AIIA Comments on Australia and New Zealand MEPS for televisions, computer monitors, and digital signage displays

4 July 2023

Introduction

The AIIA is pleased to have the opportunity to comment on DCCEEW's Consultation dated 15 June 2023 about "energy efficiency requirements for televisions, computer monitors and digital signage displays". Please find our input to the consultation below.

About the AIIA

The Australian Information Industry Association (AIIA) is Australia's peak representative body and advocacy group for those in the digital ecosystem. We are a not-for-profit organisation to benefit members. Since 1978, the AIIA has pursued activities to stimulate and grow the digital ecosystem, to create a favourable business environment for our members and to contribute to Australia's economic prosperity.

We do this by delivering outstanding member value by:
• providing a strong voice of influence
• building a sense of community through events and education
• enabling a network for collaboration and inspiration; and
• developing compelling content and relevant and interesting information.

We are unique in that we represent the diversity of the tech ecosystem from small and medium businesses, start-ups, universities and digital incubators through to large Australian companies, multinational software and hardware companies, data centres, telecommunications companies and technology consulting companies.

1. **Recommendation:** Adoption of EU 2021 MEPS regulation

   • The EU 2021 is Lot5 Tier1 requirements, EU 2023 is Lot5 Tier2 requirements, compare to Tier1, the ON Mode limit is quite challenging, this may bring problems for some high-performance monitors. While high-performance monitors are exempted from the existing Australia and New Zealand MEPS regulations , so adoption of EU2023 may cause some issues to manufacturers, suggest adopting EU 2021 MEPS regulation (Lot5 Tier1) as MEPS update for Australia and New Zealand MEPS.

2. **Recommendation:** Allow for sufficient implementation time
   • The industry needs sufficient time from the date that the final regulations are published before the mandatory effective date application of the regulations applies. While industry monitors proposals for new requirements for awareness, it's generally not possible to commit resources to apply them until the regulations are finalized.

- While proposals are subject to change, any allocation of resources to comply with uncertain requirements cannot be committed in case of further change. A significant period is needed to incorporate the final requirements non-disruptively in the redesign, compliance testing, labelling, product registration, manufacturing, shipping, distribution, and delivery cycles.
- Time is also needed to flush the supply chain of product already manufactured and in transit or in stock without being required to return or discard product into the e-waste stream resulting in consequential substantial revenue loss and unnecessary deleterious impact of the additional e-waste on the environment.
- We recommend allowing sufficient time for the industry to implement any regulation changes. Typically, the industry needs **1 year** (12 months) to implement necessary product changes and labelling changes for newly imported products, **and a further 1 year** (12 months) to flush the existing products from the supply chain without major financial losses or environmental impacts.

3. **Recommendation:** Non-energy efficiency requirements NOT to be included in the MEPS regulations

- The EU Eco-design regulations cover non-energy efficiency requirements, such as service, repair, setup, etc., these shouldn't be a part of MEPS regulations.
- We recommend 'Minimum energy performance standards (MEPS)' only regulate Energy Efficiency requirements.

4. **Recommendation:** QR code is NOT recommended on the Australia& New Zealand MEPS label.

- EU Regulation requires the Energy label to include a QR code that links to the ERPREL database, the ERPREL database generate QR code for manufacturers' use. As there is no such database available yet for Australia and New Zealand MEPS. We suggest not to add QR code on the Australia and New Zealand MEPS label, however would support alignment of an Australian / New Zealand QR code with the EU should a suitable database be made available for Australian / New Zealand suppliers.

- We believe that the energy grade and efficiency data on MEPS label are already sufficient for disclosing product energy information to users.

5. **Recommendation:** A label on the equipment should only need to be optional for digital signage displays that are only used for business purposes.
- In this case the energy grade and efficiency data that would otherwise be included on a label should be included with the equipment's documentation, such as with the user information, but not need to be attached to the display.

- If the display is demonstrated for sale in a display room environment, the GEMS compliance information should be available for inspection by the prospective purchaser.

6. **Recommendation:** Service parts, assemblies, and replacement display systems for existing equipment should be exempted so they can continue to be supplied to keep those installations operational.
   - Suppliers have a warranty obligation to buyers, often for several years under contract or under consumer protection legislation and regulations. It is necessary continue to be able to service or replace faulty equipment that has been sold. That service might require replacement of parts or the whole equipment. For commercial-use displays, there might not be a suitable alternative compliant product available for replacement purposes.
   - This will reduce e-waste and unnecessary costs by the forced removal of faulty equipment in existing installations. This is because a forced replacement of a digital signage display may consequentially require the removal and replacement of additional mounting and supporting electronic driving equipment that's needed to operate the display.

7. **Recommendation:** IEC62087 Part 2 and 3 (2023) standards should be proposed to Standards Australia for identical adoption as national Australian Standards. This will increase the availability of these standards to Australian suppliers and reduce the cost, since Australian standards are typically less costly than IEC standards.

Conclusion

Thank you once again for the opportunity to provide input.

If you wish to discuss this further with us, please contact the Head of Policy of the AIIA Rachel Bailes via rachel@aiia.com.au or 0406628060.

Yours sincerely

Rachel Bailes
Head of Policy
AIIA