

About Nordic Ecolabelling of TV and Projctor

Version 5.4

Background

5 November 2015



Nordic Ecolabelling

Nordic Ecolabelling - Background

071/5.4 – 5 November 2015

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1 Summary

The criteria revision towards version 5.0 was executed during the autumn of 2012 and spring of 2013. The criteria were revised for the 4th time. During the years the product group definition has been altered, being broad with TV-sets in combination with other equipment, Set Top Boxes etc, to a more narrow definition of TV-sets and projectors.

The Relevance/Potential/Steerability (RPS) analysis for this product group shows a high score in energy consumption during the user-phase, flame retardants in plastics, mercury in background light of TV-sets and projector lamps. Medium/high score was found for other additives in plastic parts (phthalates for instance), packaging material and dismantling. All of these topics have requirements coupled to them.

The objective for the revision was to revise the energy requirements in relation to existing energy regulations, to investigate the possibility to form a requirement for nitrogen trifluoride (NF₃) used during the production of displays for visual equipment, revise the requirements for heavy metals and flame retardants, pose requirements for additives in plastic parts, examine the possibility to pose requirements on re-cycled/re-used plastics and bio-plastics, update the packaging requirements and propose electrical safety requirements.

The most important requirements altered from version 4.0 and later modifications were the requirement for energy efficiency and flame retardants. The energy efficiency (for on-mode) referred directly to energy class A+ for all TV-sets regardless screen size. The flame retardant requirement was sharpened with two additional eco-toxicity risk-phrases and with fewer exemptions.

New requirements added to version 5.0 of the criteria were requirements for chlorine-based plastics, flame retardants, phthalates in the final product and the external cables, NF₃ and SF₆ used during LCD-display/TFT-cell production, recycled material and plastic material in packaging. Removed requirements from version 4.0 and later modifications included the harmonization with the EU Ecolabel, heavy metals and the maximum energy consumption level for a TV in on-mode. Evaluated requirements but not proposed requirements were re-cycled/re-used plastics and bio-based plastics, electrical safety and halogen-free flame retardants.

During the revision process, future requirements and areas in need to be revised in upcoming revision processes were identified. Among other areas for future revision, regulations to minimize the risk of use of "conflict metals" (minerals/metals mined in conditions of armed conflict and human rights abuses) in electronics and a revision of the projector requirements were identified.

This is a product group where technical development goes fast. New technology like LED has reduced the energy use in the user phase substantially. It is important that Ecolabel systems keep up to date with the newest product and therefore the criteria are valid for a shorter period.

2 Basic facts about the criteria

Products which can be labelled

The product group for Audiovisual equipment has in version 5.0 re-formulated the product group definition in relation to version 4.0 and later modifications to:

- Television-sets (TV-sets), and
- Projectors*

The evaluation report for this product group and its criteria 4.0 (and later modifications), written 2011-12-15, and approved by the Nordic Ecolabelling Board, concluded that the criteria until then as a whole had not fulfilled the desired effect of environmental benefits. Other driving factors such as the Directive 2009/125/EC for ErP (Energy-related-Products) and EU:s Ecolabelling scheme have been more successful in the assignment of environmental adaptation for the product group. Ecolabelling must be able to keep up with the development for these products. Nordic Ecolabels believes that the revised criterias are better fit for this now.

In version 4.0 the product group definition also included videoconferencing systems, TV-sets in combination with other equipment such as DVD/ Blu-ray players, DVD / Blu-ray players, stereo systems (including speakers with at least one of the following: radio receivers, CD, DVD, cassette or gramophone) and Set Top Boxes. All of these product types were removed from the product group definition in version 5.0 of the criteria. See below. Audio product and digital boxes are now removed from the product groups. The interest for ecolabelling of these products were low and the development for these products has been sustansial.

In version 5.0 of the criteria the product types TV-sets and projectors were kept. The former was estimated in the evaluation report to continue bring environmental benefits while the latter is interesting based on for example new mercury-free technology still worth encouraging. See further motivations for the modification of the product group definition under chapter 5 – Changes from previous version.

All equipment with CRT-technology are excluded. This is because the market has developed in such a way that CRT-technology hardly is produced or consumed by consumers. Nordic Ecolabelling has therefore taken the decision not to include this product category, as this product category is not relevant.

The product group changes name to TV and Projector in this revision.

Motivation for the Nordic Ecolabel

An RPS analysis (relevance, potential, steerability) has been performed to determine which parameters Nordic Ecolabelling can influence in order to achieve the maximum possible environmental gains, i.e. the parameters on which requirements should be imposed.

Relevance is the first factor to be considered, i.e. what environmental problems (environmental impact) are associated with the product group and how great is the problem. *Is there an environmental threat, and, if so, how great is the threat?*

The second factor to be considered is the potential: What dynamic developments would allow environmental gains to be made within a particular product group. *Can we do anything about the environmental problem?*

Sterability is a measure of the extent to which ecolabelling can influence the activity, problem or requirement. *Can Nordic Ecolabelling do anything about the environmental problem?*

Relevance

The product group belongs to a market where technological development in combination with consumer/user-friendly applications accelerates the consumption through rapid replacement of “old” technology into new such. The TVs display size tend to increase as well as the number of households that owns or consider in purchasing the second or third television set. Obviously the trend of consumption increase rapidly generates increasing amount of electrical and electronic waste as well. Also, the technology develops rapidly like the picture quality (HD-quality) and “smart” functions, which enables the TVs to access the internet and download or stream film or other programs. Another development that might be even more relevant ahead is the development of 3D-televisions which requires full effect, increasing the energy consumption. The criteria are opened for plasma type TV. However this product category is considered to have market percentage of 3-4% with no indication of this being changed in future market development.

EuP, which was the Energy using Products Directive, the framework for Ecodesign regulations, have in their preparatory studies for Televisions (LOT5) in 2007 showed that the power consumption in the user-phase is the single most important environmental impact¹. This is illustrated by a 32” Liquid crystal display (LCD) Television, se figure 1. The overall conclusion in figure 1 is also valid for a plasma-TV.

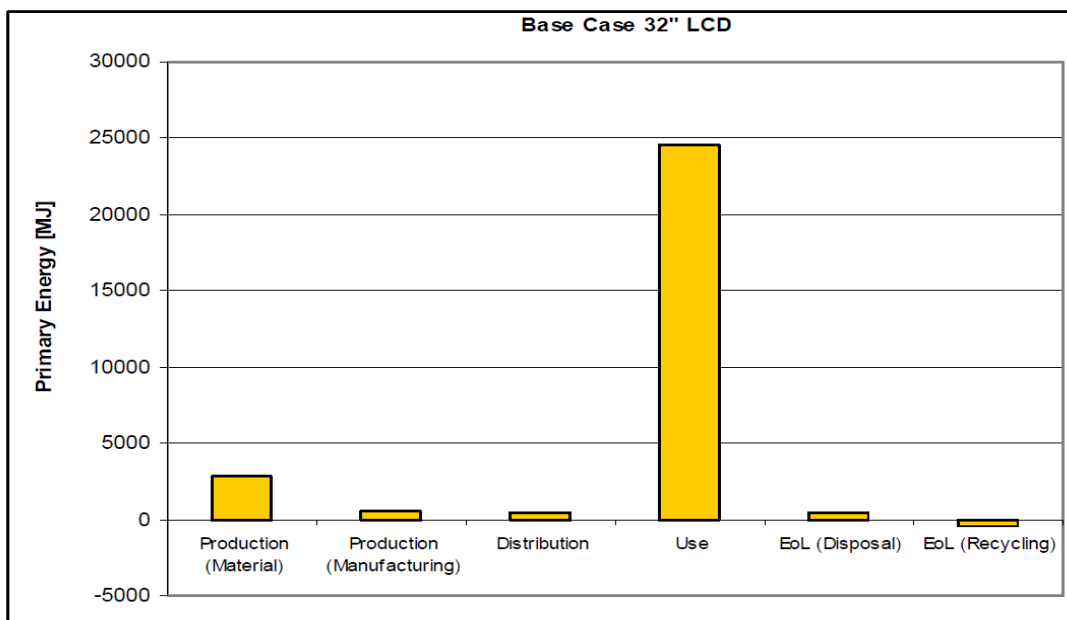


Figure 1 - Total energy consumption of 32” LCD-TV base case over all life cycle phases. EoL stands for “End-of-life”¹.

¹ [EuP Televisions, LOT5] EuP Preparatory Studies “Televisions” (Lot 5) Final Report on Task 5 “Definition of Base Cases” Fraunhofer Institute for Reliability and Microintegration, IZM, Berlin, 2007

Production phase

The EuP-studies² indicated that the production of LCD displays and other electronic components have a growing environmental impact, see energy consumption related to each module of the same TV-type in figure 2.

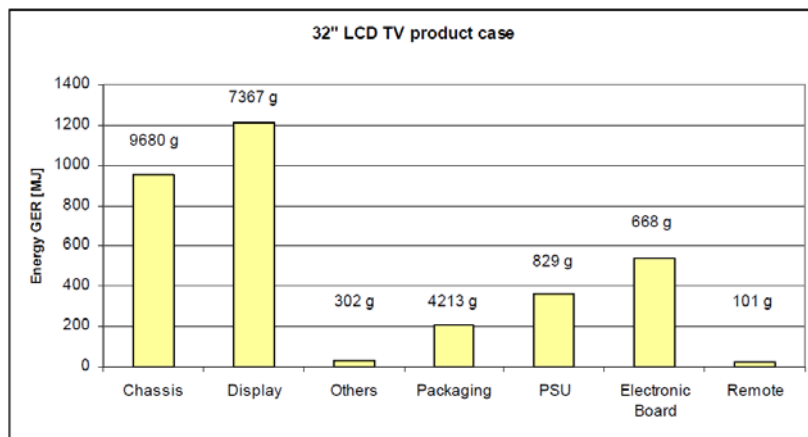


Figure 2 - Total energy consumption related to each module during production phase of 32" LCD-TV base case. PSU stands for Power Supply Unit. The "g" on each column represents the weight of each module¹.

The energy consumption in the production of the hardware is less than the user phase but is still quite significant for the overall environmental impact, see figure 1.

From the production of the hardware, it is especially the energy for the production and eco-toxicity impacts from heavy metals (arising during the extraction of materials for the components used in the final TV and during the production of the TV-sets hardware - e.g. emissions of Copper, Zinc, Nickel, Mercury, Chromium, Lead, Arsenic, Cadmium and Cobalt)³.

TVs and projektors contains o lot of material from non-renewable resources such as metals and oil-based products such as different plastics. There is a trend where the use of platsics in TVs are being reduced. The thinner the TVs are getting the lesser are the use of platsics.

² Ibid

³ [EPA, 2009] Environmental Project No. 1308 2009. Environmental Screening and Evaluation of Energy-using Products (EuP) Final Report. Marianne Wesnæs, 2.-0 LCA consultants ApS, Jesper Thestrup In-JeT ApS, Arne Remmen Aalborg University.

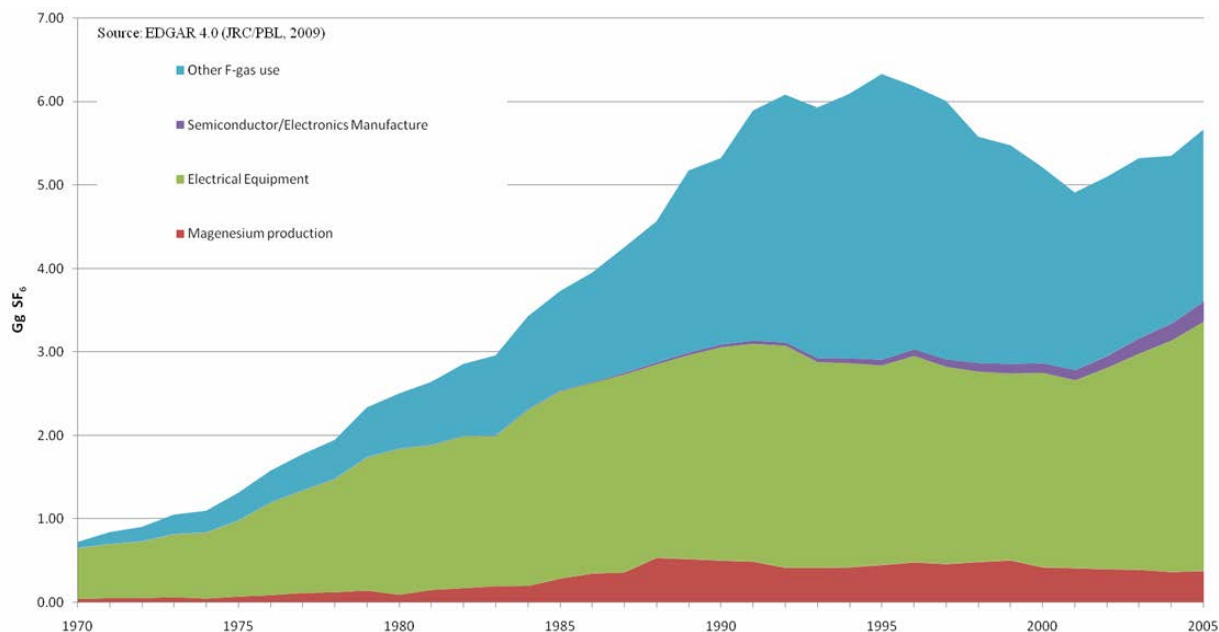


Figure 3 - Trends in global emissions of sulfur hexafluoride by major source category (1970-2005) in Gg SF₆⁴.

In recent years, environmental and working condition problems associated with certain green house gases (SF₆, NF₃ and other) used during the production phase of certain display types have been highlighted. Again the conclusion for desktops, laptops and LCD-screen is that the energy consumption during the user phase is the most important.

The LCD module manufacturing emits sulfur hexafluoride (SF₆), a gas with a very high global warming potential (GWP) which partly explains the GWP₁₀₀ difference between CRT (Cathode Ray Tube, i.e. the older type of monitor with a tube instead of a flat panel) and LCD manufacturing⁴. The same report also suggested that, although LCD manufacturing uses less energy than for CRTs, it may produce much higher levels of greenhouse gas emissions. Figure 3 above shows the global emission of SF₆ by major source categories⁵. The major part comes from manufacturing of electrical equipment, and that part is increasing.

According to the Intergovernmental Panel on Climate Change, SF₆ is the most potent greenhouse gas that it has evaluated, with a global warming potential of 23,900 times that of CO₂ when compared over a 100 year period. It is also inert in the troposphere and stratosphere and therefore has an estimated atmospheric lifetime of 800-3,200 years³.

A 10 year old US-EPA (the American Environmental Protection Agency) study on desktop computer monitors found that the greatest global warming impact for LCDs is from SF₆ in the LCD monitor/module manufacturing process, although CO₂ from the use stage and the materials processing stage also contributed significantly to the global warming impacts. LCD manufacturing also uses nitrogen trifluoride (NF₃) which has a similar GWP to SF₆ but which is not covered by international climate change negotiations, such as the Kyoto protocol. The reason is that when the Kyoto protocol first was drafted, the emission of NF₃ was insignificant, but has now increased dramatically mostly

⁴ [L. Hopkinson and P.James]: Life Cycle Energy and Environmental Impacts of Computing Equipment - A June 2011 Update to a 2009 SustelIT Report. Lisa Hopkinson and Peter James

⁵ EDGAR, Emission database for global atmospheric research, 4.0 (JRC/PBL, 2009), http://edgar.jrc.ec.europa.eu/part_SF6.php#2difference

due to the extremely rapid production of flat screens and displays⁶. Overall, the GWP₁₀₀ for desktops using LCD screens becomes 140 % higher compared to CRT desktops³.

A 2008 report by DEFRA (Department for Environment, Food and Rural Affairs, UK) on televisions acknowledged that the environmental impacts of manufacturing LCDs cannot be readily quantified, but that the use of SF₆, along with NF₃, in LCDs and monitors could be significant in terms of global warming potential. Some manufacturers are aware about the need to reduce the use of these gases. One large manufacturer of LCD's has obtained the world's first CMD (Clean Development Mechanism) project approval from the UN designed to destroy and decompose the SF₆ gas emitted from the LCD manufacturing process³.

As for plastics, audiovisual equipment's plastic parts need to be flame resistant. Although the extension of brominated flame retardants has diminished, such flame retardants can still be used. The brominated flame retardants pose a threat to human health and eco-systems. They are persistent and do not break down in natural systems and they can be converted into brominated dioxins which are extremely toxic. Many of the brominated flame retardants studied have been shown to have serious health effects.

There is a lot of electronic waste in the modern world. If not taking care of properly this leads to leakage of environmental hazardous substances. It is important do collect and recycle electronic machines.

To save resources there is a good idea till use recycled materials in packaging material. Packaging material are used to protect the TVs and projectors during transportation so there are some limitation for the use of recycled material today.

User phase

It is estimated that stand-by power use accounts for about 3 to 10 % of home and office total electricity use⁷. The same report points out that around 1 % of global carbon dioxide emissions can be reduced by reducing stand-by power usage.

The main contributions to the overall environmental impacts of a TV according to figure 1 derives from the electricity consumption during the use of the television. The electricity consumption is the main contributor to all the environmental impacts².

End phase

The waste management of such products in general is also of crucial importance. The likely presence of dangerous substances such as heavy metals and brominated flame retardants poses a challenge. If the waste is not managed in a proper manner, serious environmental problems could be generated. Likely, if material re-cycling or material re-use is improved for products containing electrical or electronic parts, resources such as energy and materials could be saved – see figure 1 showing a negative primary energy usage in the re-cycling phase, indicating a positive life-cycle post in the overall TV energy life-cycle. If the product is easy to dismantle the recycling of electronic components is more efficient.

⁶ Article in Environmental News Network, July 10, 2008 "LCD Chemical Found to have 17 000 times the Climate Impact of CO₂", <http://www.enn.com/pollution/article/37622>

⁷ Bertoldi P et al., "Standby Power Use: How Big is the Problem? What Policies and Technical Solutions Can Address It?", Proceedings of the ACEEE 2002 Summer Study on Energy Efficiency in Buildings, 18-23 August 2002, Pacific Grove, Cal.

Potential

The analysis in the EuP-study⁸ suggested that the improvement potential should primarily focus on technologies and technical measures that reduce the power consumption of the TV in the user-phase. The second focus should be placed on applied materials and electronic components in the TV-design, particularly the reduction of weight and the support of efficient re-cycling. In that respect should the analysis of best available technology also focus on toxic or otherwise harmful materials in the design and manufacturing of TVs.

Likewise, the potential to pose strict requirements for heavy metals and flame retardants used as additives in plastic parts is considered possible and important. Today there are substitutes to brominated flame retardants for many applications within the product group. Improvement options regarding life-time extension are important, such as designing televisions for easy change of important parts and disassembly purposes. Design for re-use of components and re-cycling of materials from televisions should be highly prioritized.

LCD TVs used to have mercury in the background lighting. With new technology such as LED mercury is no longer needed. This makes a requirement for mercury free TV possible.

The end of life of televisions will be influenced by the Waste Electrical and Electronic Equipment (WEEE)-directive, 2012/19/EU, which set requirements of the handling of TV and also on the possibility to identify and remove hazardous substances.

The requirement on heavy metals was removed for version 5.0 of the requirement with the motivation that the directive RoHS (2002/95/EC) captures the problem with use of heavy metals in electrical and electronic equipment. The RoHS-directive poses both absolute requirements, points out limit values and exceptions of use in certain areas. As such legislation works effectively, making producers generally to comply with its requirement, the motivation for Nordic Ecolabelling having own requirements in this area is not supported by relevance.

Producers of LCD TV uses green house gases in the production. There is cleaning system available and used today. This limit the emissions of Green house gases (GWP-gases) and reduces the climate impact of the production.

Positive initiatives from close related computer manufactures can be seen regarding use of post-consumer recycled plastic. For instance monitors with 65 % recycled content. Also TV-sets are found to contain an environmentally interesting plastic produced from recycled DVDs and TV screens with an efficient sodium sulphate based flame retardant which has led to a 80 % lower CO₂-emission than for conventional plastics in the manufacturing phase, according to this manufacturer.

Dismantling of the electronic product is important for the recycling. There are different way of dismantling electronic products and there are companies that are specialized on dismantling electronic waste. If producers make their products easier to dismantle the recycling will be more efficient. Packaging of TVs and projectors are necessary to be able to transport these fragile products. There are different types of packaging material and it is possible to use recycled material in many packaging materials.

⁸ [EuP Televisions, LOT5] EuP Preparatory Studies "Televisions" (Lot 5) Final Report on Task 5 "Definition of Base Cases" Fraunhofer Institute for Reliability and Microintegration, IZM, Berlin, 2007

Steerability

Through requirements on energy consumption, flame retardants and other additives in plastic parts, gas use during production and requirements on disassembly of the product, the Nordic Ecolabelling requirements can steer producers or license holders towards higher energy savings, less hazardous material usage, lower greenhouse gas emissions and increasing possibilities for re-cycling of plastic parts or decreasing waste management problems.

The possibilities to sort out energy efficient TVs and projectors are good thanks to ecodesign. The development for these products are fast so it is important for Ecolabel to keep up with the development. Therefore the criteria must be evaluated and the criteria is not valid very long.

However, abovementioned potentials must be placed into the context of the globalized market these products exist within. Home electronics are produced at a few locations for a global market. This means that if it is to be practically possible to live up to the requirements, the limit values and test methods must be as standardized as possible. Moreover, the requirements must be based on the whole European market rather than only the Nordic market.

It is not easy for an Ecolabel to have an impact on which material that is used for TVs and projectors. The development of thin TVs are changing the material composition of the products. Although the development is positive, and it is in line with Nordic Ecolabelling's ambition to promote post-consumer recycled plastic, there are two central challenges connected with post-consumer plastics. The first challenge is the content of post-consumer plastic parts and the second challenge is the availability of post-consumer plastic parts with good enough quality aspects. The low availability of good enough post-consumer recycled plastic parts has a consequence that manufacturers demanded volumes of such plastic parts cannot always be guaranteed, making volume-products vulnerable for large-scale production due to raw material insufficiency. The steerability for plastic is good but not high.

The possibility to exclude flameretardants from plastics used in these products are good. During the year Nordic Ecolabelling has established good relations with plastic supplier and they have now an understanding for Ecolabel demands information about plastic used in electronic machines.

The primary driving force for the home electronics sector is the introduction of new technology on the mass market. In order for Nordic Ecolabelling to be meaningful in this context, so that producers want to license their product and consumers can choose labeled products, the criteria must be adjusted to this driving force.

In this criteria version Nordic Ecolabel has added requirement for green house gases SF₆ and NF₃. In the next revision this requirement will be further developed. There is hopefully possibilities to have requirement of emission connected to production as a functional unit.

Table 1 – RPS-analysis of individual environmental parameters

| Environmental parameter | Relevance | Potential | Steerability | Assessment of RPS |
|--|-------------------|-------------------------|---------------------------|-------------------|
| Power consumption | Very high | High ¹⁾ | High | +++ |
| Plastics | Low | High ²⁾ | Good ⁷⁾ | + |
| Flame retardants in plastics | Very high | High ²⁾ | Good | +++ |
| Other additives in plastics | High | High ²⁾ | Good | ++ |
| Mercury content in TV-set background lighting and projector lamp | Very high | Very High ³⁾ | Very High | +++ |
| Heavy metals | Indifferent | Indifferent | Indifferent ⁴⁾ | 0 |
| Environmental impact of production (use or raw materials and energy, transport, GWP-gases) | High | High | Poor/Good ⁵⁾ | 0 |
| Design (dismantling) | High | High | Good | ++ |
| Packaging | Low ⁶⁾ | High | High | ++ |

¹⁾ Power consumption per unit decreases as product development continues

²⁾ Alternatives are available

³⁾ LED-technology is available

⁴⁾ Controlling the chain of suppliers is difficult. RoHS (Restriction of Hazardous Substances Directive) restricts the use of heavy metals

⁵⁾ Poor controllability so far down the production chain, although attempt is made with declaration of NF₃

⁶⁾ Low relevance in relation to the final products overall environmental impact

⁷⁾ Good Steerability means that the possibilities for ecolabels to have requirements are good. It is possible to identify different products from supplier and producers are able to choose specific material/products from suppliers.

Criteria version and validity

The criteria document was first approved as version 1.0 on 2 December 1999. Version 1 was valid until 1 December 2002. The product group comprised television sets, video recorders (VHS and DVD), and television sets in combination with video recorders, DVD players or personal computers, and complete stereo systems. Thereafter the criteria have undergone three major revisions with the revision to version 4.0 of the criteria being the latest major revision. During that criteria revision in 2009, video conferencing systems were added to the product group definition. Computers have acquired their own criteria document from 1996.

The last modification of the criteria document was to version 4.2 in June 2011. The modification contained a product group definition change, with projectors inserted as a product type.

In the criteria revision towards version 5.0, the product group definition was altered so that only TV-sets and projectors were included, see more 2.1 and under chapter 5 – Changes from previous version. The validity period was suggested to be shorter than usual, due to that, in the time of this criteria revision process both the Ecodesign and Energy Labelling regulations for TV-sets were undergoing a revision. In order to pursue the harmonization ambition with the upcoming legislation and the EU Ecolabel criteria, the above shorter validity period was suggested.

On 19 February 2014 the Secretariat Manager's meeting decided to adopt a change in O7 Phthalates in external power cable. A definition of residuals in the plastics has been added to the requirement. The new version is called 5.1.

On 13 May 2014 the Board of Directors decided to adopt a change in O11 Dismantling. Exception is made for extruded plastic materials and for light emitters in flat screens. The new version is called 5.2.

On 16 June 2015 the Nordic Ecolabelling's Criteria Group decided to prolong the criteria with nine months. On 17 November 2014 the Board of Directors decided to remove requirement O26 Marketing. The new version is called 5.3 and are valid until 31 March 2017.

On 5 November 2015 the Nordic Ecolabelling decided to prolong the criteria with twenty-seven months simultaneously the following changes was adopted: Requirement O13 Plastic materials in packaging was removed, Requirements O15 Operating instructions and O16 Working Condition was amended and that the documentation requirements for O17, O19 - O24 was changed. The new version is called 5.4 and it is valid until 30 June 2019.

The Nordic market

Development of products within this product category is predominately done in Asia whereas the production (both components and final composition of the product) is carried out in many different parts of the world. The products are sold in the Nordic market usually through special retailers or through internet. The special retails chains have plenty of power in the market which makes them capable of lowering prices. Other smaller dealers work with other values than predominately price such as service, quality and proximity to customers.

TV sets has gone through a fast development the last decade. Today we have thin and large screens capable of sending HD and also full HD (high definition). The TVs and projectors can be connected to home cinema system. There is new "smart" TV system were the products contain computer processors.

In 2011 almost 1 milion TVs were sold in Europe.⁹ The trend is that bigger TVs are selling more than smaller. Thanks to competition between seller the price for TVs and projectors are decreasing rapidly.

⁹ http://www.elektronikbranschen.se/wp-content/uploads/2011/04/Forsaljningen_2010.pdf

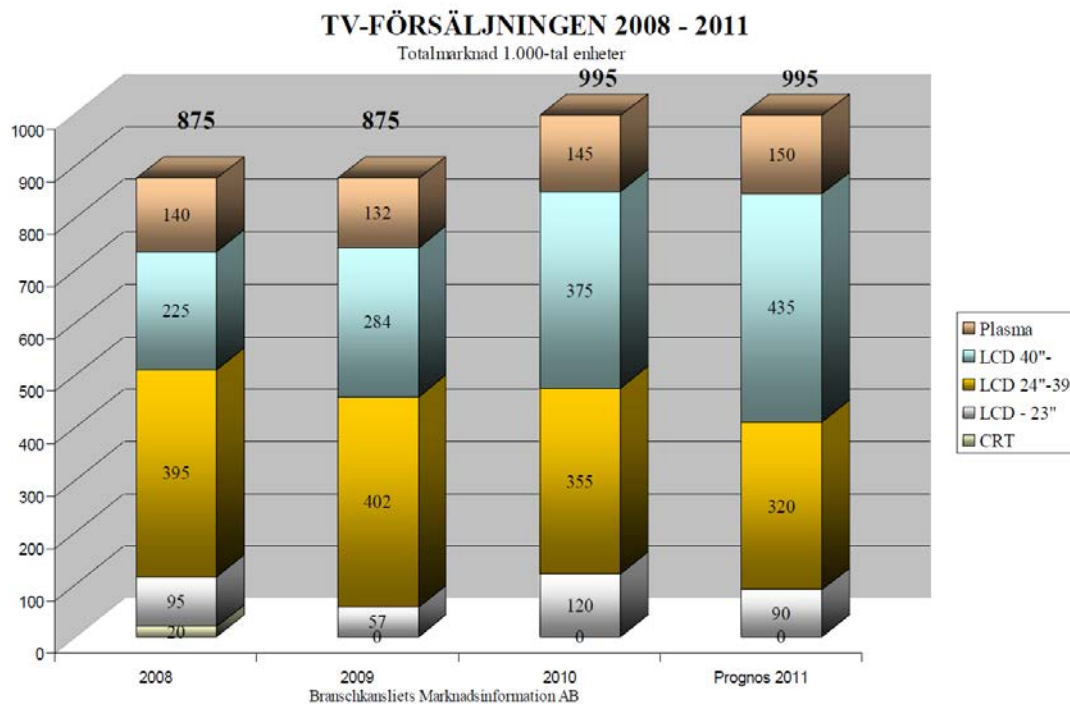


Figure 4 – Sales for different TVs 2008-2011.

Nordic Ecolabelling licenses

The product group has one license holder in the Nordic region, Samsung with 85 series of their LCD-televisions.

Other labels and legislation

Other labels (type 1 environmental labels) within this product category include:

- EU Ecolabels criteria for TV-sets (2009/300/EC)¹⁰,
- Blue Angels criteria for TV-sets (RAL-UZ 145) from 2012¹¹, and
- TCOs criteria for projectors¹² (v.1.2 from 2011)

In particular EU Ecolabel is considered to have had a much broad impact on environmental market adjustment for TV-set than Nordic Ecolabelling due to a larger quantity of licenses. Except for type I environmental labels, the Directive for Energy related Products (ErP) 2009/125/EC and its Ecodesign requirements, has also been very important so as to bring up the general level of environmental performance for energy using and energy related products, such as TV-sets. Other legislation important to improve the product types environmental prestanda include also the WEEE-directive and the Restriction of Hazardous Substances Directive (RoHS-directive), 2011/65/EU.

¹⁰ EU Ecolabel, Product groups and criteria: <http://ec.europa.eu/environment/ecolabel/products-groups-and-criteria.html>

¹¹ Blue Angel, Television Sets: http://www.blauer-engel.de/en/products_brands/vergabegrundlage.php?id=254

¹² TCO Development for Projectors: <http://tcodevelopment.com/manufacture-resourses/product-categories-2/projectors/>

The Ecodesign Directive provides with consistent EU-wide rules for improving the environmental performance of energy related products (ERPs). It prevents disparate national legislations on the environmental performance of these products from becoming obstacles to the intra-EU trade. This should benefit both businesses and consumers, by enhancing product quality and environmental protection and by facilitating free movement of goods across the EU.

Ecodesign for TV 642/2009/EC is valid from July 22nd 2009. The environmental aspect of televisions that is identified as significant for the purposes of this Regulation is the electricity consumption in the use phase.¹³ The ecodesign criterias for TV consists of requirements for ON-mode and Standby/OFF-mode power consumption. Since 2010 there has been an energy label for televisions¹⁴. The energy class is based on the energy efficiency index, which is the power consumption relative to a reference power consumption. The energy label goes from A+++ to G where A+++ is the most energy efficient and G is the least efficient.

3 About the revision

Objectives with Criteria/revision

The objective for this criteria development was to revise the criteria for Audiovisual equipment version 4.2, and construct a proposal for a new criteria document. The goals were specifically to:

- sharpen the energy requirements,
- investigate the possibility to form a requirement for NF3 used during the production of displays for visual equipment,
- revise the requirements for heavy metals and flame retardants,
- pose requirements for additives in plastic parts,
- examine whether the possibility to pose requirements on re-cycled/re-used plastics and bio-plastics,
- update the packaging requirements, and
- propose electrical safety requirements.

Requirements for flame retardants, additives in plastic parts, re-cycled/re-used/bio-plastic parts, packaging and electrical safety were predominately assessed in a parallel revision project within Nordic Ecolabelling, that of Computers to version 7.0. In order to revise the energy requirements, the ErP-directive was benchmarked. Televisions, Lot 5 in the ErP-directive was subject to a revision during the autumn of 2012 which also was considered in this criteria revision.

¹³ COMMISSION REGULATION (EC) No 642/2009 of 22 July 2009 implementing Directive 2005/32/EC of the European Parliament and of the Council with regard to ecodesign requirements for televisions

¹⁴ COMMISSION DELEGATED REGULATION (EU) of 28 september 2010 supplementing Directive 2010/30/EU of the European Parliament and of the Council with regard to energy labelling of televisions, European Union (2010)

About this criteria development/revision

The revision for criteria version 5.0 was undertaken during the autumn of 2012 and spring of 2013. During the process of the criteria revision license holders as well as other stakeholders such as other environmental label organizations, environmental organizations, producers, retailers and industrial organizations were consulted.

The referral period was set from December 2012 – February 2013 during which the proposal for the new criteria document version 5.0 was published in the website of the Nordic Ecolabelling.

The project team within the Nordic Ecolabel for this project was:

| | |
|-----------------|---------------------------|
| Project leader: | Jimmy Yoler/Anders Moberg |
| Denmark: | Jacob Wegener Waidtløw |
| Norway: | Marianne B Eskeland |
| Sweden: | Björn Simons |

4 Motivation of the requirements

For version 4.0 of the criteria, the majority of requirements were harmonized with the revised EU Ecolabel criteria for television sets. The full backgrounds to the harmonized requirements are described in the background document of the EU Ecolabel criteria “Revising the EU Ecolabel criteria for televisions 2009, Discussion papers to the working group”. During the modification of the criteria document to version 4.2, projectors were inserted as a product type in the product group definition through a harmonization with the Japanese Eco Mark and their criteria for Projectors version 1.3.

In this version 5.0 of the criteria, important harmonized background descriptions still valid from the criteria revision to version 4.0 and later modifications are described summarized under each requirement in this background document.

Energy and power consumption

For the energy and power consumption requirements in this chapter the Energy Related Products Directive was examined to reveal whether or not the Nordic Ecolabelling can pose requirements that are stricter than the EU regulation. During the revision process for criteria version 5.0 of these criteria, a parallel process was carried out in the EU; a revision of the Ecodesign regulation for televisions, Lot 5 in the ErP-directive. A discussion paper on the review of the Ecodesign and Energy Labelling Regulations for TVs¹⁵, including computer monitors, was considered in this criteria revision.

The discussion paper above suggested a merging between televisions and other electronic monitors to one product group, with common Ecodesign and Energy labelling requirements. The reason is that these product groups are increasingly converging and

¹⁵ Discussion paper of the review of the Ecodesign and Energy Labelling Regulations for televisions and on the draft Regulation on electronic displays, including computer monitors, 2012.

are therefore difficult to separate them with clear definition boundaries. Traditionally, these product groups have been separated based on their respective type of input signal. The discussion paper included a new requirement proposal based on the product supply in the market 2012. Based on over 400 TV-models, energy equations were created, adapted to the available market supply in 2012.

One of the conclusions during the ErP TV-revision process was that the transition to a more energy-efficient backlight, in the form of LED, has been implemented faster than expected in the market. Even the LED-technology has developed faster than expected towards more energy efficient solutions. However, an increase in energy consumption is expected related to the upcoming increasing use of 3D-technology and the supply of 3D broadcasting content. In order to achieve good image quality for 3D, usually a higher brightness than 2D is required, hence increasing the energy consumption.

The requirements for energy efficiency in the criteria version 4.0 and later modifications relied on the principles of Ecodesign regulations for TV-sets without referring to the Energy labelling regulation. The requirements in the criteria version 4.0 and later modifications (after 31 December 2012) corresponded at best to the energy efficiency class B according to the Energy labelling of televisions, (EU) No 1062/2010. Because the revision of the Ecodesign directive for TV-sets, which during late 2012 was fully ongoing in the EU, the Nordic Ecolabelling decided in the criteria version 5.0 to continue referring to the current Ecodesign Directive (EC) No 642/2009. Also a shorter validity period of the criteria version 5.0 was suggested, in order to harmonize the criteria with the new legislation, when the revision of the energy regulations for TV is accomplished.

Based on market energy data available in the above mentioned EU-discussion paper for TV-sets from 2012 Nordic Ecolabelling concluded that a tightening of the energy efficiency requirement was possible. The proposed requirement for energy efficiency suggests a requirement level tightening from the current level of energy efficiency corresponding to B to the level A+ for all displays, calculated according to current Ecodesign regulation for TV sets. The discussion paper reveals that 27% of the over 400 examined TV-models were able to fulfill level A+. That figure corresponds well with Nordic Ecolabels overall ambition of constructing criteria that around 30% of the market segment can adhere to. When the requirements for level A+ will be tightened with the new Ecodesign regulation for TV sets the new ecolabel will be public in good time so the producers will have good time to adapt to new levels. When the level A+ for Energy Labeling Regulations are updated the licensee must show that the requirements are met before the regulation are into force. The Ecolabel license can contain different models of TVs from the producer. Every specific model must meet the requirements and the A+ criteria. When the A+ is being updated the license holder must show documentation that the ecolabelled models fulfill A+ according to updated criteria.

Nordic Ecolabel also concluded that the passive stand-by energy requirement is not meaningful to tighten, although market energy data indicates that such potential exist. The motivation for this is mainly that passive stand-by energy consumption is marginal in relation to energy consumption related to on-mode. It is also clear that the product development by itself continuously pushes passive stand-by energy consumption down. However, the requirement formulation was changed during the revision to version 5.0 of the criteria. From explicit limit values in passive stand-by mode, the requirement refers to the Ecodesign directive for TV-sets. In practice, the requirement for passive stand-by energy consumption, the level is in line with current legislation (autumn 2012). Nordic

Ecolabel believes that it is useful to have this as a requirement to be documented although it is a law.

The specific requirement for televisions makes it easier for a user to switch off the power when the television is not being used, and remember to shut down the television, through a clearly visible on/off switch. The requirement was partly kept from the criteria version of 4.0 and later modifications; the visible on-off switch requirement was removed due to potential material efficiency benefits in allowing the on-off switch to be incorporated into the televisions frame's backside or body instead of an addition of a separate unit to the televisions frame. The difference between hard and soft switches is that the former cuts the current in the equipment while the latter electronically puts the equipment in a stand-by mode with lower energy usage level than on-mode. Stand-by is therefore a more energy using mode in relation to off-mode because the "readiness" for the equipment is higher. However, nowadays hardly any device is produced with hard switches, making televisions having at best passive (stand-by) mode as the lower energy level.

The maximum energy consumption was also removed for version 5.0 of the criteria. The motivation for this is found in chapter 5 – Changes from previous version.

Specific requirements for Televisions

All products shall have a hard or soft on-off switch.

- Declaration from the manufacturer of the audiovisual equipment, that the requirement is fulfilled.
- Photographic or descript evidence regarding the on-off switch.

Passive Standby for Televisions

The product shall meet the requirements for power consumption in standby and off mode according to current Ecodesign regulation (EC) No 642/2009.

- Test report and calculations according to (EC) No 642/2009, Ecodesign requirement regulation for televisions.

Energy efficiency for Televisions

The product shall meet the requirement for Energy Efficiency Class A+ in the current Energy Labelling Regulations (EU) No 1062/2010, with updates, for all screen sizes.

- Test report and calculations according to (EU) No 1062/2010, Energy Labelling of televisions that verifies Energy Efficiency Index (EEI). When Energy Labeling Regulations are updated the licensee must show that the requirements are met before the regulation are into force.

Specific requirements Projectors

This requirement is harmonized with the Japanese Eco Mark (criteria published 2010) and partly with TCO Development. It was decided during older criteria revisions in Nordic Ecolabelling to use the unit energy use per lumen (W/lm) instead of energy per square meter (W/m²).

During the modification to version 4.2 of these criteria, Nordic Ecolabelling chose to use the unit “ANSI lumen” instead of the unit “lumen”, measuring brightness of projectors. It was considered to be more accurate than the unit for projectors lumens. The projector shall have a Eco mode. This means that the power is reduced for the projector bulb full power is not required.

Specific requirement for Projectors

- The projector shall have a ”Eco Mode”. (“Eco mode” reduces the power of the projector bulb to increase its life length and lower the energy use.)
- It must be possible to set the projector to automatically go into Standby mode after a specified period of time when the video or computer interface is disabled.
- Standby power consumption shall be 0,5 W or less for every model. However, this item is not applicable on the network latency.
- Power consumption in use shall conform to the criteria in the table below.

| Effective Flux (Brightness) x[lm*] | Power consumption [W] | Reference Model |
|------------------------------------|---------------------------|-----------------|
| x<2500 | ≤0.085[W/lm]×x[lm]+ 80[W] | 2000lm: 250W |
| 2500≤x<3000 | ≤0.077[W/lm]×x[lm]+ 80[W] | 2500lm: 272W |
| 3000≤x<3500 | ≤0.070[W/lm]×x[lm]+ 80[W] | 3000lm: 290W |
| 3500≤x<4000 | ≤0.060[W/lm]×x[lm]+ 90[W] | 3500lm: 300W |
| 4000≤x<5000 | ≤0.060[W/lm]×x[lm]+110[W] | 4000lm: 350W |
| 5000≤x<6000 | ≤0.060[W/lm]×x[lm]+160[W] | 5000lm: 460W |
| x≥6000 | ≤0.060[W/lm]×x[lm]+220[W] | 6000lm: 580W |

* lm = ANSI Lumen according to IEC 61947-1 and IEC 61947-2

Note that in the case of a wide projector, short focus projector or products using 2 or more lamps on the light source, a reference value of power consumption shall be calculated by multiplying a coefficient per brightness [lm] by each of the following values:

A value to multiply for the wide projector α:1.1

A value to multiply for the short focus projector β:1/cosθ (β shall be up to 1.3).

θ=Injection angle: Angle of a horizontal line passing through the center of a projector lens (mirror) and the center of a project screen

A value to multiply for products using 2 or more lamps on the light source γ:1.5

Power consumption shall be measured in a normal mode (with maximum brightness) with no other function such as voice, etc. set.

(Example)

Conversion expression when brightness is 6000 ≥ lm and functions of both a wide projector and short focus projector are equipped and using 2 lamp as a light source:

$$\leq 0.060[W/lm] \times x[lm] \times \alpha \times \beta \times \gamma + 220[W]$$

Standby power consumption shall be 0,5W or less for every model. However, this item is not applicable on the network latency.

- ☒ Declaration from the projector manufacturer showing that the requirement of ”Eco-mode” and automatic stand-by mode is fulfilled.
- ☒ A test report shall be provided by the applicant to demonstrate that the product meets the requirement. The product shall be tested for its power consumption in its condition as delivered to the customer, according to the latest version of IEC62087. Test institute/analysis laboratory shall fulfill the requirements in appendix 2.

Hazardous materials

Constituent substance

In this criteria we have requirements that products should be free from, not contain, not added certain substances. The term constituent substance refers to all substances in the product, including additives in the ingredients (such as preservatives and stabilizers), with the exception of impurities from primary production. Impurities are defined as residual products from primary production that can be found in the product in concentrations below 0.010% (100 ppm). Substances that are actively added to an ingredient or product for a particular purpose are not considered to be impurities, irrespective of quantity. Impurities of over 1.0% concentration in the primary product are regarded as constituent substances. Substances/products known to be liberated by a constituent substance (e.g. formaldehyde and arylamine) are also themselves considered to be constituent substances.

Flame retardants

Plastic parts in TV-sets contain flame retardants in order to protect them from taking fire. According to the Swedish Environmental Protection Agency, in 2009 the total amount of plastics considered to contain flame retardants from collected electrical and electronical waste was around 1 400-3 600 tones¹⁶. The use of some flame retardants are regulated by RoHS-Directive from the 1 July 2006. Those are PBB (polybrominated biphenyls) and PBDE (polybrominated diphenyl ethers). The directive has been revised 2011/65/EU (also called RoHS 2) and takes effect in the beginning of 2013. No new substances have been subjected to prohibition or limitations¹⁷.

It is intended that flame retardants will provide protection throughout a product's life cycle. They are therefore intentionally designed not to break down easily, which means that the substances may not be readily degradable when they enter the environment. A great deal of attention has been focused on *brominated* flame retardants, not least because they have been detected in breastmilk and in blood.

Of the flame retardants that are not brominated, the most common are metal compounds, organic phosphorus and nitrogen compounds or inorganic salts.

There are around 70 brominated flame retardants on the market and knowledge regarding their effect on health and the environment varies. Table 10 gives a summary of the different flame retardants, along with their risks and usage restrictions. The five brominated flame retardants that have been used most and about which there is a great deal of knowledge are¹⁸:

- pentabromodiphenyl ether
- octabromodiphenyl ether
- decabromodiphenyl ether
- hexabromocyclododecane (HBCDD)
- tetrabromobisphenol A (TBBP-A)

¹⁶ Swedish Environmental Protection Agency, report 6482 (2012), "Collect, re-cycle!, a follow-up of the producer responsibility" – in Swedish
<http://www.naturvardsverket.se/Documents/publikationer6400/978-91-620-6482-2.pdf>

¹⁷ Electric and electronic equipment – RoHS Directive – in Swedish <http://www.kemi.se/rohs>

¹⁸ <http://www.kemi.se/sv/Innehall/Fragor-i-fokus/Flamskyddsmedel/>

The three top chemicals fall into the group of polybrominated diphenyl ethers (PBDE). Under the EU's Restriction of Hazardous Substances (RoHS) Directive, polybrominated diphenyl ethers and polybrominated biphenyls (PBB) have been prohibited in new electrical and electronic equipment since July 2006. The European Commission decided in October 2005 that the flame retardant decaBDE¹⁹ should generally be excluded from the ban in the RoHS Directive. However, on 1 April 2008, the European Court of Justice ruled that the Commission's decision on such an exemption was invalid. As a consequence decaBDE was also banned in electrical and electronic products from 1 July 2008.

No new substances have been banned in the recently revised RoHS Directive (which entered into force in June 2011). The flame retardants that the Commission was tasked with working into the RoHS Directive were the brominated flame retardants HBCDD and TBBP-A.

Sweden was rapporteur for the risk assessment of HBCDD under the EU's Existing Substances Programme. The conclusions in the report are that the substance is persistent, bioaccumulating and highly toxic to aquatic organisms, and may cause damaging long-term effects in an aquatic environment. In animal tests, HBCDD has been shown to affect the liver and thyroid and be toxic for reproduction. The EU's risk assessment of HBCDD has been completed. HBCDD has been identified as a Substance of Very High Concern (SVHC), and has been entered on the Candidate List (REACH). HBCDD has also been included on the Authorisation List, Annex XIV, in REACH.

TBBP-A has also been risk assessed under the EU's Existing Substances Programme. As a result, the substance has been classified as highly toxic to aquatic organisms, and may cause damaging long-term effects in an aquatic environment. TBBP-A is considered non-readily degradable and may bioaccumulate. Alternatives to TBBP-A as a flame retardant have been developed and their use is increasing.

TBBP-A is the most widely used brominated flame retardant in global terms. It is used primarily in printed circuit boards. Since it is chemically bonded to the material in the printed circuit board and is thus not as easily spread into the surrounding environment, the EU has judged that it poses no risk to human health in this application.

Chloroparaffins, which can also be used as a flame retardant, are stable and non-readily degradable substances that can bioaccumulate in the environment. Short and medium chain chloroparaffins are highly toxic to aquatic organisms, and may cause damaging long-term effects in an aquatic environment. Short chain chloroparaffins have been identified as Substances of Very High Concern (SVHC), and have been entered on the Candidate List.

¹⁹ Penta-, octa- and decabromodiphenyl ethers belong to the same chemical group, polybrominated diphenyl ethers, which is abbreviated to PBDE. These have different numbers of bromine atoms in their structure. All three are non-readily degradable and persistent substances, but their bioaccumulation and toxicity varies.

Table 10 Summary of flame retardants, their risks and usage restrictions

| Flame retardant | Rule | Risk assessment | Nordic Ecolabel stipulation |
|---------------------------------------|--|---|--|
| Polybrominated biphenyls (PBB) | Banned in new electrical and electronic equipment since July 2006 under RoHS Directive | PBB was the first brominated flame retardant that proved to be harmful. The substance has been well studied and as far as we know PBB is no longer made. | Must not be present |
| Polybrominated diphenyl ethers (PBDE) | Banned in new electrical and electronic equipment since July 2006 under RoHS Directive (since July 2008 for decaBDE) | <u>pentaBDE</u> : persistent, harmful to health and environment. POP substance (UNEP) <u>octaBDE</u> : endocrine disruptor, persistent and bioaccumulating. POP substance <u>decaBDE</u> : suspected to be harmful but risk assessment pending. | Must not be present |
| Hexabromocyclododecane (HBCDD) | Use permitted | Classed as SVHC. Included on Candidate List. | Must not be present |
| Tetrabromobisphenol A (TBBP-A) | Use permitted | Highly toxic to aquatic organisms. May cause damaging long-term effects in an aquatic environment. | Must not be present (exceptions for printed circuit boards) |
| Short chain chloroparaffins | Use permitted | Classed as SVHC. Included on Candidate List. | Chain length of 10-13 carbon atoms and chlorine content > 50 must not be present |
| Medium chain chloroparaffins | Use permitted | Highly toxic to aquatic organisms. May cause damaging long-term effects in an aquatic environment. | Current criteria: No requirement Revised criteria: Must not be present |

Table 11 below shows a list of the brominated flame retardants used in commonly occurring polymers.²⁰

Table 11 List of brominated flame retardants used in commonly occurring polymers

| Polymer | Content (%) | Substance(s) |
|----------------------------------|-------------|--|
| Polystyrene foam | 0.8-4 | HBCDD |
| High-impact polystyrene | 11-15 | decaBDE, brominated polystyrene |
| Epoxy resin | 19-33 | TBBP-A |
| Polyamides | 13-16 | decaBDE, brominated polystyrene |
| Polyolefins | 5-8 | decaBDE, propylene dibromostyrene |
| Polyurethanes | n/a | no brominated flame retardants available |
| Polyethylene terephthalate (PET) | 8-11 | brominated polystyrene |
| Unsaturated polyesters | 13-28 | TBBP-A |
| Polycarbonate | 4-6 | brominated polystyrene |
| Styrene copolymers | 12-15 | brominated polystyrene |

²⁰ Pedro Arias, Brominated flame retardants – an overview. 2nd International Workshop on BFR, Stockholm, 2001

Against this background, particularly the credible risk assessment, the following is proposed:

1. A continued ban on polybrominated diphenyl ethers (PBDE) and polybrominated biphenyls (PBB), under which the requirements in RoHS must be met. RoHS now also includes a ban on decaBDE, which is not incorporated into the current criteria.
2. The revised criteria should be toughened to include a ban on high chlorine short chain and high chlorine medium chain chloroparaffins.
3. The revised criteria should be toughened to include a ban on hexabromocyclododecane (HBCDD), tris(2-chloroethyl)phosphate (TCEP) and tetrabromobisphenol A (TBBPA). Exceptions are made for TBBPA for printed circuit boards.
4. As is the case today, flame retardants used in constituent plastic and rubber parts must not, have been given or have the potential to be given the following risk phrases:
 - H350 (may cause cancer)
 - H350i (may cause cancer by inhalation)
 - H340 (may cause heritable genetic damage)
 - H360F (may impair fertility)
 - H360D (may cause harm to the unborn child).
 - H360Fd (Suspected of damaging the unborn child)

 - H360Df (Suspected of damaging fertility)

Exception from 4 may be acceptable where this is necessary for electrical or fire safety reasons under the Low Voltage Directive 73/23/EEC or standard EN 60335-1 (electrical appliances for household use).

Printed circuit boards and plastic/rubber parts weighing < 25 grams that are integral to electronic parts are exempted from the requirement.

Nordic Ecolabelling has found that licensees have great difficulty in providing CAS-numbers for all the flame retardants used, as is required. There are several links back down the chain between the manufacturer of the end product and the manufacturer of the components (plastic parts)/chemicals. It is therefore proposed that CAS-numbers should not be included as part of the required documentation.

Today TBBP-A is the most used flame retardants in printed circuit boards. TBBP-A has been assessed by EU and found “acceptable“ regarding human health. Regarding aquatic and terrestrial ecosystems EU has concluded that there is a need for further investigation²¹. TBBP-A is currently used in over 90% of the printed circuit boards on the market according to a report from US Environmental Protection Agency²². The market situation

²¹ Communication from the Commission on the results of the risk evaluation and the risk reduction strategies for the substances: sodium chromate, sodium dichromate and 2,2',6,6'-tetrabromo-4,4'-isopropylidenediphenol (tetrabromobisphenol A), (2008/C 152/02)
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2008:152:0011:0020:EN:PDF>

²² Design for the Environment, An EPA Partnership Program, “Flame retardants in Printed Circuit Boards”, (2007) <http://www.epa.gov/dfe/pubs/projects/pcb/index.htm>

when revising these criteria motivates the exception for printed circuit boards from TBBP-A prohibition requirement. One reason for using TBBP-A is that the printed circuit boards have to meet the fire safety requirement standard UL 94 V0 which is achieved by using TBBP-A. With TBBP-A as flame retardant it has also been possible to meet performance specifications. The specifications can be difficult to meet due to the layered structure of the printed circuit board, etc. One problem has been that the boards, for example, tend to delaminate at higher temperatures. Halogen-free alternatives to TBBP-A are, however, becoming more available on the market now. However TBBP-A is still the dominating flame retardant in printed circuit boards on the market and therefore the steerability (possibility to choose other products) is not good enough to exact requirements for printed circuit boards. Printed circuit boards are thereby exempted from this requirement.

The use of TBBP-A is not restricted today but TBBP-A is on many priority lists of chemicals that are risks to the environment. For example Norway's list to eliminate or substantially reduce releases of priority substances²³.

During the revision of the criteria Nordic Ecolabelling have been in contact with producers of white goods, computers, TVs and image equipment and asked them what kind of printed circuit boards and flame retardants they used. Most of the printed circuit boards contained TBBP-A. There were one example where one producer used printed circuit board treated with alternative DOPO (9,10-dihydro-9-oxa-10-phosphaphenanthrene-10-oxide) but that was for one printed circuit board in a product that is containing other printed circuit board. The other were treated with TBBP-A. According to European Brominated Flame Retardant Industry Panel over 95% of printed circuit boards are treated with TBBP-A, where it contributes to the fire safety²⁴. This makes it necessary with an exemption for TBBP-A in printed circuit boards today.

Normally TBBP-A is being chemically bound to the polymer as a reactive flame retardant in printed circuit board and does not emigrate from the plastic easily. It is a different situation for flame retardant that is an additive in plastic components (such as plastic for casings etc.) when TBBP-A is used as flame retardant²⁵.

Nordic Ecolabelling will review the requirement for flame retardant in coming revision and will try to exclude also TBBP-A from printed circuit boards.

There is also an exception for plastic parts <25 g and special plastic components installed in direct vicinity of heating and fusing units due to extreme heat development on those particular parts in the device. However, above mentioned parts that are exempted from the flame retardant requirement shall not be treated with PBB, PBDE, HBCDD, TCEP, TBBP-A or chlorinated paraffins.

²³ <http://www.environment.no/Tema/Kjemikalier/Kjemikalielister/Prioritetslisten/>

²⁴ <http://www.ebfrip.org/main-nav/our-substances/tbbpa>

²⁵ SWEDISH ENVIRONMENTAL PROTECTION AGENCY REPORT 6417, Recycling and disposal of electronic waste. 2011.

Flame retardants in plastic and rubber parts

- a) The flame retardants Hexabromocyclododekan (HBCDD), tris(2-chloroethyl)phosphate (TCEP) and high chlorinated short chain and high chlorinated medium chain chloro paraffines must not be added.
- b) The flame retardant Tetrabrombisphenol-A (TBBP-A) must not be added,
- c) Other organic halogenated flame retardants and other flame retardants assigned one or more of the following risk phrases, or combinations, must not be added:
 - H350 (may cause cancer)
 - H350i (may cause cancer by inhalation)
 - H340 (may cause heritable genetic damage)
 - H360F (may impair fertility)
 - H360D (may cause harm to the unborn child).
 - H360Fd (Suspected of damaging the unborn child)
 - H360Df (Suspected of damaging fertility)

Exceptions from b) are made for printet circuit board

Exceptions from c) are made for flame retardants

- In cases where there is demand for safety reason with reference to low voltage directive 73/23/EG or standard EN 60335-1
- Printet circuit board, PCB
- Plastic and rubber parts that weight less than 25 gram and are parts of electric components.

Exceptions are not made for flame retardants in a) or that are regulated according to RoHS-directive (2011/65/ EG).



The manufacturer of the imaging equipment must provide a list of plastics and rubber used in plastic parts in the product signed by filling out Appendix 5 – Plastics and rubber in TV and Projector, Manufacturer's Declaration.

The plastic and rubber manufacturer must provide a list with flame retardants used in plastic and rubber parts, by filling out Appendix 6 – Flame retardants in plastics and rubber, Plastic/Rubber manufacturer's declaration.

The manufacturer of flame retardants, used in plastic and rubber parts, must certify that the requirements are fulfilled by filling out Appendix 7 – Flame retardant manufacturer's declaration and submit an MSDS for each flame retardant.

Confidential information can be sent directly to the Nordic Ecolabel.

Chlorine based plastics

PVC (polyvinyl chloride) plastics above 25 g are excluded from use in imaging equipment. The presence of chlorine atoms in materials affords a number of technically desirable properties, but there are adverse environmental impacts coupled to the disposal of PVC plastics as they usually contain additives with undesirable health effects. When PVC ends up in the waste stream for incineration, this means effectively more chlorine in the waste stream. Chlorine is a prerequisite for the formation of the highly toxic dioxins in the flue gas, but since there are several other sources of chlorine than PVC, an increased incineration of PVC will not necessarily lead to an increased amount of dioxin,

as chlorine is not the limiting factor for the formation of dioxins in incinerator^{26, 27}. The extra amount of PVC will, however, increase the formation of acidic gases and consequently will increase the need for gas cleaning with gas cleaning equipment.

Combustion of 1 kg of PVC produces up to 1.7 kg of salt in flue gas cleaning²⁸. In practice, it means that more waste is generated than the amount of waste that was sent into the incinerator. This is due to the neutralizing process carried out in order to avoid hydrochloric acid to be formed and create a corrosive environment in the incinerator. Not all waste incineration facilities are able to incinerate PVC-products in the Nordic region. Old fractions of PVC have a high probability of containing hazardous additives such as lead and cadmium creating rest materials that need to be taken care of. In the case of incinerators that cannot incinerate PVC waste, the stream is usually landfilled. In the case of incinerators being able of incinerating such PVC waste, the rest products (the fly ash and bottom slag) are treated specially; the fly ash being landfilled in special landfills, and the bottom slag also landfilled or used as construction material for landfills.

Chlorine-based plastics

Plastic parts >25g must not contain chlorinated polymers.

- Declaration from the manufacturer of the TV/projector, showing that the requirement has been met.

Phthalates in external power cable

This requirement is new in this version. There has not been any requirements for phthalates for this product before. Phthalates are commonly used in cables. Power cables and cables as part of the AC-adapter of the TV-set are cables that the user gets in contact with.

Phthalates are mainly used as plasticizers in plastics and rubber, and the content of phthalates can be up to 40 % of the final product. Particularly notable is the use of DEHP (di (ethylhexyl) phthalate), as plasticizer in PVC. Softeners/plasticizers are not firmly bound to the PVC polymer. Phthalates can therefore leak out from plastic products throughout their life time. This diffuse distribution means that phthalates are found almost everywhere in the environment.

Phthalates are used chiefly as plasticisers in plastic and rubber and may account for up to 40% of the finished product. A particular focus is placed on the use of DEHP, (di-ethylhexyl phthalate), which is a plasticiser in PVC. Plasticisers are not firmly bound to the PVC polymer and therefore phthalates are secreted from plastic products throughout their lifetime. This diffuse dissemination means that phthalates are found almost everywhere in the environment²⁹.

²⁶ Hjelmar, 2002: Forbrænding af PVC: Påvirkning af massestrømmene gennem et forbrændingsanlæg. DHI – Institut for Vand og Miljø

²⁷ Erichsen & Hauschild, 2000: Technical data for waste incineration – background for modelling of product specific emissions in a life cycle assessment context. Department of manufacturing engineering, Technical University of Denmark, 2000

²⁸ Hjelmar, 2002: Forbrænding af PVC: Påvirkning af massestrømmene gennem et forbrændingsanlæg. DHI – Institut for Vand og Miljø

²⁹ Swedish Chemicals Agency, http://www.kemi.se/templates/Page_____3283.aspx

DEHP, dibutyl phthalate (DBP) and butyl benzyl phthalate (BBP) are classified as toxic and specifically toxic to reproduction, which means that they may impair fertility and may cause harm to the unborn child. DBP is also classified as environmentally harmful and highly toxic to aquatic organisms. These three most harmful phthalates (DEHP, DBP and BBP) are totally banned³⁰ in toys and childcare items. The three less harmful substances (DINP, DIDP and DNOP) are banned in toys and childcare items that can be put in the mouth.

It is proposed that the revised criteria should have a new requirement banning those phthalates that are shown or may be shown to be harmful. This means those that comprise linear medium, linear long or branched carbon chains. Dihexyl phthalate (DHP), Diethyl phthalate (DEP), Diisooheptyl phthalate (DIHP), Bis(2-methoxyethyl) phthalate, Diisopentyl phthalate and N-pentyl-isopentyl phthalate.

DHP and DEP are on EU's priority list as endocrine disrupting. DIHP, Bis(2-methoxyethyl)ftalat, Diisopentylftalat and N-pentyl-isopentylftalat is on EU's Candidate List of Substances of Very High Concern.

In November 2012 there was a law suggested in Denmark that the phthalates DEHP, DBP, DIBP and BBP must not be used.

There has been discussion about the Danish ban against phthalates should be implemented in this version of the criteria. The consequence for the Danish law against phthalates is not certain. Therefore Nordic Ecolabel decided to keep the exclusion for printed circuit boards and parts smaller than 25 gram from the requirement. In May 2013 the Danish environmental minister decided to postpone the law two years and consider changes of the law before it is in force.

There will be an analysis of the consequence of the Danish law for phthalates. Nordic Ecolabel will contact license holder and supplier of plastic parts so there will be a good background for the next revision of the criteria if it will have consequences for this product group.

When it comes to the computing market for instance, it seems that not all suppliers to computer manufacturers and not all computer manufacturers seem to yet have started to plan for the future restriction regarding phthalates. Nordic Ecolabelling assesses therefore the controllability in this area to be relatively low at the moment. However, Nordic Ecolabelling reasons that the effect of a limited requirement on the use of phthalates would be valuable in order to set focus on problems associated with the use of phthalates ahead. The suggestion here therefore is to only focus on the power cable used to connect the audio visual equipment to the mains. Only cables with male/female connector to connect to the TV set or AC-adapter are addressed, not cables that are hardwired to the equipment.

The motivation for the requirement is that the volume of the plastic in a "normal" power cable to a TV is considerably high in relation to the volume of the plastic in other cables inside the TV, making the requirement relevant. Cables used internally in a TV are limited to short distances and are of a lower diameter compared to external power cables due to the lower voltage levels inside the TV. The power cable is also exposed more for human contact and mechanical stress.

³⁰ If the level of the product exceeds 0.1%.

Alternatives such as halogen-free cables are available on the market today. If not halogen free alternatives would be preferred phthalates, others than those listed in the REACH candidate list still can be used in cables, such as PINP and DIDP. In the coming revisions we will investigate if a more comprehensive requirement will be possible to introduce.

Phthalates in the external power cable

The external power cable delivered with the product must not contain following substances:

- Diethylhexyl phthalate (DEHP)
- Dibutyl phthalate (DBP/DnBP)
- Benzyl butyl phthalate (BBP)
- Dicyclohexyl phthalate (DCHP)
- Diisobutyl phthalate (DIBP)
- Diisononyl phthalate (DINP)
- Diisodecyl phthalate (DIDP)
- Di-n-octylphthalate (DNOP)
- Dihexyl phthalate (DHP)
- Diethyl phthalate (DEP)
- Diisoheptyl phthalate (DIHP)
- Bis(2-methoxyethyl) phthalate
- Diisopentyl phthalate
- N-pentyl-isopentyl phthalate

Ingoing substances are defined as all substances in the product – including additives, but not residuals from production. Residuals are defined as residuals, pollutants and contaminants derived from the production, which are present in the final product in amounts less than 1000 ppm (0.1% by weight, 1000 mg/kg), but not substances added to the raw materials or product intentionally and with a purpose – regardless of amount. Known substances realised from the raw materials are also regarded as ingoing substances.

Declaration is made by the chemical supplier based to the best of his/her knowledge at the given time, also based on information from raw material manufacturers, recipe and available knowledge on the chemical product with reservations for new advances and new knowledge. Should such new knowledge arise, the undersigned is obliged to submit an updated declaration to Nordic Ecolabelling.

Declaration from the cable manufacturer, Appendix 8, can be used.

Mercury content in LCD displays and projector lamp

For TV-set screens it is prohibited to use mercury in the background light. In the criteria version 3.0 and later modifications of the criteria document there was a threshold for how much mercury could be used in a TV-screen. In version 4.0 this was turned into a prohibition. The argument for this was that the market was mature enough for such a requirement.

The latest development regarding projectors indicates that projector lamps are switching technology where mercury is not being used. It is believed that around 95% of the projectors sold in the market have a mercury-based lamp. The substitute technology in this case is LED or LED in combination with laser technology. The technological development is applied on both projectors for smaller office purposes but also in larger and more powerful projectors. However, the new lamp technology is in a development stage.

Mercury content in back-lit LCD displays and projector lamp

The background light in the TV-screen must not have any mercury (Hg) content.

The lamp for projectors cannot contain mercury (Hg).

- A declaration from the manufacturer of the TV/projectors howing that the requirement is fulfilled.
- The manufacturer of the TV/projector shall also describe the technique used.

NF₃- and SF₆-emission during TFT-cell production

Nitrogen trifluoride (NF₃) and Sulfur hexafluoride (SF₆) is used during assembly of the so called Thin Film Transistor (TFT-cell), a type of LCD-display. The gas is used in order to achieve a very sterile and clean environment in order to avoid impurities being built into the TFT-cell³¹. The gas is 17 000 times more potent than CO₂ and is not regulated by the Kyoto protocol as its use was low when the Protocol was drafted. The effect of the global emissions of NF₃ is equal to entire nation's emissions in CO₂-equivalents.

The gas is found in LCD-panels of cell phones, televisions and computer monitors, semiconductors and synthetic diamonds. However, the extremely rapid production of LCD-panels of digital televisions is believed to be the major contributor for its emission [Environmental news network, 2008], making a requirement in this field very relevant for the Nordic Ecolabelling.

Nitrogen trifluoride, NF₃, and sulfur hexafluoride, SF₆, are gases that also are widely used by the semiconductor industries³². These gases, and other similar, have a very high global warming potential and a long atmospheric lifetime. The gases are primarily used for cleaning chemical vapor deposition chambers and for dry etching. This process can be very complex with up to 100 steps where these gases are used can take up to 3 month processing time³³. Good practice in estimating the emissions from these processes have not yet been established neither on global level nor on national level.

An alternative to NF₃ for cleaning chemical vapor deposition (CVD) chambers exist, for example pure F₂. This gas can be produced onsite to avoid transports according to feedback from producer.

³¹ Swedish Radio, "Sales record of flat-panel televisions with dangerous green house gas" (2010)
<http://sverigesradio.se/sida/artikel.aspx?programid=406&artikel=3727370>

³² http://www.ipcc-nggip.iges.or.jp/public/gp/bgp/3_6_PFC_HFC_NF3_SF6_Semiconductor_Manufacturing.pdf

³³ Same as above.

Abatement systems, designed for the semiconductor industry, are available on the market. Different techniques are already used. These systems are widely used by manufacturers in Europe, US and Japan according to Peter Menzel at Ebara in Germany, a manufacturer of these systems.

Nordic Ecolabelling is concerned about the potential greenhouse gas emission from the production LCD panels and will therefore introduce a requirement on usage of abatement system for NF_3 and SF_6 when/if these gases are involved in the production of LCD panels that are used in TVs that will be licensed for Nordic Ecolabelling. The performance of the abatement systems need to be maintained carefully in order to safely operate as intended. If not, the expected result may be compromised.

As Nordic Ecolabelling is the first environmental labelling organization suggesting such a requirement, it is also a logical step to require from the producer of the LCD/TFT-cell a declaration of how much kg of the gas is purchased per annum in relation to how many m^2 of displays are produced. Nordic Ecolabelling can then in the next revision have a relevant picture of where to aim a potential limit value.

Nordic Ecolabelling is aware that this requirement is coupled to some difficulties regarding the sub suppliers declaring data and understands that the requirement is not formulated as an absolute requirement with limit values.

Nitrogen trifluoride (NF_3) and sulphur hexafluoride (SF_6) emission during LCD production

The LCD panel must be produced in such a way that the Green house gases NF_3 and SF_6 , if part of the production process, are abated by a system that is an integrated part of the production process. It is the responsibility of the manufacturing company to ensure that the abatement system is installed, operated and maintained in accordance with the manufacturers (of the abatement system) specifications.

The manufacturer of the LCD shall declare the amount of NF_3 and SF_6 purchased in relation to amount of LCD (m^2) produced over one year.

☒ Description of the abatement system for NF_3 and SF_6 gases used in the production of the LCD modules that are used in TV. Declaration from the manufacturer(s) of the LCD, declared by production site.

The manufacturer of the TFT-cell shall declare the amount of NF_3 and SF_6 purchased in relation to amount of TFT-cell (m^2) produced over one year.

Confidential information can be sent directly to the Nordic Ecolabel.

Noise

Noise limit for Projectors

In the background documents for the product groups of Imaging Equipment and Computers are descriptions regarding the problems with noise, especially in office environments. As this product group and its specific requirement on projectors have similarity with imaging equipment and computers, Nordic Ecolabelling considers it of equal importance to continue in having noise requirements.

Noise is primarily a health issue. The main indoor noise sources are usually ventilation systems, office machines, home appliances and neighbours. In contrast to many other environmental problems, noise pollutant continues to grow and it is accompanied by an increasing number of complaints from people exposed to it.

The growth in noise pollution is unsustainable because it involves direct, as well as cumulative, adverse health effects. Noise can cause noise-induced hearing impairment, disturbances of rest and sleep, psychophysiological mental- and health and performance problems. Research in recent years has shown that exposure to constant noise can cause an increase of the stress hormones like adrenaline, noradrenalin, and cortisol in the body. Stress, as we know can cause heart failure, immunity problems, hypertension, and strokes according to another WHO report³⁴.

Taking all these potential adverse health effects into account makes it plausible to continue having a noise requirement for projectors. The requirement level is harmonized with the Japanese EcoMarks projectors criteria version 1.3. In the revision process for version 5.0 of this criteria document it was not prioritized to sharpen these criteria. It is worth pointing out that the requirement in the Nordic Ecolabelling scheme is compulsory, in contrast to EcoMark where it is a recommendation.

Noise limit for Projectors

The noise emission at normal mode shall satisfy the following levels:

| Effective Flux (Brightness) x[lm*] and Weight of Product Main Body [kg] | Noise [dB] |
|---|------------|
| x < 5000 and y ≤ 2 | ≤ 42 |
| x < 5000 and y > 2 | ≤ 37 |
| x ≥ 5000 | ≤ 48 |

* lm = ANSI Lumen according to IEC 61947-1 and IEC 61947-2

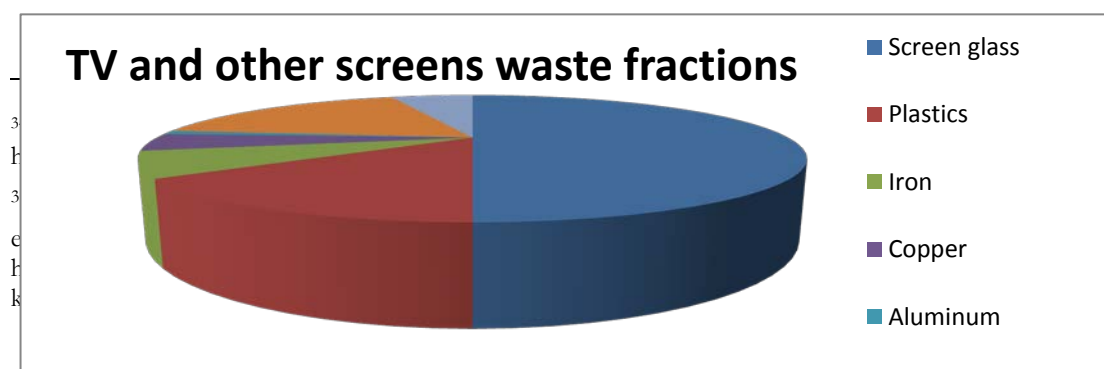
The sound power level must be measured in accordance with ISO 7779 and declared in accordance with ISO 9296. If the sound power level measurement is carried out on one appliance only the factor K = 3,0 dB(A) shall be added to the measured value. The factor K allows for measurement errors when the same device is tested using the same method at different conditions and for deviations in production.

- ☒ A test report shall be provided by the applicant to demonstrate that the product meets the requirement. Test institute/analysis laboratory shall fulfill the requirements in appendix 2.

Design

Dismantling

Audiovisual equipment represents a large amount of material that is of interest to recycle as efficiently as possible. El-kretsen, Sweden's business sectors Service Company for the collection and recycling of electrical and electronic products show in their statistics the re-cycling frequency of home electronic waste (TV, audio and video equipment) per year 2009, 2010 and 2011. 33 151 tones, 30 626 tones and 31 082 tons of home electronic waste were recycled respectively³⁵. For TV and other screens, the different waste fractions can be seen in the figure below.



The amount of waste generated from only home electronic waste motivates the requirement on dismantling so that recycling can be made. This is especially important regarding expensive and critical metals, such as gold, palladium and silver.

This requirement is fully harmonized with EU Ecolabel. In order for desirable parts of the worn-out product to be accessed it is good to ensure that audiovisual products can be dismantled, with easy-to-identify connections using the tools usually available to recyclers. It is also important that information has to be available from the manufacturer, such as labeling of components, should a re-cycler require it.

During the revision processes of the EU Ecolabel criteria for televisions in 2009 there

Figure 4 - TV and other screens waste composition in Sweden for 2011.²¹

was concern that a television should not be easy to disassemble by a member of the public due to health and safety issues. Therefore it was proposed that the requirement refers to a professional trained technician or re-cycler to undertake the work. Furthermore, to insure the product's lifetime, it was decided that worn out parts should be easily accessible and easy to remove and swap by a trained technician or re-cycler.

Dismantling

The manufacturer shall demonstrate that the product can be easily dismantled by professionally trained recyclers, using the tools usually available to them, for the purpose of:

- undertaking of repairs and replacements of worn-out parts
- upgrading older or obsolete parts
- separating parts and materials, ultimately for re-cycling.

To facilitate the dismantling:

- Fixtures within the products shall allow for this disassembly, e.g. screws, snap-fixes, especially of parts containing hazardous substances.
- Plastic parts shall be of one polymer or be of compatible polymers for re-cycling and have the relevant ISO11469 marking if >25g in mass. Exception is made for extruded plastic materials and for light emitters in flat screens.
- Metal inlays that cannot be separated shall not be used.
- Data on the nature and amount of hazardous substances in the television will be gathered in accordance with the directive of classification, packaging and labelling of dangerous substances (67/548/EEC) and directive 2006/121/EEC about changes in directive 67/548/EC.

- ☒ An exploded diagram of the product labelling the main components as well as identifying any hazardous substances in components. This can be in written or audio-visual format. Information regarding hazardous substances shall be provided in the form of a bill of materials identifying material type, quantity used and location, by filling out Appendix 6.

Packaging

Packaging constitutes for some products a significant part of the volume and weight. For other products, the packaging is secondary. For TVs and projectors cardboard box, plastics and expanded polystyrene is used. It is not unusual that some of the packaging material ends up in incineration instead of recycling. Packaging components may consist of materials that have harmful effects on the environment and/or health such as PVC or other halogenated plastics, which can cause environmental problems during disposal. Another important aspect is the recycling of the materials used in the packaging. Recycling of the packaging material is mandatory in the Nordic countries. Producers and retailers have to be joined to a recycling solution. In Sweden producers have joined REPA to fulfil their obligations regarding the recycling of packaging material. Corresponding systems in Norway and Finland are Grønt Punkt and PYR. In Denmark the Danish Ministry of the Environment is managing the producer responsibility for packaging waste.

According to the European Commission Green Public Procurement Training Toolkit, module 3 of Purchasing Recommendations, a brief environmental life cycle of packaging equipment of packaging includes resource consumption, primary energy consumption whilst making the packaging, environmental effects of chemicals used in the packaging (particularly chlorinated plastics) and the process of making it and waste generation³⁶. In the same Green Public Procurement Toolkit it is assessed that packaging material contribute little of the total environmental impact of, in the report, office IT equipment. However it is important to consider packaging although their overall environmental impact is low, mostly because it is manageable for procurers to put simple requirements in place when tendering packaging products. Important parameters which can be influenced are for instance quantity, type of packaging and opportunities for re-cycling.

During the revision project of the Nordic Ecolabelling's Computer criteria document during 2012 it was concluded that manufacturers of IT equipment have a clear interest to use recycled material in their packaging. Regarding cardboard the optimum level of recycled content in a packaging box has not been possible to find. One producer required the usage of more than 50% recycled material in the cardboard box. Another manufacturer claimed that the quality/function of the box deteriorates when that portion of recycled cardboard becomes too high lowering the stability and strength quality of the packaging. Recycling cardboard requires only 75% of the energy required to make new cardboard³⁷. Weak packaging can also result in damaged products in the end which in turn can lead to production of replacement products. The optimum level of recycled material depends on the weight and volume of the good contained in the packaging.

New packaging solutions are available and are also being developed. Some of these solutions will surely be adopted in a large scale in the future. The traditional packaging materials will still be very much used and is actually increasing more in volume in relation

³⁶ European Commission Green Public Procurement (GPP) Training Toolkit – Module 3: Purchasing Recommendations – Office IT Equipment, Background Product Report (2008)
http://ec.europa.eu/environment/gpp/pdf/toolkit/office_IT_equipment_GPP_background_report.pdf

³⁷ Bureau of International Recycling – The Industry, Paper <http://www.bir.org/industry/paper/>

to the global economic growth according to EC Nova Institute on behalf of EU³⁸. The expansion depends mostly on plastic material packaging.

Nordic Ecolabelling finds it most reasonable according to the context of packaging materials described above, to focus on cardboard material regarding recycled content and limit the use of halogenated plastics. An introduction of two new requirement were introduced in version 5.0 of the criteria:

- the use of re-cycled material in packaging in order to reduce energy and material flows for production of virgin packaging material, and
- prohibition of halogenated organic substances in packaging, intended to prevent the use of chlorinated plastic materials in packaging and consequently the formation of dioxins and other persistent organic pollutants in their production and disposal phase.

Post-Consumer Material: Material generated by households or by commercial, industrial, and institutional facilities in their role as end-users of the product that can no longer be used for its intended purpose. This includes returns of materials from the distribution chain. (Source: ISO 14021:1999)

Nordic Ecolabel has tried to harmonize the requirement for packaging with the Ecolabel systems TCO and EPEAT.

Re-cycled material in packaging

When cardboard boxes are used, they shall be made of at least 50 % post-consumer recycled material. Only primary packaging, as defined in Directive 94/62/EC, is subject to the requirement.

- Declaration from audiovisual equipment manufacturer showing that the requirement is fulfilled.

On 5 November 2015, as part of the evaluation of the criteria document, the Nordic Ecolabelling Board accepted that the requirement for plastic materials in packaging was removed from the criteria. The reason for the removal was that all manufacturers have stopped using halogenated organic substances in packaging and that the requirement had a lower environmental impact for this specific product group.

Customer information/life-time extension

Requirements regarding life-time extension

When purchasing a ecolabelled television the consumer shall feel that a reasonable guarantee time is attached the product and that there is a possibility for the televisions life-time to be extended. In order to extend the life-time of the product, electronic replacement parts shall be guaranteed for seven years, from the time the production of the particular product ceases.

³⁸ European Commission, Community Research – Material Change, the world is looking for new materials: industrial crops (2006)
http://ec.europa.eu/research/energy/pdf/gp/gp_events/biorefinery/bs4_05_gahle_en.pdf

In version 5.0 of the criteria, this requirement has been stricter in such a way that the life-time extension measures issued by the manufacturers also shall be written in the individual electronic or printed product fact sheet.

Requirements regarding life-time extension

The manufacturer shall offer a commercial guarantee to ensure that the product will function for at least two years. This guarantee shall be valid from the date of delivery to the customer.

The availability of compatible electronic replacement parts shall be guaranteed for seven years from the time that production ceases.

This shall be written in the electronic and/or printed product fact sheet.

- Declaration from the manufacturer of the audiovisual equipment showing that the requirement is fulfilled.
- Enclose written electronic and/or printed product fact sheet.

Operating instructions

This requirement is harmonized with the EU Ecolabel for televisions. Although manufacturers do not want to produce large amount of texts in operating instruction manuals, it was important during the process of revising the EU Ecolabel criteria in 2009 to achieve an energy improvement in the user-phase through the information the ecolabel could provide to consumers via the user manual. With, in the operating instruction manual, highlighted text of information on power consumption and environmental such an achievement could take place.

The requirement for operating instruction for criteria version 5.0 is kept.

Information on the energy saving modes on the television (off-on switch) in the operation instructions should be given priority, so that consumers easily understand the saving modes operations.

On 5 November 2015, as part of the evaluation of the criteria document, the Nordic Ecolabelling Board accepted that the requirement for operating instruction was changed. The reason for the change was that most of the points asked for are included in consumer legislations. The Nordic Ecolabel decided that there was better to have few points regarding environmental recommendations and information about the Nordic Ecolabel in this requirement.

New wording of the requirement: Operating instructions

The product shall be delivered with an instruction manual which provides advice on how the product is best used from an environmental perspective.

The instructions shall include information that the product is Nordic Ecolabelled with a brief explanation of what this means together with a reference that more information about the Nordic Ecolabel can be found on the Nordic Ecolabel website.

- Copy from the instruction manual that show advice on how the device is best used from an environmental perspective.
- Copy from the instruction manual that displays information about that the product is Nordic Ecolabelled.

Working Condition - Code of Conduct

In certain parts of the world the production used in components essential for a TV-set and projector involves heavy manual labour. Some of the constituent substances in components in a TV-set and projector are very harmful to health and are handled manually. Working conditions must accordingly be good in order to avert permanent damage to the health of the workers as a result of this work. At the same time, however, companies using a high proportion of manual labour are often located in countries in which the scope for securing good working conditions and freedom of speech is limited. There are examples of strikes amongst factory workers who have been exposed to high concentrations of toxic substances and whose working conditions are also poor in other respects³⁹.

Nordic Ecolabelling believes that ecolabelled products should not only be the best choice in terms of the environment, but also in terms of working conditions. For this reason, in the version 5.0 of the criteria, Nordic Ecolabelling chose to impose the requirement that licence holders must have a code of conduct in place and that this code should be communicated to suppliers/subcontractors.

Nordic Ecolabelling recognize that it may be very difficult to ensure that the working environment at all sub-contractors in all parts of the TV-set and projector production chain is satisfactory. Nevertheless, Nordic Ecolabelling is confident that the more production facilities and raw material suppliers are confronted with a requirement/signal from their customers that a code of conduct must be met, the more the possibility that such conditions in fact will be improved. The licence holder shall communicate its code of conduct to its supplier. The licence holder must not guarantee that it is followed by its supplier.

On 5 November 2015, as part of the evaluation of the criteria document, the Nordic Ecolabelling Board accepted that the requirement for Working Condition was changed concerning what kind of documents that shall be sent to Nordic Ecolabelling. Nordic Ecolabelling do not need to get any documentation sent in regarding this requirement but a valid license can be revoked if the license holder do not have an active and working system to handle all aspects included in the license holders code of conduct.

The reasons for this is that it is very hard to find the right level of the documentation that secure that the requirement is fulfilled. All different companies have different ways to document their CSR work in their organisation and that can result in that it is very hard to decide what documentation that shall be sent to Nordic Ecolabelling. The cost and time spent on handling this requirement are not in proportion to the result of the RPS of the specific requirement.

³⁹ International Network on Human Rights and Sustainability in Electronics – JOIN GoodElectronics in its urgent appeal to Gold Peak (2010)
<http://goodelectronics.org/news-en/chinese-battery-producer-fails-to-be-a-decent-employer/>

Working Condition

The license holder must have a code of conduct that shows how the license holder works to ensure that human rights, labor rights, environmental protection and anti-corruption measures follow international guidelines, such as the principles of the United Nations Global Compact, Read more at <http://www.unglobalcompact.org>.

The licensee shall ensure that all suppliers / subcontractors are aware of the code of conduct, and urging that these apply a code of conduct.

If the license holder violates the code of conduct the Nordic Ecolabel license can be revoked.

No documentation is required, but Nordic Ecolabelling may revoke the license if the requirement is not fulfilled.

Quality and regulatory requirements

The requirements for the quality system are intended to ensure that the license holder fulfills the criteria and that the requirements are verifiable during the period of validity of the license, including the possibility to trace the products. To complement this system, Nordic Ecolabelling needs also to have an appointed contact person at the license holder ensuring that the criteria are fulfilled during the period of validity of the license. The contact person is also responsible to inform Nordic Ecolabelling in case of planned changes or unplanned non-conformities affecting the licenses products. Following requirements are found in all Nordic Ecolabelling criteria document.

On 5 November 2015, as part of the evaluation of the criteria document, the Nordic Ecolabelling Board accepted that the quality and regulatory requirements was changed after the evaluation of the criteria document was decided by the Nordic Ecolabelling.

The following sentence was included in the beginning of the chapter for the quality and regulatory requirements:

If the manufacturer's quality management system is certified according to ISO 9001 and environmental management system is certified according to ISO 14 001 or EMAS, the following requirements are met.

The reasons for this are that the manufacturer of TV and Projectors are global manufacturers with well-developed quality management systems for all parts of their developing and manufacturing. These requirements have been shown be hard and time consuming to document and approve in a Nordic Ecolabelling applications process. The documentation also needs to be translated to English in some cases witch lead to extra costs for the applicant. The cost and time spent on handling this requiremants are not in proportion to the result of the RPS of the specific requirements.

The quality management systems mentioned above are certified by independent certification organizations and the Nordic Ecolabel find this to be a reasonable level of control to secure fulfilment of the specific requirements for the quality management systems. But if an applicant do not have the quality management systems certified there still is an option to document each separate requirement.

Nordic Ecolabel licence contact

The company shall appoint a person responsible for ensuring the fulfilment of Nordic Ecolabel requirements, and a contact person for communications with Nordic Ecolabelling. Preferably, this should be the same person.

- Valid certificate of ISO 9001 and ISO 14001 or EMAS for all production sites for ecolabeled products, or a chart of the company's organizational structure detailing who is responsible for the above.

Documentation

The licensee must be able to present a copy of the application, and factual and calculation data supporting the documents submitted on application (including test reports, documents from suppliers and suchlike).

- Checked on site.

Quality of the product

The licensee must guarantee that the quality in the production of the Nordic Ecolabelled audiovisual equipment is maintained throughout the validity period of the licence.

- Valid certificate of ISO 9001 and ISO 14001 or EMAS for all production sites for ecolabeled products, or procedures for collating and, where necessary, dealing with claims and complaints regarding the quality of the Nordic Ecolabelled audiovisual equipment.

Service and support

The licensee shall offer the possibility of service and support in the official Nordic language where the Nordic Ecolabelled product is sold.

- Valid certificate of ISO 9001 and ISO 14001 or EMAS for all production sites for ecolabeled products, or describe service and support organisation.

Planned changes

Written notice must be given to Nordic Ecolabelling of planned changes in products and markets that have a bearing on Nordic Ecolabel requirements.

- Valid certificate of ISO 9001 and ISO 14001 or EMAS for all production sites for ecolabeled products, or procedures detailing how planned changes in products and markets are handled.

Unplanned nonconformities

Unplanned nonconformities that have a bearing on Nordic Ecolabel requirements must be reported to Nordic Ecolabelling in writing and in a journal.

- Valid certificate of ISO 9001 and ISO 14001 or EMAS for all production sites for ecolabeled products, or procedures detailing how unplanned nonconformities are handled.

Traceability

The licensee must have a traceability system for the production of the Nordic Ecolabelled audiovisual equipment.

- Valid certificate of ISO 9001 and ISO 14001 or EMAS for all production sites for eco-labeled products, or prescription of/procedures for the fulfilment of the requirement.

Take-back system

Relevant national producer responsibility regulations, legislation and/or agreements within the sector regarding the recycling systems for products and packaging shall be met in the Nordic countries in which the Nordic Ecolabelled audiovisual equipment are marketed.

- Valid certificate of ISO 9001 and ISO 14001 or EMAS for all production sites for eco-labeled products, or peclaration from the applicant regarding adherence to existing recycling/take-back agreements.

Legislation and regulations

The license holder must guarantee adherence to safety regulations, working environment legislation, environmental legislation and conditions/concessions specific to the operations at all sites where the Swan-labeled product is manufactured. No documentation is required when the license is granted, but Nordic Ecolabelling may revoke the license if the requirement is not fulfilled.

Legislation and regulations

The licensee must guarantee adherence to safety and EMC regulations, working environment legislation, environmental legislation and conditions/concessions specific to the operations at all sites where the Nordic Ecolabelled product is manufactured. Additionally the licensee must guarantee adherence to product-specific regulations in all the Nordic countries where the product is sold.

No documentation is required, but Nordic Ecolabelling may revoke the license if the requirement is not fulfilled.

Marketing

The requirement as to marketing has been set to ensure that that the ecolabelling criteria are fulfilled and that they are verifiable during the period of validity of the licence. The requirement is common to all Nordic Ecolabelling criteria documents. On 17 November 2014 the Board of Directors decided to remove the marketing requirement.

Marketing

The requirement is removed as decided by the Board of Directors 17 November 2014.

5 Changes from previous version

Changes from previous criteria version are summarized in this chapter and are divided into:

- requirements kept from previous criteria version and revised, under table 4,
- removed requirements from version 4.0 and later modifications, and
- new requirements in version 5.0 of the criteria.

There is also a part under this chapter concentrating in describing requirements that have been evaluated during the revision process of version 5.0.

The criteria document has changed its product group definition. From a broad product group definition containing TV-sets, videoconferencing systems, televisions in combination with other equipment such as DVD/ Blu-ray players, DVD / Blu-ray players, stereo systems (including speakers with at least one of the following: radio receivers, CD, DVD, cassette or gramophone) and Set Top Boxes, the criteria document version 5.0 has a more limited product group definition containing TV-sets and projectors. The product group is now called TV och Projector. The motivation for the difference in the product group definition can be found in the below table 3.

Table 3 - Summary of product group definition change.

| Product | Summary | Recommendation |
|---|---|--|
| TV-sets | The only product type that Nordic Ecolabelling today has licensed products within. Only mercury-free TV sets can be licensed. Within the EU Ecolabel scheme, several producers have licensed products. | Keep the product type. The possibility of adhering more manufacturers and their mercury-free products to the Nordic Ecolabelling is assessed as relatively high. |
| Videoconferencing systems | The criteria were expanded with videoconferencing systems during the revision to version 3.0. The expansion of the product group definition has not led any new licensed products within the category. The main reason is a software industry shift, premiering programs such as Skype and Microsoft. | Remove this product type. Focus on the criteria should be consistent on large volume products with significant environmental benefit potentials. |
| TV-sets in combination with other equipment such as DVD / Blu-Ray players | Nordic Ecolabelling has not experienced any demand for this product type. | Remove this product type. Focus on the criteria should be consistent on large volume products with significant environmental benefit potentials. |
| DVD-/ Blu-Ray players | Within this type of products there have been a few indications of interest. However, no continuation of the interests has been made. Moreover, the market trend points to a decline in sales of DVD-players. | Remove this product type. Focus on the criteria should be consistent on large volume products with significant environmental benefit potentials. |
| Complete stereo systems, ie systems including stereo speakers with one or more of the following: radio, CD, DVD, cassette or record player. | Within this type of products there have been a few indications of interest. However, no continuation of the interests has been made. Moreover, the market trend points to a decline in sales of DVD-players. | Remove this product type. Focus on the criteria should be consistent on large volume products with significant environmental benefit potentials. |

| Product | Summary | Recommendation |
|---------------|--|--|
| Set-Top Boxes | There has, within this product type in previous criteria versions been licensed products. Interest has also been shown to introduce criteria for new types of set-top boxes. However, interest has not yet led to any new licensed products. | Remove this product type. Focus on the criteria should be consistent on large volume products with significant environmental benefit potentials. |
| Projectors | Version 4.2 of the criteria expanded the product group definition with projectors in June 2011. The aim was primarily to highlight mercury-free products in the market. Interest has been shown by two manufacturers of mercury-free products. | Keep the product type The possibility of adhering manufacturers and their mercury-free products to the Nordic Ecolabelling is assessed as relatively high. |

Due to the alteration of the product group definition of the criteria document, requirements belonging to version 4.0 and later modifications such as R6, R7 and R8 in the criteria version 4.0 and later modifications have been removed.

All changes in the revision of the criteria from version 4.0 with later modifications to version 5.0 are summarized in the following table. The most important ones are considered to be requirements for energy consumption, flame retardants, halogenated plastic parts and packaging.

Table 4 – Summary of the differences between criteria version 4.0 with later modification and version 5.0

| Requirement Title in version 4.0 and later modifications | Chapter in version 4.0 and later modifications | Correspond with chapter in version 5.0 | Change |
|---|--|--|---|
| Specific req. for TV/TV in combination with other equipment | R2 | R1 | Requirement definition changed to "Specific requirements for Televisions" only |
| Passive Standby for TV/TV in combination with other equipment | R3 | R2 | Requirement definition changed to "Specific requirements for Televisions" only. Re-formulation of requirement referring directly to Ecodesign regulation. |
| Energy efficiency | R5 | R3 | Requirement changed. The requirement refers directly to the energy labelling requirement. A+ is required for all TV-sets regardless of screen size. |
| Phtalates in external power cable | | R7 | This requirement is new from this version |
| Specific requirements for Projectors | R9 | R4 | - |
| Heavy metals and flame retardants | R10 | R5 | Requirement only posed on flame retardants as heavy metals are regulated by the Directive 2002/95/EC. |
| Mercury content in LCD displays | R11 | R8 | Requirement title re-formulated: "Mercury content in back-lit LCD displays and projector lamp". |
| NF ₃ and SF ₆ | - | R9 | New requirement in version 5. |

| Requirement Title in version 4.0 and later modifications | Chapter in version 4.0 and later modifications | Correspond with chapter in version 5.0 | Change |
|---|---|---|---|
| Requirements regarding life-time extension | R14 | R15 | The life-time extension written explicitly in the product fact sheet. |
| Code of Conduct | R16 | R16 | Reformulated requirement. |

Removed requirements

Harmonization with EU Ecolabel

The requirement was meant to simplify the application process for a producer and was a result of a mutual recognition harmonizing the application process between the EU Ecolabel scheme and the Nordic Ecolabel scheme concerning material requirements, except the requirement for flame retardants. Nordic Ecolabel had in addition to this its own quality requirements.

During the criteria revision to version 5.0 of these criteria, a harmonization was not considered to be realistic due to that Nordic Ecolabel moved forward with the revision of the criteria whilst EU Ecolabel just begun revising their criteria for televisions which created a too large difference between the two schemes to consider a harmonization.

The criteria version 5.0 is suggested to have a shorter validity period due to, during the time of revision, a revision of the ErP-directive and Ecodesign requirements for televisions. The shorter validity period also facilitates a future harmonization with a revised version of the EU Ecolabel criteria for televisions.

Heavy metals

The scope of the requirement for heavy metals covered all parts, also plastic parts < 25 grams. The main reason was that cadmium could be found in for instance "old" products, PVC-products and that lead stabilizers represent approximately 70 % of total stabilizer use in Europe. The stabilizers are for instance persistence and bio accumulative. Their effects are toxic to waterborne organisms, harmful to reproductive systems, toxic to the immune system and carcinogen.

The requirement on heavy metals was removed for version 5.0 of the requirement with the motivation that the directive RoHS (2002/95/EC) captures the problem with use of heavy metals in electrical and electronic equipment. The RoHS-directive poses both absolute requirements, points out limit values and exceptions of use in certain areas. As such legislation works effectively, making producers generally to comply with its requirement, the motivation for Nordic Ecolabelling having own requirements in this area is not supported by relevance.

Maximum energy requirement

Nordic Ecolabelling assessed during the revision that a maximum energy level is not required in relation to energy efficiency of televisions. In version 4.0 and later modifications of the criteria a limit value of 200 W was valid. That limit value has played its part in preventing televisions with very high energy levels. There are indications that very large televisions, over 50" have energy consumptions in on-mode little over 100 W.

There is also another argument to why such a limitation is unnecessary. In order to include and regulate big screens via voluntary ecolabelling schemes, such a limit is an obstacle, effectively preventing producers wanting to label their products and consumers willing to buy such products.

New requirements that have been added to the criteria document version 5.0

R5 – Flame retardants in plastic and rubber parts (new chemicals and risk phrases)

R6 - Chlorine-based plastics

R7 – Phthalates in the external power cable

R9 - Requirement for nitrogen trifluoride (NF₃) and sulphur hexafluoride (SF₆) emission during LCD production

R12 – Recycled material in packaging

R13 – Plastic material in packaging

Evaluated requirements that were considered to the criteria document version 5.0

Recycled/Re-used plastics and bio-based plastics

Positive initiatives from close related computer manufactures can be seen regarding use of post-consumer recycled plastic. For instance monitors with 65 % recycled content. Also TV-sets are found to contain an environmentally interesting plastic produced from recycled DVDs and TV screens with an efficient sodium sulphate based flame retardant which has led to a 80 % lower CO₂-emission than for conventional plastics in the manufacturing phase, according to this manufacturer.

Although the development is positive, and it is in line with Nordic Ecolabellings ambition to promote post-consumer recycled plastic, there are two central challenges connected with post-consumer plastics. The first challenge is the content of post-consumer plastic parts and the second challenge is the availability of post-consumer plastic parts with good enough quality aspects. The low availability of good enough post-consumer recycled plastic parts has a consequence that manufacturers demanded volumes of such plastic parts cannot always be guaranteed, making volume-products vulnerable for large-scale production due to raw material insufficiency.

When it comes to bio-based plastics, The Nordic Ecolabel is looking very positive on the development of using more bio-plastics in manufacturing, but is also aware of some problem connected with the use of bio-based plastics that have to be investigated further. These are for instance health and safety hazards in production, land-use and GMO as well as cultivation methods. Similarly with the use of recycled plastic we see that the availability to use bio-based plastic in products is limited for only some niche products.

According to recent research at EU level⁴⁰, there are also questions that bio-based plastics are not as sustainable as they seem. Although in some aspects bio-based plastics are more sustainable than traditional plastics, the analysis identified several environmental and occupational health and safety hazards in their respective production. Some bio-based plastics are preferable from a health and safety perspective. These include poly-hydroxyalkanoates (PHAs), poly-lactic acid (PLA) and starch. However, also they have some potential hazards. For instance, the production of PHA may expose workers to chemicals that are possibly carcinogenic, and PLA production uses a tin-based chemical that could have toxic effects on the hormonal system. Some bio-based plastics are preferable from an environmental perspective, such as starch, PHA and soy protein. However, all bio-based plastics require land for production, which may compete with land needed for food. In addition the feedstock for bio-based plastics may be genetically modified or grown using toxic pesticides, polluting the environment.

Research is currently underway to develop a second generation of bio-based plastics from sources that do not compete with food production, for example, agricultural by-products including corn straw and algae. In addition, processing bio-based feedstock to produce plastics requires significant amounts of energy and water, but since the processes are in their infancy and on a small-scale, they may become more efficient as they develop.

Therefore, in this criteria revision Nordic Ecolabelling is not ready to introduce a general requirement posing a certain level of post-consumer or bio-based plastic parts. The consequence of doing so would be that only some few niche products would be able to get acquire a license. However, developing this kind of requirements to increase the use of post-consumer plastic is something that Nordic Ecolabelling would like to do in the future.

Electrical safety

Electrical safety concerns the electrical design of apparatus with respect to its electrical insulation and other arrangements that are intended to prevent accidents resulting from contact with live components, and the risk of fire or explosion as a result of electrical flash-over due to inadequate or faulty electrical insulation.

It is the manufacturer who is responsible for ensuring that a product is safe. In order to assess the safety of products, the authorities together with the industry have compiled standards for different product groups. The manufacturer always has the possibility to use an independent test body to test the product. A number of test bodies are accredited to certify products.

In the Nordic countries there are governmental organizations conducting inspections of electrical safety, especially in the form of market surveillance. In Sweden the Swedish National Electrical Safety Board has this responsibility.

The Nordic Ecolabelling does not find any reasons to develop a new requirement for electronic safety. Nordic Ecolabelling has been in contact with the Swedish National Electrical Safety Board. They agree that there are no reasons to have specific requirements for electric safety. The CE-label still covers electrical safety and there are

⁴⁰ Alvarez-Chavez, C.R., Edwards, S., Moure-Eraso, R. & Geiser, K. (2012) Sustainability of bio-based plastics: general comparative analysis and recommendations for improvement. *Journal of Cleaner Production*. 23:47-56.

well-developed market controls done by governmental organizations in the Nordic countries and the EU. Nordic Ecolabelling concludes therefore that there is no need of requirements of electrical safety in the criteria document.

Halogen-free flame retardants

Halogen-free alternatives are becoming more available on the market. Products with PCBs with halogen free flame retardants can be found on the market now. However, our knowledge about the properties of the new flame retardants used in printed circuit boards is very limited so it is not possible for the Nordic Ecolabelling at this revision to sharpen the requirement when it comes to halogen-free flame retardants.

6 New requirements

In the upcoming revision of the criteria for TVs and Projectors the following requirements will be revised:

- Revised requirements for energy efficiency and possibilities for energy requirements in production phase.
- Limit value for NF_3 and SF_6 and other green house gases used in LCD-display/TFT-cell production
- Requirements for additives in plastics (Flameretardants and phthalates)

In the next coming revision Nordic Ecolabel will focus on:

- Regulations to minimize the risk of use of “conflict metals” in electronics
- Ban of PVC and phthalates in all plastic parts
- Possibilities to use recycled or biobased plastic
- Revision of projectors requirement (energy and noise)
- Requirements for halogen-free cables