svanemærke-kriterier for computere, men som forslaget foreligger kan vi ikke støtte det på grund af energi-kriterierne, ligesom vi ikke kan støtte de eksisterende kriterier, der heller ikke sikrer forbrugerne de miljømæssigt set bedste computere på markedet.

Dagen efter de nuværende kriterier udløber vil alle lovlige nye computere sandsynligvis leve op til energikravs-specifikationerne i Energys Star 5.0 som de nuværende kriterier for Svanen bygger på.

Ecodesign-kravene, der træder i kraft den 1. juli 2014 gør netop Energy Star 5.0 til minimumskravet for lovligt at kunne sælge en computer i EU. Det er i vores øjne en grundlæggende uacceptabel situation for et miljømærke, hvor forbrugerne har en berettiget forventning om at mærket garanterer at det valgte produkt er blandt de mest miljøvenlige på markedet – især i forhold til det væsentligste parameter – energiforbruget i brugsfasen. *Af samme grund mener vi at det er uantageligt, at man lægger op til at fortsætte med at bruge Energy Star 5.0 som energistandard såfremt version 6.0 ikke er vedtaget inden de nye kriterier træder i kraft.* Praktisk talt vil kravet bare indebære at produktet er lovligt at sælge i EU, hvilket vil være at gøre grin med forbrugerne og risikere en generel miskreditering af miljømærket.

Computere er et produktområde hvor er til stadighed sker en betydelig udvikling. Allerede her 3½ år efter Energy Star 5.0 for computere trådte i kraft er det et fåtal af de solgte computere, der ikke lever op til Energy Star 5.0 og dermed de kommende ecodesign-krav. Således har NRDC i 2012 lavet en analyse af de mest solgte computermodeller på markedet der viser at kun 1 ud af 20 modeller ikke allerede nu kunne leve op til kravene for Ecodesign Trin 1 (1. juli 2014 – Energy Star 5.0), samt at kun 4 ud af 20 computere ikke allerede i dag kunne leve op til kravene i Ecodesign Trin 2 (1. januar 2016 – 20 % skrappere). Gennemsnitligt var de undersøgte computere allerede i dag gennemsnitligt 32 % bedre ned kravene i Ecodesign-kravenes Trin 1.

En større analyse lavet på de computere, der lever op til Energy Star 5.0, viser at de i gennemsnit lå 13-19 % bedre end kravene – og det var for mere end 2 år siden!

http://energystar.gov/products/specs/sites/products/files/Computers_V6_Discussion_Document.pdf

Og koblet med NRDCs nylige undersøgelse er det klart, at de mest energieffektive computere i flere af grupperne allerede ligger langt fra både nuværende og kommende Energy Star specifikationer.

Der er selvfølgelig noget grundlæggende besnærende i at bruge Energy Star specifikationerne ifht. energikrav, der stilles til svanemærkede computere. *Men princippet bag revisionen af specifikationer for Energy Star er, at man stramme specifikationer når over 50 % af markedet lever op til de eksisterende specifikationer.* Dette står i betydelig kontrast til målet og forventningerne til svanen, der som miljømærke skal garantere at produktet er blandt de mest miljøvenlige på

markedet. Såfremt man vælger blot at lægge sig op ad Energy Star vil man forventeligt igen bringe sig i en situation hvor man ikke med rimelighed kan påstå at kriterierne garanterer at produktet energimæssigt hører til blandt de bedste på markedet. Hvis man insisterer på at følge Energy Star bliver man derfor nødt til – på linje med kriterierne for Blomsten – fx at rette kravene til Energy Star - 30 %.

Nordisk Miljömärknings kommentar

För energikraven till datorer hänvisar Nordisk Miljömärkning till senaste Energystar kriterierna. I skrivande stund är detta version 5 som Ekologiskt råd påpekar, men man arbetar med revisionen till version 6 och ska vara klara och publicera dessa under våren 2013. Bedömningen enligt EPA som ansvarar för Energystar är att ca 25 % av marknadens datorer klarar kraven i Energystar version 6. I utkastet till version 6 har energikraven skärpts till hälften och för vissa typer av datorer till en tredjedel så vid övergången till version 6 kommer kraven skärpas ordentligt. NM är medveten om att utvecklingen går fort för dessa produkttyper och kommer ge kriterierna en giltighetstid på 3 år. Om utvecklingen fortsätter med en fortsatt energieffektivisering kan vi skärpa kraven till 2016.

Miljöstyrningsrådet

The Swedish Environmental Management Council, SEMCo (Miljöstyrningsrådet), wishes to make the following comments regarding the revision of Nordic Ecolabelling of computers.

LCA:s show that environmental effects from production phase is substantial

The Nordic Ecolabelling has used LCA:s as a basis for the RPS analysis. It is SEMCo's opinion that Nordic Ecolabelling has come to the wrong conclusion regarding that the most important environmental impact is electricity used in the use phase.

SEMCO's studies of LCA:s has shown that this view is not applicable for modern computers, especially not for notebooks. Since the products have become increasingly efficient, production phase has become the most important phase regarding environmental effects.

Conclusions

- Set demands that Nordic Ecolabelling certified products have to show their environmental impacts from all phases. Environmental impacts of products can for example be verified with EPD (Environmental Product Declaration).
- Set demands that Nordic Ecolabelling certified products have to be much more energy efficient than Energy Star.

GreenIT

Vi jobbar med hållbar produktutv där vi använder livscykeldata för att fokusera på rätt förbättringar genom att bedöma miljöpåverkan i ett livscykelperspektiv, från "vagga till grav".

Tyvärr negligeras produktens livslängd. Det är väl känt att när det gäller

elektronikprylar som datorer, mobiler, läsplatton, etc så är produktionen den avgörande faktorn för produktens miljöpåverkan.

Ett snabbt LCA-överslag visar:

Om en laptops livslängd är 3 år då den använts 8 tim om dagen, dvs. drygt 5 000 tim och den tar 30Wh (vilket en vanlig laptop idag använder) så fördelar sig miljöpåverkan på detta sätt:

- Energi (svanen-märkt förstås) per 3år: 2,09 pts (Index) och 7,8 kg CO2 ekv (klimat)
- Produktion av en laptop (vagga till grind): 45,8 pts (index) och 209 kg CO2 ekv (klimat)

Detta innebär att:

1. Det tar minst 80 års användning innan påverkan från användningsenergin blir lika stor som påverkan från tillverkningen av laptopen.
2. Om inte livslängden tas hänsyn till finns inga incitament från tillverkarna till att minska livscykelpåverkan från själva produkten.

Vid produktion av finelektronik används tex. enorma mängder absolut rent vatten och absolut ren omgivande miljö (här kan man snacka om "clean tech") vilket kräver stora energimängder, detta finns inte alls med i Svanens föreslagna kriterier.

De kriterier Svanen säger Ni vill använda:

- power consumption (*vid användning*)
- design (upgradeability and disassembly)
- plastics and their additives, e.g. flame retardants & phthalates
- packaging
- recycling of discarded products
- performance such as noise level, ergonomics and electrical and magnetic fields

Helt otillräckligt

Dessa kriterier avspeglar inte på långa vägar **produkternas miljöpåverkan**, tyvärr knappt ens en skrapning på ytan.

Påverkan från tillverkningen är alltså ungt. 96-97% högre än för 3 års användning av produkten.

Detta indikerar alltså att det är livslängden man skall fokusera på och då är det oseriöst att utelämna livslängden ur miljökalkylen!!

Dessutom finns olika typer av datorkomponenter vars livslängd är helt olika. Tex. SSD (solid-state-drives), flash-hårddiskar, har avsevärt mycket längre livslängd än de gamla mekaniska HDD (hard drive disks) Dessutom är SSD mycket snabbare än HDD vilket gör att SSD totalt kräver mindre mängd energi under tex. en arbetsdag. SSD är fortfarande dyrare men säljer idag främst på sin snabbhet.

Det vill säga, om man inte tar med produkternas livslängd kan man inte avgöra hur "miljövänlig" produkten är.

Denna svaghet är ju genomgående för Svanen. Man anser att livslängden är en för svår parameter att ta fram.

Visst det kanske inte hör till det lättaste men för trovärdigheten och nyttan är ju livslängden avgörande. Annars blir det ett spel för galleriet eller en sorts obehaglig green wash.

En märkning typ Svanen driver inte utvecklingen mot totalt sett hållbarare produkter, i värsta fall kanske åt motsatt håll.

Exempel: Om man fokuserar på energi och inte på produktion kan ju i värsta fall tillverkarna, i sin strävan mot att få ner energianvändningen hos brukaren prioritera lösningar som är mer energisnåla i användningen men är ännu större energibovar under tillverkningen. Detta utan att Svanen märkningarna fångar upp det.

Visst är begränsad giftspridning mycket viktig, men detta, och så många fler miljöfaktorer, får man med även i en LCA .

Sammanfattningsvis så skulle vi kunna vara behjälpliga i projektet och hjälpa till med att ta fram nödvändiga "miljöfakta som saknas".

Nordisk Miljömärknings kommentar

Nordisk Miljömärkning tackar för kommentarerna. Bakgrundsdkoumentet kommer uppdateras och förtydligas. Anledningen till att vi ställer krav på användarfasen för datorers energianvändning är att det här finns standardiserade testmetoder för att mäta energianvändning. NM kommer ställa energikrav enligt de senaste Energystar kriterierna. I skrivande stund är detta version 5 som Ekologiskt råd påpekar, men man arbetar med revisionen till version 6 och ska vara klara och publicera dessa under våren 2013. Bedömningen enligt EPA som ansvarar för Energystar är att ca 25 % av marknadens datorer klarar kraven i Energystar version 6. NM har svårt att ställa energikrav som omfattar produktionsfasen av datorer i nuläget. Styrbarheten (möjligheten för NM att ställa mätbara krav och kontrollera produktionen) är begränsad för NM. Vi kommer i kommande revision se om förutsättningarna förbättrats och om det är möjligt att ställa energikrav på produktionsfasen.

K4 Energianvändning skärm

Lenovo

Lenovo opinion: OK but it would be better if it clarified what is "latest version" for example by saying "latest version approved or decided by EU Commission" or something alike.

Nordisk Miljömärknings kommentar

The latest version of Energystar is version 5, but version 6 will be valid this spring 2013.

K5 Energieffektivitet external kraftkälla ***Inga kommentarer***

K6 Demontering

Lenovo

Lenovo opinion: Plastic parts heavier than 25 g must be composed of one polymer or compatible polymers, except for the enclosure, which shall consist of no more than two types of polymers that are separable.

Delete this requirement it is unclear but key argument for deletion is: What is the environmental advantage for it? None! And, it is not science based. Requirement is easily misinterpreted as worded. It can be read as all polymer parts in product must be made of one compatible polymer but 2 for covers. What is rationale for max 2 polymers in cover? 25g typically means a small cover (10x10cm) in 2,5mm thickness and 1,0g/cm³ density. Often we like a stiff cover behind the panel, something else for the bezel around the panel and the keyboard plus something low cost below the keyboard. What does “compatible” and “separable” mean? Is a glassfilled ABS “compatible” with a non filled ABS, an ABS/PC etc? Today when we increasingly use recycled plastics a lot of different mixtures with and without fillers are used. I think also TCO has a 100g requirement for covers rather than 25g.

Miljöstyrelsen

Design og materiale. Dismantling: Kriterierne bør i bund og grund være det samme til de to produktgrupper. F.eks. stilles der krav om, at 90% af plastik i computerchassiset skal være genanvendeligt. Et lignende krav bør stilles til AV udstyr.

K7 Uppgradering

Lenovo

Lenovo opinion: OK today but technology moves fast so this may be inadequate or outdated twice before Version 7 is published! Thus do not mention memory size etc

Miljöstyrelsen

Mulighed for opgradering/levetidsløft: Tablets i dag er kendetegnet ved at mange ikke kan få skiftet batteri, udvidet RAM eller sågar lagerkapacitet. En svanemærket computer/tablet bør kunne levetidsløftes relativt nemt jf. ovenstående. Mulighed for opgradering af svanemærket AV udstyr bør også overvejes, f.eks. mulighed for at opdatere software, kvit og frit fra producentens side.

Nordisk Miljömärkning bør også overveje muligheden for at kræve særlige farvekoder i f.eks. lodninger, såfremt de er blybaseret. Nordisk Miljömärkning bør også indsamle oplysninger om brugen af NF3 gas i produktionen af computerere.

K8 Klorerede plaster

Inga kommentarer

K9 Färg och metall

Inga kommentarer

K10 Märkning av plast

Inga kommentarer

K11 Flamskyddsmedel i plast

Lenovo

Lenovo opinion: To 100% we dislike this list of risk phrases (even though yours it is the best of all green labels, EU flower and Blue Angel is worst -no manufacturer has been able to qualify) . We produce computers not polymers. No computer manufacturer shall be asked to verify plastics produced and controlled by others. Also, other labels have other lists of risk phrases. All are different -very confusing to us and our customers. Rather we think you shall qualify plastics like UL yellow card system that we as a purchaser can chose "Swan approved" plastics from. See also letter from Digital Europe.

Klima- og forurensningsdirektoratet

Klima- og forurensningsdirektoratet støtter forslaget og ser det som positivt at det stilles strengere krav til innhold av helse- og miljøskadelige stoffer, spesielt til ulike flammehemmere, ftalater, nanomaterialer og kvikksølv i PC'er.

Det stilles krav til at søkere skal oppfylle alle reguleringer som gjelder nasjonalt og internasjonalt for produksjon av PC'er, inkludert RoHS (direktiv 2002/95/EC), men det skal ikke legges fram dokumentasjon på dette (R 31). Det sies ikke noe om hvorfor dokumentasjon på dette ikke skal fremlegges, men det er muligens for å begrense mengde dokumenter og spare søker for arbeid med dette.

RoHS 2 (direktiv 2011/65/EU) inneholder krav til CE-merking og samsvarserklæring. Dette er et nytt krav som gjelder fra og med implementering av RoHS 2 i nasjonale regelverk i januar 2013. (I Norge er direktivet ennå ikke implementert i produktforskriften, men det vil skje straks etter at direktivet er tatt inni EØS-avtalen).

Det er produsenten som skal utarbeide denne erklæringen for å dokumentere at produktene er produsert i henhold til krav i RoHS 2, og det vil ikke medføre noen ekstra byrde i forbindelse med søknad om svanemerking. Vi syns derfor at det som et minimum på dokumentasjon på at de overholder gjeldende regelverk for innhold av helse- og miljøskadelige stoffer i disse produktene, bør kreves at samsvarserklæringen bør legges ved søknad om svanemerking.

HP

Here is our counter proposal Non halogenated flame retardants meeting any of the criteria a through e shown below shall not be used in plastic parts weighing more than 25 grams.

- a. PBT = High P + High B + [very High T (Ecotoxicity or Group II Human) or High T (Group I or II* Human)]
- b. vPvB = very High P + very High B
- c. vPT = very High P + [very High T (Ecotoxicity or Group II Human) or High T (group I or I* Human)]
- d. vBT = very High B + [very High T (Ecotoxicity or group II Human) or High T (group I or II* Human)]
- e. High T (group I Human).

Compliance verification: alternative 1) signed letter by the flame retardant manufacturer, or (even stronger) 2) signed letter by an independent expert body, who under NDA with the substance manufacturer has checked the underlying test results ensuring the substance does not have any of the above listed properties.

Why banning substances on their assigned risk phrases is not recommended **This is not recommended, because:** Risk phrases are self-declared and may vary from manufacturer to manufacturer. It is not uncommon for one manufacturer to list certain risk phrases for a substance while another may list none. Also this information varies between databases for the same substance. Substances with limited data will have less self-declared risk phrases and may appear to be better alternatives but the real hazards may be unknown. There is little incentive for manufacturers to provide data that may result in assignment of a risk phrase.

A chemical with limited data and unknown hazard could be selected because of the lack of risk phrases only to be considered a regrettable substitution later when additional hazard data is obtained. Compliance verification via self-declarations and/or safety data sheets is not enough as these documents only refer to currently available data but do not reveal the data gaps. According to the EU REACH regulation, stringent requirements apply for substances and mixtures of these. For substances in articles, like flame retardants in plastic parts, there is an obligation to inform about their presence in the finished product, if the substance is on the REACH candidate list. The substance hazard testing requirements are limited if imported in finished products.

EFRA

The European Flame Retardants Association (EFRA) would like to thank the Nordic Swan for the opportunity to comment. EFRA is concerned over some criteria regarding certain flame retardant technologies in the above-mentioned document.

Fire safety & flame retardants

Flame retardants are used to make sure that a wide range of different products, such as computers, are fire safe. These products function on electrical current and produce heat. They often consist of a considerable amount of plastic, which, if not adequately protected, is easily ignitable and burns vigorously. Flame retardants are widely used to reduce the material flammability, allowing consumer or professional to use products which meet national and international fire safety standards and laws. Flame retardants save lives and properties by increasing the typical escape time and by facilitating evacuation and rescue operations in the event of a fire.

General comment: there should be no flame retardant specific criteria

“Flame retardants” describes a *function* and not a separate class or family of chemicals: there is no clear scientific or legal definition for this term and a wide range of different chemicals is used for that purpose.

Certain flame retardant substances can also be used for other function beyond flame retardancy, for example as plastic softeners or fillers. Therefore, flame retardants should be treated as every other substance in any Nordic Swan product group and criteria. This is also acknowledged by the current EU Flower criteria for laptop

and desktop computers which do not single out flame retardants but apply to all substances: 2011/330/EU and 2011/337/EU.

EFRA therefore suggests removing the flame retardant specific criterion R9.

Nordisk Miljömärknings kommentar

For now we have focused on flame retardants in plastics as it is recognized/acknowledged environmental global problem. In future revision of criteras we will include all additives in plastics.

More specifically, our comments are related to the following statements in the above-mentioned documents:

Technical feasibility should be assured

New risk phrases, connected to aquatic toxicity, have been added to the current criteria proposal. EFRA suggest to take these restrictions back again for the following reasons: both the Blue Angel and the EU Flower experienced difficulties in the past with too long lists of restricted risk phrase substances. Especially the long list of restricted substances in the EU Ecolabel Framework Regulation makes it almost impossible for industry to comply with the requirements.

Nordisk Miljömärknings kommentar

In comparison with EU Ecolabel Nordic Swan has only added a few new risk phrases for flame retardants. MN has checked the market for flame retardants and believe that the requirements are technically feasible.

Exposure to substances should be taken into account

There will only be a negligible risk to the environment once H400 and H410 (R50/53) or H411 (R51/53) substances are encapsulated in the plastics of E&E casings or reacted to form a brominated epoxy resins for a printed circuit board , as there will be no contact with water. The classification of chemicals is hazard-based, not risk-based. A hazard is not a true representation of a risk; a hazard only becomes a risk if one is actually exposed to this hazard. Computers are manufactured and used indoors (e.g. no contact to the aquatic environment) and subject to the WEEE/RoHS directives regarding end of life treatment. Once substances like flame retardants are safely incorporated in the polymer matrix of external casings or printed circuit boards of E&E medical devices, they do not pose a risk for the environment or human health. This argument is supported by the recently adopted EU Ecolabel criteria for laptops (2011/330/EU) and desktop computers (2011/337/EU) that state: *“The use of substances or mixtures which change their properties upon processing (e.g. become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies is exempted from the above requirement.”*

Nordisk Miljömärknings kommentar

Risk with transporting chemicals and flame retardants before they are built in in the plastics. NM also believes there are risks with components with flame retardants when the electronics becomes waste.

EFRA calls for science-based approach

Flame retardants consist of a large group of many different substances which can have very different environmental and health profiles. Consequently, the restriction of halogenated organic flame retardants is not justified

To the best of our knowledge, the chemical grouping of a flame retardant molecule *per se* can only inform about the way the compound will interact with the fire reaction. This is the reason why it is common industry practice to group flame retardants depending on the presence of certain elements in the molecules – including halogens.

The sustainability of a substance should not be assessed on the basis of its elemental content as this fails to recognize that environmental and health profiles are specific to each individual substance. The presence (or absence) of a given chemical element in a flame retardant compound (e.g. Phosphorus, Aluminium, Magnesium, Chlorine, Bromine, Fluorine, Zinc, Nitrogen, Antimony, Boron, etc.) cannot be an indicator of their environmental and health profiles.

EFRA therefore believes that halogenated flame retardants should be generally permitted by Nordic Swan criteria for computers.

Nordisk Miljömärknings kommentar

NM excludes halogenated organic flame retardants. In addition to this we also excludes flame retardants with classification that. We have exemptions from the exclusion for small plastic parts and printed circuit boards and cable insulation to make the criteria feasible.

PBBs, PBDEs and chlorinated paraffins

The old as well as the recast RoHS Directive (2011/65/EU) restricts two groups of flame retardants:

Polybrominated biphenyls (PBB) and Polybrominated diphenyl ethers (PBDE). The manufacturing, marketing and use of PBBs stopped during the 1970's and in the 1990's. PBDE substances have been phased out by

EFRA companies since 2004, with the exception of Deca-BDE. Deca-BDE belongs to the group of PBDEs and is thus also restricted by the RoHS Directive.

Short-chain Chlorinated Paraffins (SCCP) and Medium-chain Chlorinated Paraffins (MCCP) are not produced by EFRA companies, so we are not able to comment on these substances. However, to our best knowledge they are typically not used as flame retardants in electric and electronic equipment including computers.

We therefore believe it is redundant and confusing to explicitly name PBBs, PBDEs, Deca-BDE and chlorinated paraffins here and suggest deleting these references.

Nordisk Miljömärknings kommentar

NM will remove requirements for chemical substances for flame retardants in the requirements.

Appendix 8 – Flame Retardant manufacturer’s declaration

Flame Retardant manufacturers, as well as other suppliers of chemical substances, compile Material Safety Data Sheets (MSDS) to their best knowledge, including the assignment of risk phrases.

Explaining on a few lines in an appendix as “background information” why the excluded risk phrases have not been assigned to a given flame retardant is neither practical nor necessary.

Furthermore, due to the complexity of the supply chains, OEMs who finally have to apply for the Nordic Swan, might not always know the flame retardant manufacturer. Implementation and compliance verification of the requirements under Appendix 7 might therefore be very challenging.

In order to keep the criteria feasible, EFRA suggests to at least deleting the requirement for flame retardant manufacturers why certain risk phrases have not been assigned to a given flame retardant substance.

Nordisk Miljömärknings kommentar

NM will adjust the appendix but will keep the requirement that the flame retardant producer shall declare that the flame retardant fulfills the requirement.

K12 Mjukgörare/Ftalater

Fujitsu

The REACH Candidate List is in a very dynamic change rate. It is simple not possible to track “serious” all substances from day to day.

FTS request is: Please refer to a fix date regarding the REACH Candidate List. For example from the 1st of January 2013.

Lenovo

Lenovo opinion: Delete. Not scientific. The cordset is detachable and fits a list of products. Do not include options in product requirement! Every global manufacturer has a list of cordsets that are unique for each market, every one with its unique national plug and voltage. Besides all these cordsets are of interchangeable standard and fit most products plus have unique safety approvals. You must qualify a product to a product requirement a cable to a cable requirement etc. As a consequence we will Skogsindustri state compliance to Swan notebooks simply by testing the product only. Compare with TCO desktops and A-I-O requirements. The keyboard and the pointing device (mouse) is not part of the desktop/A-I-O requirements.

HP

We can support the requirement as HP does have a power cord that meets this requirement. However, several of our customers who wanted this cord, have changed their mind when they realized it was 3 times more expensive than the standard cord.

Note: an applicant for the Swan label, could avoid this requirement by simply not delivering a power cord together with the products.

K13 Nickel i metalledlar

Fujitsu

Regarding Nickel Cas: 7440-02-0 a reference to an common standard is missing (impurities, threshold limits etc.).

FTS request is: Refer to REGULATION (EC) No 1272/2008 (= REACH App. XVII) in detailer:

Alloys containing nickel are classified for skin sensitisation when the release rate of 0,5 µg Ni/cm²/week, as measured by the European Standard reference test method EN 1811, is exceeded.

HP

To be adjusted as follows because of very imprecise requirement wording Alternate wording: Nickel finishes that release greater than 0.5 µg/cm²/week must not be used on the ex-ternal surface of any product part intended to be in direct and prolonged skin contact. Measurement to be performed using EN 1811:2011

K14 Kvicksilver i skärmar

HP

To be adjusted, criteria should always have a concentration limit, suggest max 0.1g / lamp.

K15 Nanometall

Inga kommentarer

K16 Recirkulerat material i förpackning

Billerud Korsnäs

Motsätter sig förslaget. Förslaget utesluter möjligheten för förnybara, nyfiberbaserade förpackningar med hög miljöprestanda att kunna miljömärkas enligt Nordic Ecolabelling.

Iggesund Paperboard AB

R16 Recycled material in packaging The amount of recycled fibers in packaging is less important than the final strength/function on the final packaging. Packaging materials should be regulated on their own, not under computers.

Skogsindustrierna

The Swedish Forest Industries Federation will give the following comments on the proposal for criteria regarding packaging.

We support a circular bioeconomy where renewable resources are used as much as possible and where resources and products are efficiently produced and recycled several times.

Fresh and recovered fibres are elements of the same system, depending on each other

For paper and board packaging, both fresh and recovered fibres are used in manufacturing, depending on the quality and functionality of the packaging. The fresh fibre production mainly takes place in countries with low population density and good

access to sustainable forest resources, that is the Nordic countries. These fibres are exported to Central and South Europe where they are recovered in multiple loops. Manufacturing based on recovered fibres requires a certain amount of fresh fibre input into the recycling loop since the fibre can only be recycled a limited number of times before it wears out during the consumption and recycling phases. Thus, fresh fibre production plays an important role in renewing the fibre wealth that is necessary as fibres wear out.

This means that fresh and recovered fibres are flows in the same system. Without a continuous inflow of fresh fibres there are no recovered fibres on the market.

Because of this **it is not advisable to require 80% recovered fibres for cardboard packaging**. It will exclude manufacturers, using fresh fibres in mills with very high environmental performance. We don't agree on the general facts in the background paper on environmental benefits with recovered fibres. There are big differences from mill to mill depending on many factors and recovered fibres can't be generally considered as the most environmentally friendly raw material to produce paper and board.

Function and properties must be the base for choice of packaging raw material

Fresh fibres and recovered fibres have different properties, for example regarding strength, which must be considered when choosing packaging. In most cases the biggest part of the environmental impact of a product is the content while the packaging contributes to a very small part. For multimaterial and expensive products like computers it is important to have a good protection through a strong and sustainable packaging. Fresh fibres will probably be the best choice in many cases. There should be no requirement on fibre raw material as the most optimal packaging should be chosen in every single case.

Fujitsu

The focus is on recycled material only. How about material from selected sources like FSC or PFC certified material and paper? Today already some tender call for certified paper.

FTS request is: Allow also the use of material from FSC, PFC or equivalent sources instead of recycled materials to be flexible.

Åbo Akademi / Datacentralen

Nuvarande text punkt "R16 Recycled material in packaging":

"When cardboard boxes are used, they shall be made of at least 80% postconsumer recycled material."

Här frågar man sig om det är fråga om vikt eller volym. Vi tycker också att man kunde rekommendera att hela förpackningen utom en eventuell plastpåse kunde vara gjord av material som kan återanvändas.

Nordisk Miljömärknings kommentar

Nordisk Miljömärkning tackar för kommentarerna och har förståelse att det ställs höga krav på förpackningar för dessa typer av produkter. Vi kommer justera kravet till 50 % återvunnen fiber i förpackningen. Erfarenheter från licensiering är att 50 %

är en rimlig andel återvunnen fiber i förpackningen utan att dess skyddande funktion blir dålig.

K17 Plastmaterial i förpackning
Inga kommentarer

K18 Användarinstruktioner
Lenovo

Lenovo opinion: Information on the power consumption of the computer during operation, in energy-saving mode and in off-mode. Information about the effect that the consumption of mains current can be reduced to zero if the plug of the computer or the power source of the portable computer is removed or if the mains socket is turned off.

Delete or reword this para for notebooks as it is not correct. Pulling the plug of a notebook means it shifts to battery operation. This does not save any energy it just empties the battery.

Nordisk Miljömärknings kommentar

Nordic Ecolabel will clarify the requirement. The recommendation to remove the power source is when the notebook is off.

HP

Please clarify and adjust.

Must accept info on the web.

Nordisk Miljömärknings kommentar

Nordic Ecolabel will accept info on the web.

K19 Buller
Inga kommentarer

K20 Ergonomi
Lenovo

Lenovo opinion: Please delete this requirement. Swan is an environmental label not an ergonomics! Testing panels to ISO 9241 is very expensive and time consuming.

Nordisk Miljömärknings kommentar

Nordic Ecolabel will keep the requirement. It is important that the computer quality is high and the usability of the computer is good.

K21 Elektroniska och magnetiska fält
Lenovo

Lenovo opinion: Please delete this requirement. Non science based. It concerns unfairly only Class I notebooks. And, if a user connects his Class I notebook to a not grounded outlet or runs on battery MPR cannot be met as there is no ground wire. All MPR standards are obsolete (except for your ref to TCO). Unfortunately Blue Angel, TCO and Swan have different measuring distances. We cannot easily measure to both distances! Besides MPR requirement is not fair nor a meaningful test on modern

panels. No flat panel product has in my records failed to meet this requirement.
Besides Swan is an environmental label not an ergonomics or work health verificate.

HP

Suggest to delete.

Nordisk Miljömärknings kommentar

Nordic Ecolabel will remove this requirement from the criteria. This is no longer a relevant environmental problem for computers.

K22 Arbetsförhållanden

Fujitsu

There is no difference between several kind of suppliers 1st tier, 2nd tier etc..
FTS request is: Please align with TCO CSR requirement which is about 1st tier production facility. Which means the manufacturing plant where the final assembly of the product is taking place.

OTHER - Templates

Since years we are requested to provide information not covered by the existing templates.

FTS request is: Update the templates – see attached “Exampe_Appendix 6.pdf”.

K22 Arbetsförhållanden

Fujitsu

There is no difference between several kind of suppliers 1st tier, 2nd tier etc..
FTS request is: Please align with TCO CSR requirement which is about 1st tier production facility. Which means the manufacturing plant where the final assembly of the product is taking place.

Nordisk Miljömärknings kommentar

The requirement for having a code of conduct is for the license holder. The license holder must then communicate its Code of conduct to its suppliers, this meaning 1st tier. Mot suppliers, 2nd tier.

K30 Insamlingssystem

HP

Suggest to remove, legal requirement.

2.1.5 Bilagorna

OTHER - Templates

Since years we are requested to provide information not covered by the existing templates.

FTS request is: Update the templates – see attached “Exampe_Appendix 6.pdf”.

Nordisk Miljömärknings kommentar

Nordic Ecolabel will update templates.

EFRA

Appendix 8 – Flame Retardant manufacturer’s declaration

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3 Diskussion och slutsatser

SYKE proposes that possibilities for requiring carbon footprint estimate will be clarified for the next revision of the criteria, and that this is now informed in the criteria set as one of forthcoming subjects. SYKE used carbon footprint as an award criteria in it's own tender competition for laptops, and it seems that computer manufacturers have knowledge to estimate this, especially if informed well beforehand. The methodology that was used as well as experiences of the tender award can be found at:

www.environment.fi/syke/co2calculators > JUHILAS > JUHILAS IT-calculator
Webropol www.environment.fi/syke/co2calculators > JUHILAS > FE36/2011
Carbon Footprint Calculators for Public Procurement