Comments of the Netherlands on working document on possible ecodesign requirements for simple set top boxes

Arjen Kapteijns, Hans-Paul Siderius – 14 February 2008

In general the Netherlands welcome the proposel for possible ecodesign requirements for simple set top boxes, including the dynamic approach with a revision date.

Comments

The proposal contains staged requirements which is good. However, as indicated in the Explanatory Notes, it is expected that simple set top boxes will be intermediate products with sales and stock to peak around 2015. Therefore in the final publication of the implementing measure it has to be ensured that the criteria come into force at the right time: the first set ("one year after this implementing measure has come into force") should come into force no later than 2009, the second set ("three years after this implementing measure has come into force") no later than 2012.

The requirements do not explicitly indicate that the product should have an off-mode and/or standby mode. In order to avoid misunderstanding, we suggest that the requirement state that the product should have an off-mode and a standby-mode.

The definition of standby refers to the proposal for an implementing measure for standby. However, this standby definition offers the possibility of an information or status display. In the requirements it seems that the definition of standby is written in full, but excluding the possibility of such a display. Does this mean that products with an information or status display do not have to comply with this requirement? We suggest to consequently follow the definition of standby in the proposal for the standby implementing measure.

The proposal provides a procedure to be applied for verification and enforcement. However, this procedure is (slightly) different from procedures that have been suggested by the Commission in other proposals.
We suggest that the Commission treats this subject in a horizontal way and provides the same procedure in all proposals for implementing measures.

The proposal does not mention the form of the implementing measure. We suggest the Commission to give the implementing measure the form of a directly applicable regulation or decision, as has been already done by the Commission in other proposals for implementing measures.