

Comments on First Draft of EPEAT SDR Roadmap Document

EPEAT Roadmap Document (introduction page)

The draft document appears to have received a fairly wide airing. According to the web site statistics, the site Home Page had 351 reads and the document description page (where comments were not solicited), had 484 reads.

Even though there weren't a large number of comments we can see that each section of the document was viewed frequently. The number of reads is included for each page in the appropriate section below.

Executive Summary

Comments (204 reads):

Tue, 06/19/2007 - 16:05 — [Colleen Pickford](#)

[EIA's Comment on SDR document](#)

EIA supports the comments made by its member companies and looks forward to additional discussions on this expansion.

Tue, 06/19/2007 - 16:01 — [Sarah Westervelt](#)

[input from BAN](#)

Recommendation 1: The Basel Action Network fully supports having televisions and display devices tied for the top category for immediate standards development. There are several reasons why, but three very compelling ones include: 1. Given the impending switch from analog to digital broadcast signals in February 2009, we can expect an increase in TV sales. 2. TV's have little value (in terms of materials) at end of life, and therefore need standards for responsible recycling. 3. Adding TVs would be a logical extension of the existing EPEAT computer standard since televisions and display devices are similar to computer monitors, which are currently covered in EPEAT.

We also fully support developing simultaneous (or staggered) standards for imaging devices (such as printers, copiers and multi-function) along with TVs, as these products tend to use high levels of energy, are in widespread use, and have little value at EOL.

Recommendation 3. Based on what we currently know about the original EPEAT standards development process, we support the choice of IEEE as the SDO for the next round of EPEAT standards. They are ANSI accredited, and are familiar with EPEAT already.

Additional Recommendation - Scope of EPEAT & expansion into broad consumer market – Section 2.2 on pg 3, Section 3.3 on pg 8: The current EPEAT computer standard and program is designed primarily for institutional purchasers. The question has been raised whether or not it should be expanded to include consumer electronic products. The Basel Action Network feels strongly that it is very important to expand the EPEAT standards to encompass the consumer models and markets. Some consumers are very eager to have a certification program they can rely on to 'vote with their dollars', and make informed choices/purchases that will drive the market toward more environmentally responsible products. We would like to see all EPEAT categories of electronic products include both procurement and consumer products/models; in many cases there is no substantial difference between institutional and consumer models, so this seems like a logical development.

Tue, 06/05/2007 - 09:55 — [Patricia Dillon](#)

[General Comment](#)

I fully support the SDR roadmap as presented. It's logical and well-supported by documentation, as well as consistent with IEEE 1680 and the experience gained through the development of 1680.

1.0 Project Overview

No Comments (157 reads)

2.0 Product Recommendations

Comments (205 reads)

Tue, 06/19/2007 - 20:00 — [Sue Chiang](#) New

[Scope of EPEAT - Consumer electronics](#)

It is important for EPEAT to expand its scope to cover consumer electronics. As others have commented, retailers are expressing interest and it would be a large segment of the market to ignore. Particularly for televisions and display devices, expanding to the consumer market is an important and logical next step for EPEAT.

Tue, 06/19/2007 - 12:16 — [Barbara Kyle](#)

[2.2 Consumer Electronic Products](#)

For an EPEAT consideration of television products to be meaningful, the scope needs to be broadened to include consumer products, since most TVs are purchased by consumers via retail chains, not by institutional purchasers.

Tue, 06/19/2007 - 12:14 — [Barbara Kyle](#)

[2.3 Sequencing](#)

If there is a choice to be made about whether the first tier categories are done together or are sequenced, we (The Computer TakeBack Campaign) support putting the television category first (and including the set top boxes). The digital changeover deadline of 2009 plus the increase in HDTV programming are both driving an enormous surge in flat panel purchases. We need this EPEAT standard to be available as soon as possible to be available to all of these buyers.

Tue, 06/19/2007 - 16:52 — [Sego Jackson](#)

Sequencing

I agree with this comment. The preference would be to move forward simultaneously as described. But if that is not possible, then priority should be given to televisions and converter boxes, for the reasons stated.

Tue, 06/19/2007 - 20:08 — [Sue Chiang New](#)

Sequencing

I agree with both of the above comments that the preference would be to start both of the top categories simultaneously. If we had to pick one to start with, televisions and converter boxes are a higher priority. One important reason is the impending switch from analog to digital broadcast signals by early 2009. Another important reason is that televisions and display devices are similar to monitors, which are already covered under the current EPEAT computer standard, so this would be a logical extension. A third reason is the enormous impact that televisions have on our environment and health throughout their lifecycle.

Tue, 06/19/2007 - 01:37 — [Paris Dieker](#)

Scope of EPEAT

Page 3, Section 2.2, Consumer Electronic Products: The Draft SDR prominently notes “clear interest among stakeholders” to develop consumer electronic standards. EPEAT was not intended to cover consumer electronics and was developed for institutional purchases in mind, and therefore may not be practicable for consumer products.

Tue, 06/19/2007 - 11:57 — [Michael Kirschner](#)

Consumer electronics

There is plenty that can be done regarding consumer electronics within the scope of EPEAT; just because the initial target was narrowly defined to be "institutional purchases" is no reason expansion to include consumer electronics should not be considered. Indeed, Walmart is rolling out something like "EPEAT" for consumer electronics ("sustainable electronics") and the European Union's Energy-using Products directive, which targets a subset of EPEAT issues, (as well as RoHS and WEEE) also targets a broad range of electronic products including consumer items. Most, if not all, of IEEE-1680 can be applied to certain classes of consumer electronics as it stands. Certain areas may need to be dropped or changed, and others added, to address various items in this broad class of products adequately, however.

Tue, 06/19/2007 - 16:50 — [Sego Jackson](#)

Application of EPEAT to consumer electronics

I agree with Michael's assessment and the other comments in support of addressing more than institutional buyers. As pointed out, the demand is there, retailers are interested or beginning their own rating systems, and I really think it is inevitable, so we should plan for it.

Mon, 06/18/2007 - 14:58 — [Theresa Jordan](#)

Mobile Devices

Products in the category "mobile devices" are rapidly evolving based on technological advances which are occurring at a staggering rate. This allows unprecedented innovation to occur in these products, with impressive results. On the environmental side, mobile phones today are lighter, more energy efficient, and use less hazardous materials than ever before. There is a robust product take-back process in place and the market for refurbished phones is strong. Motorola is concerned that an effort to develop standards to measure environmental-friendliness will take away time and resources from the efforts currently focused on improving environmental-friendliness, and that the effort to rate products will in fact limit innovation. Convergence of technologies and the trend towards "multi-function" devices is one example, as multi-function devices use more energy individually (which may cause them to "fail" an energy-efficiency standard) but result in a net energy savings. We recommend the timeline be extended for the "mobile devices" category to allow for the technology to stabilize.

Tue, 06/19/2007 - 17:13 — [Michael Kirschner](#) New

Delay Mobile Devices

I would have to agree with Theresa's assessment. Technologically, mobile phones and integrated devices are naturally (through intense competition) becoming more "environmentally friendly" with smaller form factors, greater functionality, better battery life, and improving reusability. Not that EPEAT metrics would not prod that along and potentially improve it but the amount of improvement achievable is not extraordinary like is possible with some other products. Maybe prioritizing accessories that are common to mobile devices like chargers ("wall warts") and the like merits investigation.

Thu, 06/14/2007 - 11:18 — [Sego Jackson](#)

Digital Converter Boxes (DTAs)

I recommend that DTAs be addressed with televisions and that they be prioritized in the process due to the short window of opportunity regarding their production and use. It seems like this is a chance for industry to develop what I believe is basically a new product and to do it start to finish with environmental attributes in mind. A demonstration of true cradle to cradle design and product management could be achieved.

As noted in the text, an Energy Star standard has already been set, so this criteria for moving forward is met. Also, if you look at the documents on the EPA Energy Star site for DTAs, (see http://www.energystar.gov/index.cfm?c=new_specs.digital_tv_adapters) you will find who some of the key stakeholders are and many would also be the stakeholders engaged in development of a standard for televisions.

While government institutional purchasers may not be purchasing a majority of the DTAs that will soon be sold, the fact that the government has created the need for the convert boxes and is providing funding for the purchase of the boxes by others establishes a unique situation and responsibility. This issue of "institutional purchaser" or individual purchaser should be set aside and this product should be prioritized.

Wed, 06/13/2007 - 04:32 — [Don Carolla](#)

Section 2.3.2

The following statement is located in section 2.3.2

This product category appears to have two notable features impacting end of life – the use of mercury lamps (in some

products) and the use of liquid crystals (in some products). Liquid crystals cannot yet be economically reclaimed at end of life.

Are there any issues with the reclaiming of materials from plasma display devices?

3.0 Implementation Recommendations

Comments (149 reads)

Tue, 06/19/2007 - 16:48 — [Tina Simcich](#) New

[Roadmap](#)

We think you've done a great job on this. One comment: the 3.2 process could be clearer as to how the balloting group will be determined to be "balanced", i.e. who determines dominance by any single interest group and how. Thanks.

Tue, 06/19/2007 - 20:21 — [Sue Chiang](#) New

[Standards Development Process](#)

I second this comment - it would be helpful to have more clarity over how the balloting group will be determined to be "balanced". Also, what is IEEE's definition of "consensus"?

Tue, 06/19/2007 - 01:34 — [Paris Dieker](#) New

[Facilitator selection & timeline vs. funding](#)

Page 8, Section 3.3, Question 3: The SDR indicates that EPA will issue an RFP to select a facilitator to staff and coordinate the standards development processes. The SDR should explain and solicit stakeholder comments regarding what criteria should be used in selecting the facilitator.

Page 8, Implementation Timeline and Page 9, SDR Timeline: No funding has been secured, beyond the development of the first product category. Although the Implementation Timeline for product categories is dependent on obtaining additional funding, the final roadmap document is scheduled to be finalized in mid-August, before the EPA convenes the meeting to discuss funding. The SDR should not propose to begin the simultaneous development process for a second product category this fall, before funding of that category has been secured and therefore we suggest a change in the timeline so that the standards are developed sequentially, as funding allows.

Mon, 06/18/2007 - 23:33 — [Paris Dieker](#) New

[Standards Development Process](#)

Page 7, Section 3.2: More information on the process is needed. The SDR should set out the planned process (how, who, what, where and when) for standards development in greater detail for stakeholder comment, in order to ensure a smoother

standards development process for imaging devices and televisions, as well as the other priority product groups scheduled for standards development in the future.

- For example, Section 3.2 lays out a process and timeline for development that will include stakeholder groups. Although these groups are initially “open to anyone,” it is unclear who will determine whether the final membership of the study group and working group is “balanced.” It is also unclear how the chairperson or co-chairs will be selected and how disputes over the substance of documents or data (such as the text of the draft PAR, or what weight to give certain data under review) will be resolved.

- In addition, although it is hoped that the balloting group will be open to any interested parties, it is not clear who will have the final say in which persons can be part of the balloting group, should the need arise to correct a dominance by any single interest group, or, in the case of the balloting group, to make exceptions for persons who are not IEEE members.

Mon, 06/18/2007 - 23:30 — [Paris Dieker](#) New

[Standard Development Organization](#)

Page 6, Section 3.1: It appears from the latest draft that HP’s strong comments to have a reputable standard development organization like IEEE oversee the process have been recognized. The SDR implies that IEEE will be used for the four proposed future product categories; however it is unclear whether IEEE will be used for all future standards development processes. HP supports the recommendation to use IEEE as the Standard Development Organization for the development of all future EPEAT standards.

Page 7, Section 3.1, Second Bullet: For consistency and ease of implementation, HP agrees that existing sections from IEEE 1680, that define the methods of standard implementation and/or verification, should be incorporated into the new standards wherever practicable. However, great care must be taken to avoid a wholesale “standardizing” of procedures that would be more effective and manageable if tailored to the specific product categories involved.

Mon, 06/18/2007 - 23:28 — [Paris Dieker](#) New

[Standard Development Timeline](#)

Page 8, Section 3.2: The proposed timeline (12-18 months) for each product set seems to be aggressive in some cases where there are not many standards or established environmental attributes that can be leveraged from. It might be achievable, but may require a greater resource commitment than stakeholders can support (e.g., more frequent work group meetings). The time it takes to complete a standard often depends on the number of workgroup participants (stakeholders) and how fast a consensus can be achieved on certain aspects. A more realistic timeframe would be 24+ months for product categories that do not already have widely-accepted standards available.

Mon, 06/18/2007 - 15:00 — [Theresa Jordan](#) New

[EPEAT for Consumer Devices](#)

Cell phone manufacturers and service providers believe the market for cell phones is dominated by consumers, not institutional purchasers. To date, EPEAT has been aimed at aiding purchasing decisions by institutional procurement offices. While EPEAT has expressed a desire to move into the consumer market, it remains to be seen if that will be effective. Motorola recommends a decision on developing an EPEAT standard for consumer devices such as cell phones and PDA's be delayed until the success of EPEAT with consumers purchasing televisions is measured and analyzed.

Tue, 06/19/2007 - 16:45 — [Sego Jackson](#) New

Institutional purchase of cell phones

I personally have three phones: 2 provided by my employer and 1 personal. While I agree that more phones are probably purchased by individuals, the percent purchased by businesses and institutions must be very significant. I don't think there should be a delay related to cell phones until the utility of addressing televisions has been proven. First of all, the products are in no way similar, nor purchasing decisions. Also, count the years... 2 years to put on the ground for televisions, 2 years to test impact, 2 years to put on ground for cell phones? It seems unlikely that many would think having a cell phone standard set 6 years from now would be adequate or timely.

Mon, 06/18/2007 - 14:58 — [Theresa Jordan](#) New

Mobile Devices

Motorola is concerned that this timeline will not allow for harmonization with standards currently under development. Energy Star has just announced that they will begin developing a Tier II specification for external power supplies, which are used extensively with mobile devices. Additionally, the Department of Energy has proposed regulation of external power supplies and is still developing proposed standards. We recommend the timeline for developing a standard be delayed until after these efforts are complete, as is proposed in the "Servers" category.

4.0 Next Steps and Funding

No Comments (122 reads)

Roadmap Attachments

Attachment 1: Standards Development Roadmap Evaluation Considerations Table

[SDR Eval Considerations Table 070604.pdf](#)

Attachment 2: Full List of Electronic Products Considered

[SDR List of Products Considered 0700604.pdf](#)

No Comments (191 reads)
